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APPLICATION OF THE
CITY OF SAN ANTONIO TO
AMEND ITS CERTIFICATE
OF CONVENIENCE AND
NECESSITY FOR THE SCENIC
LOOP 139KV TRANSMISSION
LINE IN BEXAR COUNTY

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY AND EXHIBITS
OF
Laura Biemer

February 19, 2021

537

1 **DIRECT TESTIMONY OF LAURA BIEMER**

2 Q. **PLEASE STATE YOUR NAME AND ADDRESS**

3 A. Laura Biemer, 26128 Mark Osborne, San Antonio, Texas 78255.

4 Q. **ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

5 A. On behalf of myself.

6 Q. **HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE PUBLIC UTILITY
7 COMMISSION OF TEXAS (COMMISSION)?**

8 A. No

9 Q. **WHAT IS YOUR OCCUPATION?**

10 A. I employed by the State of Texas, Comptroller of Public Accounts

11 Q. **WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?**

12 A. I earned a BA degree from Tarleton State University in 1988 and my CPA in 1992.

13 Q. **HAVE YOU PREPARED ANY EXHIBITS, SCHEDULES, OR STUDIES IN
CONNECTION WITH YOUR TESTIMONY?**

14

15 A. No

16 Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A. There are specific factors that I would like the Commission to consider when selecting the best
18 substation location and routes.

19 Q. **WHAT ROUTES ARE YOU MOST CONCERNED WITH?**

20 A. Segment 17 is very close to my home and a good number of homes in my neighborhood, Scenic/
21 Serene Hills. Our neighborhood has been here for approximately 50 years. I have lived here
22 with my family for almost 25 years. Segment 17 is associated with a number of Routes. Looking
23 at the routes associated with segment 17: A, B1, E, G1, H AND X1, many habitable structures
24 will be effected. All figures contained in my responses are from CPS exhibits. . For example:

25 Route A has 69 habitable structures

26 Route B1 has 61 habitable structures

27 Route E has 60 habitable structures

28 Route G1 has 52 habitable structures

29 Route H has 61 habitable structures

30 Route X1 has 40 habitable structures

31 Q. **What is your understanding regarding Prudent Avoidance and how should the
32 Commission consider that with these routes?**

33 A. Commission Substantive Rule 25.01 defines prudent avoidance as “the limiting of exposures
34 to electric and magnetic fields that can be avoided with reasonable investments of money
35 and effort”. This does not mean that a proposed transmission line must avoid habitable
36 structures at all cost, but that reasonable alternatives should be considered during the route
37 identification process. If the Commission values the avoidance with habitable structures,

38 the routes listed above should be eliminated from consideration and those with the least should
39 get more priority.

40 Q. **ARE THERE CONCERNS REGARDING HABITABLE STRUCTURE LOCATIONS NEAR**
41 **TRANSMISSION LINES?**

42 A. Yes, many will be testifying in this case regarding the dangers of electrical transmissions lines to
43 humans and animals. I will not quote the same information, as I know the Commission has heard all
44 of these arguments before. But, regarding where these segments will be located along certain routes
45 such as 17 connected to segment 54, you are having a transmission line close to many homes, as
46 noted in my testimony earlier. Along the routes that include segment 54 is an elementary school,
47 McAndrews Elementary. So, taking into consideration that those habitable structures that are
48 associated with those routes that encompass segment 54, those children that live in those homes will
49 be surrounded by these lines 24/7. So, depending on where you fall regarding the research, it can
50 not be good for the children in these neighborhoods to continually be exposed to the electrical
51 transmission lines.

52 Q. **ARE THERE OTHER ROUTES THAT YOU WOULD LIKE THE COMMISSION TO**
53 **CONSIDER?**

54 A. There are several routes that do not involve so many habitable structures. For example:

55 Route N1 has 11 habitable structures

56 Route P has 12 habitable structures

57 Route Q1 has 6 habitable structures

58 Route R1 has 7 habitable structures

59 Route U1 has 6 habitable structures

60 All of these routes utilize Substation 6. I understand based on other rulings in Commission
61 hearings that the length and cost are two of the most important factors. Based on that premise
62 Route R1 is one of the shortest at 4.76. There are only 5 segments and 7 habitable structures
63 on this route. The cost associated with this route is more than a few of the other ones, however
64 I pray that the Commission will consider Prudent Avoidance high on the list of 65

considerations, as noted earlier in my testimony. Other lines that are cheaper impact more 66
people/habitable structures. For example, route Z1 impacts 30 habitable structures.

67 I ask that the impact of this project lean towards humanity more than cost and consider a
68 route that will not effect so many people. The consideration of the children in the neighborhoods
69 should carry some weight while making these decisions, as noted earlier in my testimony
70 some of these routes will expose children 24/7, school and home if some of these routes are
71 selected. This is why I implore that the Commission consider the routes N1, P, Q1, R1 and U1
72 at the top of the list to avoid human impact.

73 In the alternative, if length and cost will be the prevailing factors, I ask that the 74
Commission exclude the following routes based on length and cost:

75 Route A - 6.66 miles and \$54,695,384

76 Route B1 - 6.19 miles and \$50,551,923

77 Route E - 6.62 miles and \$54,505,460

78 Route G1 - 6.2 and \$51,216,234

79 Route H - 6.32 and \$53,632,915

80 Route X1 - 5.34 and \$45,496,087

81 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

82 A. Yes.