



Control Number: 51023



Item Number: 559

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0247
PUC DOCKET NO. 51023

RECEIVED

2021 FEB 22 PM 4:17

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
FILED CLERK

OF

ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY AND EXHIBITS
OF
Betsy Omeis

February 21, 2021

1 **DIRECT TESTIMONY OF Betsy Omeis**

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

3 A. Betsy Omeis, 9922 Scenic Hills, 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 am a registered nurse.

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

12 A. I earned my BSN in 1982.

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

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 54 is a constituent of 20 different routes and contains, on the average, the highest level of
21 habitable structures. Segment 54 is very close to my home and many other homes in my in my
22 neighborhood, Serene/ Scenic Hills. Our neighborhood has been here for approximately 50 years.
23 I have lived here with my family for almost 27 years. Over the past few years,
24 there has been a huge increase in growth—developers tearing down trees, and building newer
25 and bigger neighborhoods, whose homes have greatly increased the demand for water and
26 electricity. Now, we are at the point of needing a huge tower substructure to supply these new
27 developments with energy.

28 Q. **WHAT WILL THE EFFECT OF THE TOWERS ON YOUR NEIGHBORHOOD BE?**

29 A. Our lifestyle has already been compromised due to the new developments and now our
30 neighborhood may possibly be engulfed in a collection of huge towers surrounding our homes.
31 I feel our smaller and older established neighborhood should not be penalized for the needs of
32 the newer and larger neighborhoods.

33 Q. **WHAT SEGMENTS, ROUTES AND SUBSTATIONS CONCERN YOU?**

34 A. Segments 13,14,54 and 17 would almost entirely encircle our neighborhood of 280 property
35 owners. Twenty routes contain Segment 54. The amount of habitable structures in these routes
36 contains a minimum of 24 and maximum of 69 habitable structures with an average of 43.6

37 habitable structures.

38 Substations 1,2,3,4 and 7 would necessitate parts or all of the above mentioned routes and
39 segments to exist.

40 I am requesting that the listed segments and substations not be used.

41 Q. **WHAT DO YOU PROPOSE AS A SOLUTION?**

42 A. I am proposing that you use any segment combination extending from Substation 6 (in particular
43 using the alternative substation and route composition Q1, U1, R1, or P) or Substation 5 (N1) for the
44 energy project. They each have the lowest number of habitable structures.

45 The definition of prudent avoidance is “the limiting of exposures to electric and magnetic fields that
46 can be avoided with reasonable investments of money and effort.” I believe the avoidance of
47 habitable structures is a high priority item.

48 Q. **HOW MANY HABITABLE STRUCTURES ARE AFFECTED WITH THE SEGMENT AND
49 ROUTES THAT I PREFER THE COMMISSION AVOID USING?**

50 A. Segment 13 has 12 habitable structures

51 Segment 14 has 12 habitable structures

52 Segment 17 has 20 habitable structures

53 Segment 54 has 18 habitable structures (segment 54 is a constituent of many different routes)

54 These are a few examples of routes with segment 54 that have a high number of habitable
55 structures:

56 Route A has 69 habitable structures

57 Route X1 has 40 habitable structures

58 Route AA1 has 30 habitable structures

59 Route Z1 has 30 habitable structures

60 Q. **HOW MANY HABITABLE STRUCTURES ARE AFFECTED WITH THE ROUTES I
61 SUGGEST THE COMMISSION CONSIDER USING?**

62 A. There are several routes that involve fewer habitable structures.

63 Route N1 has 11 habitable structures

64 Route P has 12 habitable structures

65 Route Q1 has 6 habitable structures

66 Route R1 has 7 habitable structures

67 Route U1 has 6 habitable structures

68 In regards to cost, Route R1 is one of the shortest at 4.76 with only 5 segments and 7 habitable
69 structures on this route. Other lines that are less expensive impact more people/habitable

70 structures. Sometimes you cannot always go with factors such as the bottom line when considering
71 the greater good. Our neighborhood has been in existence minding it's own business for 50 years

72 compared to the large developers who are financially benefiting by building new larger homes and
73 neighborhoods. When looking at all the existing habitable structures (including old neighborhoods
74 such as mine and newer ones) on all the proposed routes, I feel it is important to look at the human
75 element and chose the routes that will affect the least amount of existing homes and thus people. I
76 am asking you to consider using routes N1, P, Q1, R1 and U1 or at least any route initiated from
77 Substation 6 as the preferred route for the project because these routes and substation affect the
78 least amount of habitable structures.

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

80 A. Yes.