



Control Number: 51023



Item Number: 727

Addendum StartPage: 0

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

2021 APR 7 10 0 17
PUC

APPLICATION OF THE CITY OF SAN § BEFORE THE STATE OFFICE
ANTONIO TO AMEND ITS §
CERTIFICATE OF CONVENIENCE § OF
AND NECESSITY FOR THE §
SCENIC LOOP 138 KV § ADMINISTRATIVE HEARINGS
TRANSMISSION LINE IN BEXAR §
COUNTY §

REBUTTAL TESTIMONY

OF

GEORGE J. TAMEZ, P.E. #90313

ON BEHALF OF

APPLICANT
CPS ENERGY

April 7, 2021

727

**SOAH DOCKET NO. 473-21-0247
PUC DOCKET NO. 51023
REBUTTAL TESTIMONY AND EXHIBIT OF GEORGE J. TAMEZ, P.E.**

TABLE OF CONTENTS

I.	INTRODUCTION	3
II.	ADDITIONAL ROUTES	4
III.	RESPONSE TO COMMISSION STAFF.....	4
IV.	CONCLUSION.....	4

**SOAH DOCKET NO. 473-21-0247
PUC DOCKET NO. 51023
REBUTTAL TESTIMONY OF GEORGE J. TAMEZ, P.E.**

I. INTRODUCTION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- Q. PLEASE STATE YOUR NAME AND OCCUPATION.**
- A. My name is George J. Tamez. I am a professional electrical engineer employed by the City of San Antonio (City), acting by and through the City Public Service Board (CPS Energy) as Director of Grid Transformation and Planning.
- Q. ARE YOU THE SAME GEORGE J. TAMEZ THAT PROVIDED DIRECT TESTIMONY IN THIS DOCKET?**
- A. Yes, I am.
- Q. WAS YOUR REBUTTAL TESTIMONY PREPARED BY YOU OR BY KNOWLEDGEABLE PERSONS UPON WHOSE EXPERTISE, JUDGMENT AND OPINIONS YOU RELY IN PERFORMING YOUR DUTIES?**
- A. Yes, it was.
- Q. IS THE INFORMATION CONTAINED IN YOUR REBUTTAL TESTIMONY AND THE INFORMATION YOU ARE IDENTIFIED AS SPONSORING TRUE AND CORRECT TO THE BEST OF YOUR KNOWLEDGE AND BELIEF?**
- A. Yes, it is.
- Q. HAVE YOU HAD AN OPPORTUNITY TO REVIEW THE TESTIMONY FILED IN THIS DOCKET BY INTERVENORS AND THE STAFF OF THE PUBLIC UTILITY COMMISSION OF TEXAS (COMMISSION OR PUC)?**
- A. Yes, I have.
- Q. DOES ANY OF THE FILED TESTIMONY CHALLENGE THE NEED FOR THE PROJECT?**
- A. No, in fact, some of the testimony recognizes and/or accepts that the Scenic Loop 138 kilovolt (kV) Transmission Line Project (Project) is needed for the area.

1 **II. ADDITIONAL ROUTES**

2 **Q. HAVE ANY ADDITIONAL ROUTES BEEN PROPOSED THAT WERE NOT**
3 **INCLUDED IN CPS ENERGY'S APPLICATION?**

4 A. Yes. An additional route has been proposed by Lisa Chandler, Clinton R. Chandler, and
5 Chip and Pamela Putnam in the testimony of Mr. Brian C. Andrews. The route identified
6 by Mr. Andrews was labeled Route AA2. Route AA2 originates at Substation Site 7 and is
7 comprised of forward progressing segments in the Application. Route AA2 meets the need
8 for the Project and is acceptable to me from a planning and need basis.

9 **III. RESPONSE TO COMMISSION STAFF**

10 **Q. DOES COMMISSION STAFF AGREE THE PROJECT IS NEEDED?**

11 A. Yes. Mr. John Poole for Commission Staff testifies that the Project is necessary under
12 PURA § 37.056 and is the best option to meet this need.

13 **Q. DO YOU AGREE WITH MR. POOLE'S DESCRIPTION OF THE PROJECT?**

14 A. Mostly. On page 16, lines 8-17, Mr. Poole accurately describes the double-circuit
15 configuration of the Project. However on page 19, line 4 of his testimony, Mr. Poole refers
16 to the Project as a "radial" transmission line. Although CPS Energy is proposing a single
17 set of poles, the Project is proposed as a double-circuit *looped* configuration. See, e.g.,
18 pages 3-4 and 23 of the Application.

19 **IV. CONCLUSION**

20 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

21 A. Yes, it does.