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SOAH DOCKET NO. 473-25-18574
PUC DOCKET NO. 57957

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO REBUILD A 138-KV TRANSMISSION LINE IN GALVESTON COUNTY	§ § § § § §	**BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

ERRATA TO THE DIRECT TESTIMONY OF MICHAEL NOTH, P.E.

The Staff (Staff) of the Public Utility Commission of Texas (Commission) files the following Errata to the Direct Testimony of Michael Noth, P.E., originally filed on June 23, 2025. This errata reflects typographical edits throughout Mr. Noth's testimony and clarifications on pages 7 and 11. Attached is a redlined copy and a clean copy of Mr. Noth's testimony with errata.

Dated: June 27, 2025

Respectfully submitted,

PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION

Marisa Lopez Wagley
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Senior Managing Attorney

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SOAH DOCKET NO. 473-25-18574
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CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on June 27, 2025, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ David Berlin
David Berlin

PUC DOCKET NO. 57957

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APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO REBUILD A 138-KV TRANSMISSION LINE IN GALVESTON COUNTY	§	BEFORE THE STATE OFFICE
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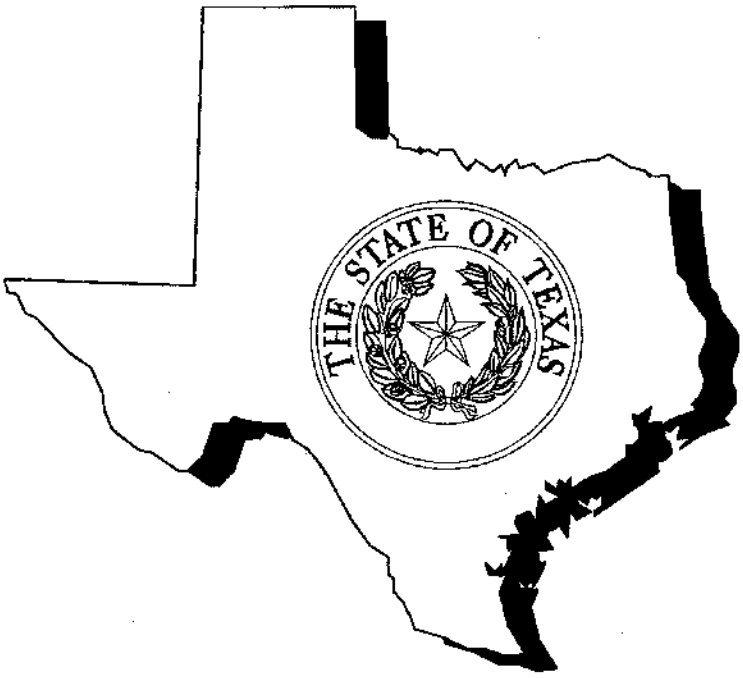

ERRATA TO THE DIRECT TESTIMONY OF

MICHAEL (MIKE) NOTH, P.E.

INFRASTRUCTURE DIVISION

PUBLIC UTILITY COMMISSION OF TEXAS

June 27, 2025

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ATTACHMENTS:

MN-1 Qualifications of Mike Noth

MN-2 List of Dockets Mike Noth has submitted testimony

I. STATEMENT OF QUALIFICATIONS

Q. Please state your name, occupation, and business address.

A. My name is Mike Noth. I am employed by the Public Utility Commission of Texas (PUC or Commission), as an Engineer VI within the Infrastructure Division. My business address is 1701 N. Congress Avenue, Austin, Texas 78701.

Q. Please outline your educational and professional background.

A. I have a Bachelor of Science degree in Electrical Engineering. I have been employed at the PUC since November of 2024. Attachment MN-1 details my educational and professional background.

Q. Are you a registered professional engineer?

A. Yes. I am a Professional Engineer in the State of Texas, license number 94052.

Q. Have you testified as an expert before the Commission or the State Office of Administrative Hearings (SOAH)?

A. Yes. Attachment MN-2 contains a list of dockets in which I have provided testimony.

II. PURPOSE AND SCOPE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to present Commission Staff's recommendations regarding the application of CenterPoint Energy Houston Electric, LLC (CEHE), to approve its Certificate of Convenience and Necessity (CCN) to rebuild an existing 138 kV Transmission Line starting at West Bay Substation and extending to a location approximately 0.34 miles

northwest of FM 3005 and 13-Mile Rd in Galveston County, Texas.[1]

Q. What is the scope of your testimony?

A. The scope of my testimony is to provide Commission Staff's recommendation regarding the need for the project and the route selection presented by CEHE.

Q. What are the statutory requirements that a utility must meet to amend its CCN to construct a new transmission line?

A. Section 37.056(a) of the Public Utility Regulatory Act[2] (PURA) states that the Commission may approve an application for a CCN only if the Commission finds that the CCN is necessary for the service, accommodation, convenience, or safety of the public. Further, PURA provides that the Commission shall approve, deny, or modify a request for a CCN after considering the factors specified in PURA § 37.056(c), which are as follows:

(1) the adequacy of existing service;

(2) the need for additional service;

(3) the effect of granting the certificate on the recipient of the certificate and any electric utility serving the proximate area; and

(4) other factors, such as:

(A) community values;

(B) recreational and park areas;

(C) historical and aesthetic values;

[1] Application of CEHE at 14 (filed April 30, 2025) (Application).

[2] Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016 (PURA).

(D) environmental integrity;

(E) the probable improvement of service or lowering of cost to consumers in the area if the certificate is granted; including any potential economic or reliability benefits associated with dual fuel and fuel storage capabilities in areas outside the ERCOT power region, and

(F) the need for extending transmission service where existing or projected electrical loads will be underserved, including where:

i. the existing transmission service is unreasonably remote;

ii. the available capacity is unreasonably limited at transmission or distribution voltage level; or

iii. the electrical load cannot be interconnected in a timely manner.

Q. Do the Commission's rules provide any instruction regarding routing criteria?

A. Yes. 16 Texas Administrative Code (TAC) § 25.101(b)(3)(B) requires that an application for a new transmission line address the criteria in PURA § 37.056(c), and that upon considering those criteria, engineering constraints and costs, the line shall be routed to the extent reasonable to moderate the impact on the affected community and landowners, unless grid reliability and security dictate otherwise. The following factors shall be considered in the selection of CEHE's routes:

(i) whether the routes parallel or utilize existing compatible rights-of-way for electric facilities, including the use of vacant positions on existing multiple-circuit transmission lines;

(ii) whether the routes parallel or utilize existing compatible rights-of-way, including roads, highways, railroads, or telephone utility rights-of-way;

(iii) whether the routes parallel property lines or other natural or cultural features; and

(iv) whether the routes conform with the policy of prudent avoidance.

Q. Which issues in this proceeding have you addressed in your testimony?

A. I have addressed the issues from the Order of Referral and Preliminary Order filed on May 5, 2025, and the requirements of PURA § 37.056 and 16 TAC § 25.101.

Q. If you do not address an issue or position in your testimony, should that be interpreted as Staff supporting any other party's position on that issue?

A. No. The fact that I do not address an issue in my testimony should not be considered as agreeing, endorsing, or consenting to any position taken by any other ~~their~~ party in this proceeding.

Q. What have you relied upon or considered to reach your conclusions and make your recommendation?

A. I have relied upon my review and analysis of the data contained in CEHE's application, the application's accompanying attachments including the Environmental Assessment (EA)[3] prepared by Power Engineers, Inc. (Power), and my review of the direct testimonies or statements of position filed in this proceeding by or on behalf of CEHE and the intervenors and responses to requests for information. One intervenor (Item 34) is giving a statement of

[3] Application at 29, Attachment 1.

position.

III. RECOMMENDATIONS

Q. Based on your evaluation of the Application, what conclusions have you reached regarding the application and the Proposed Project?

A. Based on my evaluation of the Application, I conclude the following:

1. The application is adequate, and CEHE's proposed route is adequate.
2. The application complies with the notice requirements in 16 TAC 15 § 22.52(a).
3. Considering the factors set out in PURA § 37.056(c), the proposed project is necessary for the service, accommodation, convenience, and safety of the public.
4. The proposed project is the best option to meet the need when compared with other alternatives.
5. The proposed route is the best route when weighing the factors set forth in PURA § 37.056(c)(4) and 16 TAC § 25.101(b)(3)(B).

Q. What recommendation do you have regarding CEHE's application?

A. I recommend that the Commission approve CEHE's Stewart to West Bay Project (the "Project") in Galveston County, Texas. I further recommend that the Commission include in its order approving the application the following paragraphs to mitigate the impact of the proposed project and require monthly construction progress reporting:

1. CEHE shall conduct surveys, if not already completed, to identify pipelines that could be affected by the transmission lines and coordinate with pipeline owners in modeling and analyzing potential hazards because of alternating-current interference affecting

pipelines being paralleled.

2. If CEHE encounters any archeological artifacts or other cultural resources during project construction, work must cease immediately in the vicinity of the artifact or resource, and the discovery must be reported to the Texas Historical Commission. In that situation, CEHE must take action as directed by the Texas Historical Commission.

3. CEHE must follow the procedures to protect raptors and migratory birds as outlined in the following publications: *Reducing Avian Collisions with Power Lines: The State of the Art in 2012,* Edison Electric Institute and Avian Power Line Interaction Committee, Washington, D.C. 2012; *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006*, Edison Electric Institute, Avian Power Line Interaction Committee, and the California Energy Commission, Washington, D.C. and Sacramento, CA 2006; and *Avian Protection Plan Guidelines*, Avian Power Line Interaction Committee and United States Fish and Wildlife Service, April 2005. CEHE must take precautions to avoid disturbing occupied nests and take steps to minimize the burden of construction on migratory birds during the nesting season of the migratory bird species identified in the area of construction.

4. CEHE must exercise extreme care to avoid affecting non-targeted vegetation or animal life when using chemical herbicides to control vegetation within rights-of-way. CEHE must ensure that the use of chemical herbicides to control vegetation within the rights-of-way complies with rules and guidelines established in the Federal Insecticide Fungicide and Rodenticide Act and with Texas Department of Agriculture

regulations.

5. CEHE must minimize the amount of flora and fauna disturbed during construction of the transmission lines, except to the extent necessary to establish appropriate right-of-way clearance for the transmission lines. In addition, CEHE must revegetate, using native species and must consider landowner preferences and wildlife needs in doing so. Furthermore, to the maximum extent practical, CEHE must avoid adverse environmental influence on sensitive plant and animal species and their habitats, as identified by the Texas Parks and Wildlife Department and the United States Fish and Wildlife Service.

6. CEHE must implement erosion control measures as appropriate. Erosion control measures may include inspection of the right-of-way before and during construction to identify erosion areas and implement special precautions as determined necessary. CEHE must return each affected landowner's property to its original contours and grades unless otherwise agreed to by the landowner or the landowner's representative. CEHE is not required to restore the original contours and grades where a different contour or grade is necessary to ensure the safety or stability of the project's structures or the safe operation and maintenance of the lines.

7. CEHE must use Best Management Practices (BMPs) to minimize the potential impacts to migratory birds and threatened or endangered species.

8. CEHE must cooperate with directly affected landowners to implement minor deviations from the approved route to minimize the burden of the transmission lines. Any minor deviations from the approved route must only directly affect landowners

who were sent notice of the transmission line in accordance with 16 TAC § 22.52(a)(3) and landowners that have agreed to the minor deviation.

9. CEHE must report the transmission line approved by the Commission on its monthly construction progress reports before the start of construction to reflect the final estimated cost and schedule in accordance with 16 TAC § 25.83(b). In addition, CEHE must provide final construction costs, with any necessary explanation for cost variance, after completion of construction when all costs have been identified.

10. CEHE must, to the greatest extent practicable, span any coastal wetlands or submerged aquatic vegetation as defined by 31 TAC § 501.3(b) and Texas Water Code (TWC) § 11.502.

11. CEHE must avoid or minimize any potential impacts to any coastal wetlands or submerged aquatic vegetation through utilization of Best Management Practices (BMPs) and its Stormwater Pollution Prevention Plan (SWPP).

12. CEHE must coordinate with the United States Army Corps of Engineers (USACE) prior to clearing and construction to ensure compliance with applicable requirements in order to avoid, minimize, and mitigate impacts to waters of the United States and Coastal Natural Resource Areas (CNRAs), including associated coastal wetlands and special hazard areas.

IV. PROJECT JUSTIFICATION

A. DESCRIPTION OF THE PROJECT

Q. Please describe the Proposed Project.

A. The Proposed Project is to rebuild approximately 10.78 right-of-way (ROW) miles of an existing 138 kV double-circuit transmission line using steel or concrete monopole structures between the West Bay Substation to the intersection of San Luis Pass Road (FM 3005) and 13 Mile Road. This intersection is about 0.34-mile south-west of the Stewart Substation.[4] The CCN process is needed since the project requires widening the aerial easement for the circuits involved in the rebuild. The rebuilt circuits will have a normal rating of 417 MVA.[5]

Q. Does CEHE's application contain a number of Alternative Routes sufficient to conduct a proper evaluation?

A. CEHE's application includes a single proposed route which uses existing right-of-way (and additional aerial easement) for the existing double-circuit 138 kV transmission line rebuild.[6]

Q. Is the Proposed Project located within the incorporated boundaries of any municipality?

A. Yes. The proposed route is within the municipal boundaries of Galveston and Jamaica Beach.[7]

B. TEXAS COASTAL MANAGEMENT PROGRAM

Q. Does any part of this project lie within the Texas Coastal Management Program (TCMP) boundary?

[4] Application at 9 and 14.

[5] *Id.* at 7.

[6] *Id.* at 7.

[7] *Id.* at 11.

A. Yes. The entire proposed rebuild project is within the TCMP boundary as defined in 31 TAC § 503.1. The entire project route is also located seaward of the Coastal Facilities Designation Line as defined in 31 TAC § 19.2(a)(21). The identified Coastal Natural Resource Areas (CNRAs) for the proposed project route include: special hazard areas and coastal wetlands, but may also include waters of the open Gulf of Mexico, water under tidal influence, submerged lands, submerged aquatic vegetation, tidal sand and mud flats, oyster reefs, hard substrate reefs, coastal barriers, coastal shore areas, gulf beaches, critical dune areas, critical erosion areas, coastal historic areas, and coastal preserves.[8]

Q. If constructed along the proposed route, is the project compliant with 16 TAC § 25.102 and consistent with the goals and policies of the TCMP?

A. Yes, CEHE plans to construct the proposed project consistent with the applicable goals and policies of the TCMP in accordance with 16 TAC § 25.102.[9]

C. NEED FOR THE PROJECT

Q. Could you briefly summarize the need for the project?

A. The Proposed Project is needed to address aged infrastructure; specifically replacing existing wooden poles, which are a reliability concern, with engineered materials.[10]

This project is needed for transmission hardening, primarily focusing on pole replacements. This project was included as part of resiliency measure RM-6 of the Transmission System Hardening

[8] Application at 26.

[9] *Id.* at 158.

[10] *Id.* at 14.

in CEHE's System Resiliency Plan, PUCT Docket No. 57579.[11] Since 2008 CEHE has lost 12 decayed wood poles due to high winds generated by thunderstorms or hurricanes. CEHE did a physical inspection in February 2024. Of the 15-pole sample set approximately 60% of the tested poles were of concern using the hammer test. CEHE then hired Osmose in March 2024 to do ground line inspection. Using the NESC Standard of rejecting wood poles that have less than two-thirds of their original strength, Osmose identified 21 wood poles that did not meet the two-thirds strength requirement.[12]

D. PROJECT ALTERNATIVES

Q. Did CEHE consider distribution alternatives to the Proposed Project?

A. No. Distribution circuits were not considered as alternatives to resolve the identified transmission hardening reliability issues in this CCN.[13]

Q. Did CEHE consider transmission alternatives to the Proposed Project?

A. Yes, this proposed project is a rebuild of an existing circuit. CEHE also considered rebuilding the 138 kV circuit on the other side of the road, however, the ROW on that side is already congested and would have more impacts on the community.[14]

Q. Do you agree that the Proposed Project is the best option when compared to other alternatives?

A. In my opinion, this Project appears to be the best option when compared to other alternatives.

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[11] CEHE Responses to the PUCT First Set of RFIs at 2.

[12] *Id* at 14-15.

[13] Application at 14-15.

[14] *Id.* at 15.

V. ROUTING

A. STAFF RECOMMENDATION

Q. Which route do you recommend upon considering all factors, including the factors in PURA § 37.056(c) and 16 TAC § 25.101(b)(3)(B)?

A. It is my opinion that CEHE's proposed rebuild of the existing transmission line is the best option when considering all factors pursuant to PURA § 37.056(c) and 16 TAC § 25.101(b)(3)(B).

B. COMMUNITY VALUES

Q. Has CEHE sought input from the local community regarding community values?

A. Yes. CEHE presented the project to the public at an open house meeting held on November 21, 2024 in Galveston.[15] CEHE mailed letters to 1,108 landowners whose property is within 320 feet of the proposed route to inform them about the public meeting.[16] Upon entering the meeting, visitors were asked to sign-in and were provided a questionnaire to solicit comments. A total of eight people signed in as attending the public meeting and two completed questionnaires were received.[17]

Q. Did members of the community who attended the public meeting express concerns about the Proposed Project?

A. The two questionnaires received at the public meeting indicated that the existing

[15] Application at 17.

[16] Application, Attachment 1- Environmental Assessment and Route Analysis (EA) at 3-8.

[17] EA at 3-9 and 3-10.

transmission line is near their home and no concerns were provided.[18]

Q. Are property values and the impact on future or potential development factors that are considered by the Commission in a CCN proceeding under PURA § 37.056(c)(4) or in 16 TAC § 25.101(b)(3)(B)?

A. No. PURA and the Commission's rules do not list these issues as factors that are to be considered by the Commission in a CCN proceeding. However, these rules do require consideration of using or paralleling existing ROW, which may minimize concerns about these impacts.

Q. Are there any airstrips or heliports located in the study area?

A. There are no FAA-registered airports with a runway greater than 3,200 feet in length within 20,000 feet of the proposed route centerline. There are no FAA-registered airports with runways less than or equal to 3,200 feet in length within 10,000 feet of the proposed route centerline. There are no private airstrips within 10,000 feet of the proposed project centerline and no heliports within 5,000 feet.[19]

Q. Are there any electronic communication facilities in the study area?

A. There are no known AM radio transmitters within 10,000 feet of the project centerline.[20] There are two identified FM radio transmitters, microwave towers, or other electronic installations located within 2,000 feet of the project route centerline.[21]

[18] EA at 3-10.

[19] Application at 22-23.

[20] *Id.* at 22.

[21] *Id.* at 22.

C. RECREATIONAL AND PARK AREAS

Q. Are any parks or recreational areas located within 1,000 feet of the centerline of the Proposed Project?

A. Yes. There is one park or recreational area crossed by the rebuild project however there are no other parks or recreational areas located within 1,000 feet of the existing route's centerline.[22]

D. HISTORICAL VALUES

Q. Are there possible impacts from the Proposed Project on archeological and historical values, including known cultural resources crossed by or located within 1,000 feet of the centerline?

A. Yes. The Texas Historical Commission (THC) records indicated one cemetery, three archeological sites, and two shipwrecks within 1,000 feet of the existing route's centerline.[23]

E. AESTHETIC VALUES

Q. What are the aesthetic impacts of constructing the Proposed Project along the single proposed route?

A. There are 900 directly affected habitable structures within 300 feet of the existing transmission line that is proposed for rebuild. The entire ROW length (10.78 miles) of the

[22] Application at 25.

[23] *Id.* at 25-26.

proposed line is within the foreground visual zone of FM roads and approximately 2.42 miles is within the foreground visual zone of parks/recreational areas. The proposed line has no length within the foreground visual zone of US and state highways.[24]

F. ENVIRONMENTAL INTEGRITY

Q. Please provide a general description of the study area traversed by the proposed route.

A. The area is mostly coastal residential development and is located within the Coastal Prairies sub-province of the Gulf Coastal Prairies Physiographic Province. The Coastal Prairies landscape is nearly level with deltaic sand and mud bedrock types with elevations ranging from sea level to 300 feet above mean sea level.[25]

Q. What was involved in your analysis of the environmental impact of the Proposed Project?

A. I reviewed the information provided in the EA and the direct testimonies filed in this proceeding by or on behalf of CEHE.

Q. Did your analysis include the review of the Texas Parks and Wildlife (TPWD) recommendations and informational comments following their review of the Application?

A. No. At the time of preparing this testimony TPWD had not filed any recommendations or informational comments regarding the proposed project.

Q. Based on your review of the information identified above, in your opinion, will the

[24] EA, Table 4-1.
[25] Application at 84-85.

Proposed Project present a significant negative impact to environmental integrity?

A. In my opinion, the impacts to environment integrity will be minor and temporary. Transmission lines do not often create many long-term impacts on soils. The potential impacts to soils are erosion and compaction, which are associated with the clearing and construction phases of transmission project however, these concerns should be minimal being this project is a rebuild. If necessary, CEHE will implement a Stormwater Pollution Prevention Plan (SWPPP) during construction to negate potential impacts.[26]

The proposed project crosses approximately 1.14 miles of woodlands/brushlands, approximately 0.63 miles of bottomland/riparian woodlands, and approximately 0.03 of NWI mapped wetlands. The proposed project crosses approximately 0.70 miles of designated critical habitat for federally-listed threatened or endangered species.[27]

In my opinion, CEHE's implementation of design and construction practices and techniques that are usual and customary in the electric utility industry can minimize the potential negative impacts to the local environment.

Q. Do you conclude that the proposed route is acceptable from an environmental and land use perspective?

A. Yes. In my opinion, construction of the proposed project is acceptable from an overall environmental and land use perspective.

G. ENGINEERING CONSTRAINTS

[26] Application at 55.

[27] EA, Table 4-1.

Q. Are there any possible engineering constraints associated with this Proposed Project?

A. There have been no specific engineering constraints identified that are unusual with regard to this transmission line rebuild project. In my opinion, all possible constraints can be adequately addressed by using design and construction practices and techniques that are usual and customary in the electric utility industry.

Q. Are there any special circumstances in this Proposed Project that would warrant an extension beyond the seven-year limit for the energization of the lines?

A. No. CEHE has not described any special circumstances that would merit an extension of the seven-year limit for this project.

H. COSTS

Q. What is the estimated cost of constructing the Proposed Project?

A. The total project cost is estimated at $105,297,000. The breakdown of that cost is:[28]

Right-of-way and Land Acquisition	$18,670,000
Engineering and Design (Utility)	$38,000
Engineering and Design (Contract)	$1,231,000
Procurement of Material and Equipment (including stores)	$17,244,000
Construction of Facilities (Utility)	$837,000
Construction of Facilities (Contract)	$62,277,000
Other (all costs not included in the above categories, i.e. temporary construction easements)	$5,000,000
Estimated Total Cost $	**$105,297,000**

[28] Application at 13.

Q. Does CEHE's estimated cost of constructing the Proposed Project appear to be reasonable?

A. After reviewing CEHE's estimates, I believe they are reasonable. However, the reasonableness of the final installed cost of the completed project will be determined at a future date in a rate case proceeding.

I. MODERATION OF IMPACT ON THE AFFECTED COMMUNITY AND LANDOWNERS

Q. Do the Commission's rules address routing alternatives intended to moderate the impact on landowners?

A. Yes. Under 16 TAC § 25.101(b)(3)(B), "the line shall be routed to the extent reasonable to moderate the impact on the affected community and landowners unless grid reliability and security dictate otherwise."

Q. Has CEHE proposed any specific means by which it will moderate the impact of the Proposed Project on landowners or the affected community other than adherence to the Commission's orders, the use of good utility practices, acquisition of and adherence to the terms of all required permits, and what you have discussed above?

A. Not to my knowledge.

J. RIGHT-OF-WAY

Q. Do the Commission's rules address routing along existing corridors?

A. Yes. The following factors are to be considered under 16 TAC § 25.101(b)(3)(B):

(i) Whether the routes utilize existing compatible rights-of-way, including the use of vacant positions on existing multiple-circuit transmission lines;

(ii) Whether the routes parallel existing compatible rights-of-way;

(iii) Whether the routes parallel property lines or other natural or cultural features; and

(iv) Whether the routes conform with the policy of prudent avoidance.

1. USE AND PARALLELING OF EXISTING, COMPATIBLE RIGHT-OF-WAY (INCLUDING APPARENT PROPERTY BOUNDARIES)

Q. Please describe how CEHE proposes to use or parallel existing compatible ROW for the Proposed Project.

A. The Proposed Rebuild Project utilizes existing road ROW for 10.68 miles of its length, however additional aerial easement on one side of the line is needed in this segment.[29] The proposed project utilizes existing transmission line easement for approximately 0.10 miles of its length which requires no additional aerial easement. [30]

K. PRUDENT AVOIDANCE

Q. Define prudent avoidance.

A. Prudent avoidance is defined by 16 TAC § 25.101(a)(6), as follows: "The limiting of

[29] Application, at 9.

[30] EA, Table 4-1.

exposures to electric and magnetic fields that can be avoided with reasonable investments of money and effort."

Q. How can exposure to electric and magnetic fields be limited when routing transmission lines?

A. Primarily by proposing alternative routes that would minimize, to the extent reasonable, the number of habitable structures located in close proximity to the routes.

Q. How many habitable structures are located in close proximity to the Proposed Project?

A. There are 900 habitable structures within 300 feet of the ROW centerline for CEHE's existing transmission line and the ROW centerline for this proposed rebuild project. [31]

Q. Do you conclude that CEHE's Proposed Project has minimized, to the extent reasonable, the number of habitable structures located in close proximity to the routing segments?

A. Yes.

VI. CONCLUSION

Q. Can you explain your conclusions regarding this project?

A. Yes. I recommend the Proposed Project be approved.

Q. Does this conclude your direct testimony?

A. Yes, but I reserve the right to supplement this testimony during the course of the proceeding as new evidence is presented.

[31] EA, Table 4-6 and Table 4-1.

Attachment MN-1
Qualifications of Mike Noth

Academic Experience

Bachelor of Science in Engineering: The University of Texas - Arlington, Arlington, Texas
Major: Electrical Engineering

Professional Experience

Professional Engineer
Oregon PE # 58604PE (expired)
Texas PE # 94052 (active - expires March 2026)

Engineer VI -- Public Utility Commission of Texas (PUC)	Nov 2024 - Present
Power System Managing Engineer -- Austin Energy	Aug 2017 – Nov 2024
Director of Enterprise Engineering -- The LCRA	Mar 2008 – Aug 2017
Electrical Manager -- S. Kanetzky Engineering, LLC	Oct 2006 – Mar 2008
Electrical Manager -- Samsung Austin Semiconductor	Jul 2001 – Oct 2006
Electrical Manager -- Hyundai Semiconductor America	Mar 1997 – Jul 2001
Engineer -- Texas Instruments	Aug 1984 – Feb 1997

General Description:

Performed advanced engineering work on a broad range of generation, transmission, distribution, and industrial systems. Work involves applying engineering principles to evaluate engineering and technical issues to include identifying, analyzing, and providing recommendations regarding facility design, planning, construction, start-up, operation, maintenance, and root cause analysis in the electric generation, transmission, distribution, and semiconductor industries.

Essential Functions:

- Identify, analyze, and provide recommendations on issues relating to electric infrastructure planning, design, construction, operations, and maintenance.
- Perform root cause analysis on system failures using many different methodologies.

- Prepare written testimony for filing in contested proceedings, including certificate of convenience and necessity, and rate proceedings.

Attachment MN-2
List of Dockets Containing Testimony of Mike Noth

- Docket No. 57263: Application of Oncor Electric Delivery Company LLC to Amend its Certificate of Convenience and Necessity for the Hartring - Upland 138-KV Transmission Line in Reagan and Upton Counties

- Docket No. 57463: Application of Southwestern Public Service Company for Approval of its Transmission and Distribution System Resiliency Plan

- Docket No. 57579: Application of CenterPoint Energy Houston Electric LLC for Approval of its 2026-2028 Transmission and Distribution System Resiliency Plan

- Docket No. 57849: Application of City of San Antonio, acting by and through the City Public Service Board (CPS Energy) to Amend its Certificate of Convenience and Necessity for the Spruce-To-Pawnee 345-kV Transmission Line in Bexar, Wilson, and Karnes Counties

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MICHAEL (MIKE) NOTH, P.E.

INFRASTRUCTURE DIVISION

PUBLIC UTILITY COMMISSION OF TEXAS

June 27, 2025

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I. STATEMENT OF QUALIFICATIONS

Q. Please state your name, occupation, and business address.

A. My name is Mike Noth. I am employed by the Public Utility Commission of Texas (PUC or Commission), as an Engineer VI within the Infrastructure Division. My business address is 1701 N. Congress Avenue, Austin, Texas 78701.

Q. Please outline your educational and professional background.

A. I have a Bachelor of Science degree in Electrical Engineering. I have been employed at the PUC since November of 2024. Attachment MN-1 details my educational and professional background.

Q. Are you a registered professional engineer?

A. Yes. I am a Professional Engineer in the State of Texas, license number 94052.

Q. Have you testified as an expert before the Commission or the State Office of Administrative Hearings (SOAH)?

A. Yes. Attachment MN-2 contains a list of dockets in which I have provided testimony.

II. PURPOSE AND SCOPE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to present Commission Staff's recommendations regarding the application of CenterPoint Energy Houston Electric, LLC (CEHE), to approve its Certificate of Convenience and Necessity (CCN) to rebuild an existing 138 kV Transmission Line starting at West Bay Substation and extending to a location approximately 0.34 miles

northwest of FM 3005 and 13-Mile Rd in Galveston County, Texas.[1]

Q. What is the scope of your testimony?

A. The scope of my testimony is to provide Commission Staff's recommendation regarding the need for the project and the route selection presented by CEHE.

Q. What are the statutory requirements that a utility must meet to amend its CCN to construct a new transmission line?

A. Section 37.056(a) of the Public Utility Regulatory Act[2] (PURA) states that the Commission may approve an application for a CCN only if the Commission finds that the CCN is necessary for the service, accommodation, convenience, or safety of the public. Further, PURA provides that the Commission shall approve, deny, or modify a request for a CCN after considering the factors specified in PURA § 37.056(c), which are as follows:

(1) the adequacy of existing service;

(2) the need for additional service;

(3) the effect of granting the certificate on the recipient of the certificate and any electric utility serving the proximate area; and

(4) other factors, such as:

(A) community values;

(B) recreational and park areas;

(C) historical and aesthetic values;

[1] Application of CEHE at 14 (filed April 30, 2025) (Application).

[2] Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016 (PURA).

(D) environmental integrity;

(E) the probable improvement of service or lowering of cost to consumers in the area if the certificate is granted; including any potential economic or reliability benefits associated with dual fuel and fuel storage capabilities in areas outside the ERCOT power region, and

(F) the need for extending transmission service where existing or projected electrical loads will be underserved, including where:

i. the existing transmission service is unreasonably remote;

ii. the available capacity is unreasonably limited at transmission or distribution voltage level; or

iii. the electrical load cannot be interconnected in a timely manner.

Q. Do the Commission's rules provide any instruction regarding routing criteria?

A. Yes. 16 Texas Administrative Code (TAC) § 25.101(b)(3)(B) requires that an application for a new transmission line address the criteria in PURA § 37.056(c), and that upon considering those criteria, engineering constraints and costs, the line shall be routed to the extent reasonable to moderate the impact on the affected community and landowners, unless grid reliability and security dictate otherwise. The following factors shall be considered in the selection of CEHE's routes:

(i) whether the routes parallel or utilize existing compatible rights-of-way for electric facilities, including the use of vacant positions on existing multiple-circuit transmission lines;

(ii) whether the routes parallel or utilize existing compatible rights-of-way, including roads, highways, railroads, or telephone utility rights-of-way;

(iii) whether the routes parallel property lines or other natural or cultural features; and

(iv) whether the routes conform with the policy of prudent avoidance.

Q. Which issues in this proceeding have you addressed in your testimony?

A. I have addressed the issues from the Order of Referral and Preliminary Order filed on May 5, 2025, and the requirements of PURA § 37.056 and 16 TAC § 25.101.

Q. If you do not address an issue or position in your testimony, should that be interpreted as Staff supporting any other party's position on that issue?

A. No. The fact that I do not address an issue in my testimony should not be considered as agreeing, endorsing, or consenting to any position taken by any other party in this proceeding.

Q. What have you relied upon or considered to reach your conclusions and make your recommendation?

A. I have relied upon my review and analysis of the data contained in CEHE's application, the application's accompanying attachments including the Environmental Assessment (EA)[3] prepared by Power Engineers, Inc. (Power), and my review of the direct testimonies or statements of position filed in this proceeding by or on behalf of CEHE and the intervenors and responses to requests for information. One intervenor (Item 34) is giving a statement of

[3] Application at 29, Attachment 1.

position.

III. RECOMMENDATIONS

Q. Based on your evaluation of the Application, what conclusions have you reached regarding the application and the Proposed Project?

A. Based on my evaluation of the Application, I conclude the following:

1. The application is adequate, and CEHE's proposed route is adequate.
2. The application complies with the notice requirements in 16 TAC 15 § 22.52(a).
3. Considering the factors set out in PURA § 37.056(c), the proposed project is necessary for the service, accommodation, convenience, and safety of the public.
4. The proposed project is the best option to meet the need when compared with other alternatives.
5. The proposed route is the best route when weighing the factors set forth in PURA § 37.056(c)(4) and 16 TAC § 25.101(b)(3)(B).

Q. What recommendation do you have regarding CEHE's application?

A. I recommend that the Commission approve CEHE's Stewart to West Bay Project (the "Project") in Galveston County, Texas. I further recommend that the Commission include in its order approving the application the following paragraphs to mitigate the impact of the proposed project and require monthly construction progress reporting:

1. CEHE shall conduct surveys, if not already completed, to identify pipelines that could be affected by the transmission lines and coordinate with pipeline owners in modeling and analyzing potential hazards because of alternating-current interference affecting

pipelines being paralleled.

2. If CEHE encounters any archeological artifacts or other cultural resources during project construction, work must cease immediately in the vicinity of the artifact or resource, and the discovery must be reported to the Texas Historical Commission. In that situation, CEHE must take action as directed by the Texas Historical Commission.

3. CEHE must follow the procedures to protect raptors and migratory birds as outlined in the following publications: *Reducing Avian Collisions with Power Lines: The State of the Art in 2012,* Edison Electric Institute and Avian Power Line Interaction Committee, Washington, D.C. 2012; *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006*, Edison Electric Institute, Avian Power Line Interaction Committee, and the California Energy Commission, Washington, D.C. and Sacramento, CA 2006; and *Avian Protection Plan Guidelines*, Avian Power Line Interaction Committee and United States Fish and Wildlife Service, April 2005. CEHE must take precautions to avoid disturbing occupied nests and take steps to minimize the burden of construction on migratory birds during the nesting season of the migratory bird species identified in the area of construction.

4. CEHE must exercise extreme care to avoid affecting non-targeted vegetation or animal life when using chemical herbicides to control vegetation within rights-of-way. CEHE must ensure that the use of chemical herbicides to control vegetation within the rights-of-way complies with rules and guidelines established in the Federal Insecticide Fungicide and Rodenticide Act and with Texas Department of Agriculture

regulations.

5. CEHE must minimize the amount of flora and fauna disturbed during construction of the transmission lines, except to the extent necessary to establish appropriate right-of-way clearance for the transmission lines. In addition, CEHE must revegetate, using native species and must consider landowner preferences and wildlife needs in doing so. Furthermore, to the maximum extent practical, CEHE must avoid adverse environmental influence on sensitive plant and animal species and their habitats, as identified by the Texas Parks and Wildlife Department and the United States Fish and Wildlife Service.

6. CEHE must implement erosion control measures as appropriate. Erosion control measures may include inspection of the right-of-way before and during construction to identify erosion areas and implement special precautions as determined necessary. CEHE must return each affected landowner's property to its original contours and grades unless otherwise agreed to by the landowner or the landowner's representative. CEHE is not required to restore the original contours and grades where a different contour or grade is necessary to ensure the safety or stability of the project's structures or the safe operation and maintenance of the lines.

7. CEHE must use Best Management Practices (BMPs) to minimize the potential impacts to migratory birds and threatened or endangered species.

8. CEHE must cooperate with directly affected landowners to implement minor deviations from the approved route to minimize the burden of the transmission lines. Any minor deviations from the approved route must only directly affect landowners

who were sent notice of the transmission line in accordance with 16 TAC § 22.52(a)(3) and landowners that have agreed to the minor deviation.

9. CEHE must report the transmission line approved by the Commission on its monthly construction progress reports before the start of construction to reflect the final estimated cost and schedule in accordance with 16 TAC § 25.83(b). In addition, CEHE must provide final construction costs, with any necessary explanation for cost variance, after completion of construction when all costs have been identified.

10. CEHE must, to the greatest extent practicable, span any coastal wetlands or submerged aquatic vegetation as defined by 31 TAC § 501.3(b) and Texas Water Code (TWC) § 11.502.

11. CEHE must avoid or minimize any potential impacts to any coastal wetlands or submerged aquatic vegetation through utilization of Best Management Practices (BMPs) and its Stormwater Pollution Prevention Plan (SWPP).

12. CEHE must coordinate with the United States Army Corps of Engineers (USACE) prior to clearing and construction to ensure compliance with applicable requirements in order to avoid, minimize, and mitigate impacts to waters of the United States and Coastal Natural Resource Areas (CNRAs), including associated coastal wetlands and special hazard areas.

IV. PROJECT JUSTIFICATION

A. DESCRIPTION OF THE PROJECT

Q. Please describe the Proposed Project.

A. The Proposed Project is to rebuild approximately 10.78 right-of-way (ROW) miles of an existing 138 kV double-circuit transmission line using steel or concrete monopole structures between the West Bay Substation to the intersection of San Luis Pass Road (FM 3005) and 13 Mile Road. This intersection is about 0.34-mile south-west of the Stewart Substation.[4] The CCN process is needed since the project requires widening the aerial easement for the circuits involved in the rebuild. The rebuilt circuits will have a normal rating of 417 MVA.[5]

Q. Does CEHE's application contain a number of Alternative Routes sufficient to conduct a proper evaluation?

A. CEHE's application includes a single proposed route which uses existing right-of-way (and additional aerial easement) for the existing double-circuit 138 kV transmission line rebuild.[6]

Q. Is the Proposed Project located within the incorporated boundaries of any municipality?

A. Yes. The proposed route is within the municipal boundaries of Galveston and Jamaica Beach.[7]

B. TEXAS COASTAL MANAGEMENT PROGRAM

Q. Does any part of this project lie within the Texas Coastal Management Program (TCMP) boundary?

[4] Application at 9 and 14.

[5] *Id.* at 7.

[6] *Id.* at 7.

[7] *Id.* at 11.

A. Yes. The entire proposed rebuild project is within the TCMP boundary as defined in 31 TAC § 503.1. The entire project route is also located seaward of the Coastal Facilities Designation Line as defined in 31 TAC § 19.2(a)(21). The identified Coastal Natural Resource Areas (CNRAs) for the proposed project route include: special hazard areas and coastal wetlands, but may also include waters of the open Gulf of Mexico, water under tidal influence, submerged lands, submerged aquatic vegetation, tidal sand and mud flats, oyster reefs, hard substrate reefs, coastal barriers, coastal shore areas, gulf beaches, critical dune areas, critical erosion areas, coastal historic areas, and coastal preserves.[8]

Q. If constructed along the proposed route, is the project compliant with 16 TAC § 25.102 and consistent with the goals and policies of the TCMP?

A. Yes, CEHE plans to construct the proposed project consistent with the applicable goals and policies of the TCMP in accordance with 16 TAC § 25.102.[9]

C. NEED FOR THE PROJECT

Q. Could you briefly summarize the need for the project?

A. The Proposed Project is needed to address aged infrastructure; specifically replacing existing wooden poles, which are a reliability concern, with engineered materials.[10]

This project is needed for transmission hardening, primarily focusing on pole replacements. This project was included as part of resiliency measure RM-6 of the Transmission System Hardening

[8] Application at 26.

[9] *Id.* at 158.

[10] *Id.* at 14.

in CEHE's System Resiliency Plan, PUCT Docket No. 57579.[11] Since 2008 CEHE has lost 12 decayed wood poles due to high winds generated by thunderstorms or hurricanes. CEHE did a physical inspection in February 2024. Of the 15-pole sample set approximately 60% of the tested poles were of concern using the hammer test. CEHE then hired Osmose in March 2024 to do ground line inspection. Using the NESC Standard of rejecting wood poles that have less than two-thirds of their original strength, Osmose identified 21 wood poles that did not meet the two-thirds strength requirement.[12]

D. PROJECT ALTERNATIVES

Q. Did CEHE consider distribution alternatives to the Proposed Project?

A. No. Distribution circuits were not considered as alternatives to resolve the identified transmission hardening reliability issues in this CCN.[13]

Q. Did CEHE consider transmission alternatives to the Proposed Project?

A. Yes, this proposed project is a rebuild of an existing circuit. CEHE also considered rebuilding the 138 kV circuit on the other side of the road, however, the ROW on that side is already congested and would have more impacts on the community.[14]

Q. Do you agree that the Proposed Project is the best option when compared to other alternatives?

A. In my opinion, this Project appears to be the best option when compared to other alternatives.

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[11] CEHE Responses to the PUCT First Set of RFIs at 2.

[12] *Id* at 14-15.

[13] Application at 14-15.

[14] *Id.* at 15.

V. ROUTING

A. STAFF RECOMMENDATION

Q. Which route do you recommend upon considering all factors, including the factors in PURA § 37.056(c) and 16 TAC § 25.101(b)(3)(B)?

A. It is my opinion that CEHE's proposed rebuild of the existing transmission line is the best option when considering all factors pursuant to PURA § 37.056(c) and 16 TAC § 25.101(b)(3)(B).

B. COMMUNITY VALUES

Q. Has CEHE sought input from the local community regarding community values?

A. Yes. CEHE presented the project to the public at an open house meeting held on November 21, 2024 in Galveston.[15] CEHE mailed letters to 1,108 landowners whose property is within 320 feet of the proposed route to inform them about the public meeting.[16] Upon entering the meeting, visitors were asked to sign-in and were provided a questionnaire to solicit comments. A total of eight people signed in as attending the public meeting and two completed questionnaires were received.[17]

Q. Did members of the community who attended the public meeting express concerns about the Proposed Project?

A. The two questionnaires received at the public meeting indicated that the existing

[15] Application at 17.

[16] Application, Attachment 1- Environmental Assessment and Route Analysis (EA) at 3-8.

[17] EA at 3-9 and 3-10.

transmission line is near their home and no concerns were provided.[18]

Q. Are property values and the impact on future or potential development factors that are considered by the Commission in a CCN proceeding under PURA § 37.056(c)(4) or in 16 TAC § 25.101(b)(3)(B)?

A. No. PURA and the Commission's rules do not list these issues as factors that are to be considered by the Commission in a CCN proceeding. However, these rules do require consideration of using or paralleling existing ROW, which may minimize concerns about these impacts.

Q. Are there any airstrips or heliports located in the study area?

A. There are no FAA-registered airports with a runway greater than 3,200 feet in length within 20,000 feet of the proposed route centerline. There are no FAA-registered airports with runways less than or equal to 3,200 feet in length within 10,000 feet of the proposed route centerline. There are no private airstrips within 10,000 feet of the proposed project centerline and no heliports within 5,000 feet.[19]

Q. Are there any electronic communication facilities in the study area?

A. There are no known AM radio transmitters within 10,000 feet of the project centerline.[20] There are two identified FM radio transmitters, microwave towers, or other electronic installations located within 2,000 feet of the project route centerline.[21]

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[18] EA at 3-10.

[19] Application at 22-23.

[20] *Id.* at 22.

[21] *Id.* at 22.

C. RECREATIONAL AND PARK AREAS

Q. Are any parks or recreational areas located within 1,000 feet of the centerline of the Proposed Project?

A. Yes. There is one park or recreational area crossed by the rebuild project however there are no other parks or recreational areas located within 1,000 feet of the existing route's centerline.[22]

D. HISTORICAL VALUES

Q. Are there possible impacts from the Proposed Project on archeological and historical values, including known cultural resources crossed by or located within 1,000 feet of the centerline?

A. Yes. The Texas Historical Commission (THC) records indicated one cemetery, three archeological sites, and two shipwrecks within 1,000 feet of the existing route's centerline.[23]

E. AESTHETIC VALUES

Q. What are the aesthetic impacts of constructing the Proposed Project along the single proposed route?

A. There are 900 directly affected habitable structures within 300 feet of the existing transmission line that is proposed for rebuild. The entire ROW length (10.78 miles) of the

[22] Application at 25.

[23] *Id.* at 25-26.

proposed line is within the foreground visual zone of FM roads and approximately 2.42 miles is within the foreground visual zone of parks/recreational areas. The proposed line has no length within the foreground visual zone of US and state highways.[24]

F. ENVIRONMENTAL INTEGRITY

Q. Please provide a general description of the study area traversed by the proposed route.

A. The area is mostly coastal residential development and is located within the Coastal Prairies sub-province of the Gulf Coastal Prairies Physiographic Province. The Coastal Prairies landscape is nearly level with deltaic sand and mud bedrock types with elevations ranging from sea level to 300 feet above mean sea level.[25]

Q. What was involved in your analysis of the environmental impact of the Proposed Project?

A. I reviewed the information provided in the EA and the direct testimonies filed in this proceeding by or on behalf of CEHE.

Q. Did your analysis include the review of the Texas Parks and Wildlife (TPWD) recommendations and informational comments following their review of the Application?

A. No. At the time of preparing this testimony TPWD had not filed any recommendations or informational comments regarding the proposed project.

Q. Based on your review of the information identified above, in your opinion, will the

[24] EA, Table 4-1.
[25] Application at 84-85.

Proposed Project present a significant negative impact to environmental integrity?

A. In my opinion, the impacts to environment integrity will be minor and temporary. Transmission lines do not often create many long-term impacts on soils. The potential impacts to soils are erosion and compaction, which are associated with the clearing and construction phases of transmission project however, these concerns should be minimal being this project is a rebuild. If necessary, CEHE will implement a Stormwater Pollution Prevention Plan (SWPPP) during construction to negate potential impacts.[26]

The proposed project crosses approximately 1.14 miles of woodlands/brushlands, approximately 0.63 miles of bottomland/riparian woodlands, and approximately 0.03 of NWI mapped wetlands. The proposed project crosses approximately 0.70 miles of designated critical habitat for federally-listed threatened or endangered species.[27]

In my opinion, CEHE's implementation of design and construction practices and techniques that are usual and customary in the electric utility industry can minimize the potential negative impacts to the local environment.

Q. Do you conclude that the proposed route is acceptable from an environmental and land use perspective?

A. Yes. In my opinion, construction of the proposed project is acceptable from an overall environmental and land use perspective.

G. ENGINEERING CONSTRAINTS

[26] Application at 55.

[27] EA, Table 4-1.

Q. Are there any possible engineering constraints associated with this Proposed Project?

A. There have been no specific engineering constraints identified that are unusual with regard to this transmission line rebuild project. In my opinion, all possible constraints can be adequately addressed by using design and construction practices and techniques that are usual and customary in the electric utility industry.

Q. Are there any special circumstances in this Proposed Project that would warrant an extension beyond the seven-year limit for the energization of the lines?

A. No. CEHE has not described any special circumstances that would merit an extension of the seven-year limit for this project.

H. COSTS

Q. What is the estimated cost of constructing the Proposed Project?

A. The total project cost is estimated at $105,297,000. The breakdown of that cost is:[28]

Right-of-way and Land Acquisition	$18,670,000
Engineering and Design (Utility)	$38,000
Engineering and Design (Contract)	$1,231,000
Procurement of Material and Equipment (including stores)	$17,244,000
Construction of Facilities (Utility)	$837,000
Construction of Facilities (Contract)	$62,277,000
Other (all costs not included in the above categories, i.e. temporary construction easements)	$5,000,000
Estimated Total Cost $	**$105,297,000**

[28] Application at 13.

Q. Does CEHE's estimated cost of constructing the Proposed Project appear to be reasonable?

A. After reviewing CEHE's estimates, I believe they are reasonable. However, the reasonableness of the final installed cost of the completed project will be determined at a future date in a rate case proceeding.

I. MODERATION OF IMPACT ON THE AFFECTED COMMUNITY AND LANDOWNERS

Q. Do the Commission's rules address routing alternatives intended to moderate the impact on landowners?

A. Yes. Under 16 TAC § 25.101(b)(3)(B), "the line shall be routed to the extent reasonable to moderate the impact on the affected community and landowners unless grid reliability and security dictate otherwise."

Q. Has CEHE proposed any specific means by which it will moderate the impact of the Proposed Project on landowners or the affected community other than adherence to the Commission's orders, the use of good utility practices, acquisition of and adherence to the terms of all required permits, and what you have discussed above?

A. Not to my knowledge.

J. RIGHT-OF-WAY

Q. Do the Commission's rules address routing along existing corridors?

A. Yes. The following factors are to be considered under 16 TAC § 25.101(b)(3)(B):

(i) Whether the routes utilize existing compatible rights-of-way, including the use of vacant positions on existing multiple-circuit transmission lines;

(ii) Whether the routes parallel existing compatible rights-of-way;

(iii) Whether the routes parallel property lines or other natural or cultural features; and

(iv) Whether the routes conform with the policy of prudent avoidance.

1. USE AND PARALLELING OF EXISTING, COMPATIBLE RIGHT-OF-WAY (INCLUDING APPARENT PROPERTY BOUNDARIES)

Q. Please describe how CEHE proposes to use or parallel existing compatible ROW for the Proposed Project.

A. The Proposed Rebuild Project utilizes existing road ROW for 10.68 miles of its length, however additional aerial easement on one side of the line is needed in this segment.[29] The proposed project utilizes existing transmission line easement for approximately 0.10 miles of its length which requires no additional aerial easement. [30]

K. PRUDENT AVOIDANCE

Q. Define prudent avoidance.

A. Prudent avoidance is defined by 16 TAC § 25.101(a)(6), as follows: "The limiting of

[29] Application, at 9.

[30] EA, Table 4-1.

exposures to electric and magnetic fields that can be avoided with reasonable investments of money and effort."

Q. How can exposure to electric and magnetic fields be limited when routing transmission lines?

A. Primarily by proposing alternative routes that would minimize, to the extent reasonable, the number of habitable structures located in close proximity to the routes.

Q. How many habitable structures are located in close proximity to the Proposed Project?

A. There are 900 habitable structures within 300 feet of the ROW centerline for CEHE's existing transmission line and the ROW centerline for this proposed rebuild project.[31]

Q. Do you conclude that CEHE's Proposed Project has minimized, to the extent reasonable, the number of habitable structures located in close proximity to the routing segments?

A. Yes.

VI. CONCLUSION

Q. Can you explain your conclusions regarding this project?

A. Yes. I recommend the Proposed Project be approved.

Q. Does this conclude your direct testimony?

A. Yes, but I reserve the right to supplement this testimony during the course of the proceeding as new evidence is presented.

[31] EA, Table 4-6 and Table 4-1.

Attachment MN-1
Qualifications of Mike Noth

Academic Experience

Bachelor of Science in Engineering: The University of Texas - Arlington, Arlington, Texas
Major: Electrical Engineering

Professional Experience

Professional Engineer
Oregon PE # 58604PE (expired)
Texas PE # 94052 (active - expires March 2026)

Engineer VI -- Public Utility Commission of Texas (PUC)	Nov 2024 - Present
Power System Managing Engineer -- Austin Energy	Aug 2017 – Nov 2024
Director of Enterprise Engineering -- The LCRA	Mar 2008 – Aug 2017
Electrical Manager -- S. Kanetzky Engineering, LLC	Oct 2006 – Mar 2008
Electrical Manager -- Samsung Austin Semiconductor	Jul 2001 – Oct 2006
Electrical Manager -- Hyundai Semiconductor America	Mar 1997 – Jul 2001
Engineer -- Texas Instruments	Aug 1984 – Feb 1997

General Description:

Performed advanced engineering work on a broad range of generation, transmission, distribution, and industrial systems. Work involves applying engineering principles to evaluate engineering and technical issues to include identifying, analyzing, and providing recommendations regarding facility design, planning, construction, start-up, operation, maintenance, and root cause analysis in the electric generation, transmission, distribution, and semiconductor industries.

Essential Functions:

- Identify, analyze, and provide recommendations on issues relating to electric infrastructure planning, design, construction, operations, and maintenance.
- Perform root cause analysis on system failures using many different methodologies.

- Prepare written testimony for filing in contested proceedings, including certificate of convenience and necessity, and rate proceedings.

Attachment MN-2
List of Dockets Containing Testimony of Mike Noth

- Docket No. 57263: Application of Oncor Electric Delivery Company LLC to Amend its Certificate of Convenience and Necessity for the Hartring - Upland 138-KV Transmission Line in Reagan and Upton Counties

- Docket No. 57463: Application of Southwestern Public Service Company for Approval of its Transmission and Distribution System Resiliency Plan

- Docket No. 57579: Application of CenterPoint Energy Houston Electric LLC for Approval of its 2026-2028 Transmission and Distribution System Resiliency Plan

- Docket No. 57849: Application of City of San Antonio, acting by and through the City Public Service Board (CPS Energy) to Amend its Certificate of Convenience and Necessity for the Spruce-To-Pawnee 345-kV Transmission Line in Bexar, Wilson, and Karnes Counties