

Attachment 6

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

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

**SUPPLEMENTAL
DIRECT TESTIMONY**

OF

LISA B. MEAUX

ON BEHALF OF

**APPLICANT
CPS ENERGY**

December 22, 2020

**SOAH DOCKET NO. 473-21-0247
PUC DOCKET NO. 51023
SUPPLEMENTAL DIRECT TESTIMONY OF LISA B. MEAUX**

TABLE OF CONTENTS

I.	INTRODUCTION AND QUALIFICATIONS	3
II.	PURPOSE OF SUPPLEMENTAL TESTIMONY	3
III.	AMENDED ENVIRONMENTAL ASSESSMENT AND ROUTING STUDY	4
IV.	INFORMATION ADDRESSING PURA AND THE PUC’S CCN APPLICATION REQUIREMENTS.....	6
VI.	CONCLUSION.....	7

**SOAH DOCKET NO. 473-21-0247
PUC DOCKET NO. 51023
SUPPLEMENTAL DIRECT TESTIMONY OF LISA B. MEAUX**

I. INTRODUCTION AND QUALIFICATIONS

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Lisa B. Meaux. My business address is 16825 Northchase Drive, Suite 1200, Houston, Texas 77060.

Q. WHAT IS YOUR OCCUPATION?

A. I am employed by POWER Engineers, Inc. (POWER), a 100 percent employee owned consulting and engineering firm, as Project Manager/Department Manager in the Environmental Division.

Q. ARE YOU THE SAME LISA B. MEAUX THAT PROVIDED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes, I am.

II. PURPOSE OF SUPPLEMENTAL TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY?

A. The purpose of my testimony is to introduce, support, sponsor, and describe the *Scenic Loop 138 kV Transmission Line and Substation Project Environmental Assessment and Alternative Route Analysis AMENDMENT* (EA Amendment) prepared by POWER at the request of CPS Energy to document changes to the information previously reported by POWER in the *Scenic Loop 138 kV Transmission Line and Substation Project Environmental Assessment and Alternative Route Analysis Bexar County, Texas* (EA) that was previously admitted into evidence as Attachment 1 to CPS Energy Exhibit 1 in this proceeding. The EA Amendment is sponsored by me and is included as Attachment 2 to the Amendment to CPS Energy's Application, filed on December 22, 2020 (the Application Amendment).

1 **Q. WHICH PORTION OF THE APPLICATION AMENDMENT DO YOU**
2 **SPONSOR?**

3 A. I sponsor the Application Amendment responses to each of the questions I sponsored in
4 CPS Energy's original Application, which are noted in my initial Direct Testimony.

5 **III. AMENDED ENVIRONMENTAL ASSESSMENT AND ROUTING STUDY**

6 **Q. WHY DID POWER PREPARE THE EA AMENDMENT?**

7 A. CPS Energy retained POWER to perform and prepare the EA Amendment for the Scenic
8 Loop 138 kV Transmission Line Project (Project), in order to address route modifications
9 ordered by the Administrative Law Judges in this proceeding. My responsibility as Project
10 Manager involved overseeing and participating in preparation of the EA Amendment. A
11 POWER team of professionals with expertise in different environmental and land use
12 disciplines (geology/soils, hydrology/water quality, terrestrial ecology, wetland ecology,
13 land use/aesthetics, and cultural resources) were all involved in preparing the EA
14 Amendment.

15 **Q. WHAT DOES THE EA AMENDMENT ADDRESS?**

16 A. The EA Amendment presents changes to information previously reported by POWER in
17 the EA as a result of modification of Segments 26, 42, 46, 48, and 49.

18 **Q. WHAT INFORMATION DOES THE EA AMENDMENT CONTAIN?**

19 A. The EA Amendment documents the location of Segments 26a, 42a, 46a, 46b, and 49a. Data
20 for each of the 48 land use and environmental criteria is presented in the EA Amendment
21 for the modified segments listed above and updated for each of the routes containing one
22 or more of the modified segments. Ultimately, 16 of the 29 routes originally included in
23 the Application have been adjusted to account for one or more of the modified segments.
24 In addition, POWER identified two additional alternative routes (Routes DD and EE) and
25 included the land use and environmental data for those routes in the EA Amendment as
26 well. The Application Amendment includes 31 geographically diverse alternative routes
27 for the Commission to make a determination in this proceeding.

1 **Q. WHAT ARE THE RESULTS OF POWER'S INVESTIGATIONS REGARDING**
2 **THE PROPOSED TRANSMISSION LINE PROJECT FOLLOWING THE**
3 **APPLICATION AMENDMENT?**

4 A. The results of POWER's investigations indicate that the Application Amendment does not
5 result in significant impacts to existing land use, socioeconomic, hydrological, ecological,
6 geological, or wetland resources and no adverse effects to historic-age or archeological
7 resources are anticipated as a result of construction of any of the primary alternative routes
8 for the Project included in the Application Amendment. Section 4.0 of the EA Amendment
9 describes in detail the results of the primary alternative route evaluation and the potential
10 impacts for the primary alternative routes.

11 **Q. ARE THE ROUTES INCLUDED IN THE APPLICATION AMENDMENT**
12 **CONSISTENT WITH THE APPLICABLE PROVISIONS OF PURA, THE**
13 **COMMISSION'S SUBSTANTIVE RULES, THE COMMISSION'S CCN**
14 **APPLICATION FORM, AND ISSUES COMMONLY INCLUDED IN**
15 **COMMISSION PRELIMINARY ORDERS FOR CCN APPLICATIONS?**

16 A. Yes. POWER staff with expertise in many different disciplines evaluated the routes
17 included in the EA Amendment in accordance with the requirements of PURA
18 § 37.056(c)(4)(A)–(D), Commission Substantive Rule 25.101, the Commission's CCN
19 application requirements, and the issues commonly included for consideration in the
20 Commission's preliminary orders for CCN applications. I personally evaluated each
21 potential route and, in my professional opinion, all of the primary alternative routes in the
22 Application Amendment, and their constituent route segments, comply with the routing
23 requirements of PURA § 37.056(c)(4)(A)–(D), Commission Substantive Rule 25.101, the
24 Commission's CCN application requirements, and the issues commonly included for
25 consideration in the Commission's preliminary orders for CCN applications.

26 Following the Application Amendment, other reasonably forward-progressing
27 routes that connect the Project endpoints may be created by utilizing the existing primary
28 alternative route segments. Such routes may be proposed for consideration in this case and
29 evaluated for compliance with the applicable statutory and regulatory criteria.

IV. INFORMATION ADDRESSING PURA AND THE PUC'S CCN APPLICATION REQUIREMENTS

Q. WHAT INFORMATION COMPILED BY POWER WAS USED FOR PURPOSES OF THE APPLICATION AMENDMENT?

A. POWER provided environmental and land use information for the primary alternative routes that was used to address several specific questions in the Application Amendment. Unless identified specifically below, POWER's findings in the EA and presented in my direct testimony are unaffected by the Application Amendment.

POWER's findings regarding proximity to habitable structures is presented in Table 4-1 Amended of the EA Amendment and Tables 4-6 through 4-36 in Appendix C of the EA Amendment.

Descriptions of electronic installations and their distances from the centerlines of the routes are provided in Section 4.2.4 and in Table 4-3 and Tables 4-6 through 4-36 in Appendix C of the EA Amendment and are shown on Figure 4-1 Amended.

The distances from the centerlines of each applicable primary alternative route to the Boerne Stage Field Airport are provided in Tables 4-6 through 4-36 in Appendix C of the EA Amendment and its location is shown on Figure 4-1 Amended.

Known historical and archeological sites and National Register of Historic Places are listed and described with the approximate distance from the centerline for each of the primary alternative routes in Section 4.5.3 and Tables 4-4 through 4-36 of the EA Amendment.

The impacts on environmental integrity from the Project are summarized in Section 4.1 of the EA Amendment.

The primary alternative route lengths and route percentage parallel to other existing compatible ROW for each primary alternative route are provided in Table 4-1 Amended of the EA Amended.

Q. HAVE AN ADEQUATE NUMBER OF ALTERNATIVE ROUTES BEEN IDENTIFIED FOR THE COMMISSION TO CONDUCT A PROPER EVALUATION?

A. Yes. Considering the distance between the Project endpoints and nature of the study area, the 31 primary alternative routes included in the Application Amendment provide an

adequate number of geographically diverse alternative routes for evaluation by the Commission. To the extent that any additional routes comprised of primary alternative route segments contained in the Application Amendment are proposed by other parties to this proceeding, those would potentially expand the geographic diversity of the routes to be considered for this Project.

Q. DO YOU BELIEVE THAT THE SEGMENTS AND ROUTES IN THE AMENDED APPLICATION WERE IDENTIFIED IN COMPLIANCE WITH THE COMMISSION'S POLICY OF PRUDENT AVOIDANCE?

A. Yes. In my professional opinion, the primary alternative routes and segments presented in the Amended Application and EA Amendment were identified in accordance with the Commission's policy of prudent avoidance in that they reflect reasonable investments of money and effort in order to limit exposure to electric and magnetic fields.

VI. CONCLUSION

Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY?

A. Yes, it does.