

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

**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

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

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REBUTTAL TESTIMONY OF GEORGE J. TAMEZ, P.E.**

I. INTRODUCTION

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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.