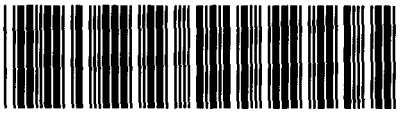

Control Number: 49715

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SOAH DOCKET NO. 473-20-0418
PUCT DOCKET NO. 49715

APPLICATION OF ENTERGY TEXAS, INC. TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR A 230-KV TRANSMISSION LINE IN LIBERTY AND HARRIS COUNTIES	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

TESTIMONY IN SUPPORT OF STIPULATION

OF

THOMAS A. MARTINEZ

ON BEHALF OF

ENTERGY TEXAS, INC.

MAY 2020

8i

TESTIMONY IN SUPPORT OF STIPULATION OF THOMAS A. MARTINEZ
ENTERGY TEXAS, INC.
SOAH DOCKET NO. 473-20-0418
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I. INTRODUCTION AND PURPOSE

Q1. PLEASE STATE YOUR NAME AND BUSINESS AFFILIATION.

A. My name is Thomas A. Martinez. I am employed by Entergy Services, LLC ("ESL"). My office is located at 10055 Grogans Mill Road, The Woodlands, Texas.

Q2. PLEASE STATE HOW YOU ARE EMPLOYED.

A. I am the Sr. Project Manager of Capital Projects for Entergy Texas, Inc.'s ("ETI" or "the Company") Transmission Business. My area of responsibility includes management of new transmission projects for ETI.

Q3. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. I am submitting this testimony to the Public Utility Commission of Texas ("Commission") on behalf of ETI.

Q4. HAVE YOU PREVIOUSLY FILED TESTIMONY OR PARTICIPATED IN THESE PROCEEDINGS?

A. Yes. I filed Direct Testimony in this proceeding on July 15, 2019. In addition, in my role as Manager of Capital Projects, I secured resources to form the project team and monitor team progress and performance throughout the entire life cycle of the Project. I also provided support to ETI in the negotiations that resulted in the settlement of this docket.

Q5. WHAT IS THE PURPOSE OF YOUR STIPULATION TESTIMONY?

A. Through this testimony, I address the settlement agreement on Stipulated Route No. 2 ("the Settlement Route"). My testimony provides an overview description of the route and explains that the Settlement Route best meets the PUCT criteria, is reasonable, and should be approved by the Commission.

II. OVERVIEW OF STIPULATION

Q6. PLEASE DESCRIBE THE ROUTE AGREED UPON BY PARTIES IN THE STIPULATION?

A. The Company and all intervenors came to an agreement on the Settlement Route. This route affects 0 habitable structures, has a length of 8.90 miles (fourth shortest), and has an estimated cost of $57,441,059 including both transmission and substation facilities costs, which is $67,098 higher than the originally proposed Route 2. The Settlement Route, a route very similar to the as-filed Route 2, remains the second least expensive route. I discuss in more detail below the Settlement Route and how it compares to the alternative routes evaluated.

Q7. WHICH INTERVENORS ARE DIRECTLY AFFECTED BY THE SETTLEMENT ROUTE?

A. The intervenors directly affected by the Settlement Route are Wolf Trot Properties LLC, Lake Houston Venture, LH Ranch LTD, and CH-B KINGLAND, LLC. All of the intervenors in this proceeding, including those directly affected by the Settlement Route, are signatories or are unopposed to this Stipulation.

Q8. HOW DOES THE SETTLEMENT ROUTE DIFFER FROM THE PROPOSED ROUTE NO. 2 INCLUDED IN THE COMPANY'S APPLICATION AT THE TIME OF FILING?

A. The Settlement Route includes a very minor modification to segments J and K1. See Attachment TM-S-1 to the Stipulation and Settlement Agreement for a map of the Settlement Route

Q9. HOW DOES THE SETTLEMENT ROUTE MEET THE REQUIREMENTS SET FORTH UNDER PURA § 37.056 AND 16 T.A.C. § 25.101?

A. In his Direct Testimony, Company witness Jeff Dicharry describes Route No. 2 and lists the various reasons Route No. 2 is beneficial and best meets the requirements set out in PURA and the PUCT Substantive Rules. Because Route 2 and the Settlement Route are very similar, the benefits are the same and the reasons discussed by Mr. Dicharry apply equally to the Settlement Route. The Settlement Route, when compared to Routes 1, 3, 4, 5, 6, 7, 8, 9, and 10:

- has the 2nd lowest overall estimated cost when compared to the alternative routes at $57,441,059;
- is the fourth shortest route, at 8.90 miles;
- has zero habitable structures within 300 feet of the centerline;
- has the second greatest length of route parallel to other existing compatible ROW, at 2.88

- has only one Interstate Highway, US Highway, or State Highway crossing (SH 99);
- does not cross any recorded historic or prehistoric sites; and
- has the second least length of route across high archaeological/historical site potential, at 3.02 miles.
- does not cross or within 1,000 feet of any parks/recreational areas;
- has no length of route across land irrigated by traveling systems;
- does not cross any gravel pits, mines, or quarries;
- has no electric transmission line crossings;
- has no FM or RM road crossings;
- has no cemeteries within 1,000 feet of the route;
- has no private use airstrips within 10,000 feet of the route centerline;
- has no heliports within 5,000 feet of the route centerline;
- is not within 20,000 feet of a public use airport having a runway greater than 3,200 feet;
- is not within 10,000 feet of a public use airport having a runway less than 3,200 feet;
- has no commercial AM radio transmitters within 10,000 feet of the route;
- has no FM radio transmitters, microwave towers, etc., within 2,000 feet of the route;
- has no existing water wells within 200 feet of the route;
- has no oil and gas wells within 200 feet of the route;

- has no estimated length of route within the foreground visual zone of US Highways and State Highways;
- has no estimated length of route within the foreground visual zone of FM or RM roads;
- has no estimated length of route within foreground visual zone of parks/recreational areas;
- crosses no known/occupied habitat of federally endangered or threatened species and does not cross or come within 1,000 feet of any sites listed or eligible for listing on the NRHP.

Based on these factors, the Company has determined that the Settlement Route best meets the criteria set forth in PURA Section 37.056 and 16 T.A.C. §. 25.101.

Q10. WHY DOES ETI RECOMMEND THE SETTLEMENT ROUTE OVER THE ROUTE RANKED HIGHEST BY POWER FROM A LAND USE AND ENVIRONMENTAL PERSPECTIVE?

A. As discussed in the Direct Testimonies of Company witness Mr. Dicharry and Mr. McClanahan, POWER Engineers ("POWER"), ETI's environmental routing consultant, ranked Route No. 1 as the highest. However, this ranking was solely from a land use and environmental perspective. Notably, Route No. 2, to which the Settlement Route is very similar, was ranked second by POWER. Based on the professional judgment of POWER's evaluators, the overall potential environmental impacts of all 10 routes presented in the Company's application are minimal, viable, and feasible. The Company's analysis took into account

additional factors such as cost, engineering design, and maintenance. These factors include accessibility and identified transmission and future distribution plans. Given their similarity, the conclusions from this analysis pertain equally to both Route 2 and the Settlement Route. As discussed above, the Settlement Route is the second least expensive of the primary alternative routes considered and is only $94,710 higher than the least expensive route. When taking all these factors into account, POWER's second highest scoring alternative route, Route No. 2, was assessed by the Company as the route that best met all the routing criteria as a whole. That assessment remains valid following the very minor modification to Route No.2 that resulted in the Settlement Route.

Q11. HOW DOES THE COST OF THE SETTLEMENT ROUTE COMPARE TO THE OTHER ROUTES?

A. While the Settlement Route is approximately $67,098 higher than the originally proposed Route 2, it is still the second lowest in overall cost when compared to the other routes and only $94,710 more than the least expensive route. Thus, the cost of the Settlement Route is reasonable.

Q12. WHY DOES ETI RECOMMEND THE MODIFICATIONS TO ROUTE NO. 2 RESULTING IN THE SETTLEMENT ROUTE?

A. During the course of this CCN application, Colony Ridge subdivided its property along segment J and K1. These properties were purchased by 7 new landowners. While ETI did notify these new landowners, they did not intervene in the case.

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- has only one Interstate Highway, US Highway, or State Highway crossing (SH 99);
- does not cross any recorded historic or prehistoric sites; and
- has the second least length of route across high archaeological/historical site potential, at 3.02 miles.
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- has no length of route across land irrigated by traveling systems;
- does not cross any gravel pits, mines, or quarries;
- has no electric transmission line crossings;
- has no FM or RM road crossings;
- has no cemeteries within 1,000 feet of the route;
- has no private use airstrips within 10,000 feet of the route centerline;
- has no heliports within 5,000 feet of the route centerline;
- is not within 20,000 feet of a public use airport having a runway greater than 3,200 feet;
- is not within 10,000 feet of a public use airport having a runway less than 3,200 feet;
- has no commercial AM radio transmitters within 10,000 feet of the route;
- has no FM radio transmitters, microwave towers, etc., within 2,000 feet of the route;
- has no existing water wells within 200 feet of the route;
- has no oil and gas wells within 200 feet of the route;

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- crosses no known/occupied habitat of federally endangered or threatened species and does not cross or come within 1,000 feet of any sites listed or eligible for listing on the NRHP.

Based on these factors, the Company has determined that the Settlement Route best meets the criteria set forth in PURA Section 37.056 and 16 T.A.C. §. 25.101.

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Q11. HOW DOES THE COST OF THE SETTLEMENT ROUTE COMPARE TO THE OTHER ROUTES?

A. While the Settlement Route is approximately $67,098 higher than the originally proposed Route 2, it is still the second lowest in overall cost when compared to the other routes and only $94,710 more than the least expensive route. Thus, the cost of the Settlement Route is reasonable.

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A. During the course of this CCN application, Colony Ridge subdivided its property along segment J and K1. These properties were purchased by 7 new landowners. While ETI did notify these new landowners, they did not intervene in the case.

Regardless, ETI believes the addition of these new landowners and the routing across their properties would have result in a higher impact to such landowners and higher cost to obtain the necessary easements as compared to the Settlement Route, where the landowner has agreed to new segments on their property.

Q13. WHAT ADDITIONAL INFORMATION IS PROVIDED REGARDING THE SETTLEMENT ROUTE?

A. My Exhibit TM-S-2 provides an updated Table 4-1 showing the results of the evaluation criteria for the Settlement Route. This exhibit was put together by POWER.

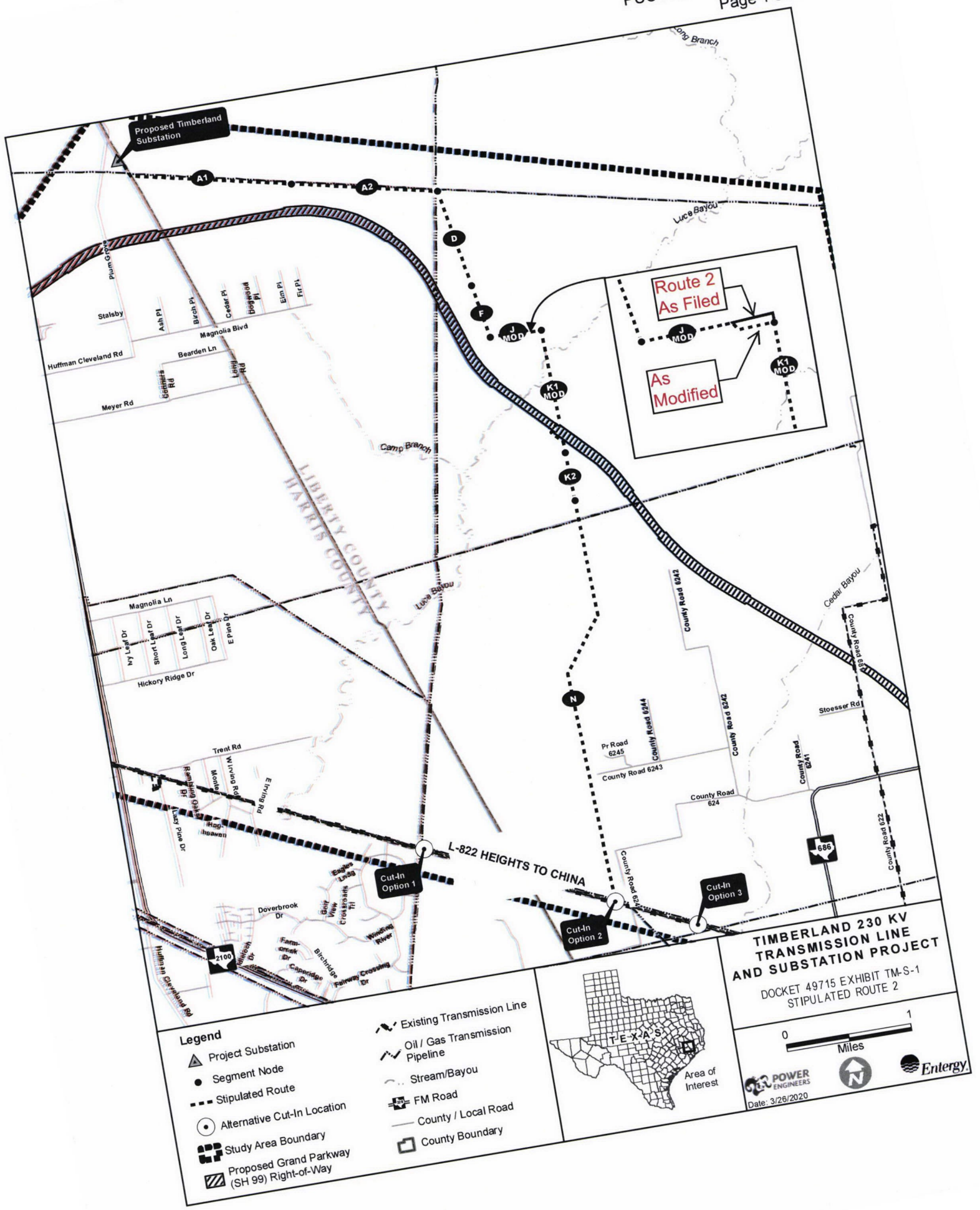
III. REASONABLENESS OF STIPULATION

Q14. WHAT IS THE COMPANY'S POSITION REGARDING COMMISSION APPROVAL OF THIS STIPULATION?

A. ETI has determined that the Settlement Route is the route that best addressed the criteria under PURA and the Commission's rules. Therefore, the Stipulation is reasonable and within the public interest. Furthermore, the Stipulation is supported by all intervening parties and represents a reasonable result. For these reasons and those listed earlier in my testimony and in ETI's application, the Settlement Route best meets the PUCT criteria and should be approved by the Commission.

Q15. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.


Proposed Timberland Substation
A1
A2
D
F
J MOD
K1 MOD
K2
N
Route 2 As Filed
As Modified
Plum Grove
Stalsby
Ash Pl
Birch Pl
Cedar Pl
Dogwood Pl
Elm Pl
Fir Pl
Magnolia Blvd
Bearden Ln
Huffman Cleveland Rd
Dennis Rd
Lahti Rd
Meyer Rd
Camp Branch
Luce Bayou
LIBERTY COUNTY
HARRIS COUNTY
Cedar Bayou
Magnolia Ln
Ivy Leaf Dr
Short Leaf Dr
Long Leaf Dr
Oak Leaf Dr
E Pine Dr
Hickory Ridge Dr
Trent Rd
Rambling Oaks Pl
Lazy Pine Dr
Hog Heaven
W Irving Rd
E Irving Rd
Eagles Landing
Golf View Crossroads Trl
Doverbrook Dr
Farmcreek Dr
Birchridge Dr
Caperidge Dr
Winding River
Fairway Crossing Dr
2100
County Road 6242
County Road 6244
County Road 6243
County Road 624
County Road 6241
Pr Road 6245
Stoesser Rd
County Road 622
686
L-822 HEIGHTS TO CHINA
Cut-In Option 1
Cut-In Option 2
Cut-In Option 3
TIMBERLAND 230 KV TRANSMISSION LINE AND SUBSTATION PROJECT
DOCKET 49715 EXHIBIT TM-S-1
STIPULATED ROUTE 2
0
1
Miles
Date: 3/26/2020
Legend
Project Substation
Segment Node
Stipulated Route
Alternative Cut-In Location
Study Area Boundary
Proposed Grand Parkway (SH 99) Right-of-Way
Existing Transmission Line
Oil / Gas Transmission Pipeline
Stream/Bayou
FM Road
County / Local Road
County Boundary
T E X A S
Area of Interest
POWER ENGINEERS
Entergy

DOCKET 49715 EXHIBIT TM-S-2

ENVIRONMENTAL DATA FOR STIPULATED ROUTE 2: A1-A2-D-F-J MOD-K1 MOD-K2-N

	Evaluation Criteria	
	Land Use	**SR 2**
1	Length of alternative route	8.90
2	Number of habitable structures[1] within 300 feet of the route centerline	0
3	Number of newly affected habitable structures[2] within 300 feet of the route centerline	0
4	Length of route utilizing existing electric transmission line right-of-way (ROW)	0
5	Length of route parallel to existing electric transmission line ROW	0
6	Length of route parallel to other existing compatible ROW (highway, roads, canals, railway, etc.)	2.88
7	Length of route parallel to apparent property lines[3] (or other natural or cultural features)	2.81
8	Length of route parallel to pipeline ROW	2.44
9	Length of route across parks/recreational areas[4]	0
10	Number of additional parks/recreational areas[4] within 1,000 feet of the route centerline	0
11	Length of route across cropland	0.7
12	Length of route across pasture/rangeland	0.1
13	Length of route across land irrigated by traveling systems (rolling or pivot type)	0
14	Length of route across gravel pits, mines, or quarries	0
15	Number of pipeline crossings	11
16	Number of electric transmission line crossings	0
17	Number of Interstate (IH), US Highway (US Hwy), and State highway (SH) crossings	1
18	Number of Farm-to-Market (FM) or Ranch-to-Market (RM) road crossings	0
19	Number of cemeteries within 1,000 feet of the route centerline	0
20	Number of private use airstrips within 10,000 feet of the route centerline	0
21	Number of heliports within 5,000 feet of the route centerline	0
22	Number of Federal Aviation Administration (FAA) registered airports[5] (runways >3,200 feet) within 20,000 feet of the route centerline	0
23	Number of FAA registered airports[5] (runways <3,200 feet) within 10,000 feet of the route centerline	0
24	Number of commercial amplitude modulation (AM) radio transmitters within 10,000 feet of the route centerline	0
25	Number of frequency modulation (FM radio) transmitters, microwave towers, etc within 2,000 feet of the route centerline	0
26	Number of existing water wells within 200 feet of the route centerline	0
27	Number of oil and gas wells within 200 feet of the route centerline (including dry or plugged wells)	0
	Aesthetics	
28	Estimated length of route within foreground visual zone[6] of Interstate, US, and State highways	0
29	Estimated length of route within foreground visual zone[6] of FM/RM roads	0
30	Estimated length of route within foreground visual zone[6] of parks/recreational areas[4]	0
	Ecology	
31	Length of route across bottomland/riparian woodlands	2.8
32	Length of route across upland forest	5.1
33	Acreage of route across National Wetland Inventory (NWI) mapped forested or scrub/shrub wetlands	23.3
34	Acreage of route across NWI mapped emergent wetlands	3.2
35	Length of route across known occupied habitat of federally listed endangered or threatened species	0
36	Length of route across open water (lakes, ponds, etc)	0
37	Number of stream/river/canal crossings	1
38	Length of route parallel (within 100 feet) to natural streams, rivers, or canals	2.9
39	Length of route across Federal Emergency Management Agency (FEMA) mapped 100-year floodplains	0.7
	Cultural Resources	
40	Number of recorded historic or prehistoric sites crossed by route	0
41	Number of additional recorded historic or prehistoric sites within 1,000 feet of route centerline	2
42	Number of National Register listed sites crossed by route	0
43	Number of additional National Register listed sites within 1,000 feet of route centerline	0
44	Length of route across high archaeological/historical site potential	3.02

[1]Single-family and multi-family dwellings, and related structures, etc , mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, schools or other structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis within 300 feet of the centerline of a transmission project of 230 kV or less

[2]Newly affected habitable structures are habitable structures within 300 feet of an alternative route that is currently not affected by an existing transmission line

[3]Property lines created by existing roads, highway, or railroad ROW are not "double-counted" in the length of route parallel to property lines criteria

[4]Defined as parks and recreational areas owned by a governmental body or an organized group, club, or church

[5]As listed in the Chart Supplement South Central U S (FAA 2018b formerly known as the Airport/Facility Directory South Central U S), FAA 2018a, and TxDOT 2018a

[6]One-half mile, unobstructed