



Control Number: 51023



Item Number: 481

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

APPLICATION OF THE 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 PROPOSED SCENIC
LOOP 138-KV TRANSMISSION
LINE IN BEXAR COUNTY

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS




DIRECT TESTIMONY OF RICHARD LEPERE
ON BEHALF OF INTERVENOR GUAJALOTE RANCH, INC.

Richard LePere files this, his Direct Testimony on behalf of Intervenor Guajalote Ranch, Inc., and stipulates that all parties may treat this Direct Testimony as though filed under oath.

Respectfully submitted,

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ATTORNEYS GUAJALOTE RANCH, INC.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed in the records of Docket 51023 on this 15th day of February, 2021.



Soledad M. Valenciano

1 **PLEASE STATE YOUR NAME FOR THE RECORD.**

2 My name is Richard LePere.

3 **ARE YOU PROVIDING DIRECT TESTIMONY ON BEHALF OF**
4 **INTERVENOR GUAJALOTE RANCH, INC.?**

5 Yes, I am.

6 **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

7 The purpose of my testimony is to state for the record that Guajalote Ranch, Inc.
8 opposes any of CPS's proposed segments that would cross its property.

9 **WHAT SEGMENTS ARE THOSE?**

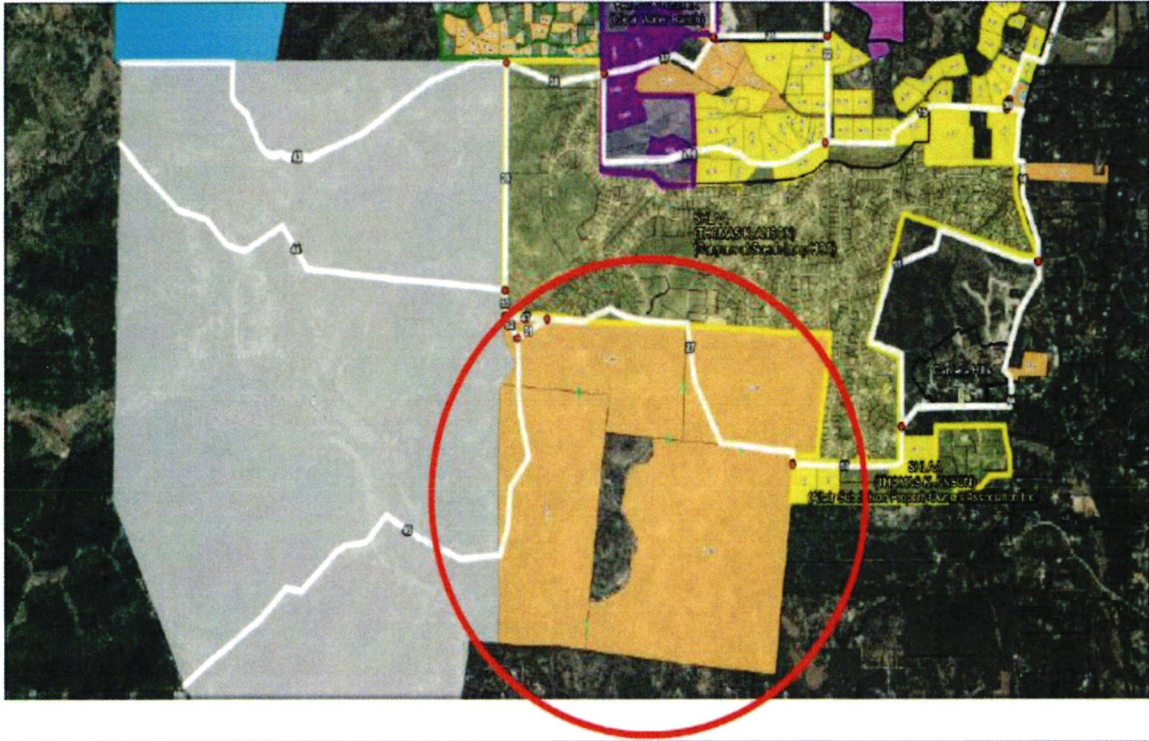
10 Segments 27, 45, 47, 51, 52, and 53.

11 **IS THE AERIAL IMAGE INCLUDED IN THIS TESTIMONY AN**
12 **ACCURATE DEPICTION OF YOUR PROPERTY AND HOW PROPOSED**
13 **SEGMENTS 27, 45, 47, 51, 52, AND 53 WILL CROSS IT?**

14 Referring to that aerial, Guajalote Ranch, Inc.'s property is shaded in tan and
15 enclosed generally within the red circle. Except for the unshaded "keyhole," this
16 aerial appears to accurately depict the property owned by Guajalote Ranch, Inc.
17 The unshaded "keyhole" is also owned by Guajalote Ranch. The proposed
18 segments that cross Guajalote Ranch are shown in white.

19 **DO YOU OPPOSE ANY OTHER SEGMENTS?**

20 Yes, I also oppose Segments 39, 43, and 44.



1

2 **DO YOU HAVE A PREFERENCE ON WHERE CPS'S LINE SHOULD BE**
3 **BUILT?**

4 Yes, I believe that CPS's chosen Route Z, which I believe may now be called
5 Route Z1, should be ordered by the PUC because it is a better overall choice under
6 the circumstances. I also support the Texas Parks and Wildlife Department's
7 choice of Route AA, which I believe may now be called Route AA1. I understand
8 that Routes Z and Z1, as well as AA and AA1, are substantially similar, and were
9 amended to include donated land.

10 **DOES THIS CONCLUDE YOUR TESTIMONY?**

11 Yes. Thank you.