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

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

DIRECT TESTIMONY
OF
SUNIL DWIVEDI, M.D.
ON BEHALF OF
ANAQUA SPRINGS HOMEOWNERS' ASSOCIATION

February 17, 2021

1 **DIRECT TESTIMONY OF SUNIL DWIVEDI, M.D.**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. Sunil Dwivedi. 5223 Hamilton Wolfe, San Antonio, Texas 78229.

4 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

5 A. On behalf of myself and Anaqua Springs Homeowners' Association. I have owned
6 property in Anaqua Springs since 2013 and have lived there since 2018.

7 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE PUBLIC
8 UTILITY COMMISSION OF TEXAS (“COMMISSION”)?**

9 A. No.

10 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

11 A. I am employed by Gastroenterology Consultants of San Antonio as a board certified
12 gastroenterologist.

13 **Q. PLEASE OUTLINE YOUR EDUCATIONAL AND PROFESSIONAL
14 QUALIFICATIONS.**

15 A. I completed my BA in biochemistry at Hamilton College in 1995. I completed my
16 medical degree at Universidad Autonoma de Guadalajara School of Medicine in
17 2001. I completed my internal medicine residency in 2005 and my
18 gastroenterology fellowship in 2010, both at the University of Texas Health Science
19 Center in San Antonio. From 2005-2010, I was an assistant professor in the liver
20 transplant division at the University of Texas Health Science Center in San
21 Antonio. From 2010 to the present, I have practiced gastroenterology at
22 Gastroenterology Consultants of San Antonio. I am board certified in
23 gastroenterology by the American Boards of Internal Medicine.

1 **Q. HAVE YOU PREPARED ANY EXHIBITS, SCHEDULES, OR STUDIES IN**
2 **CONNECTION WITH YOUR TESTIMONY?**

3 A. No.

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
5 **PROCEEDING?**

6 A. I am testifying in support of the modification to Route R1, which I am calling Route
7 R1 Modified.

8 **Q. CAN YOU TELL ME WHERE YOUR HOUSE IS LOCATED?**

9 A. My house is on the southern border of Anaqua Springs. It is listed in the Amended
10 Application as Habitable Structure 134. For ease of reference on the map, it is
11 directly north of the node that is at the intersection of Segments 38, 39, and 43.

12 **Q. CAN YOU EXPLAIN THE CONCERNS YOU HAVE ABOUT A**
13 **TRANSMISSION LINE RUNNING CLOSE TO YOUR HOME?**

14 A. Yes. I live in this home with my family. My wife and I have three children: twin
15 boy and girl who are 9 years old, and a daughter who is 13 years old. I am
16 concerned about having transmission line construction so close to my home.
17 Construction sites can seem like attractive playscapes for children, and a
18 transmission tower can seem like something fun to try to climb. The construction
19 noise would be disruptive as well. I have a home office and often work at home to
20 return patient phone calls and complete paperwork. Dr. Lauren Pankratz testifies
21 about her concerns related to electromagnetic fields around children, and I have
22 similar concerns.

1 **Q. ARE YOU AWARE OF A MODIFICATION THAT HAS BEEN PROPOSED**
2 **IN THIS CASE?**

3 A. Yes. I have had meetings with my neighbors and we are opposed to a line running
4 so close to our homes when it can be moved farther away from our homes without
5 impacting other existing homes. We do not understand why CPS would route the
6 line so close to our homes when there are no homes south of ours that would be
7 impacted by Route R1 Modified, as we have proposed.

8 **Q. DO YOU THINK THAT ANY OTHER LANDOWNER WHO WOULD**
9 **HAVE THIS TRANSMISSION LINE LOCATED ON THEIR PROPERTY**
10 **WOULD FEEL ANY DIFFERENTLY ABOUT IT THAN YOU?**

11 A. Probably not. I am keenly aware that no one wants a transmission line on their
12 property. However, I am also aware that transmission lines are often needed to
13 ensure a reliable electrical grid. And I know too that sometimes it is inevitable that
14 houses will be close to transmission lines. Yet, there is an option in this case to
15 move the line farther away from my home and my neighbors' homes without
16 encroaching on any other home and to do so in a manner that may be less expensive
17 than what is currently proposed. It is my understanding that there are no homes
18 along the modification we are proposing, and that the landowners have already
19 received notice about a transmission line on their properties. This would change
20 the location of the line, but the same landowners would have the lines on their
21 properties, and fewer homes would be directly impacted by the line.

1 The modification would move the line away from families and children into
2 undeveloped areas where people who decided to develop at a later time could
3 develop with full knowledge of the location of the lines.

4 **Q. DO YOU HAVE ANY CONCERNS ABOUT THE LINES RUNNING IN**
5 **FRONT OF THE ANAQUA SPRINGS ENTRANCE?**

6 A. Yes. Those concerns are addressed in the testimonies of the other witnesses
7 testifying on behalf of Anaqua Springs, and I will not repeat them here.

8 **Q. DO YOU HAVE ANY OTHER CONCERNS?**

9 A. My main concern is the safety and well-being of my family.

10 **Q. DO YOU HAVE ANY CLOSING REMARKS?**

11 A. We built our family home to be a safe haven, not a place to be constantly worried
12 about immediate and long-term dangers. Moving the proposed route farther from
13 existing families' homes would be the right thing to do.

14 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

15 A. Yes, it does.