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Addendum StartPage: 0



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

APPLICATION OF THE CITY OF SAN § BEFORE THE STATE OFFICE
ANTONIO ACTING BY AND §
THROUGH THE CITY PUBLIC §
SERVICE BOARD (CPS ENERGY) TO §
AMEND ITS CERTIFICATE OF § OF
CONVENIENCE AND NECESSITY §
FOR THE SCENIC LOOP 138-KV §
TRANSMISSION LINE IN BEXAR §
COUNTY § ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY
of the
CHARLENE JEAN ALVARADO LIVING TRUST

**DIRECT TESTIMONY OF
CHARLENE JEAN ALVARADO LIVING TRUST**

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ATTACHMENTS:

Attachment A-1	Photograph depicting family home.
Attachment A-2	Photograph depicting waterfall on the Property.
Attachment A-3	Photograph depicting the barn and bridge on the Property.
Attachment A-4	Photograph depicting the bluebonnet fields on the Property.
Attachment A-5	Photograph depicting the life-size dollhouse located on the Property.
Attachment A-6	Photograph depicting community gathering on the Property.
Attachment A-7	Photograph depicting community gathering on the Property.

1 Supreme Court on the Texas Children’s Commission. I chair the Children’s Court
2 Oversight Committee for the district courts and serve on various committees within the
3 Bexar County District Courts Administration. Previously, I have served on the San Antonio
4 Crime Coalition, St. John’s Lutheran Academy School Board, and as a Girl Scout Troop
5 Leader.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

7 A. I am testifying on behalf of my mother Charlene Jean Alvarado and the Charlene Jean
8 Alvarado Living Trust.

9 **Q. ARE YOU A DIRECTLY AFFECTED LANDOWNER?**

10 A. Yes.

11 **Q. CAN YOU DESCRIBE YOUR INTEREST IN SOAH DOCKET NO. 473-21-0247
12 AND PUC DOCKET NO. 51023.**

13 A. I intervened in this proceeding as a potentially affected landowner. My mother’s trust owns
14 an interest in property in Bexar County which will be impacted by the transmission line
15 and related construction proposed to be built by the City of San Antonio, acting by and
16 through the City Public Service Board (CPS Energy) (“CPS”) in this docket

17 **Q. HAVE YOU EVER PARTICIPATED OR TESTIFIED IN ANOTHER
18 PROCEEDING BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
19 (“PUC”)?**

20 A. No.

21 **II. DESCRIPTION OF PROPERTY**

22 **Q. PLEASE DESCRIBE YOUR PROPERTY.**

23 A. My mother’s trust owns an approximate 5-acre tract in Bexar County that will be impacted
24 by the proposed transmission line, if any route utilizing Segment 4 or 5, or Substation 3 is
25 approved by the PUC. This property has been identified by CPS as Tract IA-268, and is
26 hereinafter referred to as the “Property”.

27 **Q. IS THE PROPERTY THE SUBJECT OF YOUR TESTIMONY A PERMENANT
28 RESIDENCE?**

29 A. It is the permanent residence of my mother, Charlene Jean Alvarado.

1 **Q. WHICH ROUTE OR SUBSTATIONS DO YOU OPPOSE?**

2 A. I oppose the use of Segments 4 and 5. Therefore, I oppose the following Primary
3 Alternative Routes: D, E, G, H, I, J, K, L, and M. Further, I also oppose the use of
4 Substation 3.

5 **Q. PLEASE DESCRIBE THE PROPERTY'S CURRENT USES AND OPERATIONS.**

6 A. The Property is a peaceful, and serene rural residence. However, it is much more than that.
7 Among our family, and in much of the community, the Property is affectionately known
8 as Enchanted Oaks because of its beauty and its place for community gathering. It is home
9 to a beautiful 200+ year old live oak tree. It is incredibly scenic with enormous live oaks,
10 beautiful wild flowers and flora all over the property. Wildlife abounds on this land
11 including free roaming deer, squirrels, possums, raccoons and many species of birds.
12 Additionally, the property is a place of community gathering often used to host weddings,
13 bridal and baby showers, church retreats, various other retreats and team building events
14 for nearby UTSA clubs and organizations, school field trips, birthday parties and children's
15 events. The Property features a full size red barn, a life size walk-in doll house to host
16 children events, a beautiful reflection waterfall for meditation and retreats, a full puppet
17 studio used for puppetry parties, teacher workshops, and school field trips for shows
18 centered on anti-gang and anti-drug use. Across the street from the property is the rodeo
19 grounds and Scenic Loop Café which is a local place to gather, reconnect, and adds to the
20 quaint quality of this neighborhood.

21 **Q. HOW WOULD A TRANSMISSION LINE ON SEGMENTS 4 OR 5 AFFECT YOUR
22 PROPERTY?**

23 A. Use of Segments 4 or 5 interfere with the use of the Property as a rural residence, and affect
24 the many community uses described above.

25 **Q. HOW WOULD USE OF SUBSTATION 3 AFFECT YOUR PROPERTY?**

26 A. If the substation is built on the proposed Substation 3, it will transform the Property from
27 a peaceful rural residence, hosting many community and family events, into an industrial
28 property. Hosting community events such as church retreats or UTSA clubs will be
29 impossible. How can one meditate and reflect next to an industrial site? In this matter, there
30 is no reason for a substation to be built near several existing residences, and especially

1 adjacent to my family's Property. In addition, using Substation 3 (as opposed to Substation
2 6 or 7, as examples) forces the power line to detrimentally affect far more habitable
3 structures. I submit that the Substation 3 is the worst possible site for a substation on this
4 project.

5 **Q. HAVE YOU INCLUDED ANY PHOTOS OF YOUR PROPERTY AS PART OF**
6 **YOUR TESTIMONY?**

7 A. Yes, I have included several photographs labeled as Attachments A-1 – A-7.

8 **Q. CAN YOU DESCRIBE THOSE PHOTOGRAPHS?**

9 A. A-1 depicts our family home and my mother's permanent residence.

10 A-2 depicts the waterfall on the Property.

11 A-3 depicts the barn and bridge on the Property.

12 A-4 depicts the bluebonnet fields and wildlife habitat on the Property.

13 A-5 depicts the life-size dollhouse located on the Property that is used for many community
14 events and demonstrations.

15 A-6 depicts one of many community gatherings on the Property.

16 A-7 also depicts a community gathering on the Property.

17 **Q. IF THE TRANSMISSION LINE IS BUILT ON THE PROPERTY, DO YOU HAVE**
18 **ANY CONCERNS ABOUT HAVING ACCESS TO THE PROPERTY?**

19 A. Yes, every time my mother enters or exits the Property, she must cross under the power
20 line. It will also affect each and every person who would attend community events.

21 **Q. ARE THERE ANY EXISTING TRANSMISSION LINES THAT CROSS THE**
22 **PROPERTY?**

23 A. No.

24 III. REASONS FOR OPPOSITION TO ROUTE

25 Costs

26 **Q. ARE YOU CONCERNED WITH THE COSTS OF THIS PROJECT?**

27 A. Yes. As a user of electricity, I am concerned about the cost of any routes using Segments
28 4 and 5 because of the added cost to the Project. Routes Z and AA are projected to have
29 significantly less cost than any routes using Segments 4 and 5. Further, Substation 3 is
30 projected to have a cost substantially greater than all other Substation Sites. Substation 3

1 is projected to have a cost of \$11,004,617. For comparison, use of Substation 6 (which I
2 support) has a projected cost of \$9,807,084. Additionally, Substation 7 (which I support
3 in the alternative) has a projected cost of \$9,999,864. In both comparisons, it is projected
4 that use of Substation 3 will cost over \$2,000,000 more. Put another way, avoiding the use
5 of Substation 3 could save \$2,000,000. There are less costly alternatives to using Segments
6 4 or 5, or Substation 3.

7 **Habitable Structures**

8 **Q. ARE YOU CONCERNED ABOUT THE AFFECT ON THE HOUSE ON THE**
9 **PROPERTY AND OTHER HABITABLE STRUCTURES?**

10 A. Yes, I am very concerned. This house, again known as Enchanted Oaks, which is mother's
11 permanent residence, was chosen for its aesthetic benefits. Placing a line near this house,
12 and a substation next door would be a travesty. In my opinion, the most important thing to
13 protect is the daily lives and interactions between residents of the area, and this Project.
14 What could be more important than, where possible, to minimize the number of interactions
15 between people and the power lines and substations? My opinion is that nothing is more
16 important, and in this case protecting large numbers of residents can be accomplished
17 without impacting the Project. For example, Routes Q, R, and U affect only 4 habitable
18 structures. Route N affects only 8, Route F only 9, and Route P only 10. In contrast, every
19 route utilizing Segments 4 or 5 has at least 34 affected habitable structures.

20 Further, every single route utilizing Segments 4 or 5 have a corresponding route that is
21 shorter and affects fewer habitable structures. For example, Route Z utilizes Segments 54-
22 20-36-42-48- and 46 and affects only 30 habitable structures. Route I simply extends Route
23 Z past Substation 7 by adding Segments 5 and 14, and affects 12 more habitable structures,
24 42 in all. Adding Segments 5 and 14 adds length, affects an additional 12 habitable
25 structures and cost significantly more. Clearly, there are far better alternatives to utilizing
26 Segments 4 or 5, or Substation 3.

27 **Q. HOW WOULD YOU DESCRIBE THE AESTHETIC EFFECTS THAT THIS LINE**
28 **WOULD HAVE ON YOUR PROPERTY?**

1 A. The power line would affect our view, and we would have to cross under it every time we
2 enter the property. More importantly, the large industrial structure of Substation 3 would
3 completely destroy the residential character of the Property.

4 IV. ROUTES SUPPORTED

5 **Q. WHAT ROUTES DO YOU SUPPORT?**

6 A. I support all routes using Substation 6, which include Routes P, Q, R, S, T, U, V, and W.
7 Every single one of these routes affect fewer habitable structures than any route utilizing
8 Segments 4 or 5, or Substation 3. In particular, I support Route P, which affects only 10
9 habitable structures and costs just over \$43,000,000. As an alternative, I also support any
10 routes which utilize Substation 7, which include Routes X, Y, Z, AA, BB, and CC. Each
11 of these routes using Substation 7, are either far less costly or affect fewer habitable
12 structures, or both, than routes utilizing Segments 4, 5, or Substation 3. Routes Z, AA, and
13 Y are all less costly than any route utilizing Segment 4, 5, or Substation 3. Routes Y, Z,
14 AA, and BB all affect fewer habitable structures than any route utilizing Segments 4, 5 or
15 Substation 3.

16 IV. SUMMARY AND CONCLUSION

17 **Q. PLEASE SUMMARIZE YOUR POSITION IN THIS PROCEEDING REGARDING**
18 **THE ROUTING OF THE PROPOSED TRANSMISSION LINE.**


19 A. I support all routes that do not utilize Segments 4 or 5, or Substation 3. In particular, I
20 support Routes R, P, Z, and AA.

21 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

22 A. Yes, that concludes my testimony, subject to subsequent correction.

CERTIFICATE OF SERVICE

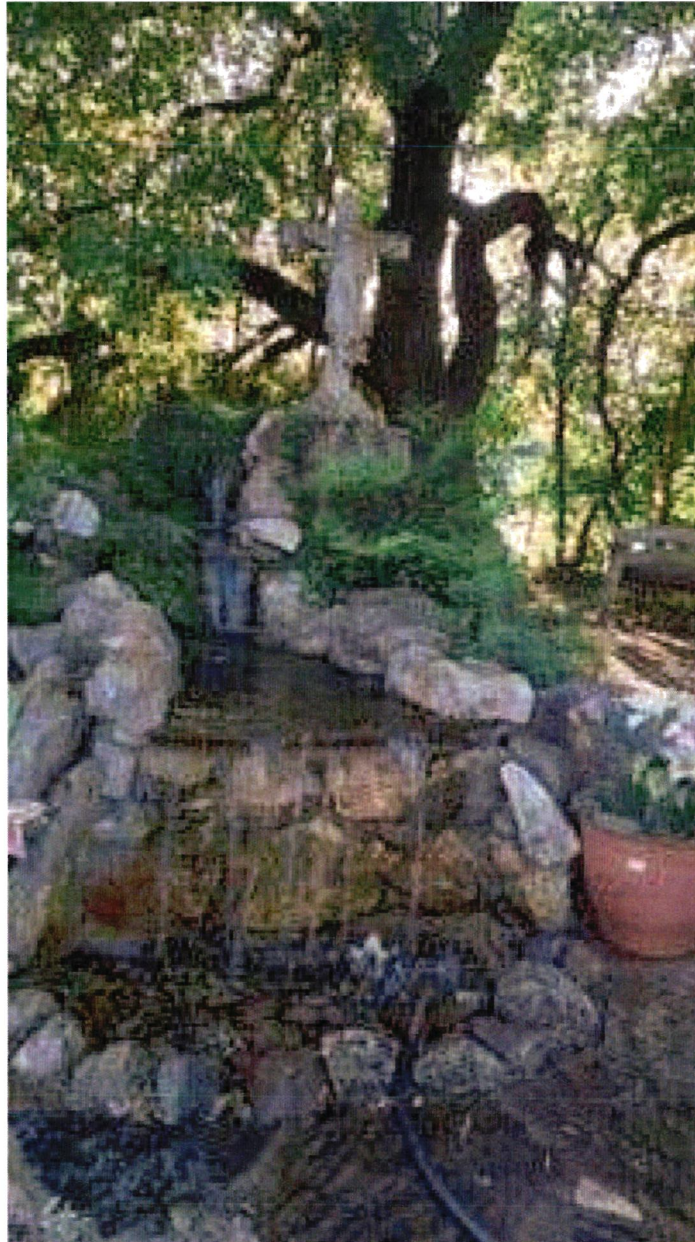
This is to certify that on the 17th day of February, 2021 a true and correct copy of the preceding document was served in accordance with SOAH Order No. 1 in this Docket.


Todd W. Boykin

Attachment A-1



Attachment A-2



Attachment A-3



Attachment A-4



Attachment A-5



Attachment A-6



Attachment A-7

