



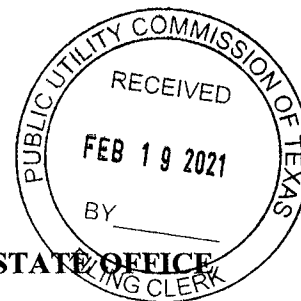
Control Number: 51023



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Addendum StartPage: 0

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 §

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**DIRECT TESTIMONY OF KURT A. ROHLMEIER AND ADRIANNA A. ROHLMEIER
ON BEHALF OF CLEARWATER RANCH POA**

Intervenors, Kurt L. Rohlmeier and Adrianna A. Rohlmeier on Behalf of Clearwater Ranch POA ("Clearwater Ranch") files this Direct Testimony, which is attached. Clearwater Ranch stipulates that this Direct Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

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ATTORNEYS FOR CLEARWATER RANCH

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on February 19, 2021, in accordance with Public Utility Commission Procedural Rule 22.74.

/s/Patrick L. Reznik

Patrick L. Reznik

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1
2
3
4 **I. INTRODUCTION**

5 QUESTION: PLEASE STATE YOUR NAME AND CURRENT ADDRESS FOR THE
6 RECORD.

7 ANSWER: Kurt and Adrianna Rohlmeier, 24706 Clearwater Run, San Antonio, TX 78255.
8
9

10 QUESTION: ARE YOU AN INTERVENOR IN SOAH DOCKET NO. AND PUC DOCKET
11 NO. 51023 AND ON WHOSE BEHALF ARE YOU TESTIFYING?
12

13 ANSWER: Yes. We are testifying on behalf of ourselves, Kurt and Adrianna Rohlmeier and
14 Clearwater Ranch POA, which we fully support.
15
16

17 QUESTION: HAVE YOU EVER TESTIFIED IN A PUBLIC UTILITY COMMISSION OF
18 TEXAS (“PUC” OR “COMMISSION”) PROCEEDING?
19

20 ANSWER: No.
21
22

23 QUESTION: BRIEFLY DESCRIBE YOUR OCCUPATION, EDUCATIONAL AND WORK
24 HISTORIES.
25

26 ANSWER: Kurt is a disabled Navy Veteran officer with a Masters degree and currently works at
27 USAA for the last 7 years. Before working at USAA, Kurt was a Navy F/A-18 pilot in the Navy
28 for 10 years. Adrianna has a Masters degree has worked at HEB corporate in consumer research
29 for 14 years.
30
31

32 QUESTION: WHERE IS YOUR PROPERTY LOCATED?
33

34 ANSWER: Our property is located at 24706 Clearwater Run, San Antonio, TX 78255. Lot 3. *See*
35 **Exhibit A.**
36
37

38 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?
39

40 ANSWER: We have owned our property since 2014.
41

1
2 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF BEXAR COUNTY, TEXAS?

3
4 ANSWER: Yes, we have lived in Bexar County since 2003.
5

6
7 **II. PURPOSE AND SCOPE OF TESTIMONY**
8

9
10 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?

11
12 ANSWER: The purpose of our testimony is to (a) describe our property; (b) describe the expected
13 impact of the proposed transmission line on our property; (c) voice our opposition against The City
14 of San Antonio, acting by and through the City Public Service Board (“CPS Energy”), using
15 Segments 25, 26a, 32, 37, 38, 39, and 43 and Routes F1, K, L, N1, P, Q1, R1, T1, U1, BB, and CC
16 which utilize these Segments; and (d) voice our support for Routes Z1 and AA1.
17

18
19 QUESTION: WHAT IS CLEARWATER RANCH POA’S CONCERNS ABOUT THE
20 PROPOSED TRANSMISSION LINE USING CPS ENERGY’S SEGMENTS 25, 26a, 37, 38, 39
21 AND 43 AND ROUTES F1, K, L, N1, P, Q1, R1, T1, U1, BB, AND CC?
22

23 ANSWER: In general, Clearwater Ranch is opposed to the construction of CPS Energy’s
24 transmission line through their community because of the following: (1) a 138-kV transmission
25 line will severely depreciate the value of the Clearwater Ranch properties; (2) a 138-kV
26 transmission line will severely detract from the scenic beauty and aesthetic values of the
27 Clearwater Ranch properties and area; (3) a 138-kV transmission line would negatively impact
28 community, economic, and historical values and the character, ecology, and biology of Clearwater
29 Ranch’s properties and area; (4) the Clearwater Ranch residents and visitors will have to drive
30 under or near a 138-kV transmission line on a regular basis; (5) for transmission lines crossing a
31 Clearwater Ranch property, they would be required to give third parties access to their properties,
32 which limits the privacy and control over our properties; (6) Clearwater Ranch has general
33 concerns about any buzzing of the 138 kV transmission line and general health and safety concerns
34 and concerns about living and being close to a 138 kV transmission line; and, (7) we have gone to
35 great lengths to preserve native Texas Hill Country and have established guarantees to preserve

1 the natural native flora and fauna of the Texas Hill Country. A 138 kV transmission line would
2 utterly destroy the protections that we have established and destroy this portion of undeveloped
3 Hill Country.

4
5
6 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**
7

8
9 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?

10
11 ANSWER: Yes. Our home is on the property within several hundred feet of one proposed
12 segment.

13
14
15 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS
16 ECOLOGICAL OR BIOLOGICAL FEATURES.

17
18 ANSWER: Our home is a mixture of pasture and hills with cedar, oak, and mountain laurel. Trees
19 mostly inhabit the parameter on three sides that block the views of the surrounding homes and
20 properties. The proposed route would mostly eliminate this important tree line that hides the
21 densely developed Sundance Ranch community on the other side of the proposed route.

22
23
24 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES.

25
26 ANSWER: We moved several times in San Antonio and this was our dream property. Close
27 enough to the city but enough space for our children to play outside without busy traffic by the
28 house requiring constant supervision. We take every precaution to preserve the local trees when
29 developing anything on the property.

30
31
32 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO
33 RESTORE THE LAND OR THE ENVIRONMENTAL QUALITY OF THE PROPERTY?

34
35 ANSWER: Yes, we have worked to provide a variety of habitats for local animals and control
36 invasive predators. We have preserved old growth oaks, even building our home in a place where
37 no oaks would need to be removed. Yearly we spread seeds of local flora and grasses and provide
38 areas of shelter for local wildlife.

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QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF SO, DESCRIBE THE GENERAL LOCATION.

ANSWER: Yes, there is one well site 100 feet north of the home near the north central area of the property.

QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO, DESCRIBE THE GENERAL LOCATION.

ANSWER: No.

QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF SO, DESCRIBE THE GENERAL LOCATION.

ANSWER: No.

QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR PROPERTY IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES PREVIOUSLY DESCRIBED.

ANSWER: We intend to build a barn in a natural clearing in the north area of the property.

QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES CROSS YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE PROPERTY.

ANSWER: Yes, on the western border of our property, there is a CPS electric line, which our neighborhood went at great expense to bury underground to preserve the natural beauty of the area. We do have an electricity distribution line that comes down to our driveway to serve only our home, and this too was buried underground at increased cost to us.

QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES ON YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE PROPERTY.

1
2 ANSWER: No.

3
4
5 QUESTION: WOULD THE LINKS THAT MIGHT IMPACT YOUR PROPERTY RUN
6 ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

7
8 ANSWER: Yes, along the eastern boundary of our property proposed Segment 32 would eliminate
9 the tree line that separates our home from Sundance Ranch. The tree line also has several game
10 trails and shelter locations that provide security for local wildlife. **See Exhibit A.**

11
12
13 QUESTION: HOW WOULD A 138-KV ELECTRIC TRANSMISSION LINE IMPACT YOUR
14 PROPERTY AND ITS OPERATIONS?

15
16 ANSWER: Proposed Segment 32 would eliminate a tree line that separates our home from
17 Sundance Ranch. This tree line is also the focal point of our home. We purposely built the home
18 with large windows looking at this tree line to fill the windows with natural beauty. This tree line
19 is also the portion of our habitat that is all natural growth to provide cover for wildlife that traverses
20 and inhabits the area.

21
22
23 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE
24 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

25
26 ANSWER: Not on the line within our property, but this route would logically run to another
27 section that would cross the neighborhood road that is the only access to our home.

28
29
30 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF CPS
31 ENERGY BUILDS A 138-KV TRANSMISSION LINE ON YOUR PROPERTY.

32
33 ANSWER: We designed everything about our home to take advantage of the view to the east.
34 Many large windows, our back patio, the view of the pool, all have the backdrop of the east tree
35 line where the proposed line would go and eliminate. The biggest impact would be to the value of
36 the home itself. It would appear we designed our home to look at power lines.

1
2 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU
3 HAVE ANY CONCERNS ABOUT CPS ENERGY HAVING ACCESS TO YOUR PROPERTY?
4

5 ANSWER: Yes, we have the general concerns of landowners who are required to give third parties
6 access to their property. Also, this would materially affect the use of our property. We hope that
7 CPS will respect our property.

8
9
10 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU
11 HAVE ANY OTHER CONCERNS?
12

13 ANSWER: We have general safety and health concerns for living around transmission lines and
14 EMF issues. Because potential buyers may be aware of medical studies available on the Internet
15 arguing, correctly or not, a connection between high-powered transmission lines causing health
16 problems and possible cancer, we are concerned about a negative stigma being attached to our
17 property and the possible devaluation of our property value. In addition, the buzzing sounds
18 emanating from high-voltage transmission lines would be bothersome for people living near them.

19
20
21 QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE ADMINISTRATIVE
22 LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO CONSIDER IN THIS
23 PROCEEDING?
24

25 ANSWER: Yes, our children regularly play and explore the natural areas of the property. Besides
26 the loss of a large portion of this wooded area, it also exposes them to the possible health issues of
27 playing in the direct vicinity of the transmission line. In addition to that, it opens our property to
28 having a direct view to our home and eliminates the privacy from Sundance Ranch that was key
29 to our purchase of the property.

30
31 DO YOU HAVE ANY CONCERNS ABOUT SEGMENT 42a THAT IS UTILIZED IN ROUTES
32 Z1 AND AA1?
33

1 ANSWER: No, while our children attend McAndrew Elementary of Northside Independent School
2 District, this segment does not cross the entrances/exit, is the behind the school, and away from
3 where the children play.

4
5
6 **IV. CONCLUSION AND RECOMMENDATIONS**
7

8
9 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS PROCEEDING
10 REGARDING CPS ENERGY'S PROPOSED ALTERNATIVE ROUTES F1, K, L, N1, P, Q1,
11 R1, T1, U1, BB, AND CC AND CPS ENERGY'S PREFERRED ROUTES 1 AND AA1Z?
12

13 ANSWER: We oppose CPS Energy's Alternative Routes F1, K, L, N1, P, Q1, R1, T1, U1, BB,
14 and CC and any Route using Segments 25, 26a, 32, 37, 38, 39, and 43. We support CPS Energy's
15 Routes Z1 and AA1 as the route(s) that best meet(s) the overall community values and PURA §
16 37.056(c)(4) and P.U.C. SUBST. R. 25.101(b)(3)(B).

17
18 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?
19

20 ANSWER: Yes.



ROHLMEIER KURT & ADRIANNA - Lot 3
 +/- 11.2210 Acres - Bexar County

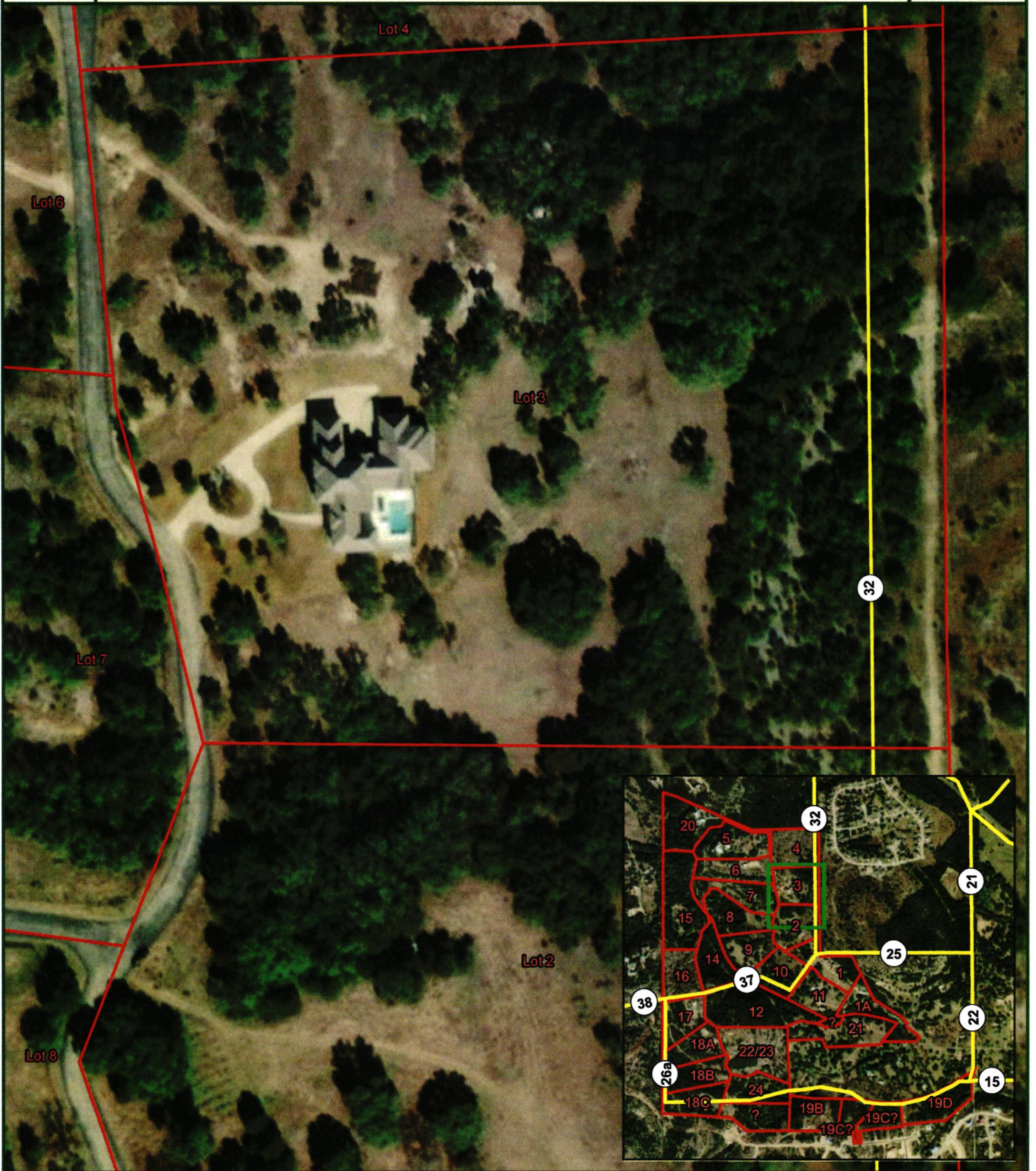




EXHIBIT A

 Lot
 Route

