

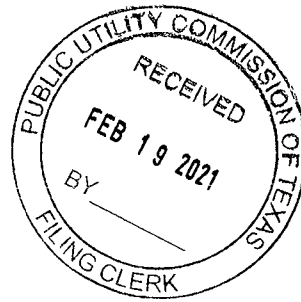


Control Number: 51023



Item Number: 527

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 CONVENIENCE § OF  
AND NECESSITY FOR THE PROPOSED §  
SCENIC LOOP 138-KV TRANSMISSION §  
LINE IN BEXAR COUNTY § ADMINISTRATIVE HEARINGS

**DIRECT TESTIMONY OF KURT M. OHRMUNDT AND BRENDA D. OHRMUNDT  
ON BEHALF OF CLEARWATER RANCH POA**

Intervenors, Kurt M. Ohrmundt and Brenda D. Ohrmundt 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,

BRAUN & GRESHAM, PLLC

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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 Brenda Ohrmundt, 25010 Clearwater Creek, San Antonio, TX 78255.  
8  
9

10 QUESTION: ARE YOU AN INTERVENOR IN SOAH DOCKET NO. 473-21-0247 AND PUC  
11 DOCKET NO. 51023 AND ON WHOSE BEHALF ARE YOU TESTIFYING?  
12

13 ANSWER: Yes. We are testifying on behalf of ourselves, Kurt and Brenda Ohrmundt, 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 graduate of University of Wisconsin at Oshkosh with a Bachelors in both  
27 Marketing and Spanish, worked in the medical sales industry for over 15 years and is currently a  
28 Division Manager at Berlin Packaging. Brenda is a graduate of Texas A&M University with a  
29 Bachelors and Masters in Accounting, worked as an auditor at Deloitte & Touche for five years  
30 after college, and is currently the External Reporting Director at Pioneer Energy Services where  
31 she has worked for the past ten years.  
32  
33

34 QUESTION: WHERE IS YOUR PROPERTY LOCATED?  
35

36 ANSWER: Our property is located at 25010 Clearwater Creek, San Antonio, TX 78255. Lot 7.  
37

38 ***See Exhibit A.***  
39

40 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?

1  
2 ANSWER: We have owned the property since 2013.  
3  
4

5 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF BEXAR COUNTY, TEXAS?  
6

7 ANSWER: Yes, Brenda was born and raised in this area (Boerne) until attending college and  
8 working in Houston for five years. Kurt has lived in the area since they moved here in 2010, first  
9 living in Helotes for approximately 5 years.  
10

11  
12 **II. PURPOSE AND SCOPE OF TESTIMONY**  
13

14  
15 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?  
16

17 ANSWER: The purpose of our testimony is to (a) describe our property; (b) describe the expected  
18 impact of the proposed transmission line on our property; (c) voice our opposition against The City  
19 of San Antonio, acting by and through the City Public Service Board (“CPS Energy”), using  
20 Segments 25, 26a, 32, 37, 38, 39, and 43 and Routes F1, K, L, N1, P, Q1, R1, T1, U1, BB, and CC  
21 which utilize these Segments; and (d) voice our support for Routes Z1 and AA1.  
22

23  
24 QUESTION: WHAT IS CLEARWATER RANCH POA’S CONCERNS ABOUT THE  
25 PROPOSED TRANSMISSION LINE USING CPS ENERGY’S SEGMENTS 25, 26a, 37, 38, 39  
26 AND 43 AND ROUTES F1, K, L, N1, P, Q1, R1, T1, U1, BB, AND CC?  
27

28 ANSWER: In general, Clearwater Ranch is opposed to the construction of CPS Energy’s  
29 transmission line through their community because of the following: (1) a 138-kV transmission  
30 line will severely depreciate the value of the Clearwater Ranch properties; (2) a 138-kV  
31 transmission line will severely detract from the scenic beauty and aesthetic values of the  
32 Clearwater Ranch properties and area; (3) a 138-kV transmission line would negatively impact  
33 community, economic, and historical values and the character, ecology, and biology of Clearwater  
34 Ranch’s properties and area; (4) the Clearwater Ranch residents and visitors will have to drive  
35 under or near a 138-kV transmission line on a regular basis; (5) for transmission lines crossing a  
36 Clearwater Ranch property, they would be required to give third parties access to their properties,

1 which limits the privacy and control over our properties; and (6) Clearwater Ranch has general  
2 concerns about any buzzing of the 138 kV transmission line and general health and safety concerns  
3 and concerns about living and being close to a 138 kV transmission line; and, (7) we have gone to  
4 great lengths to preserve native Texas Hill Country and have established guarantees to preserve  
5 the natural native flora and fauna of the Texas Hill Country. A 138 kV transmission line would  
6 utterly destroy the protections that we have established and destroy this portion of undeveloped  
7 Hill Country.

8  
9  
10 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**  
11

12  
13 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?  
14

15 ANSWER: Yes. Our home is on the property.  
16  
17

18 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS  
19 ECOLOGICAL OR BIOLOGICAL FEATURES.  
20

21 ANSWER: Our property is a fully developed residential property. The entire property is integral  
22 to our home. The property is a mixture of old oaks, mountain cedar and pasture, plenty of wildlife  
23 habitat and some horse pasture.  
24  
25

26 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES.  
27

28 ANSWER: This is our home. Our family includes us, Kurt and Brenda, and our two young girls  
29 who we want to raise outside the city, in a home surrounded by the beauty of nature and wildlife  
30 and the freedom from the city that this property and our community currently provide.  
31  
32

33 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO  
34 RESTORE THE LAND OR THE ENVIRONMENTAL QUALITY OF THE PROPERTY?  
35

36 ANSWER: Yes, we have a wildlife plan that includes feeding the birds and turkeys, retaining key  
37 wildlife habitat, removal of fire ants, provision of water source for wildlife, etc. The proposed CPS  
38 routes impacting our neighborhood would be very destructive to the sanctuary this neighborhood

1 provides to the wildlife. We are surrounded by bigger and ever expanding neighborhoods with  
2 little to no habitat for the wildlife and our contiguous lots in this neighborhood provide a creek  
3 bed, trees, grass, water and general sanctuary for the wildlife in the area.

4  
5  
6 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF SO,  
7 DESCRIBE THE GENERAL LOCATION.

8  
9 ANSWER: Yes, one that is close to our home and there is an existing well that we believe served  
10 the ranch prior to our ownership.

11  
12  
13 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO, DESCRIBE  
14 THE GENERAL LOCATION.

15  
16 ANSWER: No.

17  
18  
19 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF SO,  
20 DESCRIBE THE GENERAL LOCATION.

21  
22 ANSWER: No.

23  
24  
25 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR PROPERTY  
26 IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES PREVIOUSLY  
27 DESCRIBED.

28  
29 ANSWER: This is to be our permanent home, and home for our children when they grow up as  
30 long as they or their children want to live here. However, its monetary value is also very important  
31 to us as we may need to sell the home to pay for medical/retirement costs.

32  
33  
34 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES CROSS  
35 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE  
36 PROPERTY.

37  
38 ANSWER: There are CPS electric lines, which our neighborhood went at great expense to bury  
39 underground to preserve the natural beauty of the area. We do have an electricity line that comes



1 across our property to serve only our home, and this was buried underground at increased cost to  
2 us.

3  
4  
5 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES ON  
6 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE  
7 PROPERTY.

8  
9 ANSWER: No.

10  
11  
12 QUESTION: WOULD THE LINKS THAT MIGHT IMPACT YOUR PROPERTY RUN  
13 ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

14  
15 ANSWER: No. However, there is not a place on our property or within our home that the view  
16 would not be destroyed by the proposed lines.

17  
18  
19 QUESTION: HOW WOULD A 138-KV ELECTRIC TRANSMISSION LINE IMPACT YOUR  
20 PROPERTY AND ITS OPERATIONS?

21  
22 ANSWER: The lines would destroy the value of our home which faces one of the lines directly  
23 and we would never be able to sell the home for the value we have in it. Worse, the lines would  
24 destroy the aesthetics, beauty and tranquility of the nature that we desperately sought when we  
25 purchased this property.

26  
27  
28 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE  
29 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

30  
31 ANSWER: Yes, we would have to drive along and under transmission lines along Huntress and  
32 within our neighborhood.

33  
34  
35 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF CPS  
36 ENERGY BUILDS A 138-KV TRANSMISSION LINE ON YOUR PROPERTY.

1 ANSWER: While we are not directly impacted by any proposed Segment of this transmission  
2 line, Segments 32 and 37 would destroy the aesthetic views of our home, as we face them from  
3 every view of our home, patio, pasture, driveway, pool, etc.

4  
5  
6 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU  
7 HAVE ANY CONCERNS ABOUT CPS ENERGY HAVING ACCESS TO YOUR PROPERTY?

8  
9 ANSWER: The proposed segments are not directly on our property.

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

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

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

27  
28 ANSWER: Yes, we bought this property for the natural beauty and wildlife that reside here, which  
29 would be destroyed by installation of the lines both in and through our neighborhood. We believe  
30 lines should be placed alongside existing lines and roads when at all possible, and should never  
31 cut directly through an established neighborhood such as is proposed with Clearwater Ranch. We  
32 purchased this property in order to be surrounded by the big beautiful lots on all sides and these  
33 proposed routes through neighborhood and property lines (including segment 37) are egregious.

1 DO YOU HAVE ANY CONCERNS ABOUT SEGMENT 42a THAT IS UTILIZED IN ROUTES  
2 Z1 AND AA1?

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

7

8

#### 9 **IV. CONCLUSION AND RECOMMENDATIONS**

10

11

12 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS PROCEEDING  
13 REGARDING CPS ENERGY'S PROPOSED ALTERNATIVE ROUTES F1, K, L, N1, P, Q1,  
14 R1, T1, U1, BB, AND CC AND CPS ENERGY'S PREFERRED ROUTES Z1 AND AA1?

15

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

19

20 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?

21

22 ANSWER: Yes.





**OHRMUNDT KURT M & BRENDA D - Lot 7**  
**+/- 12.3600 Acres - Bexar County**



EXHIBIT A

 Lot  
 Route

Feet  
 0 40 80 160  
