



Control Number: 51023



Item Number: 530

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 PUBLIC UTILITIES § OF § ADMINISTRATIVE HEARINGS

**DIRECT TESTIMONY OF ALEJANDRO MEDINA**  
**ON BEHALF OF CLEARWATER RANCH POA**

Intervenor, Alejandro Medina 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

P.O. Box 1148 (Mailing)  
Dripping Springs, Texas 78620  
14101 Hwy. 290 W., Bldg. 1100 (Physical)  
Austin, Texas 78737  
512-894-5426 (telephone)  
512-894-3405 (fax)

/s/Patrick L. Reznik  
Patrick L. Reznik  
State Bar No. 16806780  
[preznik@braungresham.com](mailto:preznik@braungresham.com)  
Carly Barton  
State Bar No. 24086063  
[cbarton@braungresham.com](mailto:cbarton@braungresham.com)

**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

**TABLE OF CONTENTS**

I. INTRODUCTION .....4

II. PURPOSE AND SCOPE OF TESTIMONY .....5

III. DESCRIPTION OF PROPERTY AND THE LINE’S IMPACT .....6

IV. CONCLUSION AND RECOMMENDATIONS .....9

EXHIBIT A MAP OF PROPERTY .....4, 10

1  
2  
3  
4 **I. INTRODUCTION**

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

7 ANSWER: Alejandro Medina, 2 Sarazen Court, San Antonio, TX 78257.  
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: No, I am testifying on behalf of Clearwater Ranch POA, which I fully support.  
14  
15

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

19 ANSWER: No.  
20  
21

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

25 ANSWER: I am a Real Estate Developer.  
26  
27

28 QUESTION: WHERE IS YOUR PROPERTY LOCATED?  
29

30 ANSWER: My properties are located in the Clearwater Ranch community, Lots 10, 12, and 15A  
31 and 15B ("15") ***See Exhibit A.***  
32  
33

34 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?  
35

36 ANSWER: I have owned the property for 16 years.  
37  
38

39 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF BEXAR COUNTY, TEXAS?  
40

41 ANSWER: Yes.  
42  
43  
44

1 **II. PURPOSE AND SCOPE OF TESTIMONY**  
2  
3

4 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?  
5

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

12  
13 QUESTION: WHAT IS CLEARWATER RANCH POA’S CONCERNS ABOUT THE  
14 PROPOSED TRANSMISSION LINE USING CPS ENERGY’S SEGMENTS 25, 26a, 37, 38, 39  
15 AND 43 AND ROUTES F1, K, L, N1, P, Q1, R1, T1, U1, BB, AND CC?  
16

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

1  
2 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**  
3  
4

5 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?  
6

7 ANSWER: Not at this time.  
8  
9

10 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS  
11 ECOLOGICAL OR BIOLOGICAL FEATURES.  
12

13 ANSWER: My properties overlook Leon Creek and also has frontage at Leon Creek. It is rough  
14 terrain and heavily wooded.  
15  
16

17 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES.  
18

19 ANSWER: The properties are used for a bird sanctuary and ecological reserve. There is the  
20 potential to study some unique wildlife in the area.  
21  
22

23 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO  
24 RESTORE THE LAND OR THE ENVIRONMENTAL QUALITY OF THE PROPERTY?  
25

26 ANSWER: Yes, I have installed bird feeders and maintain a Wildlife Management exemption. In  
27 addition, I have cleaned up the sections of Leon Creek which are on my property.  
28  
29

30 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF SO,  
31 DESCRIBE THE GENERAL LOCATION.  
32

33 ANSWER: No.  
34  
35

36 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO, DESCRIBE  
37 THE GENERAL LOCATION.  
38

39 ANSWER: No.  
40  
41

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

3  
4 ANSWER: No.  
5

6  
7 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR PROPERTY  
8 IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES PREVIOUSLY  
9 DESCRIBED.

10  
11 ANSWER: We are planning to have a vineyard and horses on the properties.  
12

13  
14 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES CROSS  
15 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE  
16 PROPERTY.

17  
18 ANSWER: There is CPS electric line, which our neighborhood went at great expense to bury  
19 underground to preserve the natural beauty of the area.  
20

21  
22 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES ON  
23 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE  
24 PROPERTY.

25  
26 ANSWER: No.  
27

28  
29 QUESTION: WOULD THE LINKS THAT MIGHT IMPACT YOUR PROPERTY RUN  
30 ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

31  
32 ANSWER: YES! Segment 37 would impact the boundary lines of Lots 10 and 12. **See Exhibit**  
33 **A.**  
34

35  
36 QUESTION: HOW WOULD A 138-KV ELECTRIC TRANSMISSION LINE IMPACT YOUR  
37 PROPERTY AND ITS OPERATIONS?

38  
39 ANSWER: Segment 37 would destroy our future uses for Lots 10 and 12. Specifically, Lot 10  
40 would have two turning structures on it. It would destroy the natural ecological preserve, remove  
41 numerous trees, and harm the wildlife. Countless trees would have to be removed.



1  
2  
3 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE  
4 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

5  
6 ANSWER: Yes.  
7

8  
9 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF CPS  
10 ENERGY BUILDS A 138-KV TRANSMISSION LINE ON YOUR PROPERTY.

11  
12 ANSWER: The transmission line would destroy the view, trees, privacy, ecosystem and the  
13 sanctuary I intend to build.

14  
15  
16 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU  
17 HAVE ANY CONCERNS ABOUT CPS ENERGY HAVING ACCESS TO YOUR PROPERTY?

18  
19 ANSWER: Yes, we have the general concerns of landowners who are required to give third parties  
20 access to their property. Also, this would materially affect the use of our property. We hope that  
21 CPS will respect my property.

22  
23  
24 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU  
25 HAVE ANY OTHER CONCERNS?

26  
27 ANSWER: We have general safety and health concerns for living around transmission lines and  
28 EMF issues. Because potential buyers may be aware of medical studies available on the Internet  
29 arguing, correctly or not, a connection between high-powered transmission lines causing health  
30 problems and possible cancer, we are concerned about a negative stigma being attached to our  
31 property and the possible devaluation of our property value. In addition, the buzzing sounds  
32 emanating from high-voltage transmission lines would be bothersome for people living near them.

33  
34  
35 QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE ADMINISTRATIVE  
36 LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO CONSIDER IN THIS  
37 PROCEEDING?  
38

1 ANSWER: Yes, Clearwater Ranch is a large acreage community, intended to offer a safe and  
2 peaceful environment in touch with nature.

3  
4  
5 **IV. CONCLUSION AND RECOMMENDATIONS**  
6

7  
8 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS PROCEEDING  
9 REGARDING CPS ENERGY'S PROPOSED ALTERNATIVE ROUTES F1, K, L, N1, P, Q1,  
10 R1, T1, U1, BB, AND CC AND CPS ENERGY'S PREFERRED ROUTES Z1 AND AA1?  
11

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

16  
17 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?  
18

19 ANSWER: Yes.



**HMAM LTD - Lot 10**  
**+/- 11.600 Acres - Bexar County**

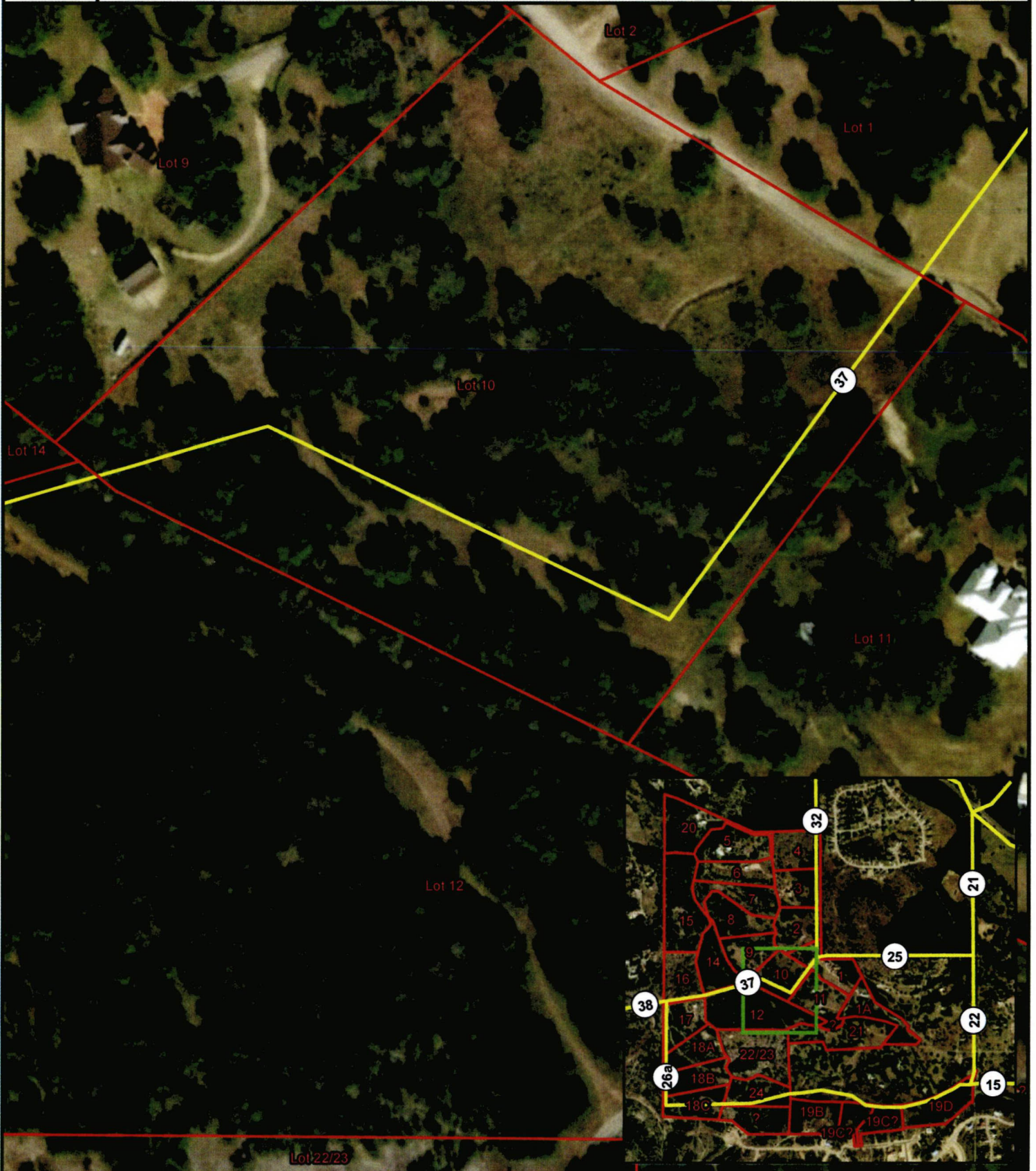
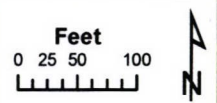


EXHIBIT A

 Lot  
 Route



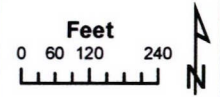


# DELACRUZ ALEJANDRO MEDINA - Lot 12

+/- 24.2920 Acres - Bexar County

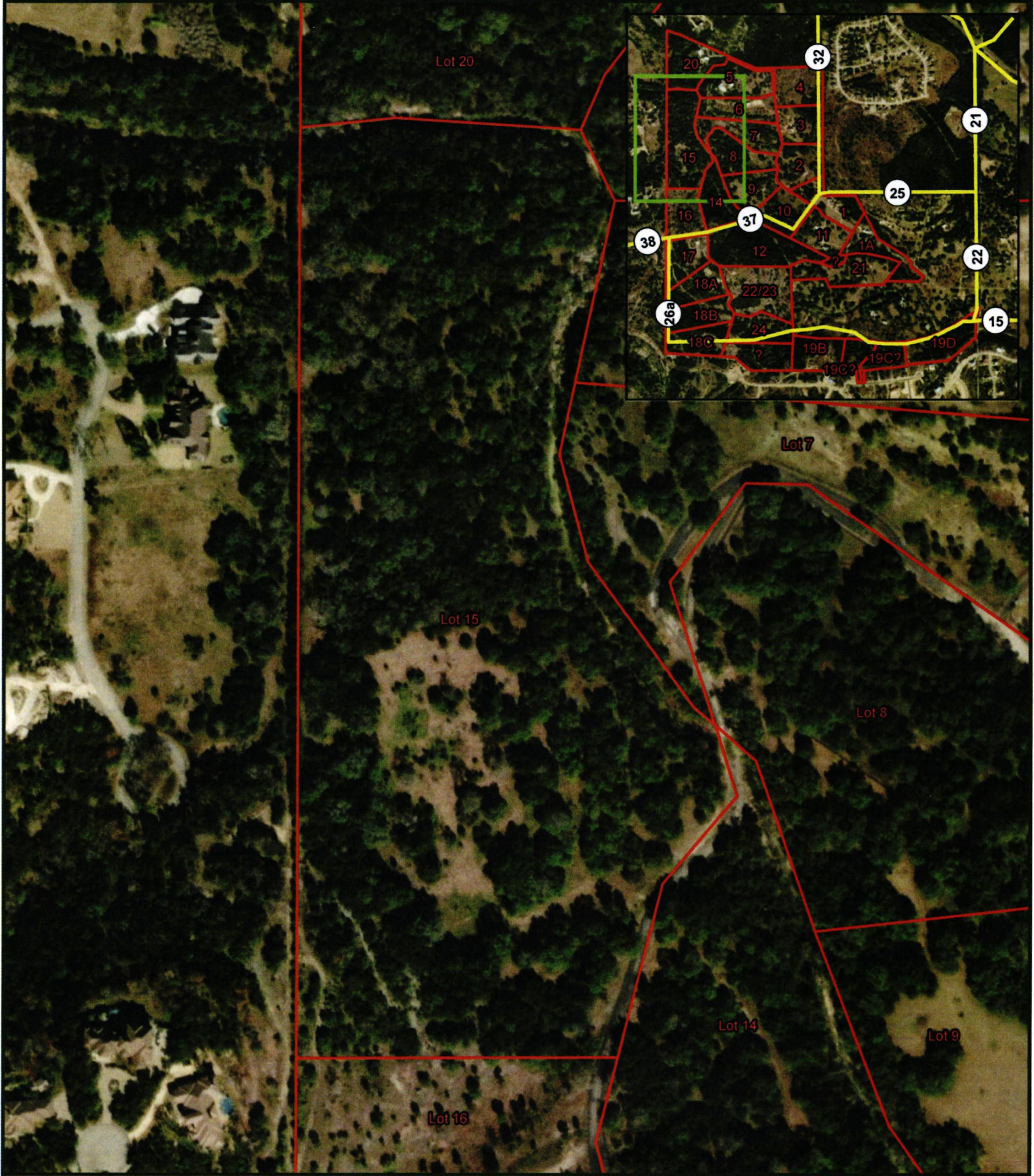


 Lot  
 Route





**HMAM LTD - Lot 15**  
**+/- 22.8000 Acres - Bexar County**



 Lot  
 Route

