

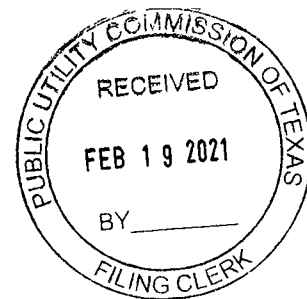


Control Number: 51023



Item Number: 532

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 PAOLO SALVATORE/CLEAR RUN LLC
ON BEHALF OF CLEARWATER RANCH POA

Intervenor, Paolo Salvatore/Clear Run LLC 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

532

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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EXHIBIT A MAP OF PROPERTY 4, 6, 7, 10

1
2
3
4 **I. INTRODUCTION**

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

7 ANSWER: Paolo Salvatore/Clear Run LLC, 24603 Clearwater Run, 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. I am testifying on behalf of myself, Paolo Salvatore/Clear Run LLC 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: Paolo Salvatore is a graduate of The University of Dallas with Bachelors of Science
27 in Biology. Currently is owner of Torre Crane L.P. and President of CFS Forming Structures, both
28 companies headquartered in Bexar County
29
30

31 QUESTION: WHERE IS YOUR PROPERTY LOCATED?
32

33 ANSWER: My property is located at 24603 Clearwater Run, San Antonio, TX 78256. Lot 11. *See*
34 **Exhibit A.**
35
36

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

39 ANSWER: I have owned the property for 1 year.
40
41

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

1
2 ANSWER: Yes.
3
4

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

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

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

16
17 QUESTION: WHAT IS CLEARWATER RANCH POA’S CONCERNS ABOUT THE
18 PROPOSED TRANSMISSION LINE USING CPS ENERGY’S SEGMENTS 25, 26a, 37, 38, 39
19 AND 43 AND ROUTES F1, K, L, N1, P, Q1, R1, T1, U1, BB, AND CC?
20

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

1 utterly destroy the protections that we have established and destroy this portion of undeveloped
2 Hill Country.

3
4
5 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**
6

7
8 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?
9

10 ANSWER: Yes, my home is on property and within several hundred feet of two of CPS's proposed
11 Segments. *See Exhibit A.*

12
13
14 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS
15 ECOLOGICAL OR BIOLOGICAL FEATURES.

16
17 ANSWER: The property is a fully developed residential lot with many large heritage oaks and
18 pasture.

19
20
21 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES.

22
23 ANSWER: This is my final home that I will retire in and one day, I will pass it on to my children.
24

25
26 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO
27 RESTORE THE LAND OR THE ENVIRONMENTAL QUALITY OF THE PROPERTY?
28

29 ANSWER: Yes, natural trees have been maintained including heritage oak trees, water sources
30 have been maintained for birds along with birdhouses. If Segment 37 was to be constructed it
31 would impact the oak trees and thus impact the natural habitat for wildlife.
32

33
34 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF SO,
35 DESCRIBE THE GENERAL LOCATION.
36

37 ANSWER: Yes, one well centrally located on property
38

39
40 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO, DESCRIBE
41 THE GENERAL LOCATION.
42

1 ANSWER: No.
2
3

4 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF SO,
5 DESCRIBE THE GENERAL LOCATION.
6

7 ANSWER: No.
8
9

10 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR PROPERTY
11 IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES PREVIOUSLY
12 DESCRIBED.
13

14 ANSWER: None, this is my permanent home
15
16

17 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES CROSS
18 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE
19 PROPERTY.
20

21 ANSWER: Yes, there is a CPS line that our neighborhood went at great expense to bury
22 underground to preserve the natural beauty of the area, all lines feeding home and structure are
23 also buried underground.
24
25

26 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES ON
27 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE
28 PROPERTY.
29

30 ANSWER: No.
31
32

33 QUESTION: WOULD THE LINKS THAT MIGHT IMPACT YOUR PROPERTY RUN
34 ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?
35

36 ANSWER: Yes. Segment 37 would be on the northwestern boundary of my property. **See Exhibit**
37 **A.**
38
39

40 QUESTION: HOW WOULD A 138-KV ELECTRIC TRANSMISSION LINE IMPACT YOUR
41 PROPERTY AND ITS OPERATIONS?

1
2 ANSWER: Segment 37 would require removal of several trees on my property which would cause
3 environmental harm and destroy wildlife habitat.

4
5
6 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE
7 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

8
9 ANSWER: No.

10
11
12 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF CPS
13 ENERGY BUILDS A 138-KV TRANSMISSION LINE ON YOUR PROPERTY.

14
15 ANSWER: The transmission line would be an unnatural eyesore, destroy several trees, wildlife
16 habitat, and the natural beauty and tranquility of my property. It would also devalue my property.

17
18
19 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU
20 HAVE ANY CONCERNS ABOUT CPS ENERGY HAVING ACCESS TO YOUR PROPERTY?

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

25
26
27 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU
28 HAVE ANY OTHER CONCERNS?

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

1 QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE ADMINISTRATIVE
2 LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO CONSIDER IN THIS
3 PROCEEDING?
4

5 ANSWER: Yes, I purchased the property to be in a natural environment, these lines would ruin
6 the natural beauty and wildlife of the area and my property.
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 §
19 37.056(c)(4) and P.U.C. SUBST. R. 25.101(b)(3)(B).
20

21 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?
22

23 ANSWER: Yes.



CLEAR RUN LLC - Lot 11

+/- 11.1000 Acres - Bexar County

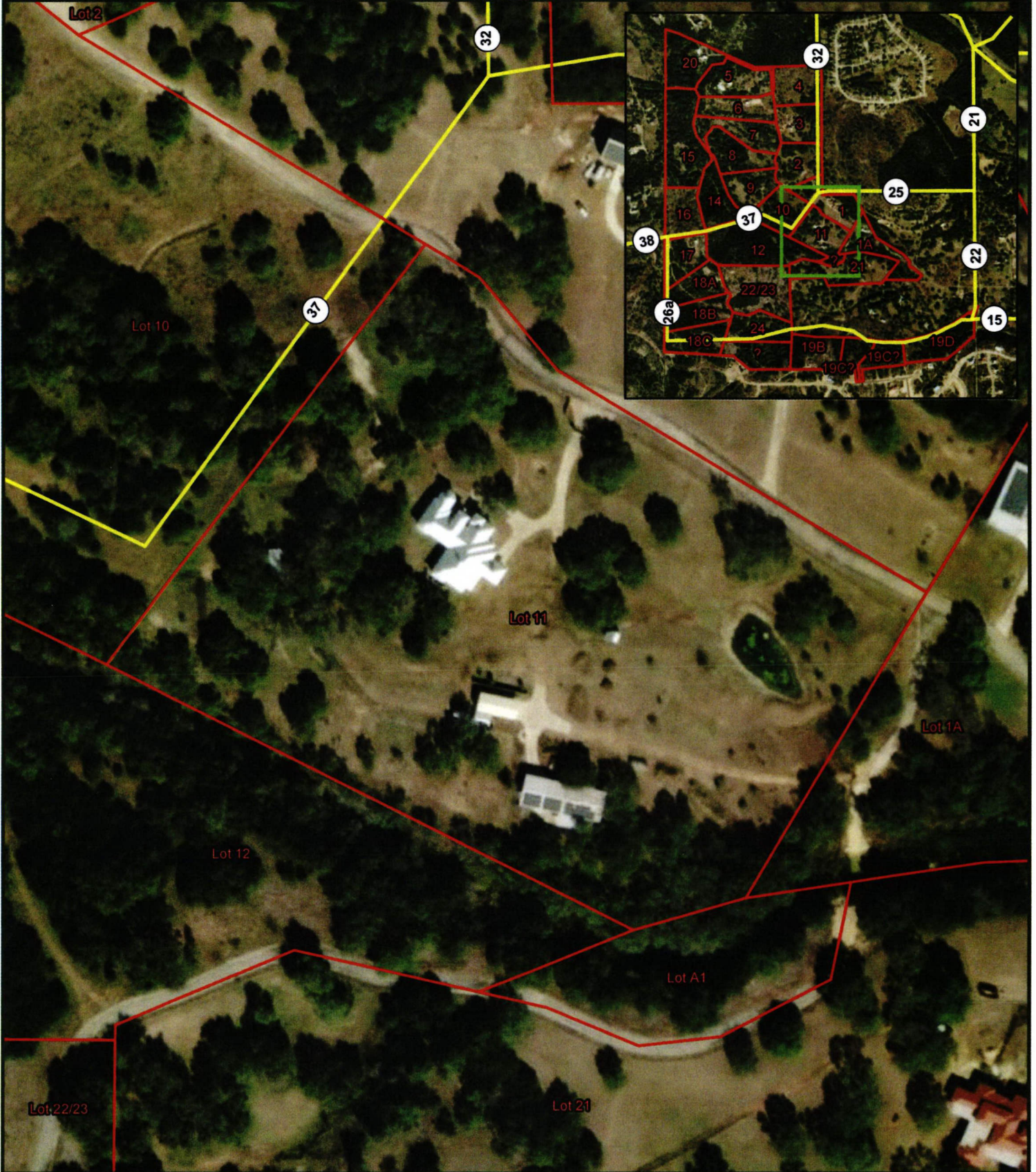


EXHIBIT A

Lot
 Route

