



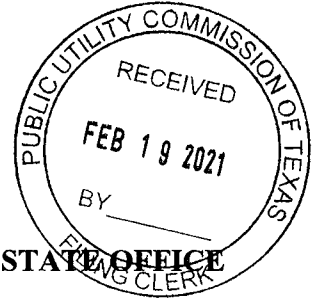
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SOAH DOCKET NO. 473-21-0247  
PUC DOCKET NO. 51023



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 CARLOS AND ROSA GUZMAN/CRG PROPERTIES LLC  
ON BEHALF OF CLEARWATER RANCH POA**

Intervenor, Carlos Guzman and Rosa Guzman/CRG Properties LLC on Behalf of Clearwater Ranch POA (“Clearwater Ranch”) files this Direct Testimony, which is attached. Carlos Guzman and Rosa Guzman/CRG Properties LLC is an Intervenor through the purchase of the property from Intervenor Lonnie W. Arbuthnot. 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: Carlos and Rosa Guzman/CGR Properties LLC, 0 Huntress Lane San Antonio, TX  
8 78255.

9  
10  
11 QUESTION: ARE YOU AN INTERVENOR IN SOAH DOCKET NO. 473-21-0247 AND PUC  
12 DOCKET NO. 51023 AND ON WHOSE BEHALF ARE YOU TESTIFYING?

13  
14 ANSWER: Yes. We are testifying on behalf of ourselves, Carlos & Rosa Guzman/CGR  
15 Properties, LLC and Clearwater Ranch POA, which we fully support.

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

20  
21 ANSWER: No.

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

26  
27 ANSWER: Carlos started a customs broker's agency, Laredo BSL, 20 years ago. BSL continues  
28 to operate, but Carlos is now fully operating GRT Transportation. This trucking company was  
29 founded in April 2011. Additionally, he & his wife run CRG Properties in which they develop  
30 commercial & residential projects for sale & rent.

31  
32  
33 QUESTION: WHERE IS YOUR PROPERTY LOCATED?

34  
35 ANSWER: The property is located at 0 Huntress Lane, San Antonio, TX 78255 (Lots 22 and 23).  
36 We purchased the property from Intervenor Lonnie W. Arbuthnot three months ago. **See Exhibit**  
37 **A.**

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

1  
2 ANSWER: We have owned the property for 3 months.  
3  
4

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

7 ANSWER: Yes.  
8  
9

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

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

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

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

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

1 and concerns about living and being close to a 138 kV transmission line; and, (7) we have gone to  
2 great lengths to preserve native Texas Hill Country and have established guarantees to preserve  
3 the natural native flora and fauna of the Texas Hill Country. A 138 kV transmission line would  
4 utterly destroy the protections that we have established and destroy this portion of undeveloped  
5 Hill Country.

6  
7 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**  
8  
9

10 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?  
11

12 ANSWER: Not currently, but we will be constructing our home on our property and it is close to  
13 CPS's proposed routes.  
14

15  
16 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS  
17 ECOLOGICAL OR BIOLOGICAL FEATURES.  
18

19 ANSWER: Our property contains a mixture of old oaks, mountain cedar, and pasture. Trees  
20 almost fully surround the property.  
21

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

25 ANSWER: We have currently started our plans to build our forever home on the property and  
26 plan to retire here. We enjoy family time, gardening, and enjoying the outdoors.  
27

28  
29 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO  
30 RESTORE THE LAND OR THE ENVIRONMENTAL QUALITY OF THE PROPERTY?  
31

32 ANSWER: Yes, we have several bird feeders installed around the property for Wildlife  
33 Management. We will be planting additional natural trees, and implementing a plan to restore the  
34 natural grasses around the property. If the line were to be constructed through our property, many  
35 trees including old growth oaks would be destroyed.  
36  
37

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

3  
4 ANSWER: We are finishing up our water contract and one well site will be installed.  
5

6  
7 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO, DESCRIBE  
8 THE GENERAL LOCATION.

9  
10 ANSWER: No.  
11

12  
13 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF SO,  
14 DESCRIBE THE GENERAL LOCATION.

15  
16 ANSWER: No.  
17

18  
19 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR PROPERTY  
20 IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES PREVIOUSLY  
21 DESCRIBED.

22  
23 ANSWER: This will be our permanent home.  
24

25  
26 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES CROSS  
27 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE  
28 PROPERTY.

29  
30 ANSWER: No.  
31

32  
33 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES ON  
34 YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY CROSS THE  
35 PROPERTY.

36  
37 ANSWER: No.  
38

39  
40 QUESTION: WOULD THE LINKS THAT MIGHT IMPACT YOUR PROPERTY RUN  
41 ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

42  
43 ANSWER: No.  
44



1  
2 QUESTION: HOW WOULD A 138-KV ELECTRIC TRANSMISSION LINE IMPACT YOUR  
3 PROPERTY AND ITS OPERATIONS?  
4

5 ANSWER: We believe removal of these trees would cause environmental harm by destroying the  
6 habitat of the wildlife that resides on the property.  
7

8  
9 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE  
10 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.  
11

12 ANSWER: No, however, when we drive on the property, we would be faced with the unattractive  
13 sight of the line.  
14

15  
16 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF CPS  
17 ENERGY BUILDS A 138-KV TRANSMISSION LINE ON YOUR PROPERTY.  
18

19 ANSWER: Our property is surrounded by trees, which would be removed, exposing the property  
20 and removing a key aspect of the aesthetic value of the property.  
21

22  
23 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU  
24 HAVE ANY CONCERNS ABOUT CPS ENERGY HAVING ACCESS TO YOUR PROPERTY?  
25

26 ANSWER: Yes, we have the general concerns of landowners who are required to give third parties  
27 access to their property. Also, this would materially affect the use of our property. I hope that CPS  
28 will respect my property.  
29

30  
31 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU  
32 HAVE ANY OTHER CONCERNS?  
33

34 ANSWER: We have general safety and health concerns for living around transmission lines and  
35 EMF issues. Because potential buyers may be aware of medical studies available on the Internet  
36 arguing, correctly or not, a connection between high-powered transmission lines causing health  
37 problems and possible cancer, we are concerned about a negative stigma being attached to our

1 property and the possible devaluation of our property value. In addition, the buzzing sounds  
2 emanating from high-voltage transmission lines would be bothersome for people living near them.

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

8  
9 ANSWER: Yes, we bought this property for the natural beauty and wildlife that reside here, which  
10 would be destroyed by installation of the lines.

11  
12  
13 **IV. CONCLUSION AND RECOMMENDATIONS**  
14

15  
16 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS PROCEEDING  
17 REGARDING CPS ENERGY'S PROPOSED ALTERNATIVE ROUTES F1, K, L, N1, P, Q1,  
18 R1, T1, U1, BB, AND CC AND CPS ENERGY'S PREFERRED ROUTES Z1 AND AA1?

19  
20 ANSWER: We oppose CPS Energy's Alternative Routes F1, K, L, N1, P, Q1, R1, T1, U1, BB,  
21 and CC and any Route using Segments 25, 26a, 32, 37, 38, 39, and 43. We support CPS Energy's  
22 Routes Z1 and AA1 as the route(s) that best meet(s) the overall community values and PURA §  
23 37.056(c)(4) and P.U.C. SUBST. R. 25.101(b)(3)(B).

24  
25 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?

26  
27 ANSWER: Yes.





**CRG PROPERTIES LLC - Lot 22/23**  
 +/- 21.0200 Acres - Bexar County



EXHIBIT A

