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DIRECT TESTIMONY AND EXHIBITS OF BRITTANY SYKES

COMMISSIONER
FILING CLERK

APPLICATION OF THE CITY OF SAN	§	BEFORE THE STATE OFFICE
ANTONIO TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	OF
AND NECESSITY FOR THE	§	
SCENIC LOOP 138-KV TRANSMISSION	§	ADMINISTRATIVE HEARINGS
LINE IN BEXAR COUNTY	§	

DIRECT TESTIMONY AND EXHIBIT

OF

BRITTANY SYKES

1 **Q. PLEASE STATE YOUR NAME AND ADDRESS.**

2 A. My name is Brittany Sykes. My address is 26127 Mark Osborne, San Antonio, Texas 78255.

3 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

4 A. On behalf of myself.

5 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE PUBLIC UTILITY**
6 **COMMISSION OF TEXAS (COMMISSION)?**

7 A. No

8 **Q. HAVE YOU PREPARED ANY EXHIBITS, SCHEDULES, OR STUDIES IN**
9 **CONNECTION WITH YOUR TESTIMONY?**

10 A. Yes, there is one Exhibit (Exhibit A) attached.

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

12 A. The purpose of my testimony is to ask the Commission to highly consider the number of
13 habitable structures within 300 ft of proposed routes. I urge the Commission to select routes
14 that have few numbers of habitable structures within the 300 ft threshold when selecting a
15 substation and route.

16 **Q. WHAT ROUTES ARE YOU MOST CONCERNED WITH?**

17 A. I am most concerned with routes using Segment 17. Routes A, B1, E, G1, H, and X1 include
18 Segment 17 and have many habitable structures that would be directly affected and are within
19 300 ft of the proposed Routes. The current number of habitable structures within 300 ft of each
20 route that includes Segment 17 are listed below:

21 Route A has 69 habitable structures

22 Route B1 has 61 habitable structures

23 Route E has 60 habitable structures

24 Route G1 has 52 habitable structures

25 Route H has 61 habitable structures

26 Route X1 has 40 habitable structures

27 **Q. DO YOU HAVE ANY OTHER INFORMATION THAT SHOULD BE CONSIDERED**
28 **REGARDING SEGMENT 17?**

29 A. Yes, CPS has identified 20 habitable structures on Segment 17. However, it has come to the
30 attention of the Serene/Scenic Hills subdivision that there is a new subdivision, Scenic Crest,
31 that is currently under construction. The unit currently under construction appears to have 19

1 additional habitable structures located within 300 ft of Segment 17 (see Exhibit A).
2 However, as you can see on Exhibit A, there will be many more additional homes built in
3 later units that will also be within 300 ft of Segment 17. CPS did not include any part of this
4 New development on their inventory maps.

5 **Q. ARE THERE ANY OTHER ITEMS THAT CPS DID NOT INCLUDE ON THEIR**
6 **CONSTRAINT & INVENTORY MAPS THAT YOU FEEL THE COMMISSION**
7 **SHOULD KNOW ABOUT?**

8 A. Yes, there are numerous water wells on Segment 17 in the Serene/Scenic Hill neighborhood
9 that CPS did not include on their constraint map. There are two water wells, that I'm aware of,
10 that sit off the back property line, where Segment 17 is located.

11 **Q. WHAT ROUTES DO YOU NOT SUPPORT?**

12 A. I do not support routes that include Segment 17 because of the high number of habitable
13 structures within 300 ft and the factors that CPS did not consider, including the planned
14 development and water wells not shown on the constraints and inventory maps.

15 **Q. ARE THERE ROUTES YOU SUPPORT, THAT YOU WOULD LIKE THE COMMISSION**
16 **TO CONSIDER?**

17 A. Yes, I support the Routes below which have the least number of habitable structures located
18 within 300 ft. I'm also including the estimated cost CPS provided for each route below:

19 Route Q1 has 6 habitable structures (\$45,890,914)

20 Route U1 has 6 habitable structures (\$50,562,563)

21 Route R1 has 7 habitable structures (\$43,522,858)

22 Route N1 has 11 habitable structures (\$46,803,781)

23 Route P has 12 habitable structures (\$43,408,742)

24 There is only one other Route that has less than 20 habitable structures within 300 ft. Route F1
25 has 12 habitable structures but uses Substation 2 which is located at a busy and well-seen
26 intersection (the corner of Scenic Loop and Toutant Beauregard). Route F1 is also the second
27 most costly (\$49,658,757) of these six route options. Therefore I do not support route F1.

28 **Q. Does this conclude your testimony?**

29 A. Yes

Exhibit A

