



Control Number: 51023



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SOAH Docket No. 473-21-024
PUC Docket No. 51023

FILED
PUBLIC UTILITY COMMISSION
SAN ANTONIO, TEXAS

In Re: Application of the City of San Antonio	*	
Acting by and through the City Public Service	*	
Board (CPS Energy) to amend its Certificate	*	Before the State Office of
Of Convenience and Necessity for the	*	Administrative Hearings
Proposed Scenic Loop 138-kV Transmission	*	
Line Project in Bexar County, Texas	*	

Statement of Position and Testimony of Roy R. Barrera, Jr.

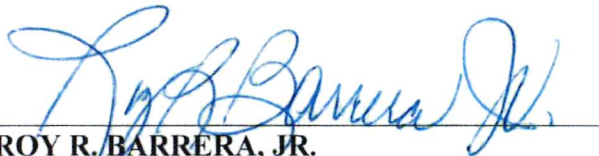
1. My name is Roy R. Barrera, Jr., and I have been a licensed practicing attorney in the State of Texas since 1976.
2. My physical home and mailing address is 26690 Toutant Beauregard Road, Boerne, Texas 78006. I live on my family ranch known as the Arci-Bar 7 Ranch.
3. I own my home and surrounding acres which lies within the confines of the ranch. My wife Sally of 47 years, and I have lived on this ranch since 1973. We have two sons, Roy III and Mark who also reside on the ranch with their respective spouses and children.
4. As you face my home, my neighbor on my right is my sister, Carmen Barrera Ramirez. My sons, Mark and Roy live on the ranch to my left.
5. My wife and I have had a horse and cattle operation on the ranch since 1974, known as SR Bar Farm and Ranch. I raise registered Beefmaster cattle and registered Quarter horses.
6. I hereby adopt the factual recitations regarding the history and improvements of the Arci-Bar 7 Ranch as set forth in the testimonial statements of my sister, Carmen B. Ramirez, and Roy R. Barrera, Sr., my father, and of Roy R. Barrera, III, my son, as if each were fully set forth herein verbatim.
7. I wholly and completely object to Segments 28, 29, 30, 31, 35, and the meeting point of Segments 31, 35 and 36 for the following reasons set forth in their respective statements. Additionally, to be clear, from the present status of property ownership, Segments 28, 30, and 31 cut directly across our ranch and do not follow any property boundary whatsoever. Conceivably, at the time of drafting of the original segment routes, those lines did originate on boundaries of the Arci-Bar 7 Ranch and the property owned by Ms. Lola Moonfrog. These are the boundaries of the sought after Conservation Easement which is still a viable end result for the approximate 100 acres on the east boundary of the Ranch. Roy R. Barrera Sr. has repurchased that property from Ms. Moonfrog in an effort to better the presentation of contiguous acreage and easement access to better the possibility of the grant of the Conservation Easement on that property. As a result of the

re-purchase of that acreage by Mr. Barrera, Sr. Segments 28 and 31 wholly fail to follow any property lines and in fact dissect in multiple directions our family ranch.

8. With all due respect, I do not believe that any proposed segment or route which touches or crosses the "Barrera Ranch", which has been in our family since 1971, is practical, logical, or financially sensible for CPS Energy to adopt.

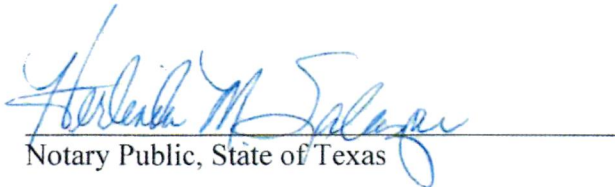
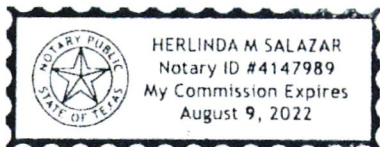
Wherefore premises considered, I respectfully request that CPS Energy run their new utility lines in or adjacent to existing utility corridors, roads or rail lines instead of fragmenting my property or the Arci-bar 7 Ranch owned by my family with Segments 28, 29, 30, 31 and 35.

Respectfully submitted,



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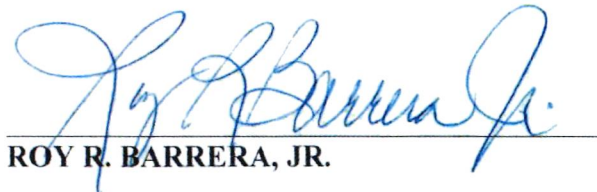
SWORN and SUBSCRIBED before me, the undersigned authority, on this 25th day of February, 2021.



Notary Public, State of Texas

Certificate of Service

I certify that a true and correct copy of the foregoing Statement of Position has been filed with the Commission and served on all other parties via the PUC interchange on this 25th day of February, 2021 pursuant to SOAH Order Number 3 issued in this docket.



ROY R. BARRERA, JR.