



Control Number: 51023



Item Number: 594

Addendum StartPage: 0

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SOAH DOCKET NO. 473-21-0247

RECEIVED

PUC DOCKET NO. 51023

2021 MAR -1 AM 10: 08

PUBLIC UTILITY COMMISSION
FILING CLERK

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

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY

OF

PAUL CRAIG

ON BEHALF OF

HIMSELF AS INTERVENOR

FEBRUARY 26, 2021

5914

SOAH DOCKET NO. 473-21-0247

PUC DOCKET NO. 51023

DIRECT TESTIMONY OF PAUL CRAIG

TABLE OF CONTENTS

I. INTRODUCTION 3

II. PURPOSE OF TESTIMONY 3

III. DESCRIPTION OF THE PROPERTY AND IMPACT OF THE TRANSMISSION LINE ADJACENT
TO THE PROPERTY 4

IV. CONCLUSIONS AND RECOMMENDATIONS 5

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 SOAH DOCKET NO. 473-21-0247

2 PUC DOCKET NO. 51023

3 DIRECT TESTIMONY OF PAUL CRAIG

4
5 I. INTRODUCTION

6 Q. Please State your name and address.

7 A. My name is Paul Craig, and my address is 26327 Dull Knife Trl, San Antonio, TX 78255

8 Q. Please describe your background, profession, and/or experience.

9 A. I currently work as an Information Security Professional for a large financial services company. I received
10 my Bachelor of Arts from Franciscan University of Steubenville, and am currently pursuing Graduate
11 Studies in Cyber Security Engineering from the SANS Institute.

12 Q. Have you ever participated or testified in another proceeding before the Public Utility Commission of
13 Texas?

14 A. No, I have not.

15 Q. On whose behalf are you testifying?

16 A. Myself as an intervenor in the case.

17 Q. Can you describe your interest in SOAH Docket number 473-21-0247?

18 A. My wife and I own one of the properties in the affected area.

19 Q. Are you familiar with the property and this area of Bexar County, Texas?

20 A. Yes.

21 Q. Briefly describe your ownership history in the affected property.

22 A. My wife and I purchased this property on July 9, 2014.

23
24 II. PURPOSE OF TESTIMONY

25 Q. What is the purpose of your testimony?

26 A. The purpose of my testimony is to make known the adverse effects that transmission lines would have on
27 our family and the property we own.

28 Q. Is the information contained in your testimony true and correct to the best of your knowledge and

1 belief?

2 A. Yes.

3
4 **III. DESCRIPTION OF THE PROPERTY AND IMPACT OF THE TRANSMISSION LINE ADJACENT**
5 **TO THE PROPERTY**

6 **Q. Please describe your property.**

7 A. The property in question is a 1.01-acre property located at Lot 13, Block 6, SERENE HILLS
8 SUBDIVISION, UNIT 2, Bexar County, Texas. The physical address associated with the property is 26327
9 Dull Knife Trl., and is located on the east side of the Serene and Scenic Hills Subdivisions.

10 **Q. Are there any habitable structures or other on your property?**

11 A. The property includes our 2500 square-foot single-family dwelling, with attached garage.

12 **Q. Please describe the property's terrain and any ecological features.**

13 A. The property is a long rectangle (~350 ft. by ~120 ft.), with the front of the dwelling facing west toward the
14 road, and the rear of dwelling facing east. The eastward part of the property gently slopes downward, and
15 backs up to undeveloped land owned by the Primarily Primates wildlife sanctuary. Beyond that property is
16 a beautiful view of the rolling hills of the beginnings of the Texas Hill Country. The area abounds with
17 wildlife, and we often have large herds of Axis deer, whitetail deer, turkey, and the occasional fox or rabbit
18 right in our backyard as they move across the mostly unfenced neighborhood feeding. The property is home
19 to many native trees: Live Oaks, Mountain Cedars, Texas Persimmons and Texas Red Oaks, and we often
20 have large herds (sometimes 20-30) of deer sleeping among the trees at night or early morning. This
21 peaceful atmosphere and country feel is a large part of why we chose to buy the property, along with the
22 absence of existing high-voltage transmission lines in the immediate area.

23 **Q. Are there any existing transmission lines crossing the property?**

24 A. There are no existing transmission lines crossing or adjacent to the property, and the existing distribution
25 lines for the neighborhood are located on the west side along the roadway, keeping the east side natural and
26 the beautiful views unmarred.

27 **Q. Please describe the property's current uses and operations.**

28 A. My wife and I currently live on the property with our three young children, ages 7, 5, and 2. I currently

1 work from home full-time due to the Covid-19 pandemic, and my wife is a full-time mom to our kids. We
2 made the decision early on in our marriage that we would homeschool our children, so all of our children,
3 including our 2nd grader and Kindergartener, are also at home a majority of the time.

4 **Q. If the transmission line is built on or near the property, do you have any concerns?**

5 **A.** As the owner of a residence located near one or more of the utility's proposed routes for a transmission line,
6 I have serious concerns and objections to portions of the project. Our neighborhood, Serene and Scenic
7 Hills, is the home of many younger families with small children, including my own, aged 7, 5, and 2. The
8 lack of high voltage transmission lines close by was a large factor in the purchase of our home in this area
9 almost 7 years ago, as the health and safety of our family is of paramount importance. There are many
10 studies showing correlation of continual exposure to strong electro-magnetic fields to various terminal
11 illnesses, including childhood Leukemia, as well as a variety of other health issues. Based on that, for the
12 safety and well-being of all the children in our neighborhood including my own, please reject any plan that
13 utilizes proposed line Segments 13, 14, 2, 5, 54 and 17. Similarly, any plan that uses proposed Substation
14 location 1 or 7 will increase the potential health risks in the neighborhood, and Substation locations 2, 3
15 and even 5 are also too close for comfort. In addition to health and safety risks, I have concerns regarding
16 the potential for serious property value issues, if the above transmission line segments and substations were
17 to be utilized. The project would devalue many of the homes in our neighborhood by making it a much less
18 desirable of an area to live, especially for families or other vulnerable individuals, and thus damage
19 permanently our peaceful community. Many including myself could feel forced to relocate, possibly selling
20 their homes at a loss, and thus causing potential financial harm or instability, which would also be
21 detrimental to our children's future. In short, I ask that your decision protect all the children and families of
22 Serene and Scenic Hills and our neighboring communities by not bringing risky and/or dangerous high
23 voltage transmission lines and power substations too close to where they sleep, learn, and play.

24
25 **IV. CONCLUSIONS AND RECOMMENDATIONS**

26 **Q. Please summarize your position in proceeding regarding the PUC's proposed alternative routes.**

27 **A.** I am very strongly opposed to proposed line Segments 13, 14, 2, and 5, and to substation locations 1 and 7.
28 I am also opposed to proposed line Segments 54 and 17, and to substation locations 2, 3 and 5. I would

1 strongly support substation location 6, coupled with Segments going westbound or southbound, starting
2 with Segment 15 or 16.

3 **Q. In particular, why would you support the routes stated above?**

4 **A.** The routes supported above are farther away from the long-established subdivision of Serene and Scenic
5 Hills, and are located along larger tracts of land and far fewer dwellings (especially the westbound route),
6 thus having less potential for health and safety issues. For example, according to the Fig. 4.1 Inventory
7 document provided by CPS, Segment 13 alone affects 9 habitable structures, and coupled with Segments 14
8 and 54 affects 38 habitable structures, while in contrast the westbound route from Substation 6 (comprised
9 of Segments 50, 15, 26, 38, and 43) only affects 8 habitable structures in total.

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

11 **A.** Yes, this concludes my testimony. Thank you for your time and consideration.