



Control Number: 51023



Item Number: 629

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 § OF
CONVENIENCE AND NECESSITY §
FOR THE PROPOSED SCENIC LOOP §
138-KV TRANSMISSION LINE IN §
BEXAR COUNTY § ADMINISTRATIVE HEARINGS

**SECOND ERRATA TO THE DIRECT TESTIMONY OF MARK TURNBOUGH, PHD
ON BEHALF OF BEXAR RANCH, L.P.**

BEXAR RANCH, L.P. submits the attached Second Errata to the Direct Testimony of Mark Turnbough, PhD on Behalf of Bexar Ranch, L.P. A redlined and clean version of the substitution pages are attached.

Respectfully submitted,
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San Antonio, Texas 78216
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By: /s/ Soledad M. Valenciano
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Soledad M. Valenciano,
State Bar No. 24056463
svalenciano@svtxlaw.com

ATTORNEYS BEXAR RANCH, L.P.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed in the records of Docket 51023 on this 11th day of March, 2021.

/s/ Soledad M. Valenciano
Soledad M. Valenciano

- 1 • Route Z1 is the shortest route of the 31 alternative routes at 4.53 miles.
- 2 • Route Z1 runs parallel to existing compatible rights of way (ROW) including
- 3 existing public roads and highways, railroads, and apparent property lines for
- 4 approximately 68 percent of its length. For the remaining alternative routes, the
- 5 maximum value for running parallel to existing compatible ROW is 83 percent.
- 6 • There are 310 habitable structures within 300 feet of the centerline of Route Z1.
- 7 For the 31 alternative routes, the mean number of habitable structures within 300
- 8 feet of the centerline is 34.5, with a median of 34. The standard deviation is 17.1.
- 9 • Route Z1 has the third shortest length across upland woodland / brushland at 3.59
- 10 acres compared to 3.12 acres for the lowest.
- 11 • Route Z1 accounts for a cumulative total of 11.12 acres of ROW across Golden
- 12 Cheeked Warbler (GCW) (modeled) habitat designated as a 3-Moderate High to
- 13 4-High Quality. For all 31 routes the mean is 13.04 acres, and the median is
- 14 11.81 acres.
- 15 • Route Z1 utilizes proposed Substation Site 7 which has the potential to be
- 16 shielded from public view.
- 17 • Route Z1 is comparable to the alternative routes with regard to impacts on
- 18 cultural resources in the study area.
- 19 • Route Z1 utilizes Segment 42a which has approximately 2,059 feet of ROW that
- 20 the land owner agreed to donate to CPS if a route utilizing Segment 42a is
- 21 approved by the Commission. The donated distance represents approximately
- 22 8.61 percent of the total length of Route Z1.

- 1 • In that context, Route Z1 has the second lowest total estimated cost of the 31
2 alternative routes at \$38,474,771.

3
4 **Q. DID YOU EVALUATE ANY OTHER OF THE 31 ALTERNATIVE ROUTES**
5 **THAT YOU THOUGHT MIGHT BEST ADDRESS THE REQUIREMENTS OF**
6 **PURA AND THE P.U.C. SUBSTANTIVE RULE?**

7 **A.** Yes. Route AA1.

8
9 **Q. WOULD YOU PLEASE EXPLAIN THE BASIS OF YOUR OPINION?**

10 **A.** Yes. The basis of my opinion follows:

- 11 • Route AA1 is the fifth shortest route of the 31 alternative routes at 4.82 miles.
- 12 • Route AA1 runs parallel to existing compatible ROW, including public roads and
13 highways, railroads, and apparent property lines for approximately 56 percent of
14 its length.
- 15 • As is the case with Route Z1, there are 310 habitable structures within 300 feet of
16 the centerline of Route AA1.
- 17 • Route AA1 has the sixth shortest length across upland woodland / brushland at
18 3.81 miles.
- 19 • Route AA1 accounts for a cumulative total of ROW across GCW habitat
20 designated as 3-Moderate High and 4-High Quality of 9.6 acres. As indicated in
21 the analysis of Route Z1, the mean value for the 31 alternative routes for GCW
22 acreage in this category is 13.04 acres, with a median of 11.81 acres.

1 the proposed placement of Alternative Segments 43, 44, and 45 (refer to POWER EA
2 Figure 2.3 Primary Alternative Segments and Attachment 6, Sheets 10, 11, 14, and 15).
3 The three segments run roughly sub-parallel to each other east / west across tract F-006
4 (the Bexar Ranch) for approximately 2.05, 1.98, and 1.68 miles, respectively.
5

6 Segments 43 and 44 fragments parcel F-006 for ~~their~~ its entire length. Segment
7 45 fragments F-006 for approximately 66 percent of its total length. Approximately 30
8 percent of Segment 43 runs parallel to an apparent property line. The remaining 70
9 percent diverges without any apparent rationale from the property line which marks the
10 northern boundary of F-006 in a straight east / west line. Inspection of mapping and
11 aerial photography in the POWER EA indicates that with the exception of the 30 percent
12 of Segment 43 noted above, none of the remaining 5.1 miles of Segments 43, 44, and 45
13 that fragment F-006 follow any defensible compatible ROW.
14

15 POWER Table 4-2, Amended, for Criterion Number 7, "Sum of evaluation
16 criteria 4, 5 and 6" (Length of ROW parallel and adjacent to (4) existing transmission line
17 ROW; (5) Length of ROW parallel and adjacent to other existing ROW; and (6) Length
18 of ROW parallel and adjacent to apparent property lines) reports that Segment 43 has a
19 length of 1.50 miles, Segment 44 has a length of 1.39 miles, and Segment 45 has a length
20 of 1.20 miles.
21

22 Based on a reconnaissance of the Ranch, proposed changes to those values for
23 Criterion Number 7 are suggested in the following: Segment 43 should have a length of

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