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

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PUBLIC UTILITY COMMISSION
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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

**REBUTTAL TESTIMONY OF RICHARD LEPERE
ON BEHALF OF INTERVENOR GUAJALOTE RANCH, INC.**

Richard LePere files this, his Rebuttal Testimony on behalf of Intervenor Guajalote Ranch, Inc., and stipulates that all parties may treat this Rebuttal Testimony as though filed under oath.

Respectfully submitted,

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ATTORNEYS GUAJALOTE RANCH, INC.

lelel

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed in the records of Docket 51023 on this 19th of March 2021.



Soledad M. Valenciano

1 **PLEASE STATE YOUR NAME FOR THE RECORD.**

2 My name is Richard LePere.

3 **ARE YOU PROVIDING REBUTTAL TESTIMONY ON BEHALF OF INTERVENOR**
4 **GUAJALOTE RANCH, INC.?**

5 Yes, I am.

6 **DID YOU PREVIOUSLY PROVIDE DIRECT TESTIMONY ON BEHALF OF**
7 **GUAJALOTE RANCH?**

8 Yes.

9 **WHAT TESTIMONY ARE YOU REBUTTING?**

10 On page 35 the Direct Testimony of Mark D. Anderson on Behalf of Anaqua Springs
11 Homeowners' Association, Brad Jauer and BVJ Properties, LLC, Mr. Anderson
12 advocates for the selection of Route W in part because he claims that it outperforms
13 Route Z1 on "paralleling other linear features."

14 **DO YOU DISAGREE, AND IF SO, WILL YOU PLEASE EXPLAIN?**

15 Yes, I disagree with this statement. Segment 27 creates a crooked L-shaped bisect of
16 the northeast quadrant of Guajalote Ranch. Segment 27 crosses over Helotes Creek
17 and related streams at least four times, so it is not paralleling this feature. Segment 27
18 also crosses over Guajalote Ranch's ranch road three times, but it is not paralleling this
19 road because the road is S-shaped and runs in a different direction.

20 **DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

21 Yes. Thank you.