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Addendum StartPage: 0

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PUC PUBLIC UTILITY COMMISSION
SAN ANTONIO, TEXAS

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

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

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12 **PAUL CRAIG'S INITIAL POST-HEARING BRIEF**

13 Intervenor Pro Se Paul Craig (referenced herein as "Craig" or "I") submits this Initial Post-Hearing Brief in
14 accordance with the ALJ's request during the Hearing on the Merits.

15 **I. INTRODUCTION**

16 Craig submits this Initial Post-Hearing Brief in opposition to the use of Segments 13, 14, 54, and/or 17, and
17 in opposition to the use of Substations 1 and 7, and any and all routes that use one or more of these stated segments
18 and substations. Craig contends that any route utilizing these segments is not a route that best complies with the
19 factors provided in PURA § 37.056(c) and 16 TAC § 25.101(b)(3)(B).

20 **II. ROUTE: ISSUE NO. 4**

21 *Which proposed transmission line route is the best alternative weighing the factors in PURA § 37.056(c)*
22 *and 16 TAC § 25.101(b)(3)(B)?*

23 For the reasons explained herein, Segments 13, 14, 54, and 17, and Substations 1 and 7, should not be
24 included as part of the best route that should be recommended to the PUC.

25 **A. Community Values**

26 The direct testimony of John Poole references the questionnaires received at CPS's public meeting, stating
27 that "The two criteria that ranked highest were maximizing distance from residences and visibility of structures"
28 (Poole, Direct Testimony, page 23). However, a closer examination of the actual numbers shows that an

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1 many families with young children, including my own. The lots in this neighborhood average about 1 acre. By
2 following the property boundaries of these small lots, the transmission lines would subject those who live in these
3 homes to the constant exposure to the electric and magnetic fields generated. And while I do feel for the owners of
4 large parcels and ranches that might be affected by these transmission lines, I also feel that it's fairly indisputable
5 that the electromagnetic fields from a transmission line on the boundary of all these small acre-sized lots would have
6 a much greater and more widespread impact than those from a transmission line that might disrupt the scenery and
7 views of much larger parcels of land.

8 Similarly, route C1, which also utilizes segments 14 and 54 (beginning at Substation 1), has the 6th highest
9 number of habitable structures affected, with 49 structures. And while the route that CPS believes is the best option
10 to meet these guidelines, route Z1 (utilizing among others segment 54), does affect a lower number, 31 structures,
11 there are several other routes that would affect even less than this, including route P with only 17 structures, which
12 is also the route recommended by Commission Staff witness John Poole, a disinterested expert representing the
13 public interest (Poole, Direct Testimony, page 21).

14 **III. SERENE AND SCENIC HILLS SUBDIVISION**

15 As a former president of our neighborhood HOA, Serene and Scenic Hills, I would like to write briefly on
16 behalf of my neighborhood as well. Serene and Scenic Hills is nearly 50 years old, and our residents are made up of
17 families, retirees and many military veterans. Our residents are in walking groups, jogging groups, bicycling
18 groups, we enjoy backyard BBQs, playing outside, enjoying the nature all around us. We don't have a guard at our
19 gate...in fact, we don't even have a gate, but welcome anyone to our community, including many nonprofit
20 organizations that host their community-wide cycling and running events through our streets each year. Our
21 neighborhood is unique to this area; not only do we enjoy the wildlife that often roams freely around our homes and
22 yards, but our neighborhood also includes Primarily Primates, the nation's first primate animal rescue in North
23 America.

24 PUC Docket 51023 shows that at least 71 residents of our neighborhood alone, including at least 15
25 showing Toutant Beauregard addresses, filed either a Request to Intervene, or Comments as a Protestor in this case.
26 The segments that would affect our neighborhood the most, segments 13, 14, 54 and 17, are a huge concern to all of
27 us. Many of those initial intervenors were not able to continue to participate in the hearing by direct testimony or
28 otherwise for whatever reason (I myself found the process to be quite intimidating!), but the segments mentioned

1 above would still impact all of us greatly.

2 In my own case, let me reiterate my own testimony that “The lack of high voltage transmission lines close
3 by was a large factor in the purchase of our home in this area almost 7 years ago, as the health and safety of our
4 family is of paramount importance. There are many studies showing correlation of continual exposure to strong
5 electro-magnetic fields to various terminal illnesses, including childhood Leukemia, as well as a variety of other
6 health issues.” (Craig, Exhibit 1). The constant electromagnetic fields that these transmission lines would produce
7 would be extremely worrisome, and the potential harm to our growing and developing children is a frightening
8 prospect. I will close by echoing my previous “ask that your decision protect all the children and families of Serene
9 and Scenic Hills and our neighboring communities by not bringing risky and/or dangerous high voltage transmission
10 lines and power substations too close to where they sleep, learn, and play” (Craig, Exhibit 1).

11 **IV. CONCLUSION**

12 In conclusion, Craig believes that it is clear that any routes utilizing segments 13, 14, 54, and/or 17, and by
13 extension Substations 1 and 7, are not routes that best comply with the factors provided in PURA § 37.056(c) and 16
14 TAC § 25.101(b)(3)(B). The evidence supports this conclusion, and Craig respectfully asks the ALJs to recommend
15 a route to the Commission that does not utilize these segments or substations.

16 Thank you for your time and consideration.

17 Respectfully submitted,

18 /s/ Paul Craig

19 Paul Craig

20 Intervenor Pro Se