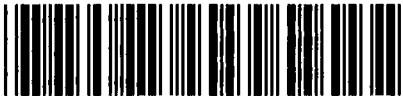




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SOAH DOCKET NO. 473-24-0247

P.U.C DOCKET NO. 51023

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PUBLIC UTILITY COMMISSION
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APPLICATION OF THE CITY OF SAN ANTONIO ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY) TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED SCENIC LOOP 138-KV TRANSMISSION LINE

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**BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

INITIAL BRIEF OF RAUL G. FIGUEROA

I, RAUL G. FIGUEROA, intervenor for transmission line segment 46b, hereby submit this post hearing brief concerning the application submitted to the Public Utility Commission of Texas by the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) to amend its certificate of convenience and necessity (CCN) for a new "Scenic Loop 138-kV Transmission Line Project". The project would entail the construction of a new substation (the Scenic Loop substation) and a double-circuit 138-kilovolt (kV) transmission line connecting the new Scenic Loop substation to the electric grid from CPS Energy's existing Ranchtown-to-Menger Creek 138-kV transmission line. I reject any proposed route that incorporates transmission line 46b in any proposal for decision (PFD) issued by the State Office of Administrative Hearings (SOAH) and, subsequently, the order of the Public Utility Commission of Texas (PUC).

I, RAUL G FIGUEROA, intervenor, live at 26670 Karsch Rd, Boerne, TX, 78006, near one or more of the proposed 138-KV transmission lines that connect to the existing Ranchtown-Menger Creek transmission line. I am adversely impacted by transmission line 46b that surrounds my home on three sides by running parallel and then crossing Karsch Rd. My property is the only habitable structure on the application surrounded on three sides by a transmission line. The west and southwest sections of TL 46b would be 54 yards away from my home.



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I am perturbed that CPS and/or consultants would propose transmission line 46b as it would surround my home on three different sides. I asked Mr. Adam R Marin, PE, on the CPS panel during the hearing if prudent avoidance was considered when proposing TL 46b, and his response was "yes". I expressed to Mr. Marin that it is very difficult to understand his answer when my home would be surrounded by the same transmission line segment on three sides. My home is approximately 7 ft from the edge of Crow-Karsch ridge, and I am extremely concerned about the digging operations for the transmission line towers. The installation and proximity of the transmission line tower could impact the structure and foundation of the house. Equally unsettling is that TL 46b is showing to be running extremely close or over my water well, which is practically on the property line west of the home.

Electromagnetic radiation from high voltage power lines could possibly affect the health of people. My family and I would constantly be stressed about exposure to electromagnetic fields. Though studies have not clearly shown whether exposure to electromagnetic fields from transmission lines increases health risks, scientists continue to conduct research on the issue according to the US EPA. The EPA further states that if one is concerned about exposure to EMFs, increasing the distance between one and the source is recommended. Avoiding exposure to EMFs would be difficult when our home is surrounded on three sides by proposed TL 46b. In addition to our health, we would also be concerned about our physical safety as power lines have caused more than 4,000 wildfires in Texas. Transmission lines have been known to cause deadly wildfires as was the case in California a couple of years ago. For these reasons, I am also having a difficult time understanding Mr. Marin's response stating prudent avoidance was considered when selecting TL 46b.

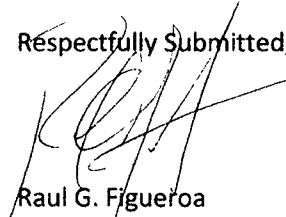
I have had a home office for the last 20 years and have worked strictly from my current home since purchasing it in 2014. My employer is located out of state, and so I have no other option than to work from home. Due to the proximity of transmission line 46b, I fear that my cell phone as well as my Wi-Fi reception would be spotty or non-existent. I asked Mr. Adam Marin on the CPS panel during the hearing if the proximity of TL 46b on three sides of my home would interfere with the cell phone reception, and he responded that he did not know the answer to my question. I use my cell phone extensively for work, and it is very concerning that neither Mr. Marin nor anyone on the CPS panel could guarantee that my cell phone reception would not be interrupted by TL 46b. Furthermore, the noise from the installation of towers and lines would interfere with my work as I conduct numerous on-line presentations daily. The proximity of TL 46b on three sides of my home could interfere with my ability to make a living.

My wife and I purchased our dream home in 2014. A major factor in our decision to buy the house was whether we could spend the rest of our lives here, and our answer was yes.

For the reasons mentioned herein, I am opposed to all routes that include TL segment 46b such as Z1, DD, X1, T1, etc... I do not advocate the selection of any specific route but urge SOAH and the PUC to consider routes that best minimize impacts on landowners and environment.

I reserve the right to file a Reply Brief to respond to any arguments made in favor of approving any route that utilizes transmission line 46b.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'R. Figueroa', written over the printed name.

Raul G. Figueroa
26670 Karsch Rd
Boerne, TX, 78006