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Addendum StartPage: 0

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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 SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

YVETTE REYNA INITIAL POST-HEARING BRIEF

Intervenor Pro Se Yvette Reyna (referenced herein as “Reyna” or “I”) submits this Initial Post-Hearing Brief in accordance with the AJL’s requesting during the hearing.

I. INTRODUCTION

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

II. ROUTES & SUBSTATIONS: ISSUE

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

Community Values

Our neighborhood Serene & Scenic Hills Estates has been in existence for nearly 50 years, it is the second oldest neighborhood in this neck of the woods, and by woods, I mean within the areas that the Public Utility Commission is considering for routes and substations. Our neighborhood was established in the early 70s, we have 280 property owners on lots (most are about an acre). Many of the homes built in our neighborhood were built in the 70s and 80s and they are still standing today and on occasion a vacant lot might be sold, and we have a new build. Our community is approachable, we don’t have a guard or gate, nonprofits are welcome to use our streets for their competitive cycling and running events, and we live in harmony with wildlife too. We are a neighborhood made up of working-class folks, we mow our own lawns, we have potluck parties in our driveways, and if you can believe it, we have an annual Halloween event where costumed kids pile up in wooden trailers to go trick-or-treating

throughout the neighborhood each year. As you drive down our no-sidewalk, asphalt roads, if you blink, you might miss the entry to Primarily Primates, the nation's first primate animal rescue in North America, it is home to hundreds of animals that cannot survive in the wild. Sadly, several of the primates froze to death or experienced trauma during the February 2021 snowstorm power outages, but as neighbors we came together to help heat, feed, and raise the spirits of the volunteers and many endangered species, that we have come to cherish in our neighborhood. As you can see, we value each of our neighbors, humans and animals alike, and we are deeply concerned about the impact from the electromagnetic fields, exposure to high voltage that segments 13, 14, 17 and 54, and substations 1 and 7 would have around or near people, animals and habitable structures in our neighborhood.

III. CONCLUSION

In conclusion, I am in full agreement with the Public Utility Commission's Engineer, John Poole's recommendation of Substation 6, Route P. And I also support Substation 6, Route P, R1 and W. Any routes utilizing segments 13, 14, 17 and 54, and substations 1 and 7 would be detrimental to humans and animals living in Serene and Scenic Hills Estates.

Thank you for your time and thoughtful consideration.

Respectfully submitted by,
Yvette Reyna
Intervenor Pro Se