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

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**APPLICATION OF THE CITY OF  
SAN ANTONIO TO AMENDS ITS  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY FOR THE  
SCENIC LOOP 138-KV  
TRANSMISSION LINE IN  
BEXAR COUNTY, TEXAS**

**BEFORE THE STATE OFFICE**

FILED CLERK

**OF**

**ADMINISTRATIVE HEARINGS**

Post-Hearing Brief  
Of  
Joan M Arbuckle

May 21, 2021

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As a former Officer and Committee Chairperson for ten years of the Serene & Scenic Hills Estates Homeowners Association, and also as a property and homeowner for fifteen (15) years, my husband and I are in our final home to live out our lives and cherish the richness of this almost 50-year-old neighborhood of rolling hills, no street lights, no sidewalks, lots close in size to one acre, and residents working hard to live in harmony with nature. Our neighborhood could not afford to hire an attorney to represent us, so we are representing ourselves as concerned individual property owners. I am very grateful for the opportunity that you have allowed us to be heard, and I commend City Public Service for facilitating us in that endeavor also.

If you look closely at the segments you have proposed for electrical lines, more of them surround a portion of our neighborhood than any other neighborhoods or property owners. Specifically, 28 routes of the total 39 proposed routes include segments 13, 14, 17 and 54. They encircle seventy-five percent of Serene and Scenic Hills. In most cases, these routes would in part be on the back property lines of our property owners and definitely violate the priority CPS Energy has of avoiding as many habitable structures as possible. Specifically, Segment 17, on the north side of our neighborhood, would be on the back property lines of 20 habitable structures in our neighborhood. A new subdivision called Scenic Crest is currently under construction on the north side boundary of our neighborhood. Scenic Crest Phase 1 and Meritage Homes are currently in the process of building several hundred homes and approximately 40 of these smaller homes are against Route 17 where it backs up to Serene & Scenic Hills. Segment 54, which runs in front of our neighborhood on Toutant Beauregard, would be in close proximity to 18 habitable structures. We have the same concerns with segments 13 and 14.

I want CPS Energy to prioritize their goal to affect as few habitable structures as possible. Knowing that cost is also a factor, I agree with John Poole, PUC's Engineer, of utilizing Substation 6, and Route P. I would also support Routes R1 and W. Substation 6 has very few surrounding habitable structures compared, say, to Substation 7.

We all are aware that we need additional energy stations and routes to accommodate the tremendous growth in our section of the County, but let's negatively affect as few homeowners and possible at the lowest cost as possible. Keeping substations and electrical lines away from as many property owners as possible is our goal.