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PUBLIC UTILITIES 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 § § § § § § § BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

**BEXAR RANCH, L.P. AND GUAJALOTE RANCH, INC.’S  
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

NOW COME BEXAR RANCH, L.P. and GUAJALOTE RANCH, INC., and together file this, their Proposed Findings of Fact and Conclusions of Law, providing the following line items in reference to CPS Energy’s Proposed Findings of Fact and Conclusions of Law previously filed under Document No. 864.

Accordingly, Lines 93 and 94 should state:

93. Based on the evidence presented, Route Z2 best meets the regulatory and statutory criteria based on the following considerations:

- Z2 has the lowest estimated cost of any of the 39 alternative routes at \$37,638,580 which is \$652,992.00 less than any other route.
- Z2 is the shortest of any of the 39 alternative routes at 4.46 miles in length.
- Z2 has a relatively high percentage of paralleling existing right of way and property lines at 71 percent (which is within 12 percent of the highest percentage for any route at 83 percent).
- Z2 utilizes Substation Site 7, which will allow for greater shielding of the substation from public roadways and is preferred by landowners whose properties abut or are nearby both substations 6 and 7.
- Z2 avoids use of Substation Site 6 which is highly visible.
- Z2 has the fourth shortest length across upland woodland/brushland at 3.53 acres (compared to 3.05 acres for the lowest (Dreico 6)).

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- Z2 has the fourth lowest acreage of right of way across combined golden-cheeked warbler modeled habitat.
  - Z2 has the eighth lowest acreage of right of way across golden cheeeked warbler modeled habitat for 3-Moderate High and 4-High Quality at 8.92 acres.
  - Z2 has the eighth lowest acreage of right of way across golden cheeeked warbler modeled habitat for 1-Low and 2-Moderate Low Quality at 11.78 acres.
  - Z2 crosses zero National Register of Historic Places (NRHP) listed properties, while Routes P, Q1, R1 and W each cross one.
  - Z2 Has a moderate number of habitable structures within 300 feet of the route centerline at 32, which is below the average of 37.
  - Z2 uses Segment 42a, which has approximately 2,059 feet of donated right of way.
  - Z2 uses Segment 42a which avoids crossing Northside Independent School District's as it avoids using Segments 35 and 41 which would run in front of or on the northern boundary of NISD's property, respectively.
  - Z2 crosses zero recorded cultural resource sites.
  - Z2 complies with cultural, historic and aesthetic values of the study area.
  - Z2 moderates the impact of landowners in the study area.
94. Route Z2 is made up of the following segments 54-20-36-42a-46-46b and uses Substation Site 7.

Respectfully submitted,

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**ATTORNEYS FOR BEXAR RANCH, L.P.  
AND GUAJALOTE RANCH, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document has been filed in the records of Docket 51023 on this 28<sup>th</sup> day of May, 2021.



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Soledad M. Valenciano