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SOAH DOCKET NO. 473-23-18893 PUC DOCKET NO. 54936

APPLICATION OF SOUTH TEXAS	§
ELECTRIC COOPERATIVE, INC. TO	§
AMEND ITS CERTIFICATE OF	§
CONVENIENCE AND NECESSITY	§
FOR THE SAN MIGUEL-TO-CRUCE	§
DOUBLE CIRCUIT 345-KV	§
TRANSMISSION LINE IN ATASCOSA,	§
MCMULLEN, DUVAL, AND JIM	§
HOGG COUNTIES, TEXAS.	§

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY OF ROEL ELIZONDO

Roel Elizondo files this Direct Testimony, which is attached. Roel Elizondo stipulates

that this Direct Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

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/s/Patrick L. Reznik Patrick L. Reznik State Bar No. 16806780 preznik@braungresham.com Carly Barton State Bar No cbarton@braungresham.com .

ATTORNEYS FOR BFG LAND & CATTLE, LTD. REPRESENTATIVE FOR ROEL ELIZONDO

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on June 26, 2023, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 54936 to date.

/s/Patrick L. Reznik Patrick L. Reznik

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1	I. <u>INTRODUCTION</u>
2 3 4 5	QUESTION: PLEASE STATE YOUR NAME AND CURRENT ADDRESS FOR THE RECORD.
6	ANSWER: Roel Elizondo, P.O. Box 456, Benavides, Texas 78341.
7 8 9 10 11	QUESTION: ARE YOU AN INTERVENOR IN SOAH DOCKET NO. 473-23-18893 AND PUC DOCKET NO. 54936 AND ON WHOSE BEHALF ARE YOU TESTIFYING?
12	ANSWER: Yes. I am testifying on behalf of myself.
13 14 15 16	QUESTION: HAVE YOU EVER TESTIFIED IN A PUBLIC UTILITY COMMISSION OF TEXAS ("PUC" OR "COMMISSION") PROCEEDING?
17	ANSWER: No, I have not.
18 19 20	QUESTION: WHERE IS YOUR PROPERTY LOCATED?
20 21 22	ANSWER: My property is located off of State Highway 359 in Duval County
22 23 24	QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?
24 25 26	ANSWER: I have owned it since 2014.
20 27 28	QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF SOUTH TEXAS?
28 29 30 31	ANSWER: Yes.
32	II. <u>PURPOSE AND SCOPE OF TESTIMONY</u>
33 34 35	QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?
36	ANSWER: The purpose of my testimony is to (a) describe my property, (b) describe the
37	expected impact of the proposed transmission line on my property, (c) and (c) voice my
38	opposition to South Texas Electric Co-op using Segments 100 or 69B and Routes A, G,
39	H, J, Q and Intervenor Routes A-1, Q-Alt 1, Q-Alt 2, Q-Alt 3, or any other potential route
40	that uses Segments 100 and 69B.
41	

III. <u>DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT</u>
QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS ECOLOGICAL OR BIOLOGICAL FEATURES.
ANSWER: The terrain is native sandy loam with Agua Poquita Creek running through it.
There is extensive wildlife on the property, including white tail deer, wild turkey, quail,
dove, and migratory.
QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES, INCLUDING BRIEFLY DESCRIBING ANY RANCH OPERATIONS.
ANSWER: We currently use the ranch for recreation and wildlife management.
QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO YOU HAVE ANY CONCERNS ABOUT STEC HAVING ACCESS TO YOUR PROPERTY?
ANSWER: Yes, I have the general concerns of landowners who are required to give third
parties access to their property.
QUESTION: WHY DO YOU OPPOSE THE ROUTING OF THE STEC LINE THROUGH THE SOUTH TEXAS AREA?
ANSWER: My family has a commitment to our land and the lands of this region of South
Texas. Many of our neighbors and those who have joined are committed to the South
Texas community and preserving the land. We oppose the construction of STEC's
transmission line through our community because the line would devastate our land and
undermine our shared environmental, aesthetic, economic and community values.
QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE ADMINISTRATIVE LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO CONSIDER IN THIS PROCEEDING?
ANSWER: No.

1 2	IV. CONCLUSION AND RECOMMENDATIONS
3 4 5 6 7	QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS PROCEEDING REGARDING STEC'S RECOMMENDED ROUTE M AND THE PROPOSED ALTERNATIVE ROUTES?
8	ANSWER: I oppose South Texas Electric Co-op use Segments 100 or 69B and Routes A,
9	G, H, J, Q and Intervenor Routes A-1, Q-Alt 1, Q-Alt 2, Q-Alt 3, or any other potential
10	route that uses Segments 100 and 69B. We support the following routes as the routes that
11	best meets the overall community values and PURA § 37.056(c)(4) and P.U.C. SUBST.
12	R. 25.101(b)(3)(B):
13	
14	"Route B-1" consisting of the following combination of Segments: 1-3-4-8-
15	9A-9B-12-17A-17B-23-29-32-40-46-49-52-59-61-70A-70B-76-80-86-91-93;
16	
17	"Route O" consisting of the following combination of Segments: 1-2A-94-97-
18	9B-12-17A-17B-22-24-32-40-46-49-52-59-61-70A-70B-76-80-86-91-93;
19	
20	"Route R" consisting of the following combination of Segments: 1-3-4-8-9A-
21	9B-12-17A-17B-22-24-32-40-46-49-52-59-61-70A-70B-76-80-86-91-93; and
22	
23	"Route Z-2" consisting of the following combination of Segments: 1-3-4-8-
24	9A-9B-12-17A-17B-23-33-37-40-46-49-52-59-61-70A-70B-76-80-86-91-93,
25 26	
27 28	QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?
28 29 30	ANSWER: Yes.