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SOAH DOCKET NO. 473-25-02531
PUC DOCKET NO. 57115

**JOINT APPLICATION OF THE CITY
OF SAN ANTONIO, ACTING BY AND
THROUGH THE CITY PUBLIC
SERVICE BOARD (CPS ENERGY),
AND SOUTH TEXAS ELECTRIC
COOPERATIVE, INC. (STEC) TO
AMEND THEIR CERTIFICATES OF
CONVENIENCE AND NECESSITY
FOR THE PROPOSED HOWARD
ROAD-TO-SAN MIGUEL 345-KV
TRANSMISSION LINE IN BEXAR AND
ATASCOSA COUNTIES**

DIRECT TESTIMONY OF ROBERT HOFFMAN, INDIVIDUALLY, AND ON BEHALF
OF HOFFMAN GROWERS, LLC

Robert Hoffman, individually, and on behalf of Hoffman Growers, LLC (“Intervenor”), files the attached Direct Testimony. Intervenor agrees and 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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DIRECT TESTIMONY

of

**ROBERT HOFFMAN, INDIVIDUALLY
AND ON BEHALF OF HOFFMAN GROWERS, LLC**

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1 **I. INTRODUCTION**

2 **Q. Please state your name and address.**

3 A. My name is Robert Hoffman. I am owner of Hoffman Growers, LLC and Hoffman Grass
4 Farm & Nursery, Inc. My address is 75 Tank Hollow Road, Poteet, Texas 78065.

5 **Q. On whose behalf are you testifying?**

6 A. I am testifying on my own behalf, and on behalf of Hoffman Growers, LLC.

7 **Q. Can you describe your interest in SOAH Docket No. 473-25-02531 and PUC Docket**
8 **No. 57115.**

9 A. I intervened in this proceeding as potentially affected landowner. I own property in
10 Atascosa County, which will be impacted by the transmission line proposed to be built by
11 the City of San Antonio, acting by and through the City Public Service Board ("CPS
12 Energy") and South Texas Electric Cooperative, Inc. ("STEC") in this docket.

13 **Q. Have you ever participated or testified in another proceeding before the Public Utility**
14 **Commission of Texas ("PUC")?**

15 A. No.

16 **Q. Please describe your background, profession and/or experience.**

17 A. I received a Bachelor of Science in Horticulture degree from Texas A&M University. I
18 worked in landscaping for approximately 17 years, and have been operating a wholesale
19 nursery for approximately 40 years.

20 **Q. Briefly describe your ownership history in the affected property.**

21 A. I purchased the property in 1996 to establish a wholesale plant nursery and tree farm.

22 **II. PURPOSE OF TESTIMONY**

23 **Q. What is the purpose of your testimony?**

24 A. The purpose of my testimony is to: (i) describe my property; (ii) describe the expected
25 impact of the proposed transmission line on my property; (iii) voice my opposition against
26 certain links and routes; and (iv) provide information on the route that I prefer.

27 **Q. Is the information contained in your testimony true and correct to the best of your**
28 **knowledge and belief?**

29 A. Yes, it is.
30

**III. DESCRIPTION OF THE PROPERTY AND IMPACT
OF THE TRANSMISSION LINE ON THE PROPERTY**

Q. Please describe your property.

A. I own an approximate 74.22-acre tract and an approximate 26.08-acre tract in Atascosa County, which will be directly impacted by the proposed transmission line, if any route utilizing Link 48 is approved by the PUC. The properties have been identified by CPS Energy and STEC as Tracts A1057 (owned by Robert Hoffman and operated as Hoffman Grass Farm & Nursery, Inc.) and A1352 (owned by Hoffman Growers, LLC), and are depicted on Exhibit "A" attached to my testimony.

Q. Are there any habitable structures or other improvements on the Property?

A. There are greenhouses on Tract 1057, as well as underground and above-ground water systems for growing plants and trees, a water well and irrigation tanks. There is a bore under Tank Hollow Road from the Hoffman Growers Property (Tract 1352) to the northeast corner of Tract 1057 (where the proposed Link 48 is located) to connect a backup water source to the trees and nursery, and I have water lines running to each individual tree slot on the Property. Proposed Segment 48 would run directly through the northeast corner of Tract 1057, which could interfere with the water lines and cut-off the secondary water source jeopardizing millions of dollars of plant inventory. Additional improvements to Tract 1057 include electricity, roads, earthen tanks for recycling water, large shade cloth structures, and high fencing to help protect plants from hogs.

Q. Please describe the Property's current uses and operations.

A. Tract 1057 is used for a wholesale plant nursery and tree farm. I operate my business, Hoffman Grass Farm & Nursery, Inc. on the Property. Tract 1352 on the north side of Tank Hollow Road has a water well that is utilized as a backup water source for the nursery.

Q. Are there any existing transmission lines that cross the Property?

A. No.

Q. If the transmission line is built on or near the Property, do you have any concerns about the possibility of CPS Energy and STEC having access to the Property?

1 A. Yes, I have the general concerns of landowners who are required to give third parties access
2 to their property. I hope that CPS Energy and STEC will respect my property if I am
3 required to give them access.

4 **Q. If the transmission line is built on or near the Property, do you have any other**
5 **concerns?**

6 A. I am concerned with the potential devaluation of my property as a result of this proposed
7 line. I am also seriously concerned about the line interfering with the numerous irrigation
8 lines and the underground bore connecting the secondary water source on the Property,
9 both of which are critical to my business operations. Lastly, I am concerned about the
10 health and safety issues potentially associated with transmission lines and exposing my
11 workers and customers to adverse conditions. Please note that I am not an expert on
12 property valuation or medical issues; my comments merely reflect my personal concerns.

13 IV. CONCLUSIONS AND RECOMMENDATIONS

14 **Q. Please summarize your position in this proceeding regarding CPS Energy and**
15 **STEC's proposed alternative routes.**

16 A. I am very opposed to the use of Links 38, 48 and 49, and any route utilizing the same (e.g.,
17 Routes B, D, E, F, G, H, J and AH). I specifically support Route U, or any other routes
18 that do not utilize Links 38, 48 and 49. Compared to Route U, the routes utilizing Links
19 38, 48 or 49 range from \$22,878,000 to \$97,183,000 more expensive, impact between 83
20 and 120 more habitable structures, and contain less percentage of route parallel and
21 adjacent to existing transmission line right of way, other existing right of way, and apparent
22 property lines or other natural or cultural features.

23 **Q. In particular, why do you support Route U?**

24 A. Based on my review of CPS Energy and STEC's proposed routes, Route U: (1) would
25 avoid the LLC's Property; (2) has a relatively short overall length at 49.15 miles; (3) has a
26 relatively low estimated cost compared to the other proposed route options; (4) has a
27 relatively low number of habitable structures within 500 feet of the centerline at 50 (40 is
28 the lowest and 179 is the highest); and (5) has a high percentage of the route parallel and
29 adjacent to existing transmission line right of way, other existing right of way, and apparent
30 property lines or other natural or cultural features at 56% of its length.

1 **Q. Does this conclude your testimony?**

2 A. Yes, that concludes my testimony, subject to subsequent correction.
3
4
5

6 **CERTIFICATE OF SERVICE**

7 I certify a copy of this document is being filed in the Public Utility Commission's
8 Interchange System and served on all parties of record as required by orders in this docket, the
9 Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on
10 March 16, 2020 and July 16, 2020, in Project No. 50664.
11

12 
13 _____

Tyler Topper

EXHIBIT "A"

