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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 BRANDON SALINAS ON BEHALF OF CCS RANCH
PROPERTIES, LLC

Brandon Salinas, on behalf of CCS Ranch Properties, 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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I. INTRODUCTION

Q. Please state your name and address.

A. My name is Brandon Salinas. I am one of the owners of CCS Ranch Properties, LLC, along with my wife, Monica Salinas. Our address is 30311 Leroy Scheel, Bulverde, Texas 78163.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of CCS Ranch Properties, LLC ("the LLC").

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

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

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

A. No.

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

A. I am a San Antonio native who attended Central Catholic High School and then played collegiate sports at Texas Lutheran University in Seguin, Texas for one year. I have been in the construction and real estate business for 22 years. My wife and I started a concrete company in San Antonio at the age of 21. We started the company as the only employees and now have multiple businesses with over 300 employees and \$225,000,000 yearly revenue.

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

A. The LLC purchased the property in May, 2024. We were unaware of this transmission project when we purchased the property, and we were told the first notice went out to landowners in April, 2024. The property was purchased to turn into a commercial hunting ranch and retreat.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

1 A. The purpose of my testimony is to: (i) describe the LLC's property; (ii) describe the
2 expected impact of the proposed transmission line on the LLC's property; (iii) voice my
3 opposition against certain links and routes; and (iv) provide information on the route that I
4 prefer.

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

7 A. Yes, it is.

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

10 **Q. Please describe your property.**

11 A. The LLC owns approximately 420 contiguous acres of land in Atascosa County, located at
12 3448 County Road 304, Jourdanton, Texas 78026, which will be directly impacted by the
13 proposed transmission line, if any route utilizing Link 48 is approved by the PUC. The
14 properties have been identified by CPS Energy and STEC as Tracts A0075, A0082 and
15 A0083, and are depicted on Exhibit "A" attached to my testimony.

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

17 A. We are currently in Phase I of our developments plans for the property, which is projected
18 to be complete by February 1, 2025. Phase I development includes:

- 19 • construction of a high fence for the game ranch, which started in June 2024;
- 20 • transported \$180,000 worth of white tail and exotic animals to the property;
- 21 • started construction and are in the framing stage of a \$2,300,000 hunting lodge
- 22 game facility for our guests;
- 23 • installing a new pivot in the pasture for dove hunting;
- 24 • reconstructed road system on the property;
- 25 • rebuilt the lakes and irrigation well for duck hunting;
- 26 • constructed a metal barn on a concrete foundation with a walk-in cooler and deer
- 27 processing facility;
- 28 • constructed a \$75,000 front entry; and
- 29 • installing a mobile home for our family to live on to watch over the property.

1 Additional improvements to the property include Carrizo Water Irrigation well, water lines,
2 three hunting blinds with feed stations, one airstrip and one helicopter landing zone. My
3 wife and I plan to make the property our homestead in the future.

4 **Q. Please describe the Property's terrain and any ecological features.**

5 A. The Property's terrain has rolling areas as well as flat areas with natural vegetation. There
6 is a 4-acre lake and a 1.5-acre pond on the property. If the line is constructed on our
7 property, our exotics, native pigs, and white tail deer could lose vegetation, which would
8 force us to supplement their feed and cost us more money. Also, our flyover ducks and
9 dove could become threatened and their flight patterns disrupted due to the transmission
10 line being located over the lake and our planned pivots, which could cost us to lose an
11 estimated \$300,000 - \$400,000 in duck and dove hunting packages and leases.

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

13 A. The property is used for development and commercial hunting.

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

15 A. No.

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

18 A. Yes, I have the general concerns of landowners who are required to give third parties access
19 to their property. I hope that CPS Energy and STEC will respect the LLC's property if we
20 are required to give them access.

21 **Q. If the transmission line is built on the Property, do you have any other concerns?**

22 A. I am seriously concerned with the potential devaluation of the LLC's commercial property
23 and the negative impact to our hunting business as a result of this proposed line. Rather
24 than following the property boundaries, proposed Segment 48 would cut through almost
25 the middle of the ranch. Not only is there potential for financial damage to our business as
26 a result of this line, but I believe there is a huge safety issue with contractors accessing the
27 property while there are numerous hunters with numerous guns in numerous locations.
28 That would require a coordinated stand down of hunting activities to allow the utility to
29 perform maintenance. There is also a possibility that a gate would be accidentally left open
30 or damaged and our expensive animals could escape. Additionally, I am concerned about
31 the negative impact the line would have on the aesthetics of the property since the line and

towers would be visible from the hunting lodge. Please note that I am not an expert on property valuation; my comments merely reflect my personal concerns.

Q. Is there anything else you would like to be made known about your Property?

A. Since the LLC purchased the property *after* the utility companies and their consultants performed their property evaluations and open houses, it appears evident to me that the utility companies' project team is unaware of the substantial work that has recently been performed on the property, the ongoing construction on the property, and the future development work that will soon be performed on the property. Therefore, the current cost estimates and environmental assessments for Link 48 may no longer be accurate because they do not take into account a commercial hunting ranch on the Property.

IV. CONCLUSIONS AND RECOMMENDATIONS

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

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

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

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

Q. Does this conclude your testimony?

A. Yes, that concludes my testimony, subject to subsequent correction.

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Tyler Topper

EXHIBIT "A"

