



## **Filing Receipt**

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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 JAMES RUSSELL WILSON**

James Russell Wilson (“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

**JAMES RUSSELL WILSON**

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## I. INTRODUCTION

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

3 A. My name is James Russell Wilson. My address is 1410 Tank Hollow Road, Poteet, Texas  
4 78065.

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

6 A. I am testifying on my own behalf.

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 have been in construction management for forty-five years.

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

19 A. I purchased the property from Hoffman Growers, LLC in 2018 for use as ranching and hay  
20 operations for retirement income.

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## II. PURPOSE OF TESTIMONY

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

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

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

28 A. Yes, it is.  
29

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

**Q. Please describe your property.**

A. I own an approximate 90-acre tract in Atascosa County, which will be impacted by the proposed transmission line, if any route utilizing Link 48 is approved by the PUC. The Property has been identified by CPS Energy and STEC as Tract A1351, and is depicted on Exhibit "A" attached to my testimony.

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

A. There is a house on the Property, where I reside, as well as a barn, a workshop, chicken coops and Conex boxes. I have improved the Property by rehabilitating an irrigation well and the associated distribution line, fencing hay pastures, installing watering system for cattle, fencing for rotational grazing, adding cattle working pens, and I have made significant improvements to the forage grasses for hay production.

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

A. The terrain is slightly rolling with a wet-weather creek. Wildlife such as turkey, deer, hogs, coyotes, mountain lion, dove, quail, raccoons, opossum and skunks inhabit the Property.

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

A. The Property is my homestead and is used for cattle ranching and hay production. I plan to eventually have a dove hunting operation as well.

**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?**

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

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

A. I am seriously concerned with the potential devaluation of my property as a result of this proposed line. I plan to pass this property along to my grandchildren and great

1 grandchildren, and the line could impact their ownership for decades to come.  
2 Additionally, I am concerned about the negative impact the line would have on the  
3 aesthetics of the property, since the line and towers would be visible from all areas of the  
4 property. I sited the house on the property for the most striking sunset view, which the line  
5 would obstruct. Lastly, I am concerned about the health and safety issues potentially  
6 associated with transmission lines. Please note that I am not an expert on property  
7 valuation or medical issues; my comments merely reflect my personal concerns.

#### 8 **IV. CONCLUSIONS AND RECOMMENDATIONS**

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

11 A. I am very opposed to the use of Links 38, 48 and 49, and any route utilizing the same (e.g.,  
12 Routes B, D, E, F, G, H, J and AH). I specifically support Route U, or any other routes  
13 that do not utilize Links 38, 48 and 49. Compared to Route U, the routes utilizing Links  
14 38, 48 or 49 range from \$22,878,000 to \$97,183,000 more expensive, impact between 83  
15 and 120 more habitable structures, and contain less percentage of route parallel and  
16 adjacent to existing transmission line right of way, other existing right of way, and apparent  
17 property lines or other natural or cultural features.

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

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

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

27 A. Yes, that concludes my testimony, subject to subsequent correction.  
28

1 **CERTIFICATE OF SERVICE**

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

6 

7 \_\_\_\_\_  
8 Tyler Topper  
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EXHIBIT "A"

