



Filing Receipt

Filing Date - 2024-11-12 12:29:15 PM

Control Number - 57115

Item Number - 153

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 JIM ROSS ON BEHALF OF JTR FARMS, LLC

Jim Ross, on behalf of JTR Farms, 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,

MORGAN WILLIAMSON LLP
701 South Taylor, Suite 440
Amarillo, Texas 79101
Telephone: (806) 358-8116
Facsimile: (806) 350-7642

By: 

By: 
Tyler Topper
State Bar No. 24059263
ttopper@mw-law.com
Christian Stewart
Texas Bar No. 24013569
cstewart@mw-law.com
ATTORNEYS FOR INTERVENOR

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

JIM ROSS
ON BEHALF OF JTR FARMS, LLC

TABLE OF CONTENTS

	<u>HEADING</u>	<u>PAGE</u>
I.	INTRODUCTION.....	2
II.	PURPOSE OF TESTIMONY	2
III.	DESCRIPTION OF THE PROPERTY AND IMPACT OF THE TRANSMISSION LINE ON THE PROPERTY	3
IV.	CONCLUSIONS AND RECOMMENDATIONS.....	5
	CERTIFICATE OF SERVICE	6

1 **I. INTRODUCTION**

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

3 A. My name is Doyle James (“Jim”) Ross, Jr. I am one of the owners of JTR Farms, LLC.
4 My address is 702 Putter Court, College Station, Texas 77845.

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

6 A. I am testifying on behalf of JTR Farms, LLC (“the 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. The LLC owns property
10 in Atascosa County, which will be impacted by the transmission line proposed to be built
11 by 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’s degree in 1987. I am an insurance agent and business owner. My
18 businesses include JTR Farms, LLC, Audience Media Group, and Jim Ross State Farm
19 Insurance.

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

21 A. The LLC purchased the property in June 2021 due to its natural beauty, with the intent to
22 establish and grow an agritourism business. The scenic appeal was critical to our business
23 concept, as well as the development of estate lots.

24 **II. PURPOSE OF TESTIMONY**

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

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

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

3 A. Yes, it is.
4

5 **III.DESCRPTION OF THE PROPERTY AND IMPACT**
6 **OF THE TRANSMISSION LINE ON THE PROPERTY**

7 **Q. Please describe your property.**

8 A. The LLC owns an approximate 98-acre tract in Atascosa County, known as “Rockberry
9 Ranch,” which will be directly impacted by the proposed transmission line, if any route
10 utilizing Link 38 is approved by the PUC. Rockberry Ranch been identified by CPS
11 Energy and STEC as Tract A1204, and is depicted on Exhibit “A” attached to my
12 testimony.

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

14 A. The property hosts Rockberry Ranch, a highly-rated (4.7-star Google reviews rating - 248
15 reviews) seasonal agritourism destination that attracts over 40,000 visitors annually in both
16 the spring and fall. Visitors enjoy picking strawberries, blackberries, and flowers, while
17 creating family memories through photography and interaction with farm attractions.
18 Approximately 30 acres along Price Road are dedicated to Rockberry Ranch Estates, a
19 residential development of scenic 2.5-acre homesites overlooking our flower fields and
20 orchard. We plan to market and sell Rockberry Ranch Estates starting in 2025. Rockberry
21 Ranch Estates development plan is attached as Exhibit “B,” and photos of Rockberry
22 Ranch’s scenic features and visitor activities are attached as Exhibit “C” to my testimony.

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

24 A. Yes. There is a historic home, referred to as the “Rock House,” which was built in the
25 1920s and is now fully restored as a historic and scenic feature to the Property. There is
26 also a ranch house, occupied by our farm managers, one barn referred to as the “Rock
27 Barn,” four pole barns, and two animal barns. The LLC has invested over \$1,300,000 to
28 purchase the Property and an additional \$700,000 in improvements over the past three
29 years. The improvements include: four water wells to support agricultural operations;
30 remodeling of the ranch house, the Rock House, and the Rock Barn and employee break

1 room; development of a 3-acre blackberry orchard and 3-acre strawberry field, and addition
2 of a lavender farm and flower fields; construction of a pole barn pavilion and shade sail
3 seating area at the flower farm; addition of equipment barn and small animal barn; road
4 installation to support visitor traffic; fencing, electric and plumbing upgrades; five custom
5 wooden playscapes; expansive petting zoo areas; giant sand pit and barn games; wagon
6 train rides, bee train rides, trike course, duck races, and garden areas; and construction of
7 displays, murals, and art installations.

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

9 A. The terrain is flat, with one pond situated near the center of the property. We have
10 undertaken extensive efforts to improve soil quality to support agricultural production on
11 the Property. The Property supports a variety of pollinators, including honeybees, as well
12 as butterflies, doves, and turkeys.

13 **Q. Are there any threatened or endangered species present on the Property?**

14 A. Yes, the Property is recognized as part of the Monarch butterfly migration route.

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

16 A. No.

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

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

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

23 A. I am seriously concerned with the potential devaluation of the LLC's property, both to the
24 land value and the business value. The scenic beauty of our Property is essential to the
25 success of our agritourism business and the experience we offer. Proposed Segment 38
26 would ruin the aesthetic appeal, making it very difficult, if not impossible, to continue
27 operations. Additionally, the Rockberry Ranch Estates lots could be rendered unsellable
28 due to the negative visual impact of the transmission lines, and at least 6 lots would require
29 residents to drive under the transmission line. The line would be prominently visible and
30 disrupt the visual flow of our flower fields, berry orchards, and adventure areas.

1 Additionally, I am concerned about the health and safety issues potentially associated with
2 transmission line, especially with so many visitors to the Property. Please note that I am
3 not an expert on property valuation or medical issues; my comments merely reflect my
4 personal concerns.

5 IV. CONCLUSIONS AND RECOMMENDATIONS

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

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

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

16 A. Based on my review of CPS Energy and STEC's proposed routes, Route U: (1) would
17 avoid the LLC's Property; (2) has a relatively short overall length at 49.15 miles; (3) has a
18 relatively low estimated cost compared to the other proposed route options; (4) has a
19 relatively low number of habitable structures within 500 feet of the centerline at 50 (40 is
20 the lowest and 179 is the highest); and (5) has a high percentage of the 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 at 56% of its length.

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

24 A. Yes, that concludes my testimony, subject to subsequent correction.
25

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
9

EXHIBIT "A"

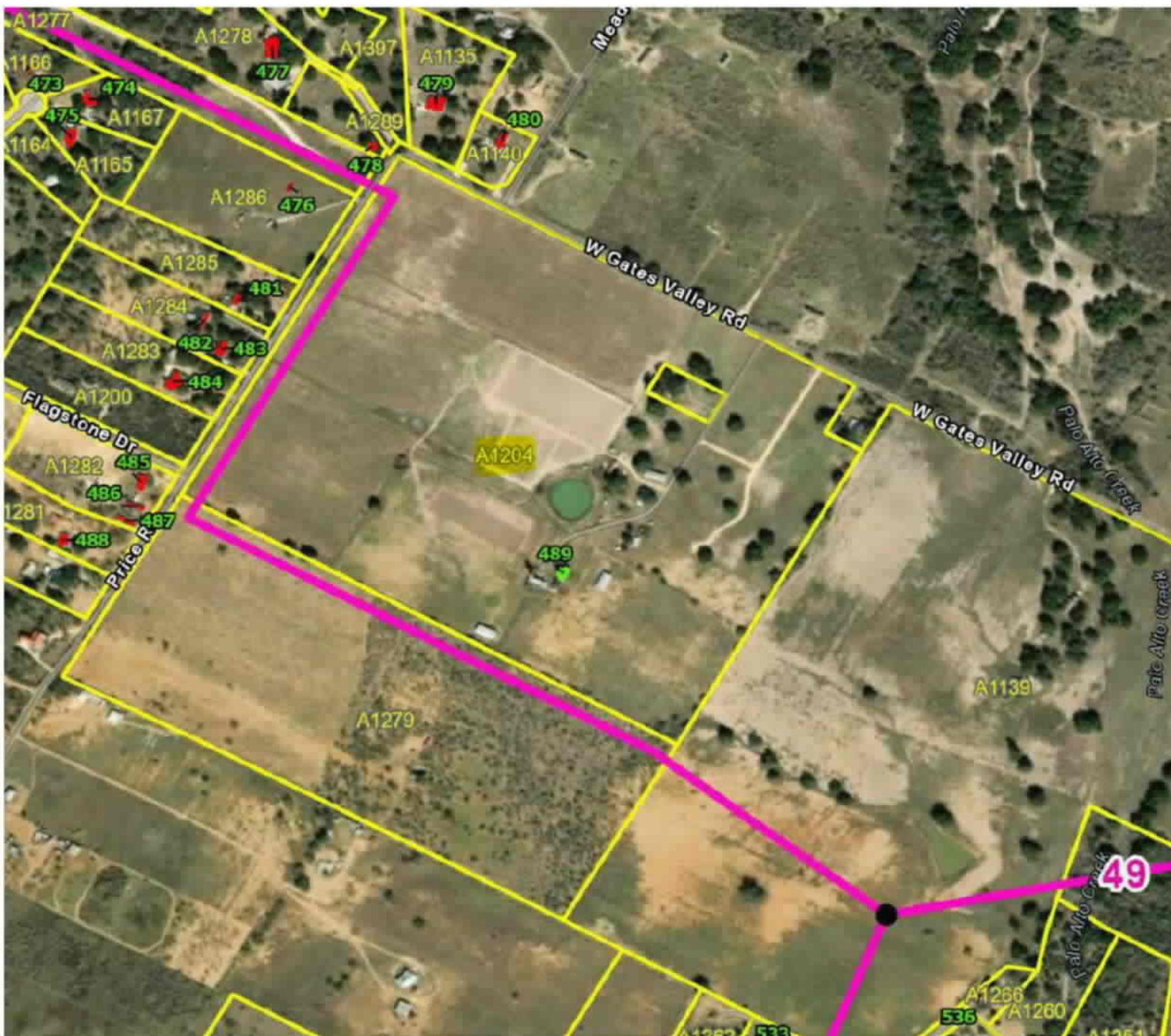


EXHIBIT "B"



Rockberry Ranch Estates subdivision map showing planned layout of the 30-acre development with 2.5-acre homesites. The approximate location of Proposed Segment 38 is shown in red.

EXHIBIT "C"

