



## **Filing Receipt**

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**SOAH DOCKET NO. 473-25-02531**

**PUC DOCKET NO. 57115**

<b>JOINT APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO, ACTING BY AND</b>	<b>§</b>	
<b>THROUGH THE CITY PUBLIC</b>	<b>§</b>	
<b>SERVICE BOARD (CPS ENERGY), AND</b>	<b>§</b>	
<b>SOUTH TEXAS ELECTRIC</b>	<b>§</b>	
<b>COOPERATIVE (STEC) TO AMEND</b>	<b>§</b>	<b>OF</b>
<b>THEIR CERTIFICATES OF</b>	<b>§</b>	
<b>CONVENIENCE AND NECESSITY FOR</b>	<b>§</b>	
<b>THE PROPOSED HOWARD ROAD-TO-</b>	<b>§</b>	
<b>SAN MIGUEL 345 KV TRANSMISSION</b>	<b>§</b>	
<b>LINE IN BEXAR AND ATASCOSA</b>	<b>§</b>	
<b>COUNTIES</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**STATEMENT OF POSITION**

**11/11/2024**

**To: Public Utility Commission of Texas**

**From: First Memorial Park, Inc.**

**Subject: PUC Docket No. 57115**

**Position: Oppose Any Proposed Route Including Segment 19**

**Introduction:** First Memorial Park Inc. owns and operates First Memorial Park Cemetery located at 20567 TX 16 South, Von Ormy, TX 78073. We have served the Southern Bexar County area and surrounding communities for 50 years. We are a family owned and operated corporation. We are submitting this statement because one of the proposed segments, Segment 19, would adversely affect our business in many ways if adopted.

**Background:** First Memorial Park Inc. was notified by letter dated 10/4/2024 that the City of San Antonio, operating through CPS Energy, and South Texas Electric Cooperative Inc. are applying for approval from the Public Utility Commission to construct the proposed Howard Road to San Miguel 345 kV Transmission Line Project in Bexar and Atascosa Counties. The letter also states that three tracts of land (Tract ID: 184368, 184084, 184364) owned by First Memorial Inc. may be directly affected by the project if the route chosen for the transmission lines follows the projected paths 19, 25, and 27 as per the Proposed Route Map provided by the CPS Energy letter.

The map shows Line 19 running North to South just to the west of our 3 tracts of land. The line splits into westward running Line 25 and southern running Line 27 at the southern end of our property. The ranch that neighbors us to the west would hold the actual transmission lines, according to the map provided.

After speaking to a representative from CPS Energy about the project, he said that the easement would be 150 feet wide, so it seems the easement would be very close to our property line. When I told them which tracts we owned and that we were a cemetery, the representative said they were unaware that our property was part of a cemetery business.

The main issues that would arise if Line 19 is chosen as the final route:

- 1) The easement and construction of the transmission lines would cause major disruption to the day-to-day operations of our cemetery business in several ways. For one, in the construction phase, the presence of heavy machinery, equipment, supplies, and the associated labor required to put up the massive towers and lines would disrupt burial services, and the grieving families would be forced to endure added stress during their most vulnerable time of emotional pain if proposed Line 19 is chosen by the PUC.
- 2) Current owners of burial rights in our cemetery would be impacted as the new high-power transmission lines will make the serene atmosphere our cemetery enjoys and uses to market a peaceful final resting place to these customers, will be forever changed if proposed Line 19 is chosen by the PUC.
- 3) Our current inventory of cemetery property will be devalued now by future customers, impacting the sales price we can expect as the natural beauty of the cemetery will be diminished with the large transmission lines in direct sight of all customers and visitors of the cemetery if the proposed Line 19 is chosen by the PUC. This will result in a loss of sales revenue and the jobs we create in the Southern Bexar County.
- 4) Finally, First Memorial Park Inc. is currently trying to purchase the ranch property that is adjacent to the west and that would bear the actual transmission lines as proposed in Lines, 19, 25, and some of 27. If these lines are chosen by the PUC, the expansion of our cemetery business would be halted by the easements and transmission line, as this property would become useless as cemetery property.
- 5) First Memorial Park Inc. currently handles the Pauper Burial Program for Bexar County, in which indigent individuals who die in Bexar County and cannot afford a regular burial or whose bodies are unclaimed, are buried by the County as a community service by law. We currently have a contract with Bexar County to provide burial spaces for this program. Our expansion by purchasing the land mentioned above, was in part a response to securing property to use for the Pauper Burial Program. The proposed routes 19, 25, and 27 would cause First Memorial Park to have to reassess our ability to provide land to use for the Pauper Burial Program at a reasonable price, which would harm a valuable community service that is required by state and local law. Our plans were to acquire enough land to provide services to Bexar County for decades into the future at a cost that we could try to keep at a lower price than other cemeteries located in Bexar County. Those plans now go on hold until the PUC makes its impactful decision of a route for these transmissions. The fate of our cemetery business, the final resting places of

thousands of customers, as well as the location and viability of the Pauper Burial Program hang in the balance.

**Recommendations:** *We feel that Possible Routes (as per the provided information) A, C, D, E, F, G, H, I, and K should not be considered, as they all use Line 19.* There are 25 other possible routes that will serve the goal of providing energy without infringing on the final resting place of thousands of loved individuals and many more families in the present and future.

**Conclusion:** Death is the natural ending to a life well-lived. 50 years ago, my grandfather bought an abandoned cemetery that he saw while driving on his sales route. He spent 25 years building a business from the ground up, providing a final resting place for the large Hispanic community in the South San Antonio area in Bexar County and I have spent 25 years of my life doing the same. Our customers now span several generations and having large, elaborate funeral services is part of the cultural traditions that have developed at our cemetery. The serene countryside provides an ideal setting for the burial services we conduct as well as a peaceful place to visit for surviving family members to pay their respects in the following years. It has become a vital part of the fabric of the community, a place to not only grieve, but also a place to celebrate lives well-lived. A large transmission line would drastically alter the landscape and scenery of our serene place of quiet reflection into one that would be unrecognizable to those who have entrusted our family with their loved ones. This would cause a devaluation of the inventory of burial plots as the demand to be buried in the shadow of a metal monstrosity would surely decline, causing decreased sales, jobs, and economic activity in the area. The intrusion of this large transmission line would also cut off our plans to expand the cemetery and our ability to provide needed services for the Bexar County Pauper Burial Program, which we have handled for close to 20 years. This is a necessary community resource that provides dignity to those who have fallen through the cracks of our community and the goal of company was to keep providing land for this public use for years to come, though the transmission line would put this goal very much in doubt. We thank the Public Utility Commission of Texas for considering our statement regarding this important decision for the future needs of the community, in terms of energy transmission as well as community cohesiveness and cultural touchpoints of the area. I am also willing to provide further information or participate in any hearings as this decision will be impactful to the future success of our family business and the emotional well-being of the families we are proud to call our customers.

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