



## **Filing Receipt**

**Filing Date - 2024-11-12 01:52:23 PM**

**Control Number - 57115**

**Item Number - 158**

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

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

**DIRECT TESTIMONY OF TERRI LYNN LUENSMANN ON BEHALF OF  
THE TERRI LYNN LUENSMANN SPOUSAL GST TRUST**

Terri Lynn Luensmann, on Behalf of Intervenor, the Terri Lynn Luensmann Spousal GST Trust files this Direct Testimony, which is attached. Terri Lynn Luensmann stipulates that this Direct Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC  
P.O. Box 1148 (Mailing)  
Dripping Springs, Texas 78620  
14101 Hwy. 290 W., Bldg. 1300 (Physical)  
Austin, Texas 78737  
512-894-5426 (telephone)  
512-894-3405 (fax)

/s/Patrick L. Reznik

Patrick L. Reznik  
State Bar No. 16806780  
[preznik@braungresham.com](mailto:preznik@braungresham.com)  
Carly Barton  
State Bar No  
[cbarton@braungresham.com](mailto:cbarton@braungresham.com)

**ATTORNEYS FOR  
THE TERRI LYNN LUENSMANN  
SPOUSAL GST TRUST**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on November 12, 2024, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 57115.

/s/Patrick L. Reznik \_\_\_\_\_

Patrick L. Reznik

## TABLE OF CONTENTS

I.	INTRODUCTION .....	4
II.	PURPOSE AND SCOPE OF TESTIMONY.....	5
III.	DESCRIPTION OF PROPERTY AND THE LINE’S IMPACT.....	5
IV.	CONCLUSION AND RECOMMENDATIONS .....	12
	EXHIBIT A – MAP OF PROPERTY .....	5, 9, 10, 11, 13
	EXHIBIT B – PHOTOS OF HABITABLE STRUCTURES.....	5, 14
	EXHIBIT C – HUNTERS CABIN.....	5, 16
	EXHIBIT D – PHOTO OF LARGE POND.....	6, 17
	EXHIBIT E – PHOTO OF SUNSET.....	6, 18
	EXHIBIT F – TEXAS TORTOISE .....	6, 8, 19
	EXHIBIT G – FARAL HOGS.....	6, 20
	EXHIBIT H – INDUSTRIAL MACHINES FOR BRUSH MANAGEMENT.....	6, 21
	EXHIBIT I – AIRSTRIP PHOTOS.....	6, 23
	EXHIBIT J – WHEEL LOADER AND SKID STEER.....	7, 27
	EXHIBIT K – WATER WELLS AND WINDMILL.....	7, 29
	EXHIBIT L – STORAGE BIN, BARNS, AND CATTLE PENS.....	10, 30

1 **I. INTRODUCTION**

2  
3 QUESTION: PLEASE STATE YOUR NAME AND CURRENT ADDRESS FOR THE  
4 RECORD.

5  
6 ANSWER: Terri Lynn Luensmann  
7 877 CR 348  
8 Lavernia, TX 78121  
9

10  
11 QUESTION: ARE YOU AN INTERVENOR IN SOAH DOCKET NO. 473-25-02531  
12 AND PUC DOCKET NO. 57115 AND ON WHOSE BEHALF ARE YOU TESTIFYING?

13  
14 ANSWER: Yes. I am testifying on behalf the Terri Lynn Luensmann Spousal GST  
15 Trust.

16  
17  
18 QUESTION: HAVE YOU EVER TESTIFIED IN A PUBLIC UTILITY COMMISSION  
19 OF TEXAS (“PUC” OR “COMMISSION”) PROCEEDING?

20  
21 ANSWER: No, I have not.  
22

23  
24 QUESTION: BRIEFLY DESCRIBE YOUR OCCUPATION, EDUCATIONAL AND  
25 WORK HISTORY.

26  
27 ANSWER: I am retired, spending part time as caregiver for my three grandchildren, my  
28 elderly parents and aunt and part time as ranch hand for my husband’s and my ranching  
29 operations in La Vernia and Pleasanton, Texas. I grew up on a large farm in Converse,  
30 Texas and graduated from East Central High School in San Antonio, Bexar County, Texas  
31 in 1979. I am a 1982 graduate of Southwest Texas State University in San Marcos, Texas  
32 (BBA in Accounting), and a 1990 graduate of St. Mary’s University in San Antonio, Texas  
33 (MBA in Finance). I became a licensed CPA in 1985. I retired in 2017 from USAA as Vice  
34 President, Investment Operations, after 34 years of service in the Investment and Life  
35 Insurance Divisions.  
36

1 QUESTION: WHERE IS YOUR PROPERTY LOCATED?

2

3 ANSWER: The property is located at 3907 County Road 427, Pleasanton, Texas. *See*

4 **Exhibit A.**

5

6

7 QUESTION: HOW LONG HAVE YOU OWNED THE PROPERTY?

8

9 ANSWER: It was purchased on April 19, 2022.

10

11

12 QUESTION: ARE YOU FAMILIAR WITH THIS AREA OF TEXAS?

13

14 ANSWER: Yes, I am 63 years old and have lived in Wilson and Bexar Counties all my  
15 life, with the exception of three years I spent away at college.

16

17

## 18 **II. PURPOSE AND SCOPE OF TESTIMONY**

19

20 QUESTION: WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?

21

22 ANSWER: The purpose of my testimony is to (a) describe my property, (b) describe  
23 the expected impact of the proposed transmission line on my property and (c) voice my  
24 opposition to CPS Energy and STEC using Segments 70, 76, and 78 and Routes I, K, S, T,  
25 V, W, X, Z, AA, AC, AD, AE, and AG, or any other potential route that uses Segments 70,  
26 76, and 78.

27

28

## 29 **III. DESCRIPTION OF PROPERTY AND THE LINE'S IMPACT**

30

31

32 QUESTION: ARE THERE ANY HABITABLE STRUCTURES ON THE PROPERTY?

33

34 ANSWER: Yes, there are two. The original home built in 2011 is used as a second home  
35 for my husband and I to maintain and enjoy the ranch with our daughter, son-in-law and  
36 their children. It is also being used by paying hunters. We recently completed a second  
37 structure, a cabin, which will now be used by the hunters. **See Exhibits B and C.**

1  
2 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S TERRAIN AND ITS  
3 ECOLOGICAL OR BIOLOGICAL FEATURES.

4  
5 ANSWER: The ranch's terrain is a combination of blue stem and other coastal grasses,  
6 pasture, Metate Creek, and four ponds. It contains many incredible ecological and  
7 biological features, including extensive wildlife of white tail deer, turkey, quail, dove,  
8 migratory birds, javelina, blue indigo, Texas tortoises, horn toad lizards, commercial cattle,  
9 and fish (large-mouth bass, blue catfish, and perch). **See Exhibits D, E and F.**

10  
11 QUESTION: PLEASE DESCRIBE YOUR PROPERTY'S CURRENT USES,  
12 INCLUDING BRIEFLY DESCRIBING ANY RANCH OPERATIONS.

13  
14 ANSWER: My husband and I and our family often visit the ranch where we spend time  
15 together, hunt, and fish and where we teach our grandchildren about conservation, wildlife,  
16 hunting, fishing and ranching. We entertain family and friends and enjoy the peace and  
17 quiet and beauty of mother nature. We have leased the ranch to our neighbor and he runs  
18 approximately 60 cow/calf pairs and uses the cattle pens and water troughs by Segment 78.  
19 There is a total of four ponds on the property. Two of the ponds are very large and are  
20 stocked with perch, catfish and bass. **See Exhibit D.** We continuously monitor and  
21 eradicate feral hogs using traps. **See Exhibit G.** Just to date in 2024, 220 hogs have been  
22 trapped and removed. At the same time, we support the growth of the javelina population  
23 and do not harvest those. My family and friends hunt whitetail deer, wild turkey, doves and  
24 quail. We have leased the ranch to hunters for whitetail deer for the last two years and we  
25 have plans to lease it for turkey, quail and dove hunts in the future. We consume the game  
26 that we harvest, and we have industrial machines that we use to manage brush on the ranch.  
27 **See Exhibit H.** There are two active oil wells and a tank battery on the property, but I am  
28 not the mineral owner. Lastly, we have added an airstrip to make travel to the ranch easier  
29 for friends and hunters. **See Exhibit I.**

1 QUESTION: HAVE YOU OR YOUR FAMILY UNDERTAKEN ANY EFFORTS TO  
2 RESTORE THE LAND OR THE ENVIRONMENTAL QUALITY OF THE  
3 PROPERTY?

4  
5 ANSWER: When we purchased the ranch, we engaged a biologist and a helicopter  
6 survey to determine harvest recommendations with the goal of maintaining good habitat  
7 and robust health for wildlife and of developing supplemental feeding programs. One of  
8 the things that attracted us to the property was its good diversity of brush species. My  
9 husband has managed the brush carefully and strategically and recently had Atascosa  
10 County NRCS observe the property to help devise a plan for further brush sculpting in  
11 order to maximize production for livestock grazing and promotion of wildlife habitat.  
12 Based on conversation with the biologist, my husband has also managed and maintained  
13 clear spaces and thick brush areas to support appropriate space and cover for wildlife such  
14 as deer, birds and rabbits. Extreme clearing or extreme brush are not conducive to wildlife  
15 populations. We have a wheel loader and a skid steer for brush control and a tractor and  
16 shredder for grass control. **See Exhibit J.** We maintain a constant effort to eradicate feral  
17 hogs which are very destructive because they eat and root grass, create holes in the ground  
18 which damages equipment and airplanes, and disrupt bird ground nesting (such as eating  
19 quail eggs).

20  
21  
22 QUESTION: ARE THERE ANY WATER WELL SITES ON THE PROPERTY? IF SO,  
23 DESCRIBE THE GENERAL LOCATION.

24  
25 ANSWER: Yes, there are three known to me. One solar-powered well services a large  
26 pond with fish near the middle of the ranch. A second well is next to two barns near  
27 Segment 78. The third well is east of the solar well under a standing windmill. **See Exhibit**  
28 **K.**

29  
30  
31 QUESTION: ARE THERE ANY GAS WELLS ON THE PROPERTY? IF SO,  
32 DESCRIBE THE GENERAL LOCATION.

33  
34 ANSWER: None to my knowledge.

1  
2 QUESTION: ARE THERE ANY PIPELINE EASEMENTS ON THE PROPERTY? IF  
3 SO, DESCRIBE THE GENERAL LOCATION.

4  
5 ANSWER: Yes, there are two that intersect. One runs from east to west. The other runs  
6 northwest to southeast near the barns and Segment 78. *See Exhibit A.*

7  
8  
9 QUESTION: PLEASE DESCRIBE ANY PLANNED FUTURE USES OF YOUR  
10 PROPERTY IF THOSE USES ARE DIFFERENT FROM THE CURRENT USES  
11 PREVIOUSLY DESCRIBED.

12  
13 ANSWER: My husband put this property into a spousal and generation-skipping trust  
14 for our grandchildren and future generations as our legacy to them. We will continue to  
15 conserve the land and wildlife for them. We plan to expand seasonal hunting leases to  
16 include turkey, dove and quail. We also plan to rent the newly built cabin to family and  
17 friends for overnight/weekend stay accommodations.

18  
19  
20 QUESTION: HOW DO THE CURRENT AND PLANNED FUTURE USES OF THIS  
21 PROPERTY CONTRIBUTE TO THE COMMUNITY VALUES OF TEXAS?

22  
23 ANSWER: While we have only owned this property for two years, we have been  
24 excited to see Texas tortoises, blue indigos, roadrunners, horn-toad lizards, and javelinas as  
25 well as sandhill cranes and migratory waterfowl. *See Exhibit F.* We have worked hard to  
26 improve the habitat and health of the whitetail deer, turkey, quail and dove population on  
27 the property by practicing proper game management, avoiding overhunting and eliminating  
28 invasive species like feral hogs. We are spending time and money in our conservation  
29 efforts to enable the wildlife to thrive and to keep hunters coming back to Atascosa County  
30 from across the country. To date we've had hunters from Montana, Iowa, Nebraska,  
31 Houston and Dallas. Wildlife is essential to the South Texas economy and cannot be taken  
32 for granted or our community will suffer economic harm.

1 QUESTION: DO ANY EXISTING TRANSMISSION OR DISTRIBUTION LINES  
2 CROSS YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY  
3 CROSS THE PROPERTY.

4  
5 ANSWER: There are no transmission lines. The ranch house and cabin are serviced by  
6 one distribution line that enters the ranch off County Road 427 and the barn is serviced by  
7 one that enters the ranch off County Road 428.

8  
9  
10 QUESTION: ARE THERE CURRENT PLANS FOR OTHER UTILITY FEATURES  
11 ON YOUR PROPERTY? IF SO, PLEASE DESCRIBE HOW AND WHERE THEY  
12 CROSS THE PROPERTY.

13  
14 ANSWER: No.

15  
16  
17 QUESTION: WOULD THE SEGMENTS THAT MIGHT IMPACT YOUR PROPERTY  
18 RUN ALONG ANY BOUNDARY LINES OF YOUR PROPERTY?

19  
20 ANSWER: Yes, Segment 87 runs along the western boundary of my property. Segment  
21 78 runs along and inside the entire eastern boundary of my property. *In addition, Segment*  
22 *78 crosses over our existing airstrip.* If Segment 78 is utilized it would impact our airstrip  
23 *shown by the black line* and planned future uses of our property. *See Exhibit A.*

24  
25 QUESTION: HOW WOULD A 345-KV ELECTRIC TRANSMISSION LINE IMPACT  
26 YOUR PROPERTY AND ITS OPERATIONS?

27  
28 ANSWER: A 345-KV Electric Transmission line would impact my property and its  
29 operations in several negative ways. The first concerns conservation of wildlife. My  
30 husband and I have taken the biologist's recommendations and practiced conservation to  
31 protect the wildlife from feral hogs and predators. Any land clearing of brush areas for the  
32 construction of electrical transmission lines will disrupt the balance of cleared areas and  
33 pasture that we have created for the young deer and quail population to hide from predators.  
34 Construction activities that clear any land would destroy this habitat and expose deer and  
35 quail to predators. A second way is that a transmission line would render the airstrip  
36 unusable, making our ranch less attractive to hunters throughout the country. Finally, the

1 construction of a transmission line would interfere with our enjoyment of our property. It  
2 runs along the eastern boundary and is close to the entrance of our property and to both the  
3 house and cabin. In summary, my husband and I strongly oppose the construction of  
4 Segment 78.

5  
6  
7 QUESTION: WOULD YOU HAVE TO REGULARLY DRIVE UNDER THE  
8 TRANSMISSION LINE IF INSTALLED ON YOUR PROPERTY.

9  
10 ANSWER: Yes, every time we visit the ranch (weekly), we would likely drive cars,  
11 trucks and equipment under the line, both while entering the property and when entering  
12 the storage bin/barns/cattle pen area. **See Exhibit L.**

13  
14  
15 QUESTION: DESCRIBE THE AESTHETIC IMPACT TO YOUR PROPERTY IF CPS  
16 AND STEC INSTALLS A 345-KV TRANSMISSION LINE ON YOUR PROPERTY.

17  
18 ANSWER: Segment 78 is not very far from the ranch house and cabin and would  
19 interfere with the sightline of the eastern horizon. In addition, it would render our airstrip  
20 unusable. **See Exhibit A.**

21  
22  
23 QUESTION: DESCRIBE ANY HISTORICAL, ARCHEOLOGICAL OR CULTURAL  
24 SIGNIFICANCE OF LAND THAT MIGHT BE CROSSED THE TRANSMISSION  
25 LINE.

26  
27 ANSWER: I am not aware of any.

28  
29  
30 QUESTION: DESCRIBE THE ENVIRONMENTAL IMPACT, SPECIFIC TO THIS  
31 AREA, THAT WOULD BE CAUSED BY THIS TRANSMISSION LINE.

32  
33 ANSWER: *Depending on exact placement of Segment 78, it likely will cross over one*  
34 *of our large ponds and affect our use and enjoyment of the pond. See Exhibits A, D.* The  
35 structures may also serve as a vulture roosting area and destroy any enjoyment of the pond  
36 because of the vulture droppings.

1  
2 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO  
3 YOU HAVE ANY CONCERNS ABOUT CPS AND STEC HAVING ACCESS TO  
4 YOUR PROPERTY?

5  
6 ANSWER: Yes, I have the general concerns of landowners who are required to give  
7 third parties access to their property. I hope that CPS and STEC will respect my property.  
8 But invariably because of a combination of human error, negligence and workplace  
9 pressures, accidents and mistakes happen. I have described the delicate wildlife population  
10 that we have spent considerable time and money to develop and maintain. I am concerned  
11 that third parties would harm our efforts. Third parties already have access to our property  
12 and while we cannot prove who did it, we have already found an unexplained deer carcass  
13 tied to a tree.

14  
15 QUESTION: IF THE TRANSMISSION LINE IS BUILT ON YOUR PROPERTY, DO  
16 YOU HAVE ANY OTHER CONCERNS?

17  
18 ANSWER: Yes, I am seriously concerned about the potential devaluation of my  
19 property if Segment 78 is used because it runs in front of the ranch's house and cabin. I am  
20 also generally concerned about the health and safety issues associated with the proposed  
21 transmission lines due to their proximity to the house and cabin. **See Exhibit A.**

22  
23  
24 QUESTION: IS THERE ANYTHING ELSE YOU WOULD LIKE THE  
25 ADMINISTRATIVE LAW JUDGE AND THE PUBLIC UTILITY COMMISSION TO  
26 CONSIDER IN THIS PROCEEDING?

27  
28 ANSWER: My family has a commitment to preserving our land and the lands of this  
29 region of South Texas. It is our grandchildren and future generations' legacy and their  
30 community. We oppose the construction of CPA & STEC's transmission line through our  
31 community because the line would devastate our land and undermine our shared  
32 environmental, aesthetic, economic and community values.

1  
2 **IV. CONCLUSION AND RECOMMENDATIONS**  
3

4 QUESTION: HOW WOULD YOU SUMMARIZE YOUR POSITION IN THIS  
5 PROCEEDING REGARDING CPS AND STEC'S RECOMMENDED ROUTE U AND  
6 THE PROPOSED ALTERNATIVE ROUTES?  
7

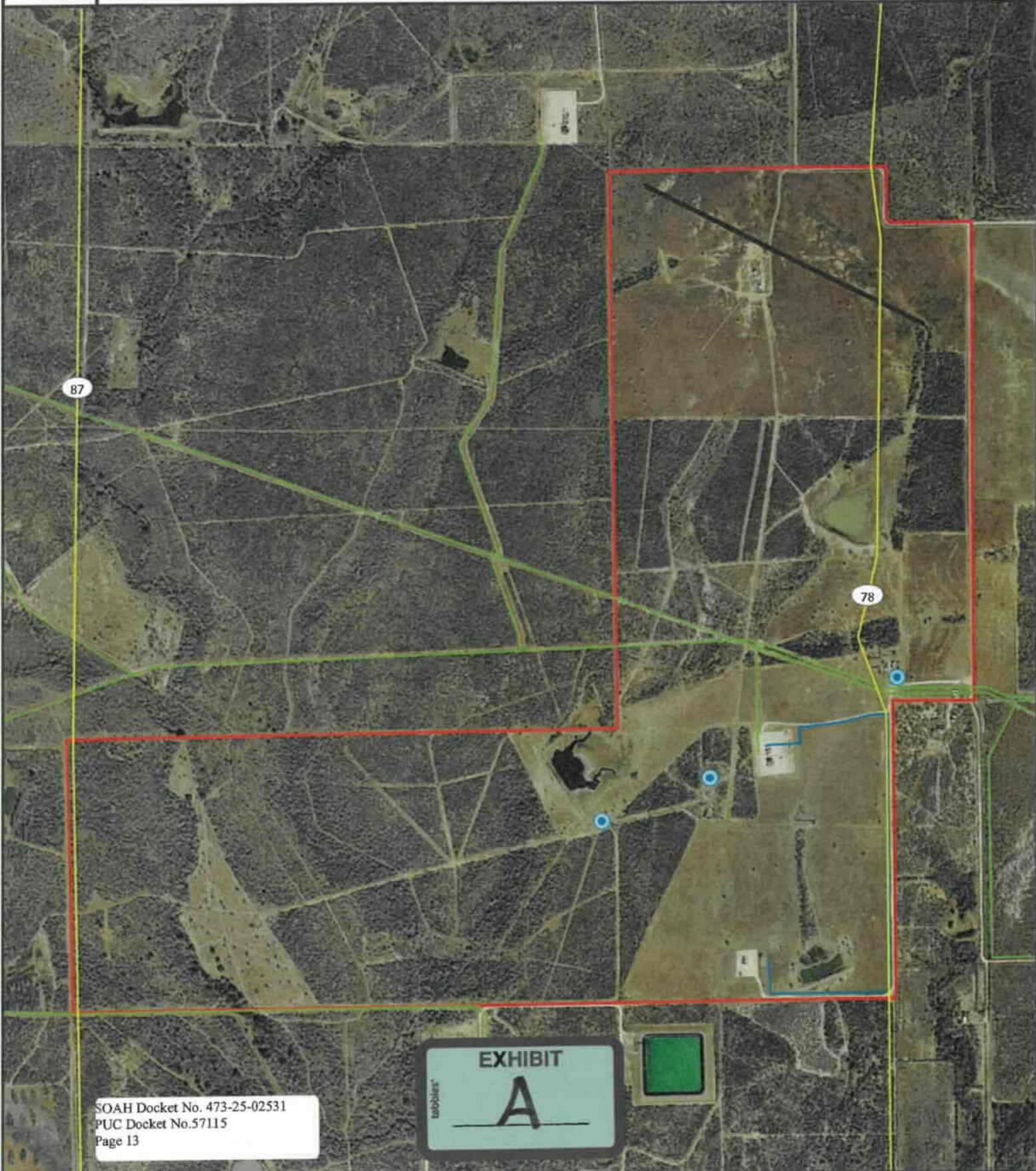
8 ANSWER: I oppose CPS and STEC's use of Segments 70, 76 and 78 and Routes, K, S,  
9 T, V, W, X, Z, AA, AC, AD, AE, and AG, or any other potential route that uses Segments  
10 70, 76, and 78. *Segment 78 crosses over our existing airstrip and would likely eliminate*  
11 *its usefulness. While Segment 87 runs along the western boundary of my property*, I still  
12 support CPS and STEC's recommended Route U as the route that best meets the overall  
13 community values and PURA § 37.056(c)(4) and P.U.C. SUBST. R. 25.101(b)(3)(B).  
14

15  
16 QUESTION: DOES THIS CONCLUDE YOUR TESTIMONY?  
17

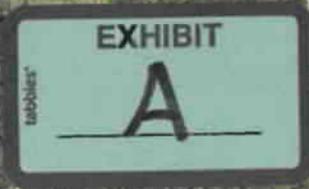
18 ANSWER: Yes.



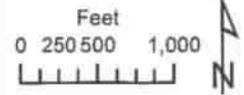
**Terri Lynn Luensmann Spousal GST Trust**  
 +/- 893.800 Acres - Atascosa County



SOAH Docket No. 473-25-02531  
 PUC Docket No. 57115  
 Page 13



- Property Boundary
- Air Strip
- Pipeline
- Proposed Route
- Well



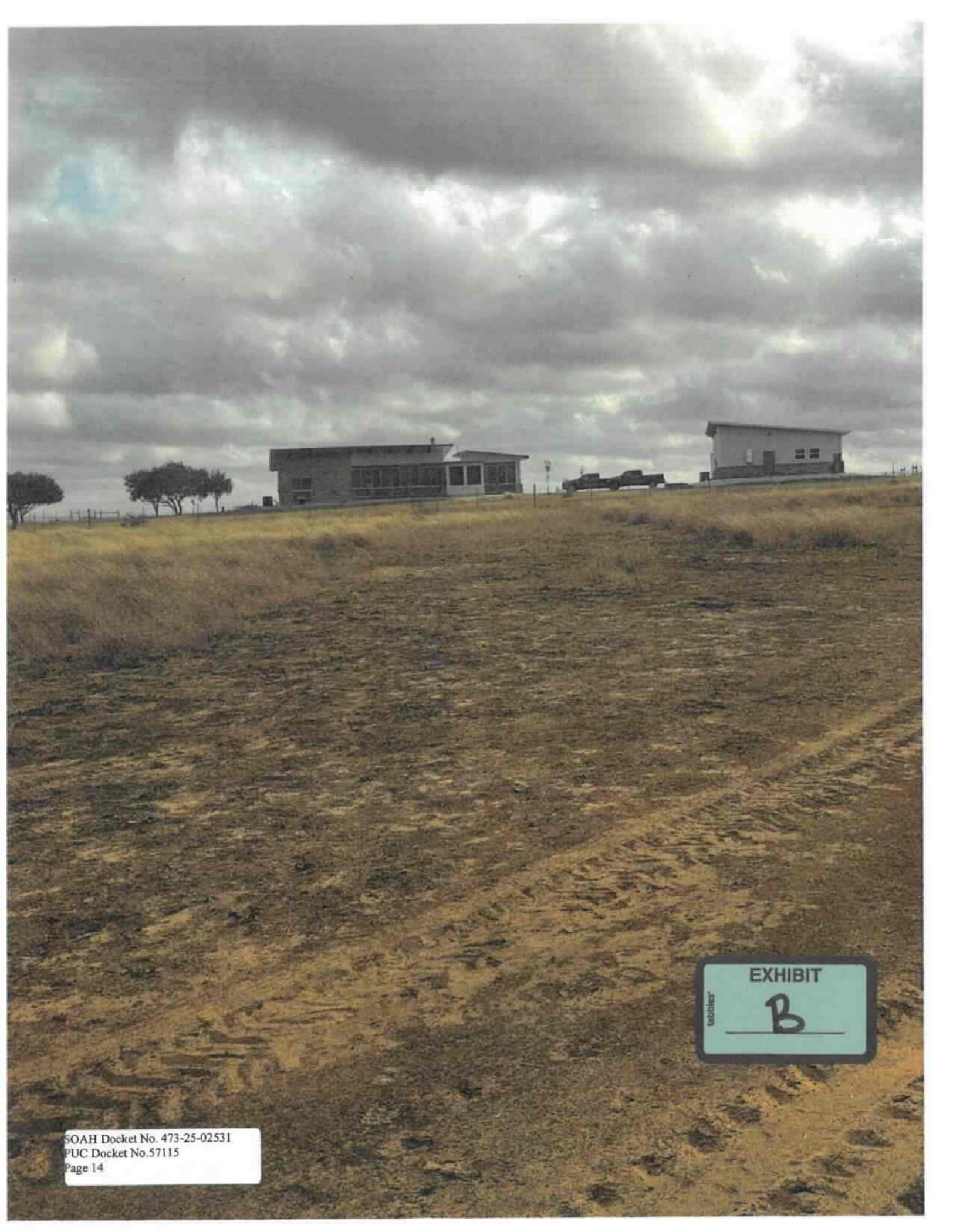
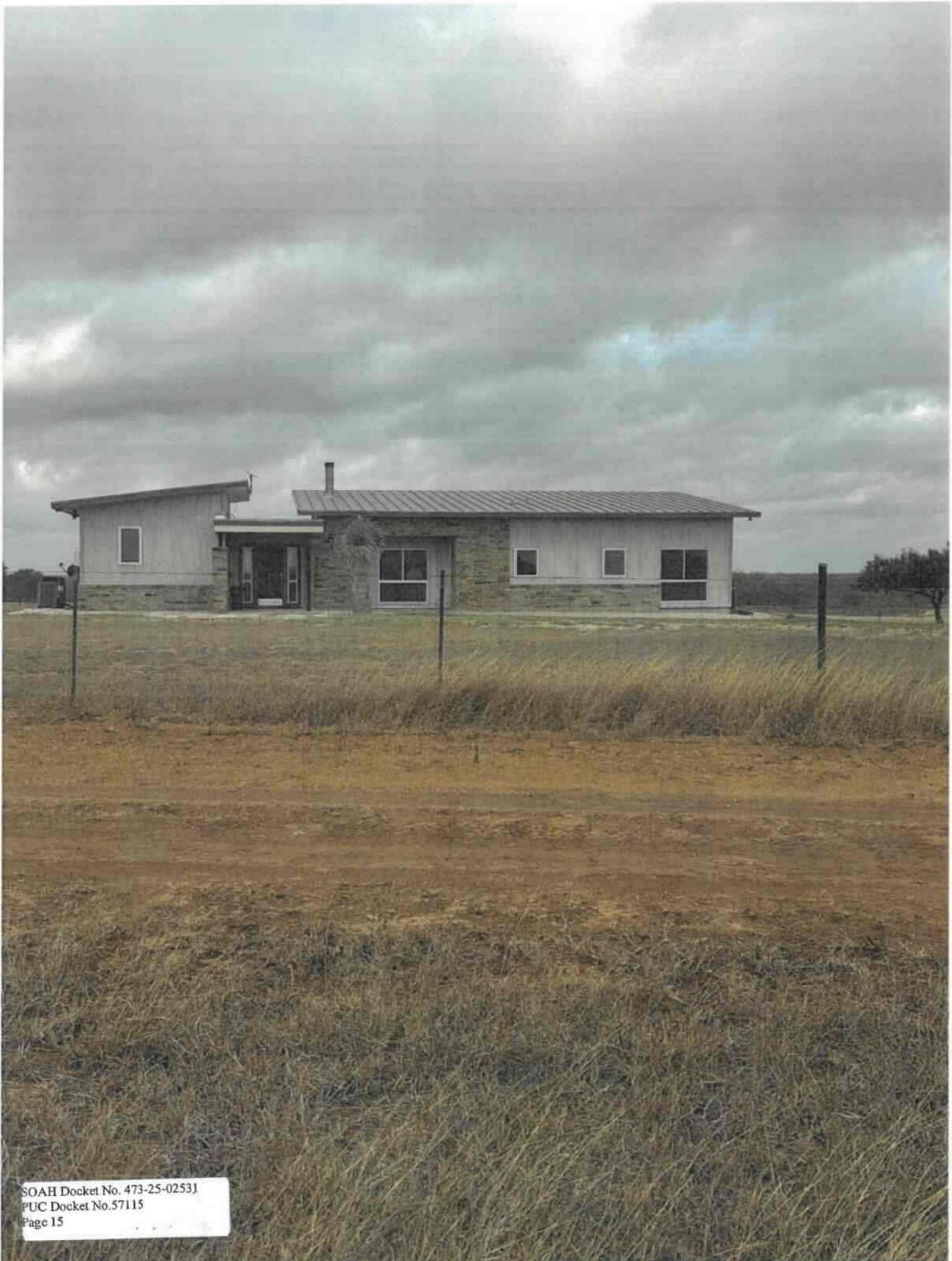


EXHIBIT  
B





SOAH Docket No. 473-25-02531  
PUC Docket No.57115  
Page 16

EXHIBIT  
C

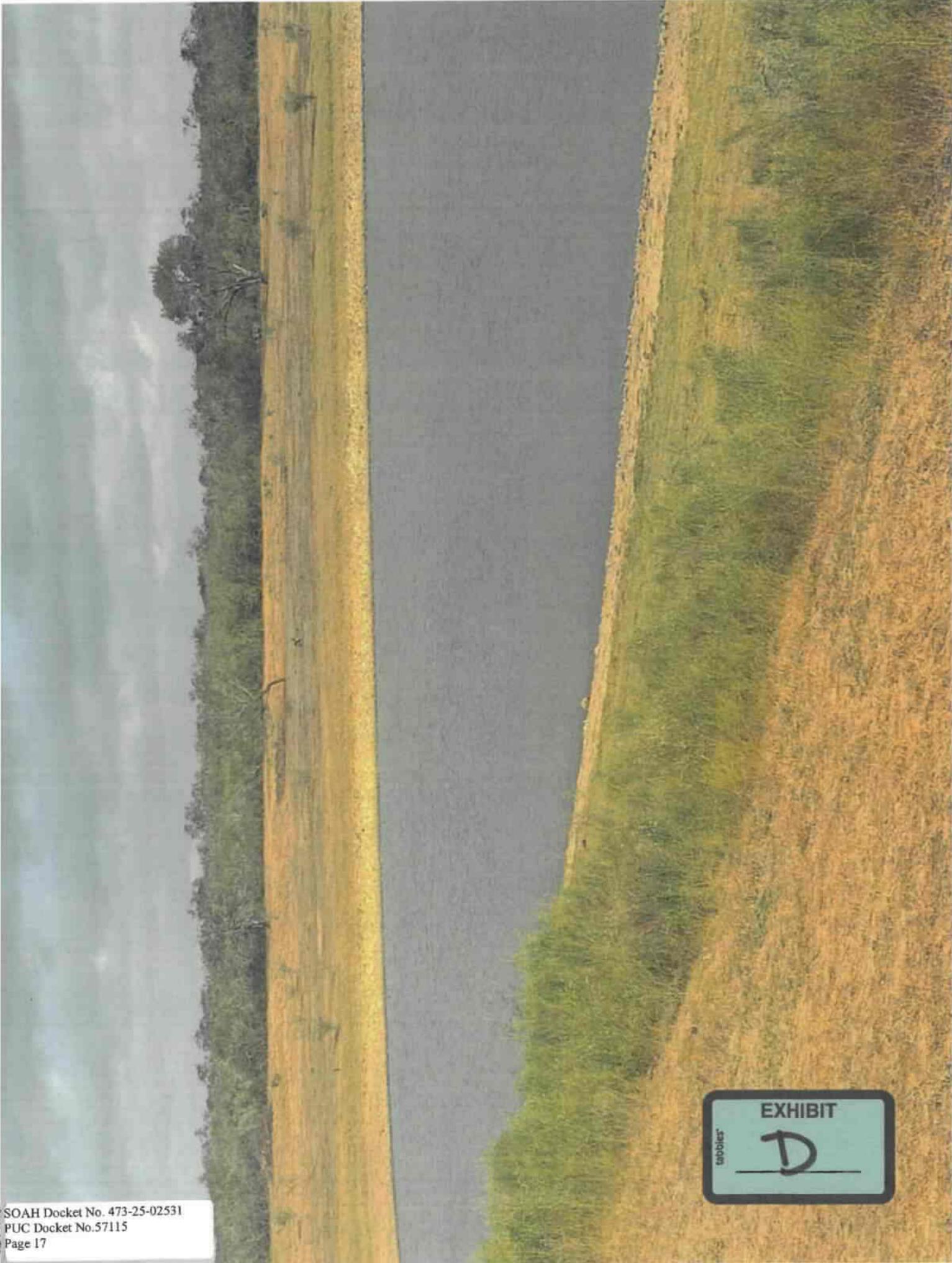
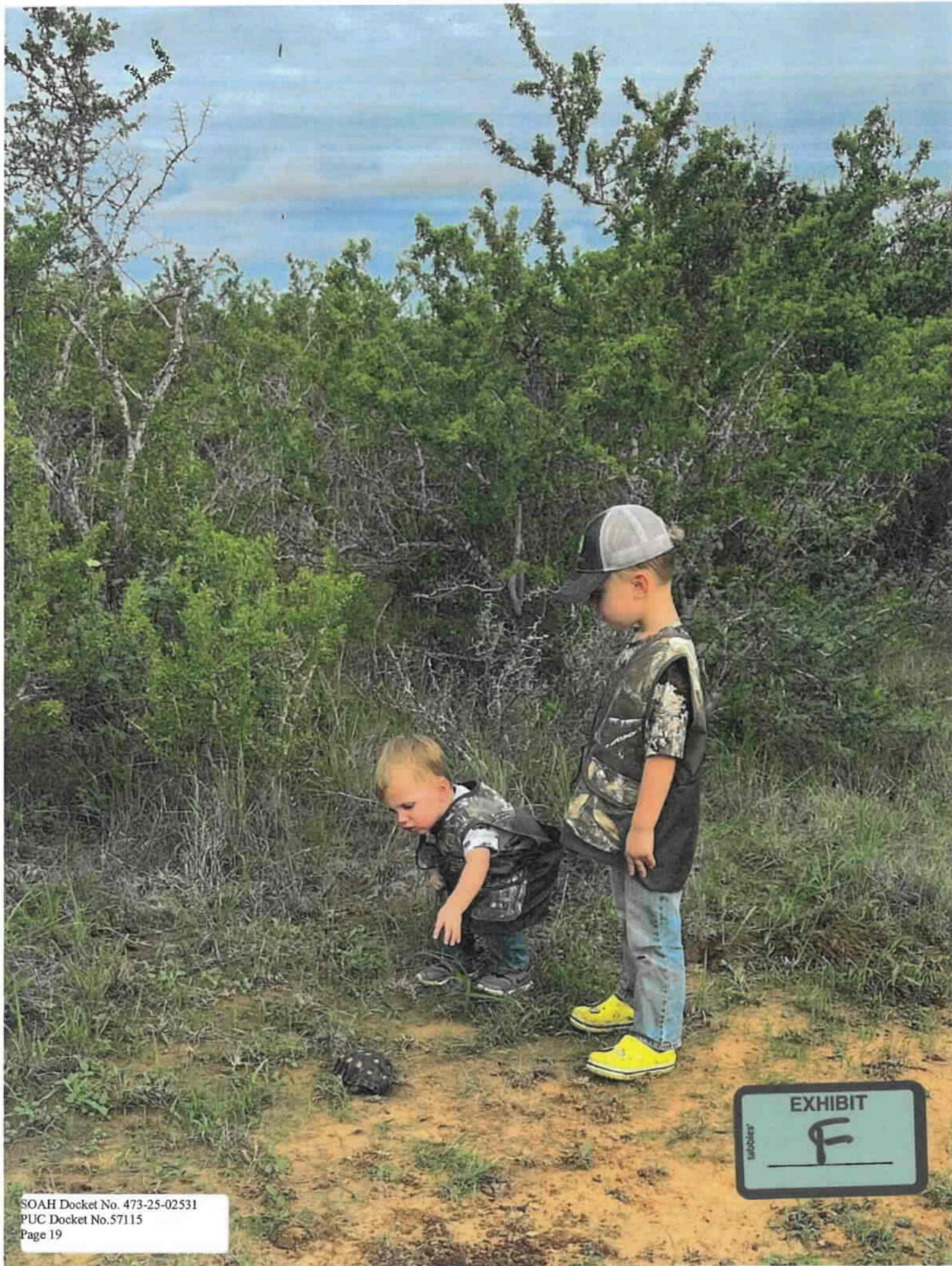
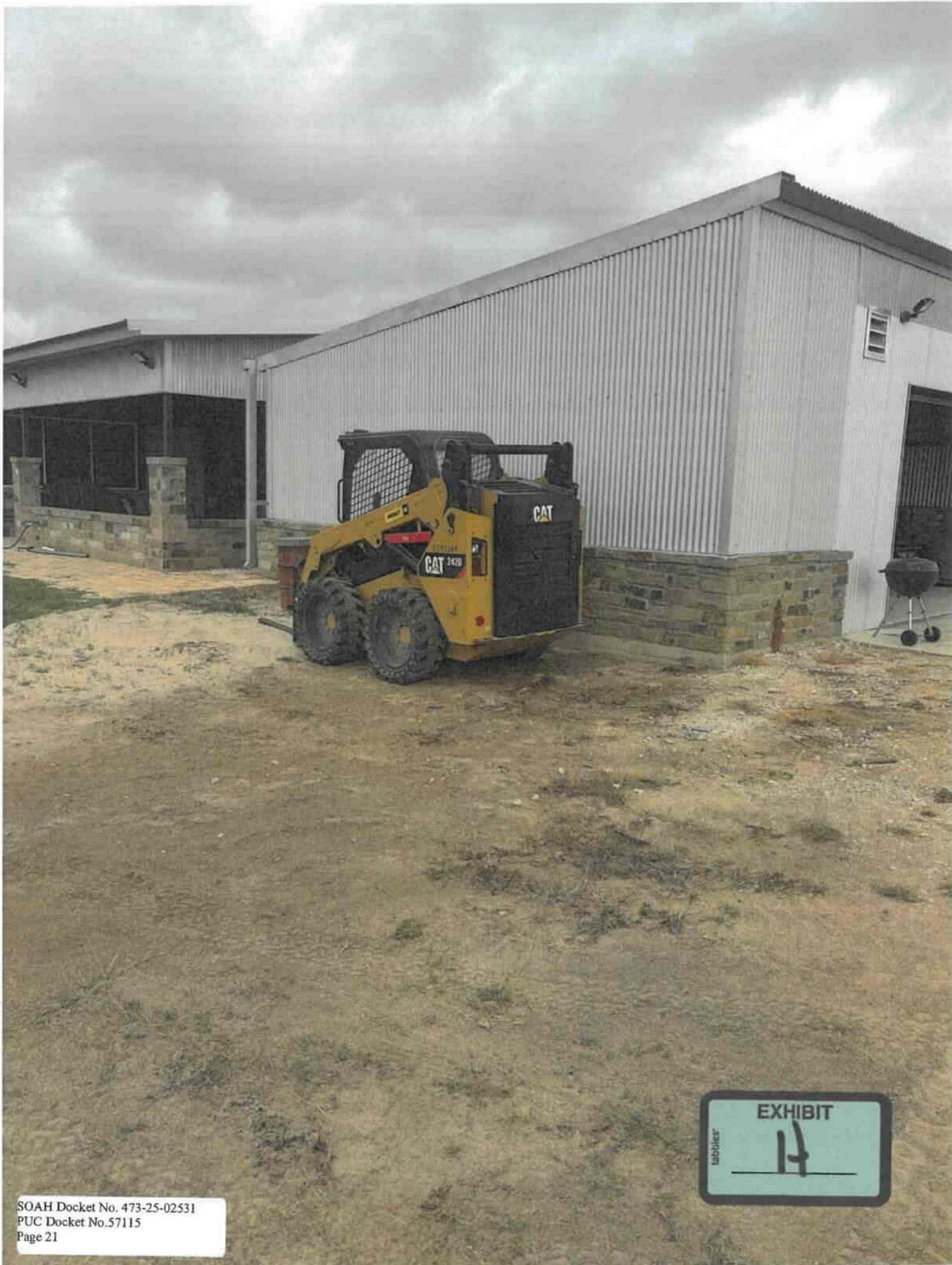


EXHIBIT  
E



LabQuest  
EXHIBIT  
F





tabblier  
EXHIBIT  
14



SOAH Docket No. 473-25-02531  
PUC Docket No. 57115  
Page 22

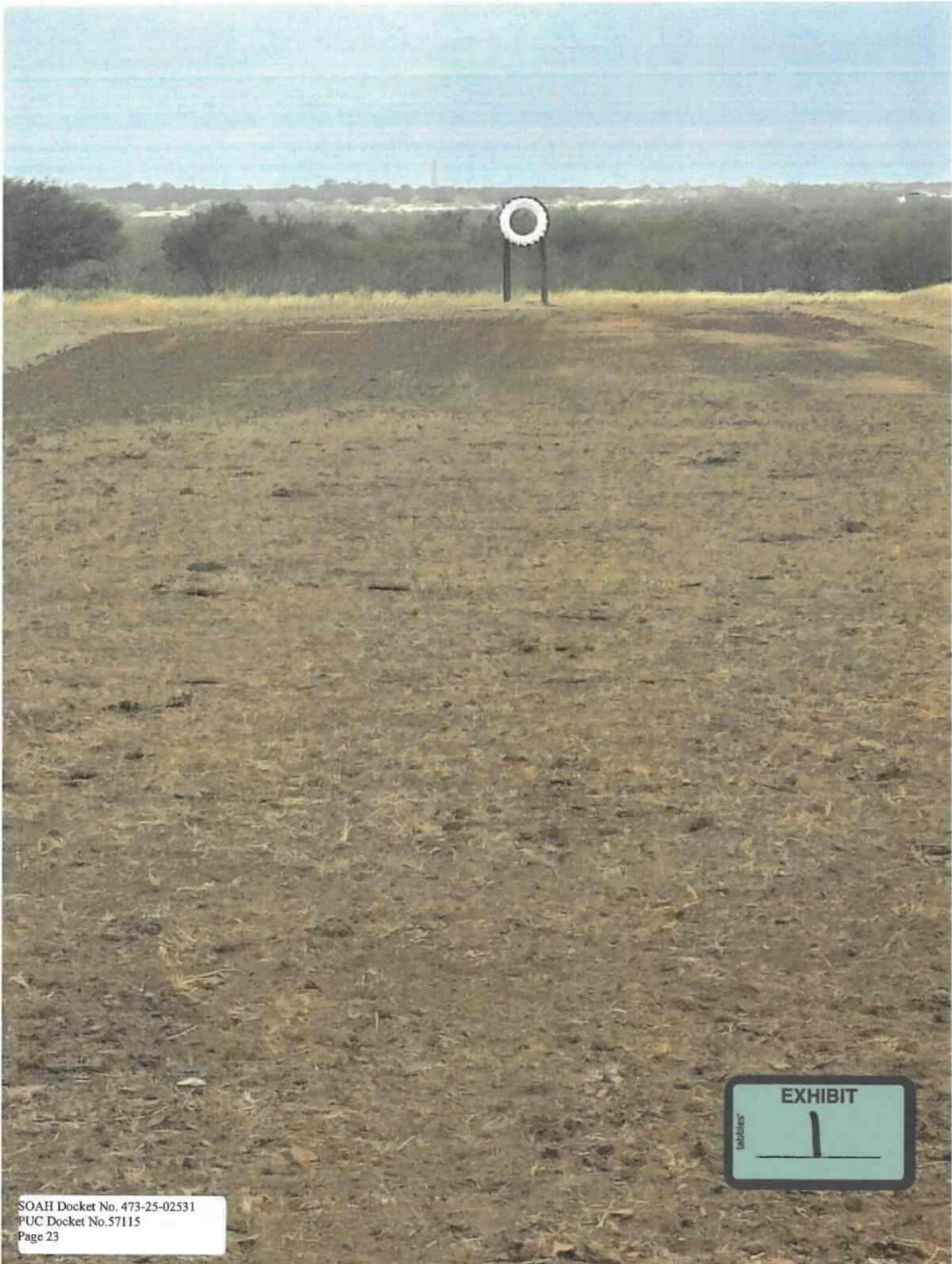
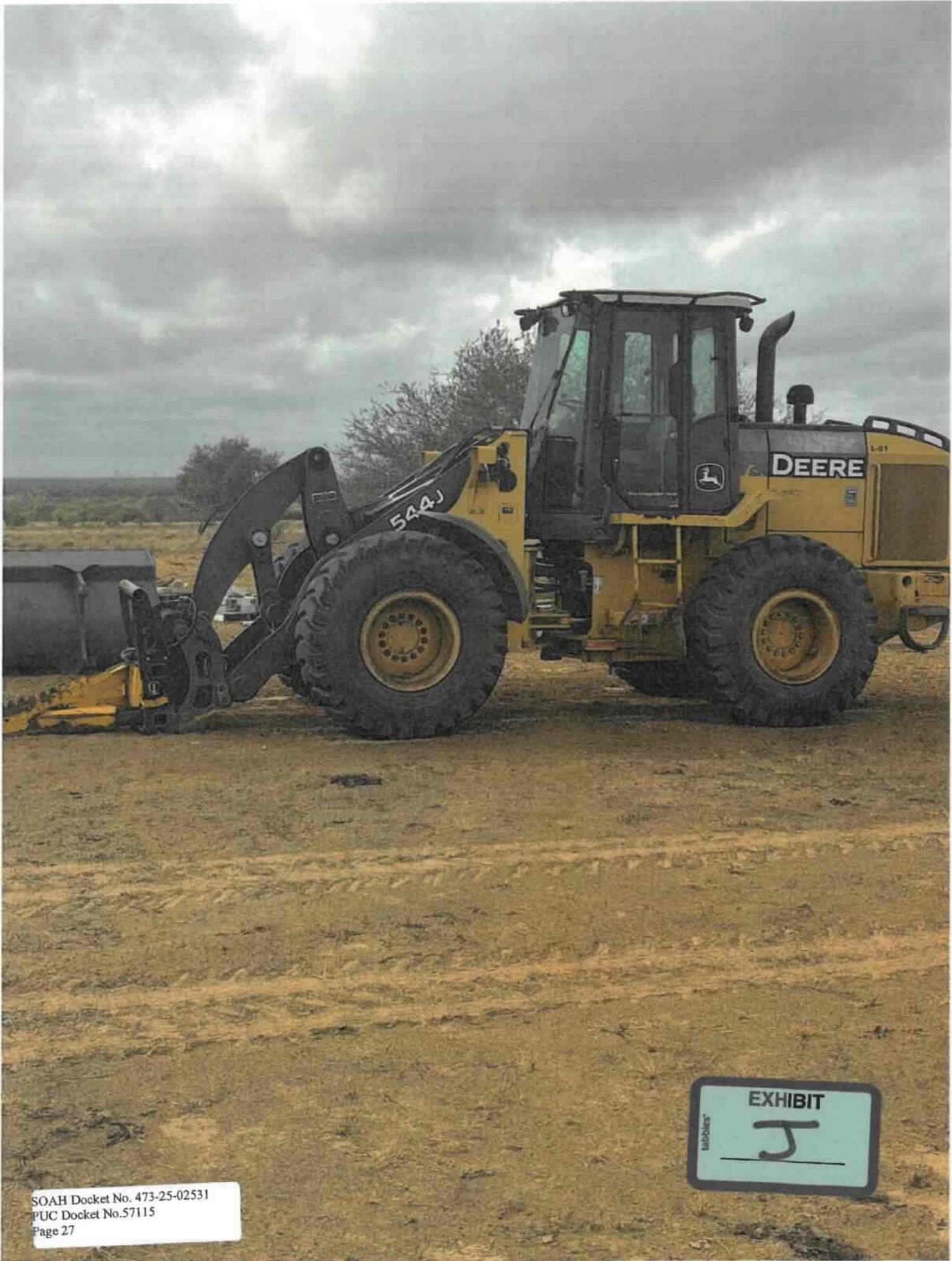


EXHIBIT  
1









SOAH Docket No. 473-25-02531  
PUC Docket No. 57115  
Page 27

EXHIBIT  
J



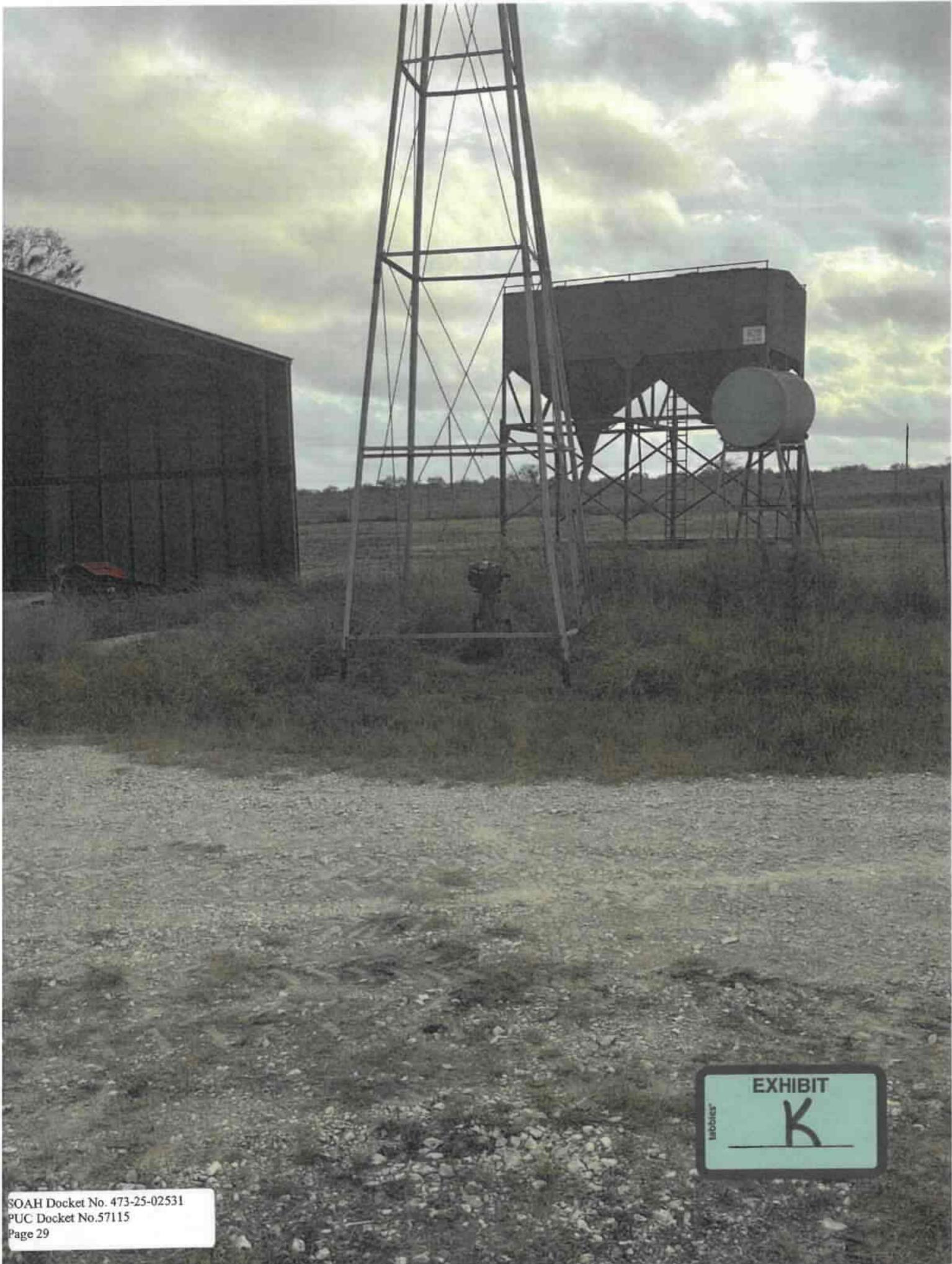
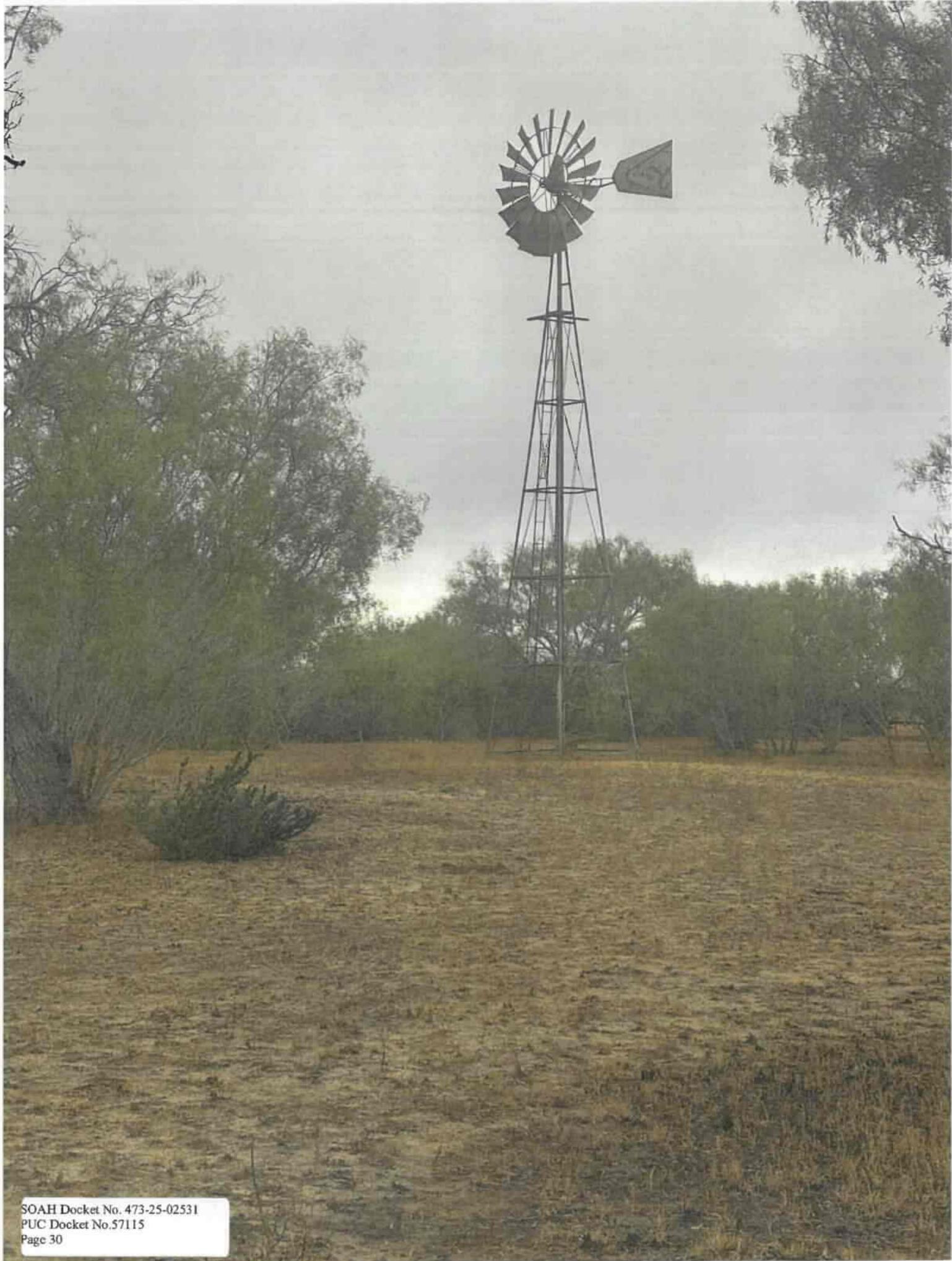


EXHIBIT  
K





labblers  
EXHIBIT  
4

