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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),	§	BEFORE THE STATE OFFICE
AND SOUTH TEXAS ELECTRIC	§	
COOPERATIVE, INC. (STEC) TO	§	OF
AMEND THEIR CERTIFICATES OF	§	
CONVENIENCE AND NECESSITY	§	ADMINISTRATIVE HEARINGS
FOR THE PROPOSED HOWARD	§	
ROAD-TO-SAN MIGUEL 345-KV	§	
TRANSMISSION LINE IN BEXAR AND	§	
ATASCOSA COUNTIES	§	

DIRECT TESTIMONY

OF

JEFFREY BEYER

ON BEHALF OF HIMSELF, MELODIE BEYER, AND 4000 FM140W LLC

MEMBERS OF THE SOUTHWEST LANDOWNERS GROUP

November 12, 2024

**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 §
§
§
§

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

AFFIDAVIT OF JEFFREY BEYER

STATE OF TEXAS §

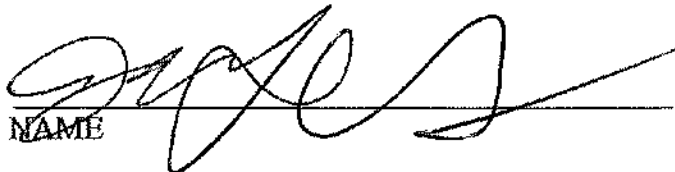
COUNTY OF Guadalupe §

Before me, the undersigned authority, on this day personally appeared the person known by me to be Jeffrey Beyer, who, after being sworn by me, stated as follows:


1. My name is Jeffrey Beyer. I am over eighteen years of age, am of sound mind and competent to make this Affidavit. I have personal knowledge of every statement contained in this Affidavit, and every statement contained herein is true and correct and based on my own personal knowledge.

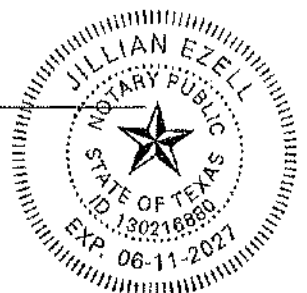
2. I make this Affidavit in support of my testimony on behalf of the Southwest Landowners. Attached hereto and made a part hereof for all purposes is my Direct Testimony and Exhibits, which have been prepared in written form for introduction into evidence in SOAH Docket No. 473-25-02531 and Public Utility Commission of Texas Docket No. 57115.

3. I hereby swear and affirm that my answers contained in the testimony are true and correct.


NAME

SUBSCRIBED AND SWORN to before me on this the 12 of November, 2024 to certify which witness my hand and seal of office.


NOTARY PUBLIC



**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	§ § § § § § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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DIRECT TESTIMONY OF JEFFREY BEYER

I. SUMMARY AND POSITION ON PROPOSED TRANSMISSION LINE

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Jeffrey Beyer.

Q. WHO ARE YOU TESTIFYING ON BEHALF OF?

A. I'm testifying on behalf of myself, my wife Melodie Beyer, and 4000 FM140W LLC, which is an entity through which we own some of our properties.

Q. WHAT IS YOUR INTEREST IN THIS CASE?

A. My family has multiple properties in Atascosa County that could be impacted by the proposed transmission line. My wife and I own these properties through 4000 FM140W LLC. They are listed below:

Properties Owned by Jeffrey and Melodie Beyer:

- Tract # A0021; Property ID # 16787
 - Impacted by Segment(s): 89, 95, 96
- Tract # A0033; Property ID # 26589
 - Impacted by Segment: 89

Q. WHAT IS YOUR POSITION ON THIS TRANSMISSION LINE?

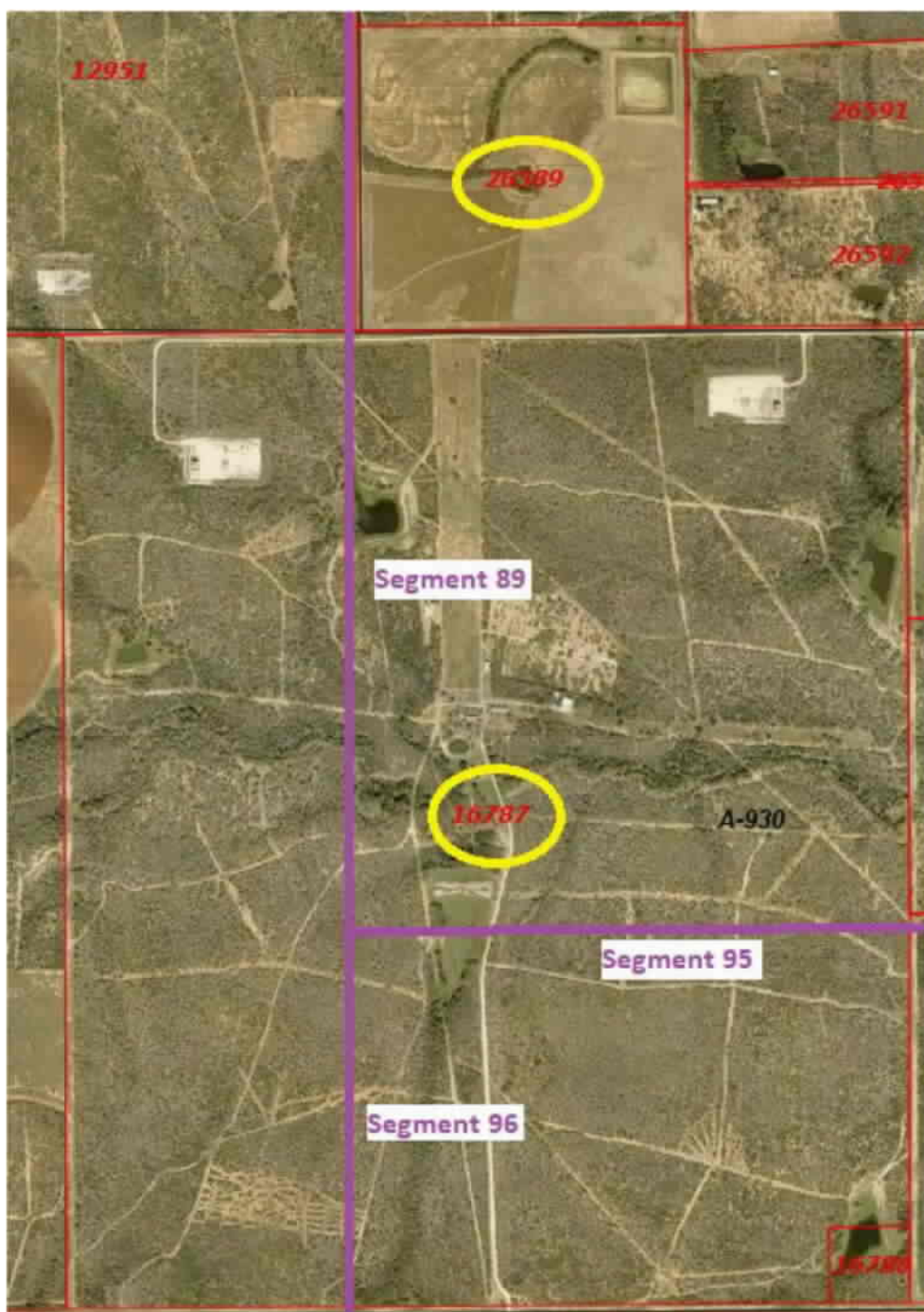
A. I strongly oppose any route that would cross my properties, and believe the Commission should not select a route that includes any of proposed Segments 89, 95, or 96. I also oppose the Commission running the line across any of my neighbors in the Southwest Landowners group. They are each filing testimony of their own, so I'll let them speak for themselves.

II. DETAIL ON HOW THE LINE WOULD IMPACT MY PROPERTY

Q. CAN YOU DESCRIBE YOUR PROPERTIES IN MORE DETAIL?

A. Yes. The two properties I mentioned above are contiguous, and together they make up over 1,100 acres of ranchland. My family's properties are depicted below on a map I pulled from the Atascosa County Appraisal District website. The tract numbers are circled in

1 yellow, and I have added purple lines to show roughly where the proposed transmission
2 line segments would be located.



1 **Q. ARE THERE ANY BUILDINGS OR OTHER FEATURES IN THE VICINITY OF**
2 **THE PROPOSED TRANSMISSION LINE?**

3 A. Yes. To the west of proposed Segment 89 and just north of the tract number marking in
4 the picture above, there is a large home, which I am often at and plan to use as my primary
5 residence in the future, as well as several barns and a set of cabins that I built for my
6 children. I have zoomed in on those in the map below. Once again, I have added the
7 approximate location of the proposed transmission line.



1 **Q. HOW WOULD THE PROPOSED TRANSMISSION LINE IMPACT YOUR**
2 **PROPERTIES?**

3 A. Putting the transmission line across my family's properties will interfere with our use and
4 enjoyment of them for ranching, hunting, and recreation. Establishing the transmission
5 right-of-way would require clear cutting miles of established trees and brush and that scar
6 would run right through the heart of our ranch. Additionally, the huge and unsightly
7 transmission towers would be clearly visible from nearly anywhere on the properties,
8 including the central area where my house is located. The transmission line would spoil
9 the view and decrease the value of the ranch.

10 Finally, I am somewhat concerned regarding the potential impact that a transmission line
11 would have on the use of my property for oil and gas extraction. As you can see in the first
12 map above, there are several existing oil and gas installations on my property, including
13 one that is quite close to the proposed path for Segment 89.

14 **Q. DO YOU HAVE ANY OTHER CONCERNS ABOUT A TRANSMISSION LINE**
15 **BEING BUILT ACROSS YOUR PROPERTIES?**

16 A. Yes. I am also concerned that expanding the transmission right-of-way and utility access
17 roads could make my property a "highway" for drug and human trafficking. It is my
18 experience that those activities tend to thrive along areas like transmission lines where it is
19 easy to move people and vehicles but also far from publicly accessible roads that the
20 authorities can properly patrol and monitor.

21 **Q. AS A MEMBER OF THE ATASCOSA COUNTY COMMUNITY, DO YOU HAVE**
22 **AN OPINION ON WHERE IT WOULD MAKE SENSE FOR THE LINE TO GO?**

23 A. Yes. While I'm not an expert, I think it makes the most sense for the transmission line to
24 run along the eastern side of the study area in Atascosa County. Putting the line in that
25 area will avoid the more populated areas of the county and generally keep the line out of
26 view of towns and highways.

