



Filing Receipt

Filing Date - 2024-11-12 02:21:28 PM

Control Number - 57115

Item Number - 165

**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

WAYNE SCHUCHART

ON BEHALF OF HIMSELF AND ATASCOSA LAND & CATTLE LTD.

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
--	--	---

TABLE OF CONTENTS

I.	SUMMARY AND POSITION ON PROPOSED TRANSMISSION LINE.....	1
II.	DETAIL ON HOW THE LINE WOULD IMPACT MY PROPERTY	1
III.	CONCLUSION.....	4

**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**

AFFIDAVIT OF WAYNE SCHUCHART

202

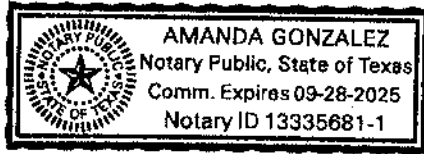
ATASCOSA §

NAME _____

Wan SGLT

Wayne Schuchart

SUBSCRIBED AND SWORN to before me on this the 8 of NOV., 2024 to certify
which witness my hand and seal of office.



NOTARY PUBLIC

Aul Seg
Amanda Gonzalez

1 **DIRECT TESTIMONY OF WAYNE SCHUCHART**

2 **I. SUMMARY AND POSITION ON PROPOSED TRANSMISSION LINE**

3 **Q. PLEASE INTRODUCE YOURSELF.**

4 A. My name is Wayne Schuchart.

5 **Q. WHO ARE YOU TESTIFYING ON BEHALF OF?**

6 A. I'm testifying on behalf of myself and Atascosa Land & Cattle, Ltd., which is an entity that
7 I indirectly control and through which I own some of my properties.

8 **Q. WHAT IS YOUR INTEREST IN THIS CASE?**

9 A. I have multiple properties in Atascosa County that could be impacted by the proposed
10 transmission line. They are listed below:

11 **Properties Owned by Wayne Schuchart:**

- 12 • Tract # A0512, Property ID # 197662
13 ○ Impacted by Segment: 74
14

15 **Properties Owned by Atascosa Land & Cattle, Ltd.:**

- 16 • Tract # A0419; Property ID # 12163
17 ○ Impacted by Segments: 74
18

19 **Q. WHAT IS YOUR POSITION ON THIS TRANSMISSION LINE?**

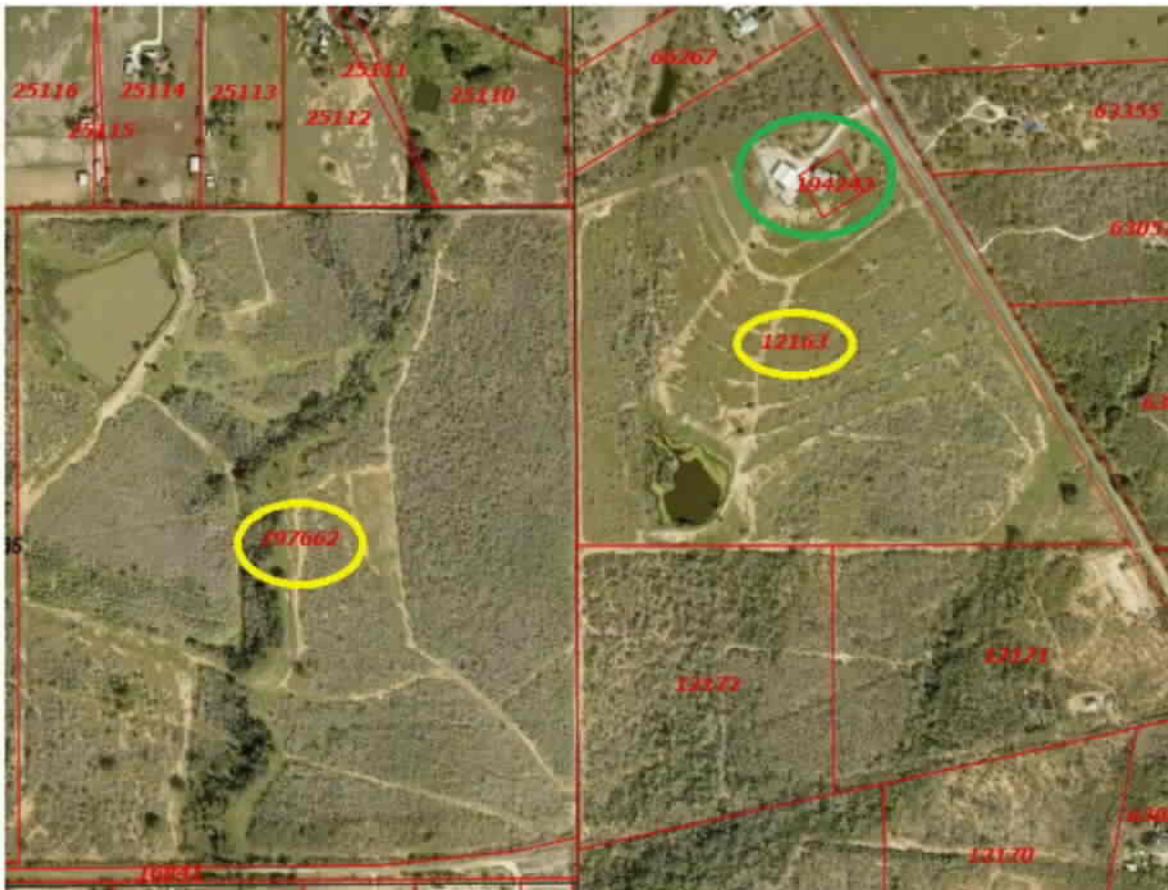
20 A. I strongly oppose any route that would cross my properties, and believe the Commission
21 should not select a route that includes Segment 74. I also oppose the Commission running
22 the line across any of my neighbors in the Southwest Landowners group. They are each
23 filing testimony of their own, so I'll let them speak for themselves.

24 **II. DETAIL ON HOW THE LINE WOULD IMPACT MY PROPERTY**

25 **Q. CAN YOU DESCRIBE YOUR PROPERTIES IN MORE DETAIL?**

26 A. Yes. The proposed transmission line segments would impact my properties along Segment
27 74. Those two tracts are contiguous, and total approximately 235 acres of ranchland. Tract

1 # A0419 also contains a separately-owned tract that is the site for a home owned by my
2 son, Shane Schuchart and his wife Andrea.¹ My son Shane is also a 45% owner in Atascosa
3 Land & Cattle, Ltd. My and my son's properties are shown below in an excerpt that I took
4 from the Atascosa County Appraisal District website. My tracts are circled in yellow, and
5 my son's tract and home is circled in green.



6
7 **Q. CAN YOU EXPLAIN HOW THE TRANSMISSION LINE WOULD IMPACT**
8 **YOUR PROPERTIES?**

9 A. Yes. First, the line would bisect my two contiguous tracts of land. Proposed Segment 74
10 would run along the property line between Tracts 12163 and 197662. As I explained above,

¹ This parcel is listed as Tract # 194243 in the Atascosa County Appraisal District's property search system. It is my understanding that even though this tract is owned by my family, it was not identified as "directly affected" by the transmission line due to its distance from the proposed location for the line.

1 I own both of those properties and they share a boundary line. The transmission line would
2 isolate those tracts from one another by inserting a broad utility right-of-way. Not only
3 would this impact my use and enjoyment of the properties, as discussed below, but it would
4 also significantly decrease the marketability of those neighboring tracts by separating them.

5 Second, the line would spoil the wonderful view from my son's home, which is circled in
6 green on the map above. That house sits on top of a hill, which you can see on the map
7 above because of the water retention earthworks that terrace the hill to the south and west
8 of the house. This hill provides the home with an outstanding view toward the wooded
9 creek bottom on my western tract. If a transmission line is built along the boundary line
10 between my two tracts, the tall towers of that line will dominate and ruin the view from
11 that home. I fear that would significantly decrease its value.

12 Finally, putting the transmission line across my properties will interfere with my family's
13 use and enjoyment of them for ranching, hunting, and recreation. Establishing the
14 transmission right-of-way would require clear cutting a scar through the center of my
15 properties. I also worry about the prospect that a transmission line could start wildfires on
16 my property.

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

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

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

26 A. Yes. While I'm not an expert, I think it makes the most sense for the transmission line to
27 run along the eastern side of the study area in Atascosa County. Putting the line in that

1 area will avoid the more populated areas of the county and generally keep the line out of
2 view of towns and highways.

3 **III. CONCLUSION**

4 **Q. CAN YOU REITERATE YOUR POSITION ON THIS TRANSMISSION LINE?**

5 A. I strongly oppose any route that includes proposed Segment 74 because it would bisect my
6 properties and ruin the view from my family's home. I also oppose the Commission
7 running the line across any of my neighbors in the Southwest Landowners group.

8 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

9 A. Yes.