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
**Control Number - 57115**

**Item Number - 169**

**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**

Tyler Nicholson, individually, and on behalf of Megan Nicholson (“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.

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



**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  
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ATASCOSA COUNTIES**

## DIRECT TESTIMONY

of

**TYLER NICHOLSON, INDIVIDUALLY  
AND ON BEHALF OF MEGAN NICHOLSON**

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1 **I. INTRODUCTION**

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

3 A. My name is Tyler Nicholson. My address is 410 Boulder Ridge Drive, Del Rio, Texas  
4 78840.

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

6 A. I am testifying on my own behalf, and on behalf of my wife, Megan Nicholson, aka  
7 Megan Seaton.

8 **Q. Can you describe your interest in SOAH Docket No. 473-25-02531 and PUC Docket**  
9 **No. 57115.**

10 A. My wife and I intervened in this proceeding as potentially affected landowners. We own  
11 property in Atascosa County, which will be impacted by the transmission line proposed to  
12 be built by the City of San Antonio, acting by and through the City Public Service Board  
13 (“CPS Energy”) and South Texas Electric Cooperative, Inc. (“STEC”) in this docket.

14 **Q. Have you ever participated or testified in another proceeding before the Public Utility**  
15 **Commission of Texas (“PUC”)?**

16 A. No.

17 **Q. Please describe your background, profession and/or experience.**

18 A. I received a Bachelor of Science in Political Science from UTSA in 2013. I am a Major in  
19 the U.S. Air Force and a pilot. I have flown the EC130 and E3 Sentry and am currently a  
20 T1 instructor. I will soon fly as a pilot for United Airlines.

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

22 A. My wife and I purchased the property in 2018 to be our family’s homestead once we are  
23 done in the military.

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 my property; (ii) describe the expected  
27 impact of the proposed transmission line on my property; (iii) voice my opposition against  
28 certain links and routes; and (iv) provide information on the route that I prefer.

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

31 A. Yes, it is.

**III. DESCRIPTION OF THE PROPERTY AND IMPACT  
OF THE TRANSMISSION LINE ON THE PROPERTY**

**Q. Please describe your property.**

A. My wife and I own an approximate 25-acre tract in Atascosa County, which will be directly impacted by the proposed transmission line, if any route utilizing Link 48 is approved by the PUC. The Property has been identified by CPS Energy and STEC as Tract A0076, and is depicted on Exhibit "A" attached to my testimony.

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

A. There are not currently any habitable structures on the Property, however, we cleared approximately 5 acres of heavily wooded area in the front of the Property to build our future home, which we plan to complete within the next five years. Proposed Segment 48 runs along the entire length of our Property and directly through our future homesite. Other improvements to the Property include two hunting blinds and a road.

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

A. The remaining 20 acres of the Property is forested and there is a natural pond on the back 5 acres. Wildlife such as white tail deer, coyotes, hogs, turkeys, rabbits, skunks, wildcats, and various birds inhabit the Property.

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

A. The Property is currently used by our family for recreational activities including hunting and camping. A friend of our also runs their cattle on the Property.

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

A. No.

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

A. Yes, I have the general concerns of landowners who are required to give third parties access to their property. I hope that CPS Energy and STEC will respect my property if I am required to give them access.

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

A. I am seriously concerned with the potential devaluation of my property as a result of this proposed line, because Segment 48 would take up the entire western side of the Property and could render roughly two-thirds of the Property useless for anything we currently use

1 and intend to use it for. I am also concerned about the health and safety issues potentially  
2 associated with transmission lines, especially since we hunt and camp on the Property as a  
3 family, including our two small children, and the line would be very close to our future  
4 home. Additionally, I am concerned about the aesthetic impacts the line would have on  
5 the Property. Please note that I am not an expert on property valuation or medical issues;  
6 my comments merely reflect my personal concerns.

#### 7 IV. CONCLUSIONS AND RECOMMENDATIONS

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

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

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

18 A. Based on my review of CPS Energy and STEC's proposed routes, Route U: (1) would  
19 avoid the LLC's Property; (2) has a relatively short overall length at 49.15 miles; (3) has a  
20 relatively low estimated cost compared to the other proposed route options; (4) has a  
21 relatively low number of habitable structures within 500 feet of the centerline at 50 (40 is  
22 the lowest and 179 is the highest); and (5) has a high percentage of the route parallel and  
23 adjacent to existing transmission line right of way, other existing right of way, and apparent  
24 property lines or other natural or cultural features at 56% of its length.

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

26 A. Yes, that concludes my testimony, subject to subsequent correction.  
27

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"

