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Filing Date - 2024-12-20 07:19:01 AM

Control Number - 57115

Item Number - 243

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

INITIAL POST-HEARING BRIEF

The City of San Antonio, acting through the City Public Service Board (CPS Energy) and South Texas Electric Cooperative, Inc. (STEC) (collectively, applicants) applied to construct and operate a transmission line in Bexar and Atascosa counties.¹ The proposed transmission facilities include a new double-circuit 345-kV transmission line connecting the CPS Energy Howard Road station to the STEC San Miguel station.²

The Commission provided SOAH a list of issues to address in this docket.³ Issue No. 8 requires the ALJs to weigh factors set out in the Public Utility Regulatory Act and a Commission rule to determine which proposed alternative route is the best alternative. This brief addresses why the Commission should not approve a route that affects The Farmacy's ranch and Issue No. 8.

Mitchell Meyer testified about The Farmacy's property, their work to improve it, and his concerns about environmental and other impacts on the property if the transmission line project were constructed on The Farmacy's property.⁴ The Farmacy LLC owns property on Segment 46 in the eastern part of the study area.⁵ The Farmacy has cultivated a balanced wildlife sanctuary

¹ Order of Referral and Preliminary Order at 1 (Oct. 7, 2024).

² *Id.* at 2.

³ *Id.* at 5-11.

⁴ The Farmacy LLC Ex. 1, Meyer Direct.

⁵ *Id.* at 2.

and the transmission line would run right through the middle of it.⁶ In addition to the forever effect of having an easement on the ranch, construction would damage sensitive soils and plants.⁷ Meyer urged the Commission to keep what's left of Atascosa County's primitive landscape and ecosystem and make it its crown.⁸

The Farmacy opposes any route that uses Segment 46 because of the negative impact on the ranch.⁹ Of the routes in the application, the routes that affect The Farmacy are among the more expensive routes and affect the most habitable structures.¹⁰ Of the 34 alternative routes in the application, 23 routes are less expensive than Route AG, the lower cost of the two proposed routes that affect The Farmacy.¹¹ The estimated cost of Route AG is \$316,754,000. The estimated cost of Route AE, the other route that affects The Farmacy, is even more—\$333,447,000. The two filed routes that affect The Farmacy have 158 and 179 habitable structures. There are 29 of the other 32 routes with fewer habitable structures than the two proposed routes that would affect The Farmacy.”¹² The additional routes intervenors proposed do not affect The Farmacy's ranch.

The applicants identified Route U as the route that best meets the Commission's routing criteria.¹³ That route does not affect The Farmacy's ranch. Commission Staff's witness recommended Route M.¹⁴ That route does not affect The Farmacy's ranch. None of the focus routes in the applicants' intervenor map¹⁵ affect The Farmacy's ranch.

Route N-AB seems to be a consensus of the intervenors and is a competitive route. The Farmacy supports approval of Route N-AB. The ALJs should not recommend and the Commission should not approve a route using Segment 46 and affecting The Farmacy's property.

⁶ *Id.* at 5.

⁷ *Id.*

⁸ *Id.* at 8

⁹ *Id.* at 5.

¹⁰ *Id.* at 6

¹¹ *Id.*

¹² *Id.*

¹³ CPS Energy-STEC Ex. 1, Application at 20.

¹⁴ Staff Ex. 1, Poole Direct at 18:8-9.

¹⁵ CPS Energy-STEC Ex. 13 (Updated) – Intervenor Maps showing Routes U, N, U Alt 2, N-AB, M, and Y.

Respectfully submitted,

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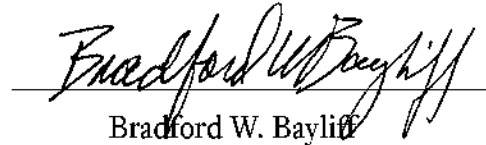
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CERTIFICATE OF SERVICE

I certify that a copy of this document is being served on all parties of record under the Commission's Second Order in Docket No. 50664 suspending PUC Procedural Rule 22.74 and orders in this docket.



Bradford W. Bayliff