



## **Filing Receipt**

**Filing Date - 2024-12-20 08:47:29 AM**

**Control Number - 57115**

**Item Number - 244**

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

**INITIAL BRIEF OF TEIXEIRA**

Teixeira, intervenor, addresses Preliminary Order Issue No. 8, “*Weighing the factors set forth in PURA § 37.056(c) and P.U.C. Subst. R. § 25.101(b)(3)(B), which proposed transmission-line route is the best alternative?*”

Of the line segments adversely affecting Teixeira – 41, 44, 47, and 50 – segments 44-47-50 are of most concern since they run the transmission line through three of its existing pivot irrigation areas and near one of its habitable structures.<sup>1</sup> Teixeira does not oppose regulatory route approval with just segment 41, given its limited impact relative to those other segments.<sup>2</sup>

Segment 41 is in all of the “routes of interest.”<sup>3</sup> None of the “routes of interest” include line segments 44-47-50 (of most concern to Teixeira).<sup>4</sup> Thus, Teixeira is similarly not opposed to regulatory approval of any “route of interest.” Teixeira does oppose approval of any route that is not a “route of interest.”

Teixeira notes that no intervening party opposes Route N-AB.<sup>5</sup> Therefore, Teixeira supports selection of that “route of interest.”<sup>6</sup>

<sup>1</sup> Teixeira Ex. 1 at p. 12 (Teixeira Dir.).

<sup>2</sup> Teixeira Ex. 1 at p. 12 (Teixeira Dir.).

<sup>3</sup> Appls. Ex. 14 (Routes of Interest Map - updated); Appls. Ex. 1, Appl. Attach. 1, Table 2-1 (route composition); *see also* SOAH Order No. 2 at pp. 4-5 (requiring Applicants to identify “focus” or “routes of interest” after the filing of the intervenor and Staff testimonies.) Those “routes of interest” are (in alphabetical order) Routes M, N, N-AB, U, U ALT 2, and Y.

<sup>4</sup> *See* Appls. Ex. 14 (Routes of Interest Map – updated).

<sup>5</sup> Appls. Ex. 14 (Routes of Interest Map – updated); Steinle Group Ex. 2 at p. 1 (Modified Dir. Testimony retracting opposition to Segments 77 and 87); Teixeira Ex. 2 at p. 16 (Teixeira Cross-Rebuttal).

<sup>6</sup> If an alternative to unopposed Route N-AB is necessary, Teixeira notes that: Routes M and N each has only one intervenor opponent, and both have favorable costs and other routing data; and Route U-Alt 2 addresses Rips Ranch’s diagonal crossing concern with original Route U but is still opposed by that intervenor. Rips Ranch Ex. 2 at p. 5-6 (Rips Ranch Cross-Rebuttal); Teixeira Ex. 2 at pp. 3, 6-8, 15-16, 20 (Teixeira Cross-Rebuttal). In light of the intervenor cross-rebuttal testimony and Staff direct testimony, Teixeira takes no position on the priority of those routes as an alternative to unopposed Route N-AB, but opposes selection of any alternative to unopposed Route N-AB that is not a “route of interest” such as Routes M, N, or U-Alt 2.

Accordingly, it is respectfully requested that Route N-AB, or alternatively another “route of interest” such as (in alphabetical order) Route M, Route N, or Route U-Alt 2, be recommended for approval.

Respectfully submitted,

By: /s/ Thomas K Anson  
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**ATTORNEYS FOR TEIXEIRA**

Certificate of Service: I certify service under SOAH Order No. 2 this Dec. 20, 2024.

/s/ Thomas K. Anson  
Thomas K. Anson