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Filing Date - 2024-12-20 08:58:44 AM

Control Number - 57115

Item Number - 245

**SOAH DOCKET NO. 473-25-02531
PUC DOCKET NO. 57115**

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

MW COALITION’S INITIAL POST-HEARING BRIEF

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

On December 9, 2024, the Administrative Law Judges (“ALJs”) conducted a Hearing on the Merits and admitted, among other things, all of the pre-filed Direct Testimony of Intervenors Andrew T. Moody, individually, and on behalf of Joe M. Moody, Jr., Joe M. Moody, III, and Leah Good; Jim Ross on behalf of JTR Farms, LLC; James Russell Wilson; Brandon Salinas on behalf of CCS Ranch Properties, LLC; Robert Hoffman, individually, and on behalf of Hoffman Growers, LLC; and Tyler Nicholson, individually, and on behalf of Megan Nicholson.

By the commencement of the Hearing on the Merits, there appeared to be complete consensus among the parties as to the “focus routes” being supported by the various parties. The focus routes consist of Routes M, N, U, Y, N-AB, and U Alt 2.¹ Other than the focus routes, there does not appear to be any specific support or persuasive evidence in the record for any other route. Among the focus routes, Route N-AB appears to be supported by the vast majority of the Intervenors and best meets the overall community values for the area. Consequently, there are no alternative routes that would have a less negative impact on landowners.

In particular, Route N-AB: (1) has a relatively short overall length at 50.12 miles; (2) has the fourth lowest cost of all 36 routes for which route data is presented; (3) impacts a relatively low number of habitable structures within 500 feet of the centerline at 74 (41 is the lowest and 179 is the highest); and (4) has a high percentage of the route parallel and adjacent to existing

¹ See CPS ENERGY-STEC Exhibit 14 (Updated).

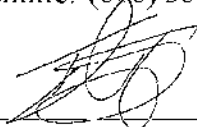
transmission line right of way, other existing right of way, and apparent property lines or other natural or cultural features at 54% of its length.²

While the MW Coalition specifically supports Route N-AB as best addressing the routing factors set forth in PURA § 37.056(c), P.U.C. SUBST. R. 25.101(b)(3)(B), and the Preliminary Order, the MW Coalition does not have any objection to any of the focus routes.

The MW Coalition respectfully requests that the ALJs' Proposal for Decision recommend, and ultimately PUC Final Order approve, Route N-AB. In the alternative, the MW Coalition respectfully requests the recommendation and approval of one of the other focus routes.

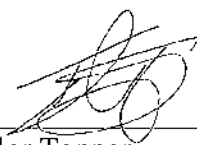
Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify a copy of this document is being filed in the Public Utility Commission's Interchange System and served on all parties of record as required by orders in this docket, the Commission's rules, and the Commission's First and Second Orders Suspending Rules issued on March 16, 2020 and July 16, 2020, in Project No. 50664.


Tyler Topper

² See CPS ENERGY-STEC Exhibit 12.