



Filing Receipt

Filing Date - 2024-12-20 01:54:22 PM

Control Number - 57115

Item Number - 250

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

JOINT APPLICATION OF THE CITY OF SAN : BEFORE THE STATE OFFICE
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 : OF
AND NECESSITY FOR THE PROPOSED :
HOWARD ROAD-TO-SAN MIGUEL 345-KV :
TRANSMISSION LINE IN BEXAR AND :
ATASCOSA COUNTIES : ADMINISTRATIVE HEARINGS

INITIAL POST-HEARING BRIEF
OF THE STEINLE GROUP

NOW COMES the Steinle Group to file its Initial Post-Hearing Brief in this Docket, as follows:

Introduction

On October 4, 2024, the City of San Antonio, acting by and through the City Public Service Board and South Texas Electric Cooperative, Inc. (collectively the “Applicant”) filed its Joint Application 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 (the “Application”). The Application identified thirty-four (34) primary alternative routes, comprised of different combinations of 110 potential segments. Thereafter, several intervenors proposed additional alternative routes and modified segments. Based on the record in this matter, it appears six (6) routes have been identified by the parties as most effectively fulfilling the requirements of the Public Utility Regulatory Act, the P.U.C. Substantive Rules, and other applicable routing criteria. These route(s) (each a “Focus Route” and collectively the “Focus Routes”) are as follows (in no particular order):

Route M:

Segments: 3-6-15-21-30-31-35-41-45A-45B-52-54-55-58-59-65-68B-74-82-86-98-106-108-110

Route N:

Segments: 3-6-15-21-30-34-39-40-41-45A-45B-52-54-55-58-59-65-68B-74-82-86-98-106-108-110

Route U:

Segments: 3-6-20-28-30-31-35-41-45A-45B-52-56-61-62-69-75-77-87-94-99-107-108-110

Route Y:

Segments: 3-6-20-28-30-31-35-41-45A-45B-53-57-62-70-78-99-107-108-110

Route N-AB:

Segments: 3-6-15-21-30-34-39-40-41-45A-45B-52- 54-55-58-59-65-68B-71-75-77-87-94-99-107-108-110

Route U-ALT-2:

Segments: 3-6-20-28-30-31-35-41-45A-45B-52-56-61-62MOD2-69-75-77-87-94-99-107-108-110

*Segment 62MOD2 is set out and described in Interchange Filing No. 184

Route Adequacy and Selection

It is anticipated that other parties in this Docket will express a preference for a particular Focus Route. The Steinle Group has no preference for any particular Focus Route. Focus Route(s) U, N-AB, and U-ALT-2 each affect lands owned by the Steinle Group, by utilizing Segments 77 and 87.

The Steinle Group remains **unopposed to the use of Segments 77 and 87** in any Route recommended by the Administrative Law Judges and/or ultimately selected by the Commission, **provided there are no operations by the Applicant outside of the proposed one hundred fifty foot (150') wide easement**, on lands owned by the Steinle Group (the "Easement Area"). The Steinle Group's Direct Testimony (as set forth in Steinle Group Exhibit No. 1) stated an opposition to the negative impacts the proposed project would have on their operations. While the Steinle Group has retracted its opposition to the use of the Easement Area (along Segments 77 and 87), the use of any other lands of the Steinle Group would over-burden their operations, and is opposed.

In addition, and though not utilized by any Focus Route, the Steinle Group remains **opposed to and objects to any route utilizing Segment 83.**

Conclusion

The Steinle Group respectfully requests that the Administrative Law Judges recommend, and the Commission approve, one of the Focus Routes (with assurances that there will be no use of Steinle Group lands outside of the Easement Area). Each Focus Route, when reviewed with PURA, the P.U.C Substantive Rules, and other applicable routing criteria, appears to be a better choice than any other route identified in the Application (and/or by the parties).

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2024, a true and correct copy of this document has been filed in the Public Utility Commission's Interchange System and served on all parties of record as required by the orders in this Docket, the rules of the Public Utility Commission, and the First and Second Orders Suspending Rules issued on March 16, 2020, and July 16, 2020, in Project No. 50664.



Matthew K. Franklin