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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 TEXAS ELECTRIC COOPERATIVE, INC. (STEC) TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR THE PROPOSED HOWARD ROAD-TO-SAM MIGUEL 345-KV TRANSMISSION LINE IN BEXAR AND ATASCOSA COUNTIES	§ § § § § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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INITIAL POST-HEARING BRIEF OF
THE COBLE RD. GROUP INTERVENORS

Pursuant to the orders on file in the above numbered docket, Intervenor, PATRICK SCOTT, RACHEL SCOTT, DORIS A. KOSUB, KAY KOSUB THEECK, and DAVID L. DOMSCH, collectively the “Coble Rd. Group,” files this Initial Post-Hearing Brief of the Coble Rd. Group Intervenor.

DECEMBER 20, 2024

CERTIFICATE OF SERVICE

I hereby certify on that on the 20th day of December, 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.

/s/ JAIME J. TREVINO, JR.
JAIME J. TREVINO, JR.

I. INTRODUCTION

On October 4, 2024, the City of San Antonio, acting by and through the City Public Service Board (“CPS Energy”) and South Texas Electric Cooperative, Inc. (“STEC”) (collectively “Applicants”) filed a joint application with the Public Utility Commission of Texas (“Commission” or “PUC”) to amend their certificates of convenience and necessity (“CCNs”) to construct and operate a new, double-circuit 345-kilovolt transmission line connecting the CPS Energy Howard Road Station in Bexar County, Texas to the STEC San Miguel Station in Atascosa County, Texas (“Project”). The Coble Rd. Group Intervenor has an interest in this Project because certain proposed routes cross or otherwise directly affect the members of the Coble Rd. Group’s property, and it was admitted as an intervenor to this document by SOAH Order No. 4¹. On December 9, 2024, a hearing on the merits was held. The Coble Rd. Group has limited its brief to a discussion of selected routing matters.

II. JURISDICTION AND DEADLINE FOR DECISION

Not addressed.

III. PRELIMINARY ORDER ISSUES

A. Application and Route Adequacy

Not addressed.

B. Notice

Not addressed.

C. Public Input

Not addressed.

D. Need

Not addressed.

E. Route

The specific routes that have emerged as the focus of these proceedings are Routes M, N, and N-AB (“Interest Routes”). The Coble Rd. Group does not advocate for any particular route, is not opposed to any of the Interest Routes, and opposes any route that utilizes Segment 50. When considering the statutory

¹ SOAH Order No. 4 at I (December 5, 2024).

factors in connection with the Commission's rules², and the testimony admitted in this docket, either of the Interest Routes appear to be the best routes. These routes allow for a reasonably forward-progressing movement of the Project and achieve the ultimate goal of the Project. The evidence, and a majority of Intervenor, support the Interest Routes as the routes that best meet the criteria and will speak to their preferences in their own filings. No party has advocated for a route that includes Segment 50 and no evidence in the record supports a route that utilizes Segment 50 as the best route when considering the criteria.

F. Landowner Preferences, Contributions, and Accommodations

Not addressed.

G. Cost to Consumers

Not addressed.

H. Best Management Practices

Not addressed.

I. TPWD's Recommendation and Comments

Not addressed.

J. Permits

Not addressed.

K. Coastal Management Program

Not addressed.

L. Limitation of Authority

Not addressed.

M. Other Issues

Not addressed.

IV. CONCLUSION

² PURA §37.056 (c); 16 Tex. Admin. Code §25.101(b)(3)

For the reasons set forth above, the Coble Rd. Group does not advocate for any particular route, is not opposed to the selection of any of Interest Routes, and does oppose the selection of any route utilizing Segment 50. Any route utilizing Segment 50 has little to no support amongst Intervenor and is less favorable under the criteria. The preferences of the Intervenor as a whole appears to support the conclusions that either of the Interest Routes should be chosen as the best meets route for the transmission line. For these reasons, the Coble Rd. Group respectfully requests that Your Honors and the Commission enter an order selecting a route that does not utilize Segment 50.

Respectfully submitted,

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INTERVENORS