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

**POST-HEARING REPLY BRIEF
OF RIPS RANCH LLC**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES ("ALJs");

Rips Ranch LLC timely files its Post-Hearing Reply Brief in this proceeding and would respectfully show as follows:

I. ARGUMENT

More than a dozen parties, including the Applicants and PUC Staff, filed initial briefs. A number of the filers were unaffected by any of the Routes of Interest; a few intervenors were affected by some, but not all of the Routes of Interest; no party opposed, and **almost all endorsed, approval of Route N-AB**. Rips Ranch, too, contends that the ALJs should recommend, and the Commission should approve, Route N-AB.

- **Route N-AB is among the shortest alternatives**, doing less damage to the affected areas, whether woodlands, rangelands, farms, ranches, or streams than longer or more-complex routes. PUC SUBST. R. § 25.101(b)(3)(B).
- In an Application which proposed, together with routes described in discovery and the Applicants' rebuttal testimony, routes ranging from \$274 million to more than \$390.5 million in cost to build, Route N-AB is estimated to cost just over \$280 million. **Route N-AB is the fourth least-costly alternative** out of 36 routes, more than \$4 million lower than the next-lowest alternative. Route

N-AB is just a fraction more costly than the lowest cost alternative and far less costly than any eastern corridor alternative, including any iteration of Route U. PUC SUBST. R. § 25.101(b)(3)(B).

- Alternative routes pass between 41 and 179 habitable structures. Route **N-AB passes only 74 habitable structures**, ranking first among the top dozen most-cost-effective routes for impact upon habitable structures, thereby moderating the impact of the line on the affected community and landowners and promoting the Commission's policy of prudent avoidance. PUC SUBST. R. § 25.101(b)(3)(B)(iv), (a)(1).
- **Route N-AB excels in paralleling existing corridors and apparent property lines**, with 54% of its length parallel to such features. PUC SUBST. R. § 25.101(b)(3)(B)(ii), (iii).

Route N-AB avoids impacts to landowners, including owners of habitable structures, at a reasonable cost; respects community values; properly considers impacts upon recreational and park areas; moderates the impacts upon historical and aesthetic values; and promotes environmental integrity. PURA § 37.056(c)(4). Balancing all statutory and rules-based factors, Route N-AB best meets the Commission's obligation to "route[the proposed line] to the extent reasonable to moderate the impact on the affected community and landowners." PUC SUBST. R. § 25.101(b)(3)(B).¹

II. CONCLUSION

The ALJs and the Commission should note that **Route N-AB** and similar, central-corridor routes are straighter, significantly shorter, materially less costly than routes in the western portions of the Study Area or eastern portions of the Study Area, including

¹ The ALJs and the Commission should avoid routes using Segment 62 and derivatives because of the disproportionate damage such routes do to Rips Ranch and a habitable structure not identified in the Application, Rips Ranch's ranch foreman's home, and to the Atascosa River, its nearby tributaries, and the wooded areas through which they flow. If the ALJs nevertheless consider routes including some version of Segment 62, including Route U, to be favorable, they should order modifications to the Segment that straighten it, reduce its number of turning structures, reduce its impact upon the previously unacknowledged habitable structure on Rips Ranch, and reduce Segment 62's overall impact on Rips Ranch, such as Segment 62-MOD2, resulting in Route U Alt 2.

routes that include Segment 62; moreover, opposition to Route N-AB is non-existent, and support is strong. **The ALJs should, therefore, recommend adoption of Route N-AB.**

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of this document is being filed and served on this, the 6th day of January, 2025, in the Public Utility Commission of Texas's Interchange System in accordance with the orders of the presiding officer, SOAH Order No. 2.

/s/ David F. Brown

David F. Brown