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

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

SOUTHWEST LANDOWNERS' REPLY BRIEF

Pat and Suzanne Schuchart; Running V Land LP; Wayne Schuchart; Atascosa Land & Cattle, Ltd.; Jeffrey and Melodie Beyer; 4000 FM140W LLC; Bill Kaiser, Jr.; and Kari Kaiser Vickers (collectively the "Southwest Landowners") urge the Commission to select *unopposed Route N-AB*.

Notably, while Commission Staff does not oppose Route N-AB, Staff's initial brief advocated for the adoption of Route M. The Southwest Landowners present this reply brief to emphasize that they *strongly oppose Route M*. Importantly, the Commission is required to consider community values when routing transmission lines, and as Staff's brief acknowledged, "community values may include landowner concerns and opposition."¹ As explained in the Southwest Landowners' initial brief, they oppose Route M because that route would disproportionately impact Southwest Landowners' group member Wayne Schuchart. Segment 74 would unnecessarily bisect Mr. Schuchart's contiguous properties and would spoil the view from his son's home. The Commission should not select a route that would do that when there is an unopposed alternative (Route N-AB) that performs extremely well on both the qualitative and quantitative factors that the Commission is required to consider when routing transmission lines.

¹ Application of LCRA Transmission Services Corporation to Amend its Certificate of Convenience and Necessity for the Gillespie to Newton 345-kV CREZ Transmission Line in Gillespie, Llano, San Saha, Burnet, and Lampasas Counties, Texas, Docket No. 37448, Proposal for Decision at 14 (Mar. 18, 2010).

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Michael A. McMillin

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ATTORNEY FOR THE SOUTHWEST LANDOWNERS GROUP

CERTIFICATE OF SERVICE

I, Michael A. McMillin, Attorney for The Southwest Landowner's Group, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 6th day of January, 2025 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Michael A. McMillin Michael A. McMillin