



Filing Receipt

Filing Date - 2024-11-04 11:47:50 AM

Control Number - 57115

Item Number - 95

Request to Intervene in PUC Docket No. 57115

The following information must be submitted by the person requesting to intervene in this proceeding. This completed form will be provided to all parties in this docket. **If you DO NOT want to be an intervenor, but still want to file comments, please complete the "Comments" page.**

Mail this completed form and 10 copies to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, TX 78711-3326

First Name: Elizabeth Last Name: Burney
Phone Number: 210.225.4031 Fax Number: 210.222.0586
Address, City, State: 2632 Broadway St., Ste. 401-S, San Antonio, TX 78215
Email Address: edb@ddb-law.com

I am requesting to intervene in this proceeding. As an INTERVENOR, I understand the following:

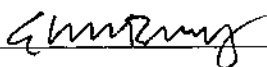
- I am a party to the case;
- I am required to respond to all discovery requests from other parties in the case;
- If I file testimony, I may be cross-examined in the hearing;
- If I file any documents in the case, I will have to provide a copy of that document to every other party in the case; and
- I acknowledge that I am bound by the Procedural Rules of the Public Utility Commission of Texas (PUC) and the State Office of Administrative Hearings (SOAH).

Please check one of the following:

- ☐ I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.
- ☐ One or more of the utility's proposed routes would cross my property.
- ☒ Other. Please describe and provide comments. You may attach a separate page, if necessary.

Please see attached.

Signature of person requesting intervention:



Date: 11/1/24

Effective: April 8, 2020

000617

I represent Teixeira Holdings, LLC, which owns Property ID 11912. Segment 47 of the proposed transmission line cuts directly across the center of 11912 for a length of 6,200 feet.

The introduction of a high-voltage transmission line across this tract could significantly reduce the value and marketability of the property. Real estate trends and appraisals consistently reflect a decline in property value for land that houses transmission lines, due to both aesthetic concerns and the perception of reduced desirability among prospective buyers. This issue is compounded by the fact that any compensation offered may not account for the long-term devaluation or potential restrictions imposed on the property.

Moreover, such transmission lines often come with limitations on land use around the vicinity of the lines. This would affect my client's ability to utilize the property to its full potential, potentially interfering with agricultural plans, future development options, and other profitable uses.

This tract of land was purchased for agricultural purposes, including the growing of seasonal crops. If this segment is selected as part of the Howard Road to San Miguel Transmission Line Project, my client's use of the property will be significantly harmed, resulting in not only loss of property value but also loss of annual revenue earned by the crops. In addition, segment 47 will directly impact the installed irrigation system, which would be detrimental to the crops.

Additionally, my client is concerned about the environmental and safety impacts, particularly related to electromagnetic field (EMF) exposure and potential ecological disruption.

I urge CPS Energy to consider alternative routing options that do not include segment 47. Based on the Description of Primary Alternative Routes, there appear to be several alternative routes available.