

September 29, 2026

Public Utility Commission of Texas

**Re: PUCT Docket 60319 - Opposition to El Paso Electric's Proposed Link R1**

To the Commissioners:

I am writing to express my strong opposition to El Paso Electric's proposed Link R1 route for the 345 kV transmission line from Pine Substation to McCloud Central. I respectfully ask the Public Utility Commission of Texas to carefully consider the significant and potentially permanent effects this route would have on the natural environment, wildlife habitat, archaeological resources, scenic character, safety, and quality of life of the people who live along this proposed path.

I have lived in this area continuously since 1989 and am currently the longest-standing resident in the immediate area. Over those decades, I have had the opportunity to observe firsthand the unique natural character of this landscape and the wildlife that depends upon it. This is not simply vacant or undeveloped land. It is an established desert ecosystem and a quiet residential environment located near the historic and environmentally significant Hueco Tanks State Park.

**Significant Impact on Wildlife and Natural Habitat**

Construction of a 345 kV transmission corridor and the ongoing clearing and maintenance of its associated right-of-way would create a substantial disturbance to existing wildlife habitat. Heavy construction equipment, excavation, access roads, vegetation removal, construction noise, and continued maintenance activity could alter areas currently used for feeding, shelter, nesting, movement, and reproduction.

Wildlife regularly observed in this area includes great horned owls, red-tailed hawks, western diamondback rattlesnakes, black-tailed rattlesnakes, gopher snakes, numerous species of lizards and toads, oryx, aoudad, mule deer, javelinas, mountain lions, foxes, skunks, porcupines, badgers, and other native wildlife.

The presence of this variety of species demonstrates that this area functions as meaningful wildlife habitat. Once a large transmission corridor is constructed and regularly maintained, portions of that habitat may be permanently altered. The Commission should therefore give serious consideration not only to the immediate footprint of individual transmission structures, but also to the cumulative effects of construction, right-of-way clearing, access, maintenance, noise, and long-term habitat fragmentation.

**Proximity to Homes and Quality of Life**

The proposed route would also have an extraordinary impact on the people who actually live here.

The proposed steel transmission structures are approximately 125 feet tall. Because of the elevation and terrain, the tops of these structures would be approximately level with my home. They would therefore become a dominant feature immediately within my viewshed and substantially interfere with the view from my front porch toward historic Hueco Tanks State Park.

This is not a minor aesthetic inconvenience. Residents chose to live in this area because of its open desert landscape, natural beauty, wildlife, views, peace, and tranquility. A major 345 kV transmission corridor immediately adjacent to residences would fundamentally and permanently change that environment.

The Commission should carefully consider whether imposing such a significant industrial infrastructure corridor this close to established homes is justified when alternative routing may be available that could reduce impacts on residents and environmentally sensitive areas.

## Electrical Grounding and Safety Concerns

I am also concerned about the suitability of the local soil conditions for grounding infrastructure of this magnitude.

The soil in this area has high resistivity, with solid rock and caliche occurring at depths of approximately 30 inches in many locations. Proper grounding is an essential component of electrical system and public safety.

I respectfully request that El Paso Electric be required to fully evaluate and document the grounding conditions along Link R1, including how the area's high soil resistivity, rock, and caliche would affect the design, installation, inspection, and long-term effectiveness of the grounding system.

Given the proximity of the proposed infrastructure to residences, these concerns deserve careful technical review rather than being treated as a routine construction issue.

## Archaeological and Cultural Resource Concerns

The archaeological significance of the broader Hueco Tanks area must also be taken seriously.

Although the proposed route may not fall within the formal boundaries of Hueco Tanks State Park, proximity to a protected cultural and archaeological area should warrant heightened caution. Applicable state and federal antiquities and cultural-resource requirements must be followed, and any archaeological or cultural resources encountered would need to be appropriately evaluated and addressed before construction proceeds.

Once archaeological resources are disturbed or destroyed, they cannot simply be replaced. Thorough investigation should therefore occur before irreversible ground disturbance takes place, rather than relying solely on discoveries made during construction.

## The Cumulative Impact Should Not Be Minimized

Each of these concerns is significant by itself. Taken together, however, they present an even stronger reason for the Commission to closely scrutinize Link R1.

The proposed route would introduce approximately 125-foot transmission structures and a major 345 kV electrical corridor into an area characterized by open desert, established wildlife habitat, archaeological sensitivity, nearby residences, and views toward Hueco Tanks State Park. Construction and subsequent right-of-way maintenance would create disturbances that could continue long after the initial construction is complete.

For those of us who live here, the consequences would not end when construction crews leave. We would live with this infrastructure every day.

I moved to this area because of its extraordinary views, wildlife, peace, and tranquility. After living here continuously since 1989, this environment has become an irreplaceable part of my home and my life. Having this transmission line immediately outside my front door would dramatically change that environment and would cause me significant personal distress. As a disabled U.S. Army veteran who served from 1977 through 1987 and who experiences PTSD and high anxiety, the tranquility of my home and surroundings is particularly important to my quality of life.

I respectfully ask the Public Utility Commission of Texas **not to approve Link R1 as proposed** and to require serious consideration of alternative routes that would reduce impacts on established residences, wildlife habitat, the natural desert landscape, archaeological and cultural resources, and the broader Hueco Tanks area.

Infrastructure needs are important, but the route chosen to meet those needs matters. Where reasonable alternatives exist, the burden should not unnecessarily be placed on residents, wildlife habitat, and a landscape whose natural and cultural character cannot be restored once permanently altered.

Thank you for considering these concerns and for carefully evaluating the full human and environmental consequences of the proposed Link R1 route before making a final determination.

Respectfully submitted,

**Claudia Deneen**

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