

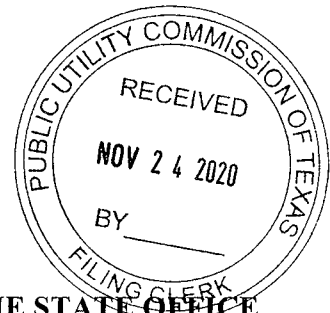


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SOAH DOCKET NO. 473-21-0247  
PUC DOCKET NO. 51023

APPLICATION OF THE CITY OF SAN ANTONIO TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY § BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS §

**CPS ENERGY’S RESPONSE TO STATEMENT ON ROUTE ADEQUACY AND REQUEST FOR APPROVAL OF AGREED AMENDMENTS TO CPS ENERGY’S APPLICATION BY TOUTANT RANCH, LTD., ASR PARKS, LLC, PINSON INTERESTS LTD. LLP, AND CRIGHTON DEVELOPMENT CO.**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Response to the Statement on Route Adequacy and Request for Approval of Agreed Amendments to CPS Energy’s Application by Toutant Ranch, Ltd., ASR Parks, LLC, Pinson Interests Ltd. LLP, and Crighton Development Co. (Developers) that was filed in this docket today.

**I. INTRODUCTION**

For over a year CPS Energy has had discussions with Developers regarding the property owned by Developers in the Study Area that would be impacted by the Project. Developers have been willing to engage with CPS Energy regarding routing alternatives that are acceptable to CPS Energy with respect to Project need and in compliance with the applicable rules of the Public Utility Commission of Texas (Commission). Prior to, and subsequent to the filing of the Application, Developers have continued to discuss potential route modifications with CPS Energy wholly on property owned by Developers that would not directly affect any other landowners.

**II. CPS ENERGY’S RESPONSE**

In prior proceedings involving amendments to transmission line certificates of convenience and necessity, the Commission has generally supported requests of landowners who are willing to have a transmission line located on their property in a manner that does not negatively affect other landowners and who are willing to contribute toward the project cost. CPS Energy believes the route changes proposed by Developers today are consistent with prior route modifications supported by the Commission. As a result, CPS Energy supports the route changes requested by Developers and, if approved by the Administrative Law Judges, is willing to amend its Application

in this proceeding to accomplish the requested modifications. CPS Energy has presented the route modifications shown in Developers' statement and request to Commission Staff and understands Commission Staff is not opposed to the requested changes.

Respectfully submitted,

/s/ Kirk D. Rasmussen

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**ATTORNEYS FOR CPS ENERGY**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record on this date via the Commission's Interchange in accordance with the Commission's order in Docket No. 50664 suspending PUC Procedural Rule 22.74.

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen