



Control Number: 51023



Item Number: 398

Addendum StartPage: 0

RECEIVED

2020 DEC -3 PM 1:39

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

APPL. OF THE CITY OF SAN ANTONIO §
TO AMEND ITS [CCN] FOR THE §
SCENIC LOOP 138-KV TRANS. LINE IN §
BEXAR COUNTY, TX §

STATE OFFICE OF PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS

SAVE HUNTRESS LANE AREA ASSOCIATION’S ROUTE ADEQUACY REPLY

Save Huntress Lane Area Association (“SHLAA”), an intervenor with over 30 individual landowners plus the two adjoining Canyons Property and Altair Subdivision Property Owners Associations, is located in the central and southern portions of the study area. It timely replies to the Anaqua Springs Home Owners Association and BVJ Properties joint route adequacy statement.

The standard is “whether an adequate number of reasonably differentiated routes has been proposed in the application to allow a reasoned choice of route considering all the facts and circumstances presented.”¹ Applicant has proposed 29 potential routes in a relatively compact study area. Over half appear to affect SHLAA (i.e., proposed Routes F, K, L, N, O, P, Q, R, S, T, U, V, W, BB, CC). Therefore, there are already more than sufficient potential routes in the central and southern areas. It appears that a much lesser number of applicant’s potential routes affect the joint filers. The joint filers seek to create in a “route adequacy” context additional central and southern routes. This is inconsistent with the “route adequacy” standard and should accordingly be rejected.

Respectfully submitted,

By: /s/ Thomas K Anson
Thomas K. Anson (SBN 01268200)
512-499-3608 / 512-536-5718 (fax)
TAnson@clarkhill.com
Clark Hill Strasburger
720 Brazos St. Suite 700, Austin, TX 78701

ATTORNEYS FOR SHLAA

Certificate of Service: I certify I served the foregoing under SOAH Order No. 3 on Dec. 3, 2020.

/s/ Thomas K Anson
Thomas K. Anson

¹ E.g., *Appl. of Wood Cnty Elec Coop, Inc for a [CCN] for a Proposed Transm Line in Wood Cnty, Tex*, PUC Docket No 32070, Order on Appeal of Order No. 8 at 5 (2006)