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

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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 DIRECT CASE EVIDENCE FOR THE ROUTE ADEQUACY HEARING

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files its Direct Case Evidence for the Route Adequacy Hearing. Pursuant to SOAH Order No. 4, this filing is timely made by noon on December 8, 2020.

I. DIRECT CASE EVIDENCE

At the Hearing on Route Adequacy, CPS Energy will offer the following Direct Case Evidence:

Exhibit	Description
CPS Energy Exhibit 1	Complete Application w/ Attachments 1-13
CPS Energy Exhibit 2	Pre-Filed Direct Testimony of Lisa B. Meaux
CPS Energy Exhibit 3	Conservation Easement
CPS Energy Exhibit 4	Correspondence to Kirk D. Rasmussen from Army Environmental Command and USAF dated March 26, 2020 ¹
CPS Energy Exhibit 5	Toutant Beauregard Road highlight of Figure 2-4 from the Environmental Assessment

For the information of the parties, four hard copies of each of these exhibits (one for each of the Administrative Law Judges and two for the appeal boxes) will be delivered to the State Office of Administrative Hearings prior to the hearing on Thursday. An exhibit list including these exhibits is included as Attachment 1 to this filing.

¹ This letter is also included in Appendix C of Attachment 1 to the Application, but is being identified as a separate exhibit for convenience of the parties.

The following witness will be presented to offer direct testimony regarding CPS Energy's route adequacy:

Witness

Title

	Project Manager/Department Manager
Lisa B. Meaux	in the Environmental Division of
	POWER Engineers, Inc.

II. REBUTTAL CASE EVIDENCE

Consistent with SOAH Order No. 4, CPS Energy reserves the right, as the Applicant, to present one or more rebuttal witnesses and additional evidence as appropriate to address the direct case of other parties.

III. COURT REPORTER AND HEARING TRANSCRIPT

CPS Energy has requested the attendance of a court reporter from Kennedy Reporting Service to transcribe the proceedings with a next day delivery of the transcript. Contact information for Kennedy Reporting Service is below:

Lorrie A. Schnoor, CSR, RDR, CRR | President 555 Round Rock West Drive Building E, Suite 202 Round Rock, TX 78681 512-474-2233 www.kennedyreporting.com

CPS Energy's Exhibit List, included as Attachment 1, will be provided to Kennedy Reporting Service prior to the hearing on Thursday, December 10, 2020.

IV. CONCLUSION

CPS Energy respectfully submits this listing of Direct Case Evidence for the Route Adequacy Hearing and respectfully requests any further and appropriate relief to which it may be entitled. Respectfully submitted,

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen State Bar No. 24013374 Craig R. Bennett State Bar No. 00793325 Jackson Walker LLP 100 Congress Avenue, Suite 1100 Austin, Texas 78701 (512) 236-2000 (512) 691-4427 (fax) Email: krasmussen@jw.com Email: cbennett@jw.com

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 SOAH Order No. 3 in this docket and the Commission's order in Docket No. 50664 suspending PUC Procedural Rule 22.74.

/s/ Kirk D. Rasmussen Kirk D. Rasmussen

Attachment 1

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OF

ADMINISTRATIVE HEARINGS

CPS ENERGY'S ROUTE ADEQUACY HEARING EXHIBIT LIST

Exhibit	Description
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