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APPLICATION OF THE CITY OF SAN ANTONIO ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY) TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED SCENIC LOOP 138-KV TRANSMISSION LINE § BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

JOINT ROUTE ADEQUACY HEARING STATEMENT OF ANAQUA SPRINGS HOMEOWNERS' ASSOCIATION AND BRAD JAUER/BVJ PROPERTIES, LLC

Anaqua Springs Homeowners' Association ("Anaqua Springs HOA") and Brad Jauer/BVJ Properties, LLC ("Jauer") file this Joint Route Adequacy Hearing Statement and Witness List pursuant to SOAH Order No. 4.

I. CROSS-EXAMINATION OF CPS ENERGY WITNESSES

Anaqua Springs HOA and Jauer intend to cross-examine Lisa Meaux and any other witnesses CPS Energy calls at the hearing, including rebuttal witnesses. Only one attorney will cross-examine each CPS Energy witness. Anaqua Springs HOA and Jauer reserve the right to cross-examine witnesses called by any other party.

II. EXHIBIT LIST AND PREFILED EXHIBITS

Pursuant to SOAH Order No. 4, Anaqua Springs HOA and Jauer are pre-filing exhibits with an attached exhibit list simultaneously with this filing.

III. WITNESSES

Anaqua Springs HOA and Jauer plan to call two witnesses: Steve Cichowski, President of Anaqua Springs HOA, and Mark Anderson. Both witnesses will participate over Zoom videoconferencing using the SOAH-provided link. Mr. Cichowski may be reached at 210-870-1490. Mr. Anderson may be reached at 612-345-1456.

Respectfully submitted,

By: 

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**ATTORNEY FOR BRAD JAUER &
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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December 2020, notice of the filing of this document was provided to all parties of record via the PUC Interchange in accordance with SOAH Order No. 3.


Wendy K. L. Harvel

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

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SERVICE BOARD (CPS ENERGY) TO AMEND ITS CERTIFICATE OF CONVENIENCE AND
NECESSITY FOR THE PROPOSED SCENIC LOOP 138-KV TRANSMISSION LINE**

EXHIBIT LIST

Ex. No.	Description
1	Business Records affidavit with emails from Steve Cichowski
2	Scenic Loop Intervenors Map
3	Figure 2-2 Open House Map
4	Figure 2-3 As Filed map
5	Mark Anderson resume
6	Adam Marin Direct Testimony
7	George Tamez Direct Testimony
8	Preliminary Alternative Segments & Substation sites 8/29/20
9	Environmental Assessment 6-7, 6-8, 6-41
10	Army Letter dated 6/29/19
11	USAF Letter dated 3/26/20
12	Scenic Loop Substation Analysis Report – Figure 16
13	Scenic Loop Substation Analysis Report – Figure 17
14	CPS Response to AS RFI 1-4
15	CPS Response to AS RFI 1-5
16	CPS Response to AS RFI 1-6
17	CPS Response to AS RFI 1-9
18	CPS Response to AS RFI 1-12
19	CPS Response to AS RFI 1-13
20	CPS Response to AS RFI 1-20
21	CPS Response to AS RFI 1-21
22	CPS Response to AS RFI 1-22
23	CPS Response to AS RFI 1-26
24	Habitable Structure Map with notations (demonstrative)