



Control Number: 51023



Item Number: 416

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PUBLIC UTILITY COMMISSION OF TEXAS

2020 DEC -9 PM 3:45
PUBLIC UTILITY COMMISSION
FILMS/CLERK

In re 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 Project
in Bexar County, Texas

Docket Number: 51023
SOAH Docket No. 473-21-0247
PATRICK CLEVELAND'S
AMENDED REPLY TO CPS ENERGY'S
RESPONSE TO STATEMENTS OF ROUTE
ADEQUACY

Introduction

I, Patrick Cleveland, respectfully submit this Amended Reply to CPS Energy's Response to Statements of Route Adequacy in the above titled and numbered case in order to correct inaccuracies that I have discovered. I also incorporate herein my previous Reply to CPS Energy's Response to Statements of Route Adequacy in its entirety, except for the following amendments:

Amendments

In my Reply to CPS Energy's Response to Statements of Route Adequacy (hereinafter "Reply"), I indicated that 100% of my proposed Toutant Beauregard Road segment would comply with 100% of the criteria in 16 Tex. Admin. Code § 25.101. Upon further analysis, approximately 90% of the length of the line complies with all the criteria in § 25.101.

In my Reply, I indicated that Segments 26, 27 38, 43, 44, and 45 all could have followed property lines but they do not. Upon further analysis, there is no property line for segment 44 to

416

1 follow because it bisects Property F-006 and there are already proposed segments to the north
2 and south (Segments 43 and 45). In addition, I agree that Segment 45 should not follow the
3 southern property line of Property F-006.
4

5 In my Reply, I indicated that a significant portion of each of the following segments
6 satisfies none of the ROW criteria in 16 Tex. Admin. Code § 25.101 in that the segments follow
7 no roads, existing electrical lines or property lines: Segments 2, 27, 31, 38, 40, 43, 44, 45, 48,
8 and 49. Upon further analysis, I inadvertently included Segments 27, 40 and 48, which do
9 follow at least one criteria.
10

11 Dated this 9th day of December, 2020.

12
13 /Patrick Cleveland/

14 _____
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CERTIFICATE OF SERVICE

22 I certify that notice of the filing of this document was provided to all parties of record via
23 electronic mail on December 9, 2020, in accordance with the Order Suspending Rules, issued in
24 Project No. 50664.
25

26 /Patrick Cleveland/

27 _____
28 Patrick Cleveland