



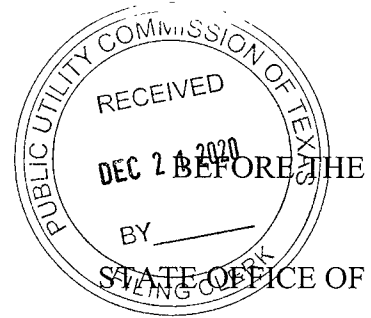
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**SOAH DOCKET NO. 473-21-0247  
P.U.C. DOCKET NO. 51023**



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 §

ADMINISTRATIVE HEARINGS

**STATEMENT OF POSITION OF INTERVENOR  
MARIA CONCEPCION URIARTE-AZCUE**

MARIA CONCEPCION URIARTE-AZCUE (“Ms. Uriarte”) files this Statement of Position objecting to Segment 2 of the proposed transmission line and shows as follows:

Ms. Uriarte is the owner of the real property located at 25820 Boerne Stage Road, San Antonio, Texas 78006 which comprises approximately 144 acres, including several buildings and a residence. Ms. Uriarte opposes Segment 2 inasmuch as such segment as currently drawn literally bisects the Property, is routed next to the residence and significantly interferes with the Property’s use and development, including possible subdivision.

It appears Segment 2 is an orphan from an earlier plan assuming the segment would be required to connect substation 2 and 3, but in the event it is not, then certainly a less intrusive, negatively impactful and less expensive route would be to dispose of the current plan for Segment 2 in its entirety and route the line along the existing road to the West of the Property.

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Respectfully submitted,

**CACHEAUX, CAVAZOS & NEWTON, L.L.P.**

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By: */s/ Jeffrey Hiller*

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**ATTORNEYS FOR INTERVENOR  
MARIA CONCEPCION URIARTE-AZCUE**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been filed with the Commission and served on all other parties via the PUC Interchange on December 21, 2020.

*/s/ Jeffrey Hiller*  
Jeffrey A. Hiller