



Control Number: 51023



Item Number: 455

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

2021 JAN 21 AM 10:47

APPLICATION OF THE CITY OF § BEFORE THE STATE OFFICE
SAN ANTONIO TO AMEND ITS §
CERTIFICATE OF CONVENIENCE § OF
AND NECESSITY FOR THE §
SCENIC LOOP 138-KV TRANSMISSION § ADMINISTRATIVE HEARINGS
LINE IN BEXAR COUNTY §

**CPS ENERGY'S SUPPLEMENTAL RESPONSE TO PATRICK CLEVELAND'S
FIRST REQUEST FOR INFORMATION, QUESTION 1-9**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this, its Supplemental Response to Patrick Cleveland's First Request for Information (RFI), Question 1-9. CPS Energy agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

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)
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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.

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen

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**CPS ENERGY’S SUPPLEMENTAL RESPONSE TO PATRICK CLEVELAND’S
FIRST REQUEST FOR INFORMATION, QUESTION 1-9**

Patrick Cleveland Question No. 1-9:

Please provide any and all correspondence, documentation and the substance of any oral communications made between Texas Parks and Wildlife Department and CPS Energy relating to the CPS-Scenic Loop Project after August 1, 2019.

Supplemental Response No. 1-9 (January 21, 2021):

See Supplemental Attachment.

Supplemental Attachment (January 21, 2021):

Attachment Cleveland Supplement 1-9: Correspondence, 4 Pages, Various Authors, Various Dates

Prepared By: Adam R. Marin	Title: Regulatory Case Manager
Sponsored By: Adam R. Marin	Title: Regulatory Case Manager

Rasmussen, Kirk

From: Russell Hooten <Russell.Hooten@tpwd.texas.gov>
Sent: Thursday, January 14, 2021 1:58 PM
To: Rasmussen, Kirk
Subject: RE: CPS Energy CCN Application - Docket 51023 [IMAN-JWDOCS.FID4061346]

****RECEIVED FROM EXTERNAL SENDER – USE CAUTION****

Sorry, I meant to include a mailing address in my last email. Please send to:

Russell Hooten
TPWD-Wildlife Division
6300 Ocean Drive, NRC 2501
Unit 5846
Corpus Christi, TX 78412

Thanks,
Russell

From: Rasmussen, Kirk <krasmussen@jw.com>
Sent: Thursday, January 14, 2021 1:56 PM
To: Russell Hooten <Russell.Hooten@tpwd.texas.gov>
Subject: RE: CPS Energy CCN Application - Docket 51023 [IMAN-JWDOCS.FID4061346]

ALERT: This email came from an external source. Do not open attachments or click on links in unknown or unexpected emails.

Russell,

Unless I hear otherwise from you this afternoon, I will send the hard copy of the application amendment to your attention at the TPWD headquarter offices.

Please let me know if you have any questions about this amendment.

Kirk Rasmussen
512-968-4566

From: Rasmussen, Kirk
Sent: Tuesday, January 12, 2021 5:33 PM
To: Russell Hooten <Russell.Hooten@tpwd.texas.gov>; Todd George <Todd.George@tpwd.texas.gov>
Cc: Bennett, Craig <cbennett@jw.com>; kdgiles@cpsenergy.com; rustin.tawater@puc.texas.gov; Armstrong, Heath <Heath.Armstrong@puc.texas.gov>; Laura Zebehazy <Laura.Zebehazy@tpwd.texas.gov>
Subject: CPS Energy CCN Application - Docket 51023 [IMAN-JWDOCS.FID4061346]

Russell and Todd,

I hope this email finds you both healthy and safe. Just before the holidays, in the above-referenced docket, CPS Energy filed an amendment to its application. The primary changes were requested by, and wholly located on, a large landowner in the proceeding (involving Segments 42, 46, 48, and 49). Another change moved a segment from one side of a property line to the other to avoid a newly constructed habitable structure (Segment 26). All of the application amendment materials have been filed on the PUC Interchange and are available electronically in pdf and native form on the ShareFile Site that Russell previously accessed for the initial application shapefiles (I gave access to Todd and Laura earlier this afternoon). After I get hard copies of the oversized maps in my office tomorrow, I will send a hard copy of the entire package to you overnight via FedEx to the TPWD headquarters or another location (if you are working remotely). If you would like it sent to another location, please let me know.

If you have a few minutes this week, we would be happy to walk you through the amendment changes. As you will see, the data for many of the routes, including the route identified by TPWD as the least impacting to natural resources (Route AA), has changed (the route is now identified as Route AA1, for example). As a result of the amendment filing, the schedule in the case has been extended by approximately 30 days. However, that still results in Intervenor Testimony being filed on February 17. Thus, to the extent TPWD could evaluate the application amendment and determine what, if anything, should change in its recommendation letter and make a subsequent filing in the docket about what if anything changes in its recommendation, I know CPS Energy, many of the parties, and PUC Staff would appreciate the updated review based on the application amendment.

If there is anything we can do to help facilitate your updated review and analysis of the application amendment, including a brief zoom call this week to walk through the changes, please let me know.

Best regards,

Kirk Rasmussen | Partner
100 Congress Avenue Suite 1100 | Austin, TX | 78701
V: (512) 236-2310 | C: (512) 968-4566 | F: (512) 236-2002 | krasmussen@jw.com



Rasmussen, Kirk

From: Russell Hooten <Russell.Hooten@tpwd.texas.gov>
Sent: Thursday, January 14, 2021 1:50 PM
To: Rasmussen, Kirk
Subject: RE: CPS Energy CCN Application - Docket 51023 [IMAN-JWDOCS.FID4061346]

****RECEIVED FROM EXTERNAL SENDER – USE CAUTION****

Hi Kirk,

Thank you for providing information regarding the amended EA for the Scenic Route transmission line project. I have downloaded the amended EA and supporting documents; however, I won't be able to closely review the information and determine if TPWD would change its recommendation until next week. At this point, I don't think a meeting is necessary but I will reach out if I have questions or need additional information. Thanks again for contacting us.

Sincerely,
Russell

From: Rasmussen, Kirk <krasmussen@jw.com>
Sent: Tuesday, January 12, 2021 5:33 PM
To: Russell Hooten <Russell.Hooten@tpwd.texas.gov>; Todd George <Todd.George@tpwd.texas.gov>
Cc: Bennett, Craig <cbennett@jw.com>; kdgiles@cpsenergy.com; rustin.tawater@puc.texas.gov; Armstrong, Heath <Heath.Armstrong@puc.texas.gov>; Laura Zebehazy <Laura.Zebehazy@tpwd.texas.gov>
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Best regards,

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