



Control Number: 51023



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

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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 SECOND 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 Second 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)  
Email: kasmussen@jw.com  
Email: cbennett@jw.com

**ATTORNEYS FOR CPS ENERGY**

4724

**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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<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S SECOND 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.

Second Supplemental Response No. 1-9 (February 10, 2021):

See Attachment.

Second Supplemental Attachment (February 10, 2021):

Attachment Cleveland Second Supplement 1-9: Correspondence, 2 Pages, Various Authors, Various Dates

Prepared By:	Lisa B. Meaux	Title:	Project Manager, POWER Engineers, Inc.
	Adam Marin		Regulatory Case Manager
Sponsored By:	Lisa B. Meaux	Title:	Project Manager, POWER Engineers, Inc.
	Adam Marin		Regulatory Case Manager

## Rasmussen, Kirk

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**From:** Rasmussen, Kirk  
**Sent:** Friday, February 5, 2021 2:52 PM  
**To:** Russell Hooten  
**Subject:** RE: CPS Energy CCN Application - Docket 51023 [IMAN-JWDOCS.FID4061346]

There is not a formal deadline established. I'm sure many of the parties will welcome your additional comments as soon as they can be filed.

**Kirk Rasmussen**  
512-968-4566

**From:** Russell Hooten <Russell.Hooten@tpwd.texas.gov>  
**Sent:** Friday, February 5, 2021 11:09 AM  
**To:** Rasmussen, Kirk <krasmussen@jw.com>  
**Subject:** RE: CPS Energy CCN Application - Docket 51023 [IMAN-JWDOCS.FID4061346]

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

Hi Kirk,

TPWD is in the process of finalizing our review of the amended Application and EA for the Scenic Route project. In addition to your mentioning Feb 17 as the deadline for intervenor testimony to be filed, I checked the interchange for a date to submit additional comments such as ours, but didn't find one. Do you know if there is an actual deadline for us to submit additional comments or should we just try to get them in as close to Feb 17 as possible, if not sooner?

Thank you,  
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>  
**Subject:** 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 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](mailto:krasmussen@jw.com)

