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

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 RESPONSE TO BRAD JAUER’S AND BVJ PROPERTIES, L.L.C.’S
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Response to the Brad Jauer’s and BVJ Properties, L.L.C.’s Second Request for Information (RFI). This Response is timely filed. 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

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ATTORNEYS FOR CPS ENERGY

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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 3 in this proceeding.

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen

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Brad Jauer & BVJ Properties RFI 3-1:

Regarding Segment 36 where it runs along the north side of Brad Jauer/BVJ Properties, LLC property (i.e., Tract No. C-014 as per the Landowner Notice List, which is Attachment 8 of the Application; and Tract No. IA-86 as per the Intervenor Map, Rev. 14), please confirm:

- i) the general height of the ledge or cliff that runs along the north side of the property and the south side of the Toutant Beauregard right-of-way, and its distance from the centerline of Toutant Beauregard' s right of way;
- ii) the width of the Toutant Beauregard right-of-way along the north side of the property and whether the ledge/cliff is within that right-of way, and, if not, how far outside does it lie;
- iii) the width of the right-of-way of the distribution line that already exists along the north side of the property;
- iv) whether the distribution line’s right-of way abuts and/or overlaps the Toutant Beauregard right-of-way and, if it does neither, what is the distance between the two rights-of-way, and, if it overlaps, what is the width of the overlap;
- v) the distance of the centerline of the distribution line's right-of-way from the centerline of Taunton Beauregard's right-of-way;
- vi) the width of Segment 36’s right-of-way where it runs along the north side of the property (*e.g.*, is it 75 feet or 100 feet wide?);
- vii) whether Segment 36' s right-of-way will abut and/or overlap the distribution line's right-of-way along the north side of the property, and, if it does neither, what is the distance between the two rights-of-way, and, if it overlaps, what is the width of the overlap; and
- viii) the distance of the centerline of Segment 36' s right-of-way from the centerline of Taunton Beauregard’s right-of-way.

Response No. 3-1:

- i) POWER and CPS Energy do not have road right-of-way easement information for Toutant Beauregard Road. The requested calculations for these responses have been made using Google Earth visually approximating the location of the Toutant Beauregard Road right-of-way. POWER estimates the height of the rock ledge (road cut) to range from

approximately zero feet to 8-10 feet above Toutant Beauregard Road, depending on where the measurement is taken. The distance from the road cut to the painted centerline of Toutant Beauregard roadway is approximately 30-40 feet depending on where the measurement is taken.

- ii) POWER and CPS Energy do not have road right-of-way information for Toutant Beauregard Road. Based on measurements from Google Earth, the right-of-way of Toutant Beauregard Road visually appears to be approximately 70 feet wide. The road cut appears to be generally close to the edge of the Toutant Beauregard Road right-of-way. CPS Energy and POWER cannot specifically state whether the road cut is within or outside of the Toutant Beauregard Road right-of-way or the distance to the road right-of-way if it is outside of it.
- iii) The operational clearance requirements for the CPS Energy distribution line on the northern edge of the Brad Jauer/BVJ Properties, LLC property adjacent to Toutant Beauregard Road is approximately 28 feet in width. Approximately 14 feet width of right-of-way is located on the Brad Jauer/BVJ Properties, LLC properties and approximately 14 feet width of clearance is utilized from the Toutant Beauregard Road right-of-way.
- iv) Refer to CPS Energy's response to Brad Jauer & BVJ Properties RFI 3-1 iii).
- v) Based on measurements from Google Earth, the distance from the centerline of the CPS Energy's distribution line right-of-way along the northern Brad Jauer/BVJ Properties, LLC property line to the center of the painted centerline of Toutant Beauregard roadway visually appears to range from approximately 30-40 feet depending on where the measurement is taken.
- vi) Refer to CPS Energy's response to Brad Jauer & BVJ Properties RFI 2-2.
- vii) Because the survey, geotechnical, and engineering work necessary to design the proposed transmission line facilities along Segment 36 have not yet been completed, CPS Energy cannot yet identify where pole structures will be located and whether narrower than anticipated right-of-way may be required in that area. In general, however, if the transmission line proposed in this Project is approved for construction along Segment 36, it is anticipated that the transmission line easement will fully overlap the existing distribution line right-of-way. Refer also to CPS Energy's response to Brad Jauer & BVJ Properties RFI 2-2.
- viii) Based on measurements from Google Earth, the distance from the centerline of Segment 36 to the center of the painted centerline of Toutant Beauregard roadway visually appears to range from approximately 70 feet to 90 feet depending on where the measurement is taken. Refer also to CPS Energy's response to Brad Jauer & BVJ Properties RFI 2-2.

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