

Control Number: 51023



Item Number: 498

Addendum StartPage: 0



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APPLICATION OF THE CITY OF SAN	§	BEFORE THE STATE OFFICE
ANTONIO ACTING BY AND THROUGH	§	
THE CITY PUBLIC SERVICE BOARD	§	
(CPS ENERGY) TO AMEND ITS	§	OF
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE PROPOSED	§	
SCENIC LOOP 138-KV TRANSMISSION	§	ADMINISTRATIVE HEARINGS
LINE	§	

## MOTION FOR EXTENSION OF TIME

Brad Jauer and BVJ Properties, LLC ("Jauer") file this motion for extension of time to file its direct testimony. Jauer appreciates CPS's willingness to extend the filing deadline for Intervenors' direct testimony until Friday, February 19, 2021, without the need for a motion, due to the winter storms. These storms certainly have had an impact on our lawyers and witnesses. In fact, each of the foregoing have been without sustained power, water, Wi-Fi and/or cell service for extended periods of time – some throughout much of the storm's duration. As a result, we have experienced a significant delay in finalizing our testimony. While Jauer may be able to file some of its direct testimony today, in an abundance of caution, Jauer is filing this motion.

For these reasons, Jauer respectfully requests that the Administrative Law Judges grant this request for an extension of time to file direct testimony until Friday, February 19, 2021 or such time as Jauer's lawyers, witnesses, and clients are able to communicate.

Respectfully submitted,

Lynn Sherman

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ATTORNEY FOR BRAD JAUER & BVJ PROPERTIES, L.L.C.

499

## **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 this 17<sup>th</sup> day of February 2021, pursuant to SOAH Order No. 3 issued in this docket.

Lynn Sherman