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LISA CHANDLER
SAVE HUNTRESS LANE AREA ASSOCIATION
CLEARWATER RANCH POA
FEBRUARY 17, 2021



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

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

**LISA CHANDLER,
SAVE HUNTRESS LANE AREA ASSOCIATION, AND
CLEARWATER RANCH POA
GOOD-CAUSE MOTION TO EXTEND DEADLINE
FOR ALL INTERVENORS TO FILE
DIRECT TESTIMONY OR STATEMENT OF POSITION**

COMES NOW, Lisa Chandler, the Save Huntress Lane Area Association, and Clearwater Ranch POA to submit this good-cause motion to extend the deadline to file direct testimony or a statement of position and shows as follows:

The procedural schedule requires landowner parties to file direct testimony or a statement of position by February 17, 2021. On February 16, CPS Energy requested a filing grace period until at least Friday, February 21, 2021. On February 17, 2021, Anaqua Springs HOA and Brad Jauer and BVJ Properties LLC (Jauer) filed separate motions for an extension of time for each of them to file testimony until Friday, February 21, 2021, or until such time as the attorneys could communicate with their clients and witnesses.

Lisa Chandler files this motion to request a good-cause extension of the deadline for all intervenor parties to file testimony until Friday, February 19, 2021, or until such time as the administrative law judges (ALJs) can issue an order to give parties at least one day to file their testimony.

The intervenors in this case have been conscientious and worked diligently to meet the deadlines in the procedural schedule. Counsel for Lisa Chandler

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understands the State Office of Administrative Hearings (SOAH) is closed for the rest of this week and the ALJs cannot access the SOAH orders server. Similar difficulties affect other participants in the case and justify an extension of the deadline for all intervenors to file testimony. Some of the affected parties may not be able to even file a motion or request to extend the deadline. Because of the unprecedented weather and utility events of the past several days, good cause exists to extend the deadline

Counsel for Lisa Chandler spoke with counsel for CPS Energy, Anaqua Springs HOA, Jauer, Bexar Ranch about this request. Anaqua Springs authorized counsel to represent Anaqua Springs agrees with this request.

Counsel for Lisa Chandler communicated with counsel for the Save Huntress Lane Area Association (SHLAA) (Thomas K. Anson) and the Clearwater Ranch POA (Patrick Reznik and Carly Barton). As a courtesy to Mr. Anson, Mr. Reznik, and Ms. Barton, counsel for Ms. Chandler is including SHLAA and Clearwater Ranch in this motion to request an extension for all intervenors to file their direct testimony or statement of position.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on February 17, 2021, this document is being served on parties vial email and submitted electronically to the Interchange System maintained by the Central Records Division of the Public Utility Commission of Texas.

/sig/ Bradford W. Bayliff
Bradford W. Bayliff