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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 ANAQUA SPRINGS HOMEOWNERS’
ASSOCIATION’S THIRD REQUEST FOR INFORMATION**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Response to the Third Request for Information (RFI) of Anaqua Springs Homeowners’ Association (Anaqua Springs HOA). 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

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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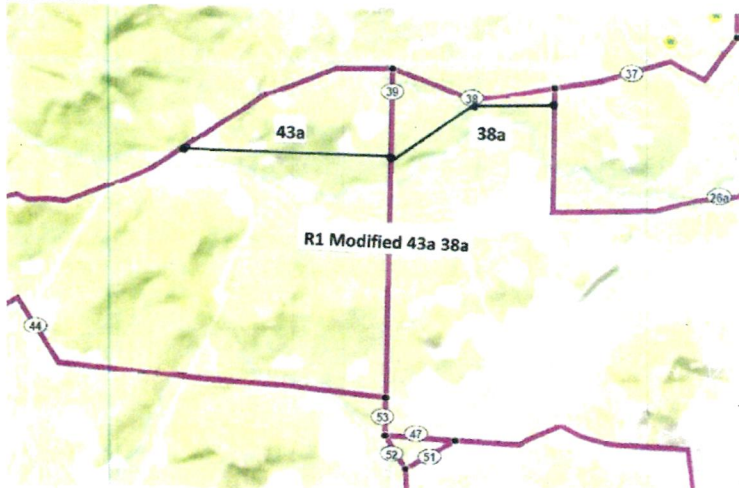
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Anaquas Springs Question No. 3-1:

Please provide the cost, length, and habitable structure count on a modified Route R1 as follows: Substation 6, Segments 50, 15, 26a, 38 modified and renamed to 38a, and 43a, with modifications as shown on the attached exhibit.

Exhibit:



Response No. 3-1:

“Modified and renamed” segments “43a” and “38a” as shown on the exhibit are not segments included in CPS Energy’s Application or Amended Application in this proceeding. CPS Energy has not identified, evaluated, or compiled data associated with these “modified” and “renamed” segments. Accordingly, CPS Energy does not have, and is therefore unable to provide, information responsive to this request.

Prepared By: Lisa B. Meaux
Sponsored By: Lisa B. Meaux

Title: Project Manager, POWER Engineers, Inc.
Title: Project Manager, POWER Engineers, Inc.

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Anaqua Springs Question No. 3-2:

If your response to the prior RFI is that you have not evaluated this route and have no or incomplete data to provide, do you have any reason to believe that it would be any more expensive than Route R, of which it appears to be a mirror image? And if so, please explain.

Response No. 3-2:

Route R was amended in CPS Energy’s Application Amendment on December 22, 2020, to become Route R1. This response presumes the question is with respect to Route R1.

CPS Energy cannot state whether a modification of Route R1 using “modified and renamed” segments “43a” and “38a” would be reasonably estimated to cost more or less than Route R1. A number of factors, including, but not limited to distance interior away from the property line, geographic relief, vegetation cover, and golden-cheeked warbler habitat could increase or decrease the estimated cost of a potential routing segment in this area.

Prepared By: Scott D. Lyssy	Title: Manager Civil Engineering
Sponsored By: Scott D. Lyssy	Title: Manager Civil Engineering