



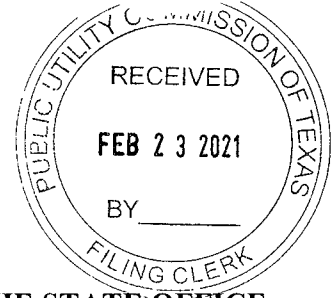
Control Number: 51023



Item Number: 576

Addendum StartPage: 0

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



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

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**TOUTANT RANCH, LTD., ASR PARKS, LLC, PINSON INTERESTS LTD. LLP,  
AND CRIGHTON DEVELOPMENT CO.'S ERRATA TO  
THE DIRECT TESTIMONY OF TOM DREISS**

Toutant Ranch, Ltd., ASR Parks, LLC, Pinson Interests Ltd. LLP, and Crighton Development Co. submit the following errata to the Direct Testimony of Tom Dreiss.

Page 5, Figure 4: Replace Figure 4. The original version of that figure inadvertently omitted Segment 48.

A clean version of pg. 5 is attached.

Respectfully submitted,

THOMPSON & KNIGHT LLP

*/s/ Michael McMillin*

\_\_\_\_\_  
Katherine L. Coleman  
State Bar No. 24059596  
Michael McMillin  
State Bar No. 24088034  
98 San Jacinto Blvd., Suite 1900  
Austin, Texas 78701  
(512) 469.6100  
(512) 469.6180 (fax)

**ATTORNEYS FOR TOUTANT RANCH, LTD.,  
ASR PARKS, LLC, PINSON INTERESTS LTD.  
LLP AND CRIGHTON DEVELOPMENT CO.**

**CERTIFICATE OF SERVICE**

I, Michael McMillin, Attorney for Toutant Ranch, Ltd., ASR Parks, LLC, Pinson Interests Ltd. LLP, and Crighton Development Co., hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 23<sup>rd</sup> day of February, 2021 by hand-delivery, facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

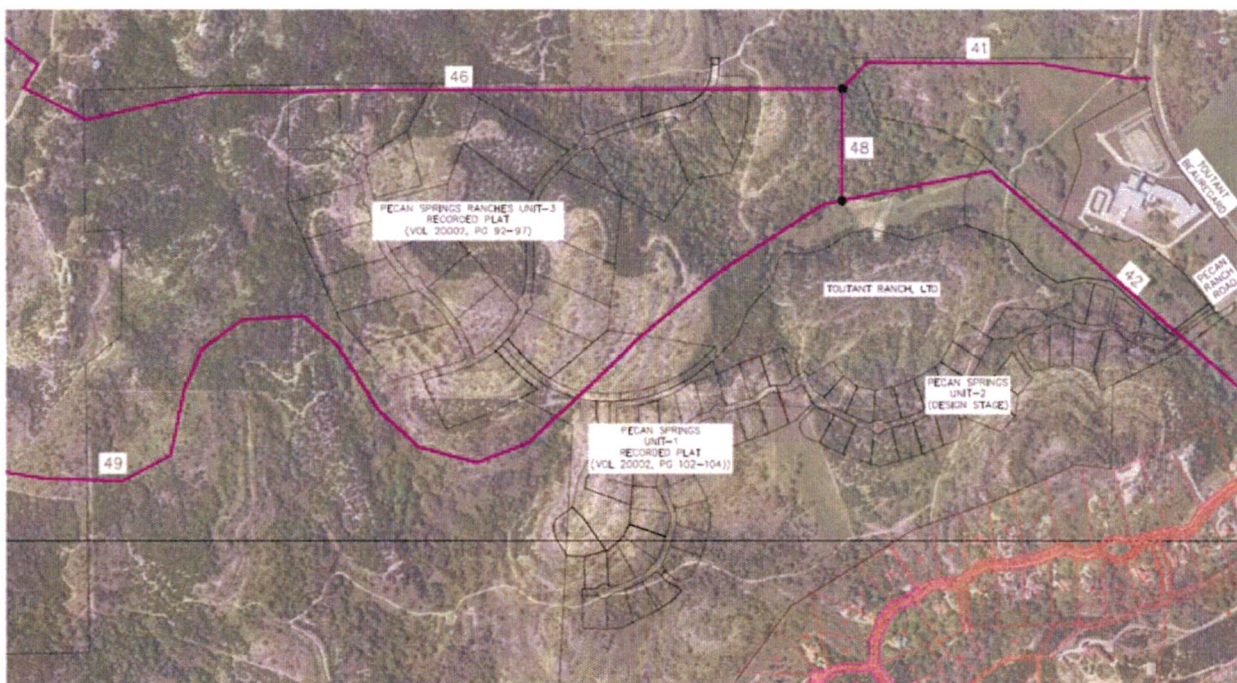
*/s/ Michael McMillin*

\_\_\_\_\_  
Michael McMillin

1 **Q. HOW DID THE COMPANIES ADDRESS THIS ISSUE?**

2 A. In late spring/early summer 2020, my business partner and I arranged a series of meetings  
3 with CPS Energy and worked with them to develop an alternative path for preliminary  
4 segment 42. While we originally hoped to eliminate preliminary segment 42 entirely,  
5 CPS Energy was not able to agree to that request. Eventually, after we agreed to donate a  
6 portion of the right-of-way (ROW) along what is now Segment 42a, CPS Energy  
7 developed Segment 49, which followed boundaries between the three ongoing  
8 subdivision projects rather than bisecting them. While we did not believe this solution  
9 was ideal at the time, we were willing to accept it because it avoided a “worst case”  
10 scenario for the Companies.

11 **Figure 4: Routing Segments as Proposed in CPS Energy’s Original Application**



12 **Q. DID THE REVISED ROUTING SEGMENTS IN CPS ENERGY’S ORIGINAL**  
13 **APPLICATION COMPLETELY RESOLVE YOUR ISSUES?**

14 A. No. After CPS Energy filed its CCN application, it became increasingly clear that the  
15 uncertainty around the location for the transmission line was impeding our ability to sell  
16 finished home sites in our completed Pecan Springs Ranches Unit 3 because the tracts  
17 were surrounded on both sides by potential transmission line paths. Having these home