



Control Number: 51023



Item Number: 579

Addendum StartPage: 0

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

RECEIVED

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

2021 FEB 24 AM 10:06
PUBLIC UTILITY COMMISSION
FILING CLERK

BRAD JAUER AND BVJ PROPERTIES, LLC
STATEMENT OF CONFIDENTIALITY

Brad Jauer and BVJ Properties, LLC (“Jauer”) has designated as Protected Material or Highly Sensitive Protected Material certain information contained in and attached to the Direct Testimony of Carl G. Huber as Exhibit Huber-8. Jauer considers the information identified below to be confidential and exempted from disclosure under the Public Information Act, Tex. Gov't Code §§ 552.101 and 552.110.


I. DESCRIPTION OF CONFIDENTIAL MATERIAL

The confidential material is contained in the “Tower Sublease Agreement” between The City of San Antonio and CellTex Site Services, Ltd., dated June 17, 2019, which is attached to the Direct Testimony of Carl G. Huber as Exhibit Huber-8. The communications equipment installed pursuant to this agreement is part of a network of critical public safety infrastructure owned and operated by multiple governmental entities; and, whereas, the selection of the site is public information, as demonstrated by the city ordinance attached to the Direct Testimony of Carl G. Huber as Exhibit Huber-7, and the installation of microwave antennas are open and obvious, the particulars of the network and its component parts may not.

II. STATEMENT OF COUNSEL

The undersigned counsel for Brad Jauer and BVJ Properties, LLC has reviewed the foregoing material sufficiently to state that, upon information and belief, and in good faith, information contained in Exhibit Huber-8 to the Direct Testimony of Carl G. Huber is confidential for at least the reasons stated above.

Respectfully submitted,

By: 

Lynn Sherman
State Bar No. 18243630

P.O. Box 5605

Austin, Texas 78763


(512) 431-6515

lsherman@h2otx.com

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

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 23rd day of February 2021, pursuant to SOAH Order No. 3 issued in this docket.


Lynn Sherman