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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
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**ANAQUA SPRINGS HOMEOWNERS' ASSOCIATION AND  
BRAD JAUER/BVJ PROPERTIES, LLC ERRATA TO THE  
DIRECT TESTIMONY OF MARK D. ANDERSON**

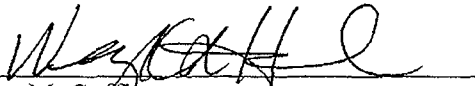
Anaqua Springs Homeowners' Association ("Anaqua Springs HOA") and Brad Jauer/BVJ Properties, LLC ("Jauer") submit the following errata to the Direct Testimony of Mark D. Anderson.

An exhibit was incorrectly listed and omitted. The testimony should read:

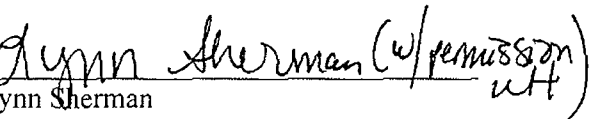
- Page 32, line 17, Exhibit MDA-13 should have been Exhibit MDA-27.
- The exhibit list on page 4 should be changed to include Exhibit MDA-27, described as a screenshot of CPS's map of "Habitable Structures and Other Land Use Features in the Vicinity of the Primary Alternative Routes (Figure 4-1 Amended).
- The exhibit should be attached to the testimony.

The corrected pages are attached to this errata, and conforming copies will be provided at the hearing to the court reporter, the Administrative Law Judges, and any party who requests a clean copy.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of March 2021, notice of the filing of this document was provided to all parties of record via the PUC Interchange in accordance with SOAH Order No. 3.

  
Wendy K. L. Harvel

- EXHIBIT MDA-19 Enlargement of Plat for West Brook Two Subdivision; and Figure 6-3, (Application, Environmental Assessment, Page 6-13) with highlighting added to show the extent of the property's floodplain
- EXHIBIT MDA-20 CPS Energy's Response to Anaqua Springs RFI 2-16
- EXHIBIT MDA-21 CPS Energy's drawing for the Scenic Loop Typical 3-Unit Substation Layout (Environmental Assessment)
- EXHIBIT MDA-22 CPS Energy's Response to Brad Jauer and BVJ Properties RFIs 2-10 and 2-13
- EXHIBIT MDA-23 CPS Energy's minimum sized substation derived from Exhibit MDA-3 super-imposed on Substation Site 7
- EXHIBIT MDA-24 CPS Energy's Response to Cleveland RFI No. 1-10
- EXHIBIT MDA-25 CPS Energy's Response to Jauer RFIs 2-8 and 2-16
- EXHIBIT MDA-26 CPS Energy's Response to Commission Staff's First RFI No. 1-2
- EXHIBIT MDA-27 Screenshot of CPS's map of "Habitable Structures and Other Land Use Features in the Vicinity of the Primary Alternative Routes (Figure 4-1 Amended)"

1 **Q. WHAT CONCLUSIONS DO YOU DRAW BASED ON THESE IMPORTANT**  
2 **OMISSIONS?**

3 A. First, I conclude that the EA and its due diligence was not very thorough. Second, I  
4 conclude that there are an increasing number of utilities and facilities that require due  
5 consideration for evaluation that further reinforce my opinion that the Toutant Beauregard  
6 corridor is too highly congested with so many issues that have the potential to increase the  
7 cost of the routes using Toutant Beauregard, that its cost estimate is not accurate and cannot  
8 be quantified with the information provided.

9 **IX. CEMETERIES AND HISTORIC DISTRICTS**

10 **Q. DOES CPS' BEST MEETS ROUTE (ROUTE Z1) INCLUDE ANY CEMETERIES,**  
11 **HISTORIC DISTRICTS OR OTHER FEATURES THAT SHOULD BE AVOIDED?**

12 A. Yes, as to both. Route Z1 (specifically Segment 36) passes within very close proximity  
13 (specifically 98 feet) to the Heidemann Ranch Historic District,<sup>29</sup> which is on the National  
14 Register of Historic Places,<sup>30</sup> and also has a cemetery on its premises.<sup>31</sup> A screenshot of  
15 CPS's map of "Habitable Structures and Other Land Use Features in the Vicinity of the  
16 Primary Alternative Routes" (Figure 4-1 Amended)<sup>32</sup> is attached to my testimony as  
17 Exhibit MDA-1327. The Heidemann Ranch Historic District is delineated by the blue

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<sup>29</sup> See "Map Number" 901 on CPS Energy's Application Amendment (Dec. 20, 2020), Attachment 2, Table 4-31 Amended, "Habitable Structures and Other Land Use Features in the Vicinity of the Primary Alternative Route Z1" (Bates Stamp No. 000128).

<sup>30</sup> See CPS Energy's Application Amendment (Dec. 20, 2020), Attachment 2, Pages 4-29 to 4-30 and Table 4-5 Amended, "NRHP-Listed Resources recorded Within 1,000 Feet of the Alternative Route Centerlines" (Bates Stamp No. 000081-82).

<sup>31</sup> See CPS Energy's Application Amendment (Dec. 20, 2020), Attachment 2, Page 4-30 (Bates Stamp No. 000082).

<sup>32</sup> See National Register of Historic Place No. 901 on CPS Energy's Application Amendment (Dec. 20, 2020), Appendix E, Figure 4-1 Amended, "Habitable Structures and Other Land Use Features in the Vicinity of the Primary Alternative Routes."

