



Control Number: 51023



Item Number: 602

Addendum StartPage: 0

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

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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 BRAD JAUER’S AND BVJ PROPERTIES, L.L.C.’S  
FOURTH REQUEST FOR INFORMATION TO CPS ENERGY**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Response to the Brad Jauer’s and BVJ Properties, L.L.C.’s Fourth Request for Information (RFI). 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  
 Kirk D. Rasmussen  
 State Bar No. 24013374  
 Craig R. Bennett  
 State Bar No. 00793325  
 Jackson Walker LLP  
 100 Congress Avenue, Suite 1100  
 Austin, Texas 78701  
 (512) 236-2000  
 (512) 691-4427 (fax)  
 Email: krasmussen@jw.com  
 Email: cbennett@jw.com

**ATTORNEYS FOR CPS ENERGY**

602

**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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Brad Jauer & BVJ Properties RFI 4-1:

What is the distance from Habitable Structure No. 77 to the closest centerline of the right-of-way on Segment 54, in its configuration as part of Route Z1?

Response No. 4-1:

The distance from Habitable Structure No. 77 to the closest centerline of the ROW on Segment 54, in its configuration as part of Route Z1, is approximately 345 feet.

Prepared By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.
Sponsored By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.

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Brad Jauer & BVJ Properties RFI 4-2:

What is the distance from Habitable Structure No. 78 to the closest centerline of the right-of-way on Segment 54, in its configuration as part of Route Z1?

Response No. 4-2:

The distance from Habitable Structure No. 78 to the closest centerline of the ROW on Segment 54, in its configuration as part of Route Z1, is approximately 315 feet.

Prepared By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.
Sponsored By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.

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Brad Jauer & BVJ Properties RFI 4-3:

What is the distance from Habitable Structure No. 76 to the closest centerline of the right-of-way on Segment 54, in its configuration as part of Route Z1?

Response No. 4-3:

The distance from Habitable Structure No. 76 to the closest centerline of the ROW on Segment 54, in its configuration as part of Route Z1, is approximately 418 feet.

Prepared By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.
Sponsored By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.

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Brad Jauer & BVJ Properties RFI 4-4:

What is the distance from Habitable Structure No. 106 to the centerline of the right-of-way on Segment 20?

Response No. 4-4:

The distance from Habitable Structure No. 106 to the centerline of the ROW on Segment 20 is approximately 424 feet.

Prepared By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.
Sponsored By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.

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Brad Jauer & BVJ Properties RFI 4-5:

What is the distance from Habitable Structure No. 106 to the centerline of the right-of-way on Segment 36?

Response No. 4-5:

The distance from Habitable Structure No. 106 to the centerline of the ROW on Segment 36 is approximately 463 feet.

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

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