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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 SUPPLEMENTAL RESPONSE TO BRAD JAUER’S AND BVJ PROPERTIES, L.L.C.’S SECOND REQUEST FOR INFORMATION, QUESTION 2-16

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this, its Supplemental Response to Brad Jauer’s and BVJ Properties, L.L.C.’s Second Request for Information (RFI), Question 2-16. 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

647

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 No. 3.

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen

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CPS ENERGY’S SUPPLEMENTAL RESPONSE TO BRAD JAUER’S AND BVJ PROPERTIES, L.L.C.’S SECOND REQUEST FOR INFORMATION, QUESTION 2-16

Brad Jauer & BVJ Properties RFI 2-16:

Regarding the pipeline or other utility service line currently marked with yellow paint and flags on the north side of Toutant Beauregard along Segment 20, please provide its (e.g., the pipeline’s) owner, size (e.g., diameter), composition or material (e.g., metal, polyvinyl, etc., including type thereof), and type (e.g. water, natural gas, etc., as well as whether it is a distribution or transmission line), and please indicate whether CPS is the entity currently having that pipeline or other utility service marked.

Supplemental Response No. 2-16 (March 16, 2021):

CPS Energy’s previous response to this request reported no pipelines listed on the PLATTs or Railroad Commission of Texas databases for the study area. CPS Energy has determined that the facilities referenced in this question are natural gas distribution facilities that are owned and operated by CPS Energy’s Gas Solutions. The facilities are a 6-inch and 8-inch plastic pipe located within the road right-of-way of Toutant Beauregard Road in the vicinity of Segment 20. These types of natural gas distribution facilities are common within road rights-of-way throughout many urban and suburban areas of Bexar County and are expected to exist throughout the study area. CPS Energy does not anticipate any interference between the natural gas distribution facilities referenced in this question and the proposed transmission line facilities if approved for construction and operation along Segment 20.

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