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

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

**TOUTANT RANCH, LTD., ASR PARKS, LLC, PINSON INTERESTS LTD. LLP,
AND CRIGHTON DEVELOPMENT CO.'S RESPONSES TO STEVE CICHOWSKI'S
SECOND SET OF REQUESTS FOR INFORMATION**

Toutant Ranch, Ltd., Pinson Interests Ltd. LLP, ASR Parks, LLC, and Crighton Development Co. (the “Developers”) file the following responses to the Second Set of Requests for Information (“RFIs”) to Developers filed by Steve Cichowski. Those RFIs were filed at the Commission and received on March 11, 2021. Accordingly, pursuant to the procedural schedule entered in this case, this response is timely filed. Developers’ responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to 16 T.A.C. § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

THOMPSON & KNIGHT LLP

/s/ Michael McMillin

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**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 22nd day of March, 2021 by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Michael McMillin

Michael McMillin

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- RFI 2-1** Refer to page 3, lines 14-16 and Exhibit 1 to the testimony of Mr. Dreiss.
- a. What is the anticipated total cost to Developers as measured by the value of right of way donations, discounted right of way values, and loss of remainder damages, should the Commission select a Route that utilizes Segments 42, 42a, 46, 46a, and 49a as those segments are identified on Exhibit A to the Agreement.
 - b. Has CPS Energy indicated to Developers that Paragraph 5 of the Agreement prohibits the Developers from advocating for any route other than one that utilized all or some combination of Segments 46, 46 Modified, 49, and/or 49a? If your response is yes, please provide any documents supporting that response.

RESPONSE:

- a. Developers have objected to this request as irrelevant. Subject to and without waiving that objection, please refer to Developers' response to substantively identical Cichowski RFI 1-8(a).
- b. Please refer to Developers' response to substantively identical Cichowski RFI 1-8(b).

Preparer: Tom Dreiss/Counsel
Sponsor: Tom Dreiss