



Control Number: 51023



Item Number: 682

Addendum StartPage: 0

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PUBLIC UTILITY COMMISSION  
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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) § OF  
TO AMEND ITS CERTIFICATE OF § ADMINISTRATIVE HEARINGS  
CONVENIENCE AND NECESSITY §  
FOR THE PROPOSED SCENIC §  
LOOP 138-KV TRANSMISSION LINE §

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

**I. INTRODUCTION**

Toutant Ranch, Ltd., Pinson Interests Ltd. LLP, ASR Parks, LLC, and Crighton Development Co. (collectively, "Developers") file the following objections 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, this objection is timely filed.

**II. OBJECTIONS TO STEVE CICHOWSKI'S SECOND SET OF RFIS**

**RFI 2-1** Refer to page 3, lines 14-16 and Exhibit 1 to the testimony of Mr. Dreiss.

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.

**OBJECTION:**

Developers object that RFI 2-1(a) is irrelevant. The Preliminary Order in this proceeding calls out compensation for right-of-way or condemnation of property as an issue not to be addressed in this proceeding. Additionally, the total cost to Developers of entering into their agreement with CPS does not impact the Commission's routing analysis. That issue is distinct from the total cost of each routing option available to the Commission following Developers' agreement with CPS, and information on that second issue is available in CPS's Amended Application.

682

### III. CONCLUSION

For the foregoing reasons, Developers request that their objections be sustained.

Respectfully submitted,

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**ATTORNEYS FOR TOUTANT RANCH, LTD.,  
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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