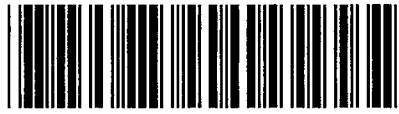




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SOAH DOCKET NO. 473-21-0247  
PUC DOCKET NO. 51023

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APPLICATION OF THE CITY OF §  
SAN ANTONIO ACTING BY AND §  
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 IN BEXAR COUNTY §

BEFORE THE STATE OFFICE  
SUPERVISOR OF PUBLIC UTILITIES  
REGULATORY DIVISION

OF

ADMINISTRATIVE HEARINGS

**BEXAR RANCH, L.P, SAVE HUNTRESS LANE AREA ASSOCIATION, AND  
CLEARWATER RANCH POA'S RESPONSE TO  
JOINT MOTION TO PARTIALLY EXTEND PROCEDURAL SCHEDULE**

COME NOW, Intervenors, Bexar Ranch, L.P., Save Huntress Lane Area Association, and Clearwater Ranch POA (together "Respondents"), and file this Response to Anaqua Springs Homeowner's Association and Steve and Catherine Cichowski's Joint Motion to Partially Extend the Procedural Schedule and shows the following:

The Joint Parties seek a contingent ruling on a matter that would only further delay these proceedings. The Joint Parties claim that there would be no significant delay if the R-1 Modified route and its segments be included in the case and that the dates for the Hearing on the Merits would remain. To the contrary, the case would essentially need to start over. The utility would have to study the new modified segments and route. Other intervenors should be given the fair option to propose their own new unstudied segments and unstudied routes under the Joint Parties' new "rules." Then intervenors would have to re-analyze the full set of routes redrawn by various intervenors. Utility and intervenor direct testimony, intervenor cross-rebuttal, discovery responses, etc., would all need to be supplemented, well-past their current deadlines, with no time to prepare

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for the hearing on the merits. This would undoubtedly lead to a continuation of the case, and presumably a significant continuation of it.

For these reasons, Respondents respectfully request the Administrative Law Judges deny Join Parties Motion to Partially Extend the Procedural Schedule.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on March 26, 2021 in accordance with Public Utility Commission Procedural Rule 22.74.

/s/ Patrick L. Reznik  
Patrick L. Reznik