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

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 **BEFORE THE STATE OFFICE**

OF

ADMINISTRATIVE HEARINGS

ERRATA TO THE DIRECT TESTIMONY OF STEVE CICHOWSKI ON BEHALF OF ANAQUA SPRINGS HOA

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Anaqua Springs HOA ("Anaqua Springs") submits the following errata to the direct testimony of Steve Cichowski.

Page 17, lines 11-12 delete the testimony from "Segment 37 to Also,".

The redlined page is attached to this errata and will be made on the copies of testimony

submitted at the hearing on the merits.

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Respectfully submitted,

By: Way 19 Hal

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ATTORNEYS FOR ANAQUA SPRINGS HOMEOWNERS' ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been filed with the

Commission and served on all other parties via the PUC Interchange on this 2nd day of April 2021,

pursuant to SOAH Order No. 3 issued in this docket.

Wendy Kal. Harvel

1	Q.	OTHER THAN RUNNING CLOSE TO THE BACK OF YOUR PROPERTY,
2		IS THERE ANOTHER CONCERN YOU HAVE REGARDING THE
3		ROUTING OF SEGMENT 43?

4 A. Yes. In my personal direct testimony, I discuss how CPS previously trespassed on
5 my land.

6 Q. CAN YOU EXPLAIN THE CONCERNS WITH THE ROUTES TO THE 7 SOUTH THAT UTILIZE SEGMENTS 38, 39, AND 43?

8 A. Yes. In looking at the routes that run to the south of Anaqua Springs, they come in
9 from either 37 or 26a, run along 38, and then either continue west to 43, or turn
10 south along 39. I will take each Segment separately.

11 Segment 37 cannot be reached without impacting numerous habitable 12 structures on Toutant Beauregard. Also, Segment 37 slants to the southwest, and 13 after passing the node at Segment 26a, becomes Segment 38 where it travels 14 southwest and then turns to the north.

As a result of Segment 38's turn to the northwest, additional habitable structures are impacted. If Segment38 turned to the west sooner, along a parcel line and then continued on the southwesterly direction, it could meet up with the current southern turn of Segment 43, reducing the overall number of impacted habitable structures by eliminating the two structures on Segment 38 and the structure on Segment 43.

21 Mr. Anderson addresses the proposed modification in detail in his
22 testimony.