



Control Number: 51023



Item Number: 724

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FILED

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

OF

ADMINISTRATIVE HEARINGS

**FIRST ERRATA TO THE REBUTTAL TESTIMONY OF MARK TURNBOUGH, PHD
ON BEHALF OF BEXAR RANCH, L.P.**

BEXAR RANCH, L.P. submits the attached First Errata to the Rebuttal Testimony of Mark Turnbough, PhD on Behalf of Bexar Ranch, L.P. A redlined and clean version of page 13 is attached. Page 46 should now be blank or deleted.

Respectfully submitted,
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ATTORNEYS BEXAR RANCH, L.P.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed in the records of Docket 51023 on this 6th day of April, 2021.

/s/ Soledad M. Valenciano
Soledad M. Valenciano

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1 statement that Segment 54 should not be used. The reason I disagree is that most of the
2 characteristics Mr. Anderson assigns to Segment 54, actually make it a very useful corridor
3 for bundling infrastructure that is necessary to support rapid subdivision and commercial
4 development in that area. By placing infrastructure necessary to support the growth in that
5 community, on Segment 54 and on subsequent Segments on Toutant Beauregard it is
6 possible to keep other nearby areas from being utilized for infrastructure placement that
7 are to date relatively unaffected.

8 Secondly, Mr. Anderson contends that no routes that run close to the elementary
9 school (McAndrew Elementary School) should be approved. With respect to the proximity
10 to Route Z-1 to the McAndrew Elementary School, using measurements provided in CPS
11 discovery responses (Documents 379 and 432), it should be noted that the centerline of the
12 ROW is approximately 320 feet to the closest edge of the school building. The distance
13 between the ROW to the nearest edge of the playground is 335 feet. The distance from the
14 ROW to the nearest edge of the soccer field / ballfield is approximately 280 feet.

15 The McAndrew Elementary School site is not atypical of tracts dedicated for or
16 donated to governmental entities in which new housing subdivisions are being developed.
17 It is not uncommon for developers to provide land for schools that is less useful for the
18 primary intended purpose (building houses) of the subdivision. In this instance, the school
19 property is adjacent to a drainage easement, a wastewater treatment plant, and a floodplain.

20 By way of comparison, I looked at locations of other schools within the Northside
21 Independent School District (NISD) using the NISD website and selected Google Earth
22 images. See **Exhibit Rebuttal MT-1** for photographs and maps for each of the schools
23 referenced below. For each school shown, there is an aerial photograph, a ground level

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