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

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

CLEARWATER RANCH POA’S OBJECTION TO THE ERRATA TO THE DIRECT TESTIMONY OF STEVE CICHOWSKI ON BEHALF OF ANAQUA SPRINGS HOA

COME NOW, Clearwater Ranch POA (“Clearwater”), and files this their Objection to the Errata to the Direct Testimony of Steve Cichowski on Behalf of Anaqua Springs HOA (“Anaqua”) filed on April 5, 2021, in the above-captioned cause.

The purpose of filing an Errata to Direct Testimony is to correct clerical errors. The changes identified in Anaqua’s Errata to the Direct Testimony of Steve Cichowski are substantive changes to Anaqua’s Direct Testimony. Specifically, it removes the sentence “Segment 37 cannot be reached without impacting numerous habitable structures on Toutant Beauregard.” This statement is more than correcting a clerical error of a misidentified segment. This is blatant attempt to remove direct testimony that is against Segment 37 as an effort to support Route P, the route that PUC Staff’s expert has identified as the best meets route and which utilizes Segment 37. Any substantive changes to a party’s direct testimony should have been filed as cross-rebuttal testimony. The deadline for an Intervenor to file cross-rebuttal testimony was March 22, 2021.

For these reasons, Clearwater respectfully requests the Administrative Law Judges strike the changes identified in the Errata to the Direct Testimony of Steve Cichowski on Behalf of Anaqua Springs HOA.

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Respectfully Submitted,

BRAUN & GRESHAM, PLLC

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**ATTORNEYS FOR CLEARWATER
RANCH POA**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on April 12, 2021 in accordance with Public Utility Commission Procedural Rule 22.74 and applicable Orders in this docket.

/s/Patrick L. Reznik
Patrick L. Reznik