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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	§	
CONVENIENCE AND NECESSITY	§	ADMINISTRATIVE HEARINGS
FOR THE PROPOSED SCENIC	§	
LOOP 138-KV TRANSMISSION LINE	§	

TOUTANT RANCH, LTD., ASR PARKS, LLC, PINSON INTERESTS LTD. LLP, AND CRIGHTON DEVELOPMENT CO.'S STATEMENT OF POSITION REGARDING APPEAL OF SOAH ORDER NO. 10

I. INTRODUCTION

The purpose of this filing is to clarify Toutant Ranch, Ltd., Pinson Interests Ltd. LLP, ASR Parks, LLC, and Crighton Development Co.'s (collectively, "Companies") position with respect to the pending appeal of SOAH Order No. 10, which has been placed on the Open Meeting Agenda for May 6, 2021.

II. STATEMENT OF POSITION

As discussed in the Direct Testimony of Tom Dreiss,¹ the Companies are sophisticated businesses that worked with CPS Energy over the course of several months to develop route modifications that exclusively impact properties that the Companies own and/or control. As part of the Companies' Agreement with CPS Energy,² they committed to support the Commission routing the Scenic Loop transmission line along a path that begins at the node that interconnects Segments 41, 42a, 46, and 46a and travels to the west. As a result of that Agreement, CPS Energy amended its Application to remove a potential transmission line path across the Companies' properties that was significantly interfering with the Companies' ongoing subdivision projects.³

¹ Docket No. 51023, Interchange # 557.

² See Exhibit 1 to the Direct Testimony of Tom Dreiss.

³ As discussed in the Agreement, removing that proposed path did not change how the proposed transmission line paths impacted any other landowner's property.

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The Companies stand by their Agreement with CPS Energy and intend to uphold that Agreement in all respects. Additionally, the Companies do not believe that any portion of their agreement with CPS Energy is contrary to public policy. For clarity, the Companies believe that under the Agreement they remain free to engage in settlement discussions and participate in the upcoming hearing on the merits. With respect to routing this transmission line, the Companies' position is that they support the Commission routing the Scenic Loop transmission line along a path that begins at the node that interconnects Segments 41, 42a, 46, and 46a and travels to the west. That said, the Companies would not oppose the Commission routing the line along a path that would not impact their properties.

III. CONCLUSION

The Companies appreciate the time and effort that CPS Energy put into developing the various modifications that were necessary across the Companies' tracts. The Companies' stand by the resulting Agreement and do not believe there is any need for the Commission to interfere in its operation.

Respectfully submitted,

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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 19th day of April, 2021 by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Michael McMillin

Michael McMillin