



Control Number: 51023



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

2021 APR 25 PM 2:43

APPLICATION OF THE CITY OF § BEFORE THE STATE OFFICE
SAN ANTONIO TO AMEND ITS §
CERTIFICATE OF CONVENIENCE § OF
AND NECESSITY FOR THE §
SCENIC LOOP 138-KV TRANSMISSION § ADMINISTRATIVE HEARINGS
LINE IN BEXAR COUNTY §

**CPS ENERGY'S SUPPLEMENTAL RESPONSE TO BRAD JAUER'S
AND BVJ PROPERTIES, L.L.C.'S
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Supplemental Response to the Brad Jauer's and BVJ Properties, L.L.C.'s Third Request for Information (RFI). This Response is timely filed. CPS Energy agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,

/s/ Kirk D. Rasmussen

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ATTORNEYS FOR CPS ENERGY

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on this date via the Commission's Interchange in accordance with SOAH Order 3 in this proceeding.

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen

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**CPS ENERGY’S SUPPLEMENTAL RESPONSE TO BRAD JAUER’S
AND BVJ PROPERTIES, L.L.C.’S
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Brad Jauer & BVJ Properties RFI 3-1:

Regarding Segment 36 where it runs along the north side of Brad Jauer/BVJ Properties, LLC property (i.e., Tract No. C-014 as per the Landowner Notice List, which is Attachment 8 of the Application; and Tract No. IA-86 as per the Intervenor Map, Rev. 14), please confirm:

- i) the general height of the ledge or cliff that runs along the north side of the property and the south side of the Toutant Beauregard right-of-way, and its distance from the centerline of Toutant Beauregard’s right of way;
- ii) the width of the Toutant Beauregard right-of-way along the north side of the property and whether the ledge/cliff is within that right-of way, and, if not, how far outside does it lie;
- iii) the width of the right-of-way of the distribution line that already exists along the north side of the property;
- iv) whether the distribution line’s right-of way abuts and/or overlaps the Toutant Beauregard right-of-way and, if it does neither, what is the distance between the two rights-of-way, and, if it overlaps, what is the width of the overlap;
- v) the distance of the centerline of the distribution line’s right-of-way from the centerline of Taunton Beauregard’s right-of-way;
- vi) the width of Segment 36’s right-of-way where it runs along the north side of the property (e.g., is it 75 feet or 100 feet wide?);
- vii) whether Segment 36’s right-of-way will abut and/or overlap the distribution line’s right-of-way along the north side of the property, and, if it does neither, what is the distance between the two rights-of-way, and, if it overlaps, what is the width of the overlap; and
- viii) the distance of the centerline of Segment 36’s right-of-way from the centerline of Taunton Beauregard’s right-of-way.

Supplemental Response No. 3-1 (April 26, 2021):

- vi) *Refer to CPS Energy’s response to Brad Jauer & BVJ Properties RFI 2-2. As noted in that response and the Rebuttal Testimony of Mr. Scott Lyssy, including Exhibit SDL-4R, in some areas, due to the curvature of Toutant Beauregard Road, although the*

preliminary pole placements are within 100 feet of right of way on private property, the amount of right of way necessary on private property may be slightly less than 100 feet between the poles. In this area, the right of way on private property is approximately 75 feet at the narrowest location between the poles. Exhibit SDL-4R to Mr. Lyssy's Rebuttal Testimony depicts the right of way on private property in this area.

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