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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

2021 APR 23 Aiil: 29

OF

ADMINISTRATIVE HEARINGS

RESPONSE IN OPPOSITION TO MOTION FOR CONTINUANCE

Intervenors BEXAR RANCH, L.P., SAVE HUNTRESS LANE AREA ASSOCIATION, and CLEARWATER RANCH POA ("Respondents") file this Response in Opposition to the Motion for Continuance and Other Relief and Notice of Issue at Open Meeting filed by Anaqua Springs Homeowners' Association, Steve Cichowski, Brad Jauer & BVJ Properties, LLC, and The San Antonio Rose Palace, Inc., and Strait Promotions, Inc. (the "Motion for Continuance"), respectfully stating as follows:

- 1. Respondents are ready to proceed to trial on May 3, 2021. A continuance at this very late hour will cause Respondents to incur additional unnecessary expense.
 - 2. The issues raised by the Motion for Continuance can be addressed in cross

examination at the Hearing on the Merits.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondents respectfully request that the Administrative Law Judges deny the Motion for Continuance, except to the extent of accommodating the May 6, 2021 Open Meeting.

Respectfully submitted,

SPIVEY VALENCIANO, PLLC McAllister Plaza – Suite 130 9601 McAllister Freeway San Antonio, Texas 78216 Telephone: (210) 787-4654 Facsimile: (210) 201-8178 /s/ Soledad M. Valenciano James K. Spivey ikspivey@svtxlaw.com State Bar No. 00794680 Soledad M. Valenciano State Bar No. 24056463 svalenciano@svtxlaw.com

ATTORNEYS FOR BEXAR RANCH, L.P.

Is/Thomas K. Anson Thomas K. Anson (SBN 01268200) 512-499-3608/512-536-5718 (fax) <u>TAnson@clarkhill.com</u> CLARK HILL STRASBURGER 720 Brazos St. Suite 700 Austin, Texas 78701

ATTORNEY FOR SHLAA

BRAUN & GRESHAM, PLLC P.O. Box 1148 (Mailing) Dripping Springs, Texas 78620 14101 Hwy. 290 W., Bldg. 1100 Austin, Texas 78737 512-894-5426 (telephone) 512-894-3405 (fax) /s/Patrick L. Reznik Patrick L. Reznik Patrick L. Reznik State Bar No. 16806780 preznik@braungresham.com Carly Barton State Bar No. 24086063 cbarton@braungresham.com

ATTORNEYS FOR CLEARWATER RANCH POA

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed in the records of Docket 51023 in the above-captioned proceedings, on this 28th day of April, 2021.

<u>/s/ Soledad M. Valenciano</u> Soledad M. Valenciano