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MISSION

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

**ANAQUA SPRINGS HOMEOWNERS' ASSOCIATION AND  
BRAD JAUER/BVJ PROPERTIES, LLC SECOND ERRATA TO THE  
DIRECT TESTIMONY OF MARK D. ANDERSON**

Anaqua Springs Homeowners' Association ("Anaqua Springs HOA") and Brad Jauer/BVJ Properties, LLC ("Jauer") submit the following errata to the Direct Testimony of Mark D. Anderson.

The testimony should read:

- Page 31, lines 3-4 "...there is a plastic natural gas pipeline, with steel risers, on the north side..."

The corrected pages are attached to this errata, and conforming copies will be provided at the hearing to the court reporter, the Administrative Law Judges, and any party who requests a clean copy.

1 8/2

Respectfully submitted,

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**ATTORNEYS FOR ANAQUA SPRINGS  
HOMEOWNERS' ASSOCIATION**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of April 2021, notice of the filing of this document was provided to all parties of record via the PUC Interchange in accordance with SOAH Order No. 3.

Wendy K. L. Harvel  
Wendy K. L. Harvel

**VIII. PIPELINES****Q. DO ANY OF THE SEGMENTS PARALLEL OR CROSS A PIPELINE?**

A. Yes, as Brad Jauer indicates in his testimony, there is a steelplastic natural gas pipeline, with steel risers, on the north side of Toutant Beauregard Road where CPS has located Segment 20. The riser for the pipeline is clearly shown on the photographs included in Jauer Exhibit BJ-1, and the fact that it is owned and/or operated by “CPS Energy,” itself, is evidenced by the signage shown in those photographs.

**Q. HAS CPS MADE ANY REFERENCE TO THIS PIPELINE IN THE APPLICATION OR OTHERWISE?**

A. No, it has not. In fact, in response to Brad Jauer & BVJ Properties RFI 2-8, CPS states declaratively, “CPS Energy is not aware of any steel natural gas or water pipelines within the study area.” Then, responding with even more specificity to Brad Jauer & BVJ Properties RFI 2- 16, CPS states, “CPS Energy does not have any information regarding any pipelines in proximity to Segment 20, including owner, size, composition, or material, and type.”<sup>28</sup> Both of these discovery responses from CPS Energy are attached to my testimony as Exhibit MDA-25 (CPS Response to Jauer 2-8 and 2-16).

In addition, CPS’s tables summarizing the results of its evaluations of “Environmental and Land Use Data” (i.e., Table 4-1 Amended and Table 4-2 Amended) similarly fail to identify any segment or route that parallels or crosses a pipeline.

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<sup>28</sup> Exhibit MDA-25, CPS Response to Jauer RFIs 2-8 and 2-16.