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2021 MAY -4 PM 2:23

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 BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

TOUTANT RANCH, LTD., ASR PARKS, LLC, PINSON INTERESTS LTD. LLP, AND CRIGHTON DEVELOPMENT CO.'S RESPONSES TO BVJ PROPERTIES L.L.C. AND BRAD JAUER'S FIRST SET OF REQUESTS FOR INFORMATION

Toutant Ranch, Ltd., Pinson Interests Ltd. LLP, ASR Parks, LLC, and Crighton Development Co. (the "Companies") file the following agreed responses to the First Set of Requests for Information ("RFIs") to Companies filed by BVJ Properties L.L.C. and Brad Jauer. Pursuant to 16 T.A.C. § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.



Respectfully submitted,

THOMPSON & KNIGHT LLP

/s/ Michael McMillin Katherine L. Coleman State Bar No. 24059596 Michael McMillin State Bar No. 24088034 98 San Jacinto Blvd., Suite 1900 Austin, Texas 78701 (512) 469.6100 (512) 469.6180 (fax)

ATTORNEYS FOR TOUTANT RANCH, LTD., ASR PARKS, LLC, PINSON INTERESTS LTD. 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 4th day of May, 2021 by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.

<u>/s/ Michael McMillin</u> Michael McMillin

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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

BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

TOUTANT RANCH, LTD., ASR PARKS, LLC, PINSON INTERESTS LTD. LLP, AND CRIGHTON DEVELOPMENT CO.'S RESPONSES TO BVJ PROPERTIES L.L.C. AND BRAD JAUER'S FIRST SET OF REQUESTS FOR INFORMATION

RFI 1-1 From a business perspective, would it be better for your subdivision developments if the Commission selected a route for the Scenic Loop transmission line that does not directly impact properties you are in the process of developing?

RESPONSE:

Yes.

Preparer: Tom Dreiss/Counsel Sponsor: Tom Dreiss