



Control Number: 51023



Item Number: 829

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0247

2021 MAY 21 AM 10:16

P.U.C. DOCKET NO. 51023

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

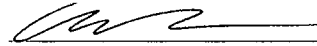
INITIAL BRIEF OF PRIMARILY PRIMATES INC.

Primarily Primates Inc. files this Initial Brief to advocate the rejection of any proposed route that incorporates Substation 1 or Segment Nos. 2 and 13 in any proposal for decision (PFD) issued by the State Office of Administrative Hearings (SOAH) and, subsequently, the order of the Public Utility Commission of Texas (PUC). Primarily Primates Inc. appreciates the opportunity to participate in this case. To date, no party has advocated selection of a route utilizing Substation 1 or Segment Nos. 2 and 13. Primarily Primates Inc. does not advocate selection of any specific route but urges SOAH and the PUC to consider routes that best minimize impacts on landowners and the environment to the extent possible as well as avoiding unnecessary costs to the public.

Primarily Primates Inc. reserves the right to file a Reply Brief to respond to any arguments made in favor of approving any route that utilizes Substation 1 or Segment Nos. 2 and 13.

Respectfully submitted,

By:



Andres Medrano

Ph: 512.542.7013

Fax: 512.542.7100

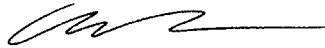
amedrano2@foley.com

FOLEY & LARDNER LLP
600 Congress Avenue, Suite
3000
Austin, TX 78701

COUNSEL FOR PRIMARILY PRIMATES
INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties on the 21st day of May 2021.



Andres Medrano