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## **PUC DOCKET NO. 51023; SOAH DOCKET NO. 473-21-0247**

APPL. OF THE CITY OF SAN ANTONIO	§	STATE OFFICE OF ADMINISTRATIVE
TO AMEND ITS CCN FOR THE SCENIC	§	HEARINGS
LOOP 138-KV TRANSMISSION LINE IN	§	ON REFERRAL FROM THE
BEXAR COUNTY, TEXAS	§	PUBLIC UTILITY COMMISSION
	§	OF TEXAS

## <u>CLARIFICATION TO SAVE HUNTRESS LANE AREA ASSOCIATION'S REPLIES TO THE</u> EXCEPTIONS TO THE PROPOSAL FOR DECISION

Save Huntress Lane Area Association ("SHLAA"), an intervenor, stated in its replies to the exceptions (at pp. 30-31, footnotes omitted):

The Northside Independent School District ("NISD") initially opposed routes that include Segments 42a, 41, and 35, because it said it does not want electric transmission lines anywhere near its schools. Nevertheless, the NISD has, many times, built elementary schools close to existing electric transmission lines and substations in multiple instances. Therefore, the NISD position was appropriately discounted by the PFD, especially as to use Segment 42a off of, to the back of, and well away from the school and its property.

Notably, NISD did not file exceptions to the PFD and its recommendation of Route Z2, and thus its recommendation to use Segment 42a. Thus, NISD is no longer opposed to use of Segment 42a well behind the school on the neighbors' Toutant Ranch development property. The Joint Exceptors do not have authority to speak for anyone else but themselves, and therefore have no authority to speak for NISD. So the Joint Exceptors' claim of concern for the school and its students, parents, and staff is belied not only by their lack of any representative capacity for the school but by the actual behavior of the NISD in taking no exceptions to the PFD.

NISD's counsel has informed SHLAA's counsel that the lack of NISD exceptions does not equate to NISD no longer opposing Segment 42a. SHLAA clarifies its replies by withdrawing the second sentence of the second paragraph above. That does not affect the remainder of those paragraphs, since NISD in fact did not file exceptions, in fact has elementary schools close to existing electric transmission lines and substations in multiple instances, etc.

Respectfully submitted,

By: /s/ Thomas K. Anson
Thomas K. Anson (SBN 01268200)
Clark Hill PLC
720 Brazos Street, Suite 700, Austin, TX 78701
512-499-3600 / 512-536-5718 (fax)
E-mail: tanson@clarkhill.com

ATTORNEY FOR SAVE HUNTRESS LANE AREA ASSOCIATION

## **CERTIFICATE OF SERVICE**

Certificate of Service: I certify	service under SC	JAH Order No. 1	3 this Oct. I	.8, 2021.
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\_\_\_/s/ Thomas K. Anson Thomas K. Anson