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SOAH DOCKET NO. 473-25-02531
PUC DOCKET NO. 57115

JOINT APPLICATION OF THE CITY
OF SAN ANTONIO, ACTING BY AND
THROUGH THE CITY PUBLIC
SERVICE BOARD (CPS ENERGY),
AND SOUTH TEXAS ELECTRIC
COOPERATIVE, INC. (STEC) TO
AMEND THEIR CERTIFICATES OF
CONVENIENCE AND NECESSITY
FOR THE PROPOSED HOWARD
ROAD-TO-SAN MIGUEL 345-KV
TRANSMISSION LINE IN BEXAR
AND ATASCOSA COUNTIES

**TERRY LYNN LUENSMANN ON BEHALF OF THE TERRI LYNN LUENSMANN
SPOUSAL GST TRUST'S RESPONSE TO CPS ENERGY AND SOUTH TEXAS
ELECTRIC COOPERATIVE, INC.'S FIRST REQUEST FOR INFORMATION**

TO: CPS Energy and South Texas Electric Cooperative, Inc., by and through their attorneys of record, Kirk D. Rasmussen, Craig R. Bennett, and Heath Armstrong, JACKSON WALKER LLP, 100 Congress Avenue, Suite 1100, Austin, Texas 78701 and Diana Liebmann and Carlos Carrasco, HAYNES AND BOONE, LLP, 112 E. Pecan St., Ste. 2400, San Antonio, Texas 78205 and Jennifer Littlefield, HAYNES & BOONE, LLP, 98 San Jacinto Blvd., Ste. 1500, Austin, Texas 78701

Pursuant to the orders in this docket, P.U.C. PROC. R. 22.144, and other applicable Commission rules, Terry Lynn Luensmann on behalf of the Terri Lynn Luensmann Spousal GST Trust (“Luensmann”) hereby serves her Responses to CPS Energy and South Texas Electric Cooperative, Inc.’s First Request for Information. The responses to these questions may be treated as though provided under oath.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
14101 Hwy. 290 W., Bldg. 1300 (Physical)
Austin, Texas 78737
512-894-5426 (telephone)

512-894-3405 (fax)

/s/Patrick L. Reznik

Patrick L. Reznik

State Bar No. 16806780

preznik@braungresham.com

Carly Barton

State Bar No. 24086063

cbarton@braungresham.com

**ATTORNEYS FOR THE TERRI LYNN
LUENSMANN SPOUSAL GST TRUST**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on November 26, 2024, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 57115.

/s/Patrick L. Reznik

Patrick L. Reznik

RESPONSE TO REQUESTS FOR INFORMATION

- 1.1 Provide the date upon which the airstrip allegedly impacted by proposed Segment 78 became operational and provide all documents (including invoices or other records) related to the construction of the airstrip.

Response: First Test landing was September 24, 2024. Invoices for truck and maintainer rental and blading are provided. *See* documents Luensmann 001-004.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.2 Provide all local, state, or federal registrations, certifications, or recognitions related to the airstrip allegedly impacted by proposed Segment 78.

Response: None.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.3 Provide all logbooks, ledgers, or other records documenting takeoffs from and landings at the airstrip allegedly impacted by proposed Segment 78 over the last three years.

Response: None, other than a Track Log provided for one of the last landings. *See* Luensmann 005-007.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.4 Describe and provide records of all pilot licensure of Terri Lynn Luensmann or anyone associated with the Terri Lynn Luensmann Spousal GST Trust.

Response: None.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.5 Provide all documentation and registration information, including tail numbers, for all aircraft owned by you or any other parties that regularly land an airplane at the airstrip allegedly impacted by proposed Segment 78.

Response: None. There have only been two test landings to date.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.6 What is the overall length of the airstrip allegedly impacted by proposed Segment 78?

Response: 2,500 feet.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.7 What is the relation of the length of the airstrip allegedly impacted by Segment 78 to aircraft that land (or are intended to land) at the airstrip.

Response: I do not know.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.8 Provide any documents between Terri Lynn Luensmann and/or representatives of the Terri Lynn Luensmann Spousal GST Trust and any state or federal regulatory agency related to the construction, maintenance, or registration of the airstrip alleged to be impacted by proposed Segment 78.

Response: None.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.9 Provide all communications related to the airstrip allegedly impacted by Segment 78, (including texts, emails, or other written communication) between you and any third party regarding this docket.

Response: None.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.10 Describe any oral communications related to the airstrip allegedly impacted by Segment 78 between you and any third party regarding this docket.

Response: When my husband spoke to Jason Peeler to describe the airstrip and ask for his feedback on what improvements were needed to ensure safe landings, he told Mr. Peeler that we wanted to provide the airstrip for our hunting guests and friends but now a transmission line project might come through the airstrip and all would be for naught. Mr. Peeler said he was aware of the project as it impacts his ranch too. *See* Luensmann 008.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

- 1.11 Provide all documents related to request, inquiry, or discussion by any guest or potential guest to the Luensmann property crossed by Segment 78 to land an airplane on the property.

Response: There are none. We purchased this ranch two years ago. We took the first year slow, with only a few hunters and guests throughout the year while we understood what wildlife was on the ranch and what level of hunting it could support. We had interest in day doe hunts and turkey and quail hunting if the ranch was more accessible to an airstrip for quick trips. Interest came specifically from Robby Bondurant, who has driven in from Houston for day hunts. Robby is obtaining his private pilot's license and would like to fly in for future hunts. Colton Oney from Nevada also expressed interest in flying to the ranch to hunt. In addition, our friend and experienced pilot and plane owner, Prentiss Cammack, who lives in Mt. Pleasant, Texas and has jobs all over the state, said he would use the airstrip when he had work in our area. Thus, we decided to build a cabin so the hunters did not stay in our house and then build an airstrip to make the ranch more accessible for quick trips. We started building the cabin in August 2023 and just completed it in September 2024. The hunters first stayed it in opening weekend of 2024 deer season. My husband did much of the work himself when he was not working our ranch in La Vernia. In April of this year we started actual planning of the airstrip with the advice of Prentiss. My husband and two of his ranch hands did most of the work (for which he was not paid) in addition to an equipment operator with a maintainer that he hired to do the blade work. My husband rented a water truck to water and pack the runway, and he planted grass on it. Once he deemed the airstrip ready to test in September, he contacted a neighbor (Jason Peeler) with a plane and asked him to test land and provide feedback on what needed to be improved. He test landed and provided feedback via text on September 24, 2024. Prentiss also offered to have his son, Ben, who is obtaining his commercial pilot's license, to test land, which Ben did on October 21, 2024. As recently as this week, they were still performing final work to complete the airstrip. There is more we would like to do to formalize the airway to increase the economic potential for the ranch, but we have not had the time to do it, and now we want to wait until we know the Segment chosen.

Prepared by: Patrick L. Reznik
Sponsored by: Terri Lynn Luensmann

Gaydos Construction, LLC
700 CR 432
Pleasanton, TX 78064

Date 8/27/2024
Invoice # 7048

Bill To

Cibolo Crossing, LLC
877 CR 348
La Vernia, Texas 78121

PAID
08/27/2024

Vendor #
Terms

Ship Date 8/27/2024
Due Date 8/27/2024
Other

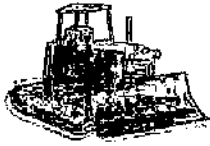
Item	Description	Qty	Price	Amount
Water Truck	Water Truck Rental	1	1,000.00	1,000.00
	Exempt Sales Tax		0.00%	0.00

Subtotal \$1,000.00
Total \$1,000.00
Payments/Credits -\$1,000.00
Balance Due \$0.00

Gaydos Construction, LLC
office@gaydosconstruction.com

830-569-8535

Misc
✓



Martin Holub
PO Box 452
Adkins, TX 78101-0452
Home: (210) 649-2645
Fax: (210) 649-4660
Cell: (210) 842-9604

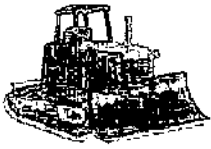
INVOICE
202400018
Number

10-Sep-24
Date

CUSTOMER		
Terri Lynn Luensmann Trust		
Name		
877 CR 348	La Vernia, TX	78121
Address	City	Zip
Home Phone		Business Phone

Description of Services	
Equipment rental for airstrip	\$ 4,150.00
<i>Paid M.H.</i>	

TOTAL LABOR \$	4,150.00
TAX	
GRAND TOTAL \$	4,150.00



Martin Holub
PO Box 452
Adkins, TX 78101-0452
Home: (210) 649-2645
Fax: (210) 649-4660
Cell: (210) 842-9604

INVOICE
202400017
Number

10-Sep-24
Date

CUSTOMER

Terri Lynn Luensmann Trust

Name

877 CR 348

Address

La Vernia, TX

City

78121

Zip

Home Phone

Business Phone

Description of Services

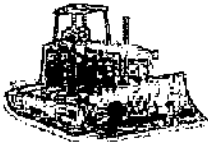
Blading Airstrip

Labor: \$ 8,250.00

Princl M.H.

TOTAL LABOR \$ 8,250.00
TAX

GRAND TOTAL \$ 8,250.00



Martin Holub
PO Box 452
Adkins, TX 78101-0452
Home: (210) 649-2643
Fax: (210) 649-4660
Cell: (210) 842-9604

INVOICE
202400020
Number

10-Sep-24

Date

CUSTOMER

Terri Lynn Luensmann Trust

Name

877 CR 348

La Vernia, TX

78121

Address

City

Zip

Home Phone

Business Phone

Description of Services

Bladed airstrip taxiway

\$ 1,500.00

Paid M.H.

TOTAL LABOR \$ 1,500.00
TAX

GRAND TOTAL \$ 1,500.00

Track Logs

K... → 28.84°N/98....

Oct 12, 2024 at 10:00 AM

CDT

N1255M

SUMMARY

Track Log

KBAZ -

Name

28.84°N/98.44°W

Pilot Name

Unknown

Initial GPS Source

ios

Recorded

iPad mini 5th Gen (Wi-Fi +

On

Cellular)

METRICS

Flight Time

46m18s

Avg Ground Speed

90 kts

Minimum g Load

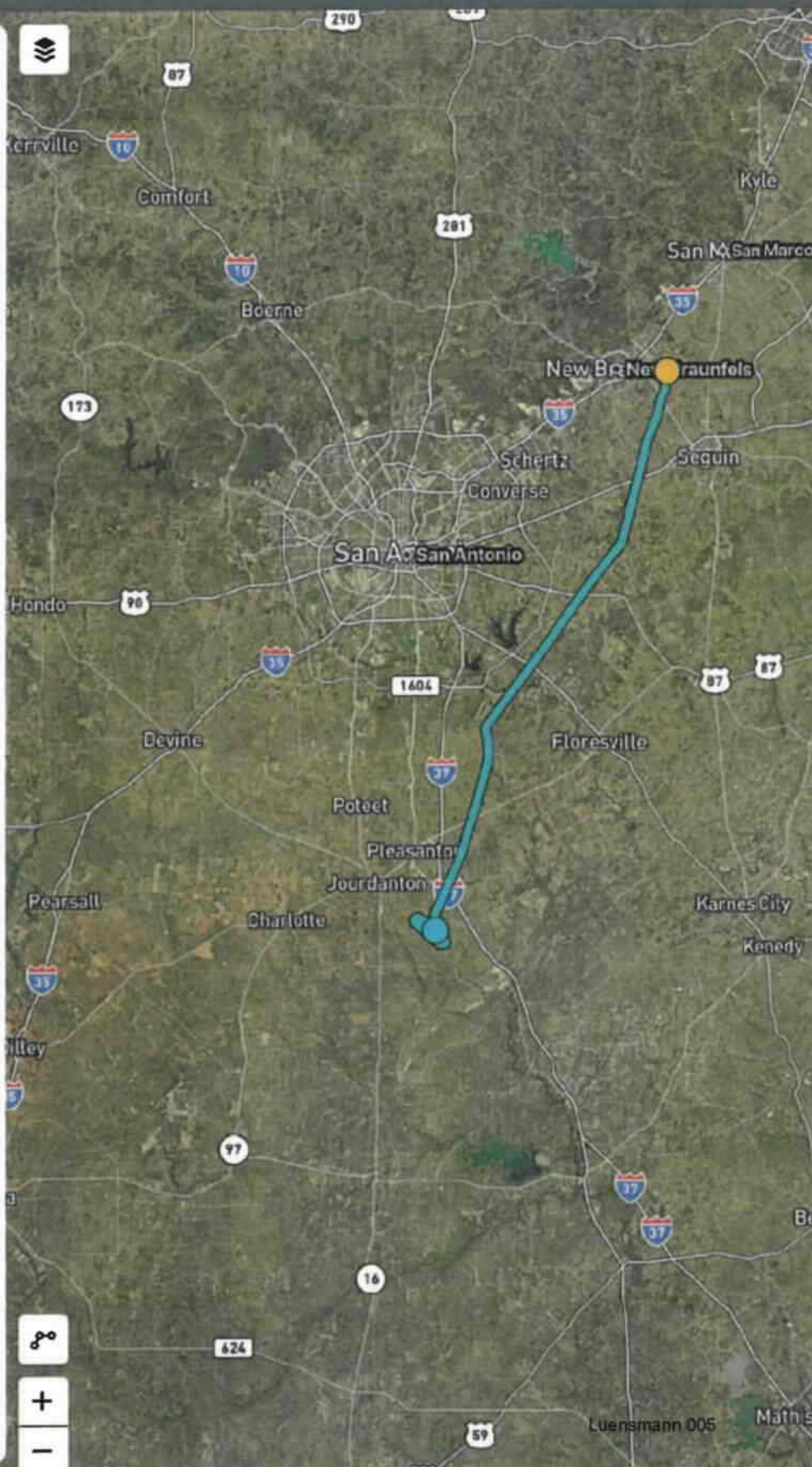
1

Maximum g Load ?

2

NOTES

1



Track Logs

K... → 28.84°N/98....

Oct 12, 2024 at 10:00 AM

CDT

N1255M

SUMMARY

Track Log NameKBAZ - 28.84°N/98.44°W

Pilot NameUnknown

Initial GPS SourceiOS

Recorded OniPad mini 5th Gen (Wi-Fi + Cellular)

METRICS

Flight Time46m18s

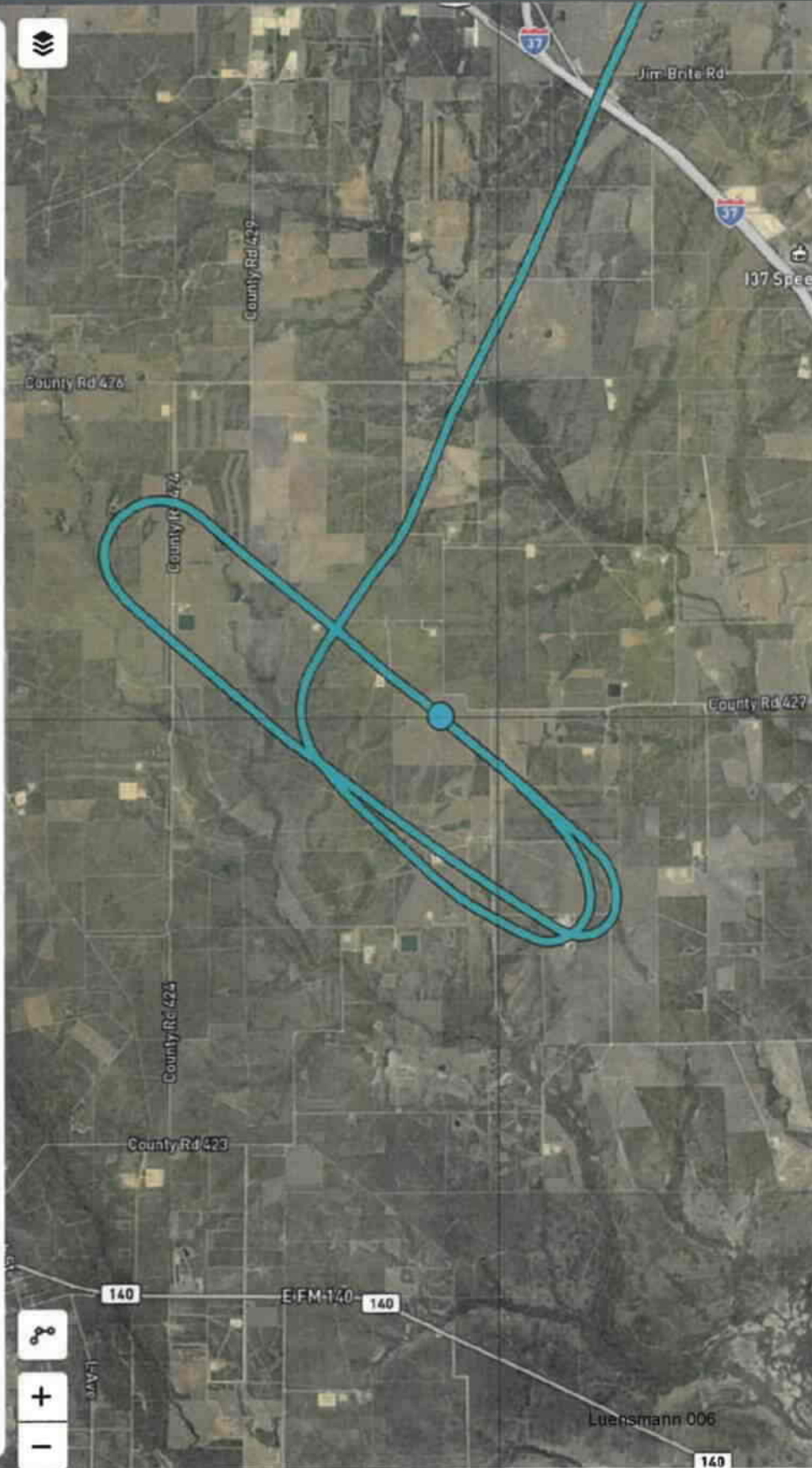
Avg Ground Speed90 kts

Minimum g Load-

Maximum g Load-

NOTES

-



Track Logs

K... → 28.84°N/98....

Oct 12, 2024 at 10:00 AM

CDT

N1255M

...

SUMMARY

Track Log

Name

Pilot Name

Initial GPS Source

Recorded On

KBAZ -

28.84°N/98.44°W

Unknown

iOS

iPad mini 5th Gen (Wi-Fi + Cellular)

METRICS

Flight Time

Avg Ground Speed

Minimum g Load

Maximum g Load

46m18s

90 kts

-

-

NOTES

-

📶

+

-

Luensmann 007

7:55



5:28



76

New iMessage

Cancel

To: Jason Peeler

iMessage

Mon, Sep 16 at 6:41PM

Jason this Mark Luensmann. Got your number from Fred Hilscher. He said you might be able to come try our runway off of CR 427. What would be a good time to call you?

Hey Mark. In the air now. Later this evening or tomorrow evening. Can you send me a pen drop



iMessage

