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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 AMENDED 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 Amended 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

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/s/Patrick L. Reznik

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**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 December 2, 2024, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 57115.

/s/Patrick L. Reznik

Patrick L. Reznik

AMENDED 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