



## **Filing Receipt**

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**Item Number - 237**

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

<b>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</b>	<b>§ § § § § § § § § § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**CPS ENERGY AND SOUTH TEXAS ELECTRIC COOPERATIVE, INC.’S  
LIST OF HEARING EXHIBITS, WITNESS LIST,  
OTHER PRE-HEARING SUBMISSIONS, AND WAIVER OF CROSS-EXAMINATION**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and South Texas Electric Cooperative, Inc. (STEC) (Joint Applicants) and file the following List of Hearing Exhibits, Witness List, and Waiver of Cross-Examination in accordance with SOAH Order No. 2.<sup>1</sup>

**I. Hearing Exhibits**

Attached below is Joint Applicants’ List of Hearing Exhibits. In addition to materials previously filed by Joint Applicants, the List of Hearing Exhibits includes the following:

- (1) CPS Energy and STEC Exhibit 12 – a single combined data table containing all applicable route data (including total estimated cost) as modified by Joint Applicants’ rebuttal testimony and including Route U ALT 2 and Route N-AB;
- (2) CPS Energy and STEC Exhibit 13 – Intervenor Maps, which includes an overview map and three detailed maps;<sup>2</sup>

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<sup>1</sup> SOAH Order No. 2 - Memorializing Prehearing Conference, Ruling on Motions to Intervene, Adopting Procedural Schedule, and Scheduling Hearing (October 25, 2024).

<sup>2</sup> Joint Applicants are working to prepare revised intervenor maps and a routes of interest exhibit that align with SOAH Order No. 4, issued December 5, 2024.

- (3) CPS Energy and STEC Exhibit 14 – Routes of Interest Exhibit, which includes the location of intervening parties and Routes M, N, U, Y, N-AB, and U ALT 2; and
- (4) CPS Energy and STEC Exhibit 15 – Location of Segment 62MOD2.

Joint Applicants have made the Jackson Walker file sharing site ShareFile available to all parties to this proceeding for the sharing of hearing exhibits.

## **II. Witness List**

At the hearing on the merits, Joint Applicants will present the pre-filed testimony of the following witnesses:

- (1) Daniel T. Otto (direct and rebuttal testimony)
- (2) Kenneth Bowen (direct testimony)
- (3) Denise M. Williams (direct and rebuttal testimony)
- (4) Scott D. Lyssy (direct and rebuttal testimony)
- (5) Paul G. Person (direct and rebuttal testimony)
- (6) Ethan J. Fholer (direct testimony)

As noted on the record by Joint Applicants at the Prehearing conference held on October 18, 2024, Mr. Lyssy will not be available to testify in person (if requested) until December 11, 2024. Joint Applicants are not aware of any party listing Mr. Lyssy for cross-examination.

## **III. Waiver of Cross Examination**

As stated in their filing of December 4, 2024, Joint Applicants have waived cross-examination of all witnesses in this proceeding subject to the agreement with counsel for Terri Lynn Luensmann Spousal GST Trust (Luensmann) for Joint Applicants to submit discovery responses of Luensmann in lieu of cross-examination. Joint Applicants reserve the right to ask questions of any witnesses called by another party.

## **IV. Other Pre-Hearing Submissions**

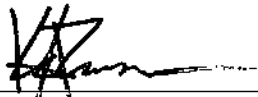
Order No. 2 requires that Joint Applicants file (i) a list of persons who have signed the Protective Order adopted in this proceeding, if any; (ii) a list of witnesses for whom cross-examination has been waived; and (iii) a proposed order of presentation, witnesses, and cross-

examination for the hearing. In accordance with Order No. 2, Joint Applicants note that no Protective Order has been adopted in this proceeding and no party designated any witnesses for cross-examination.

Joint Applicants propose that, if necessary, witnesses are presented for admission of direct and rebuttal pre-filed testimony in the following order:

- (1) Joint Applicant witnesses
- (2) Intervenor witnesses
- (3) Commission Staff witness

Respectfully submitted,



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**ATTORNEYS FOR STEC**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record on December 6, 2024, via the Commission's Interchange, in accordance with the Commission's Second Order in Docket No. 50664 suspending the PUC Procedural Rule 22.74.

  
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Kirk D. Rasmussen

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**HEARING EXHIBITS**

**CPS ENERGY AND STEC**

Exhibit	DESCRIPTION	Offered	Admitted
CPS ENERGY- STEC Exhibit 1	Complete Joint Application of CPS Energy and 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 (October 4, 2024-Interchange Item No. 2)		
CPS ENERGY- STEC Exhibit 2	Direct Testimony and Exhibits of Daniel T. Otto (October 4, 2024-Interchange Item No. 3)		
CPS ENERGY- STEC Exhibit 3	Direct Testimony and Exhibits of Kenneth Bowen (October 4, 2024-Interchange Item No. 4)		
CPS ENERGY- STEC Exhibit 4	Direct Testimony and Exhibits of Denise M. Williams (October 4, 2024-Interchange Item No. 5)		
CPS ENERGY- STEC Exhibit 5	Direct Testimony and Exhibits of Scott D. Lyssy (October 4, 2024-Interchange Item No. 8)		

<b>Exhibit</b>	<b>DESCRIPTION</b>	<b>Offered</b>	<b>Admitted</b>
CPS ENERGY- STEC Exhibit 6	Direct Testimony and Exhibits of Paul G. Person (October 4, 2024-Interchange Item No. 7)		
CPS ENERGY- STEC Exhibit 7	Direct Testimony and Exhibits of Ethan J. Fholer (October 4, 2024-Interchange Item No. 8)		
CPS ENERGY- STEC Exhibit 8	Rebuttal Testimony of Daniel T. Otto (November 27, 2024-Interchange Item No. 201)		
CPS ENERGY- STEC Exhibit 9	Rebuttal Testimony and Exhibits of Denise Williams (November 27, 2024-Interchange Item No. 202)		
CPS ENERGY- STEC Exhibit 10	Rebuttal Testimony and Exhibit of Scott Lyssy (November 27, 2024-Interchange Item No. 203)		
CPS ENERGY- STEC Exhibit 11	Rebuttal Testimony of Paul Person (November 27, 2024-Interchange Item No. 204)		
CPS ENERGY- STEC Exhibit 12	Route Data Table with Cost Estimate Totals Included		
CPS ENERGY- STEC Exhibit 13	Intervenor Map		
CPS ENERGY- STEC Exhibit 14	Routes of Interest Map		

<b>Exhibit</b>	<b>DESCRIPTION</b>	<b>Offered</b>	<b>Admitted</b>
CPS ENERGY- STEC Exhibit 15	Segment 62MOD2		
CPS ENERGY- STEC Exhibit 16	Luensmann RFI Responses		