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**SOAH DOCKET NO. 473-25-02531
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 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	§ § § § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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JJBAK, LTD. AND DOS MAVERICKS, LLC’S, INITIAL BRIEF

COMES NOW, JJBAK, Ltd. and Dos Mavericks, LLC, Intervenor, and file this, their Initial Brief, respectfully showing as follows:

1. Introduction

JJBAK, Ltd. and Dos Mavericks, LLC, own approximately 1,222.19 acres of contiguous land in Atascosa County, Texas (the “Property”). The Property was acquired on December 5, 2022, for the sole purpose of a planned unit development. The Property is impacted by Segments 50 and 51, which segments are used in Routes A, C, H, I, O, P, Q, R, and S. Although future development is not a statutory or regulatory criterion the Commission is required to consider in approving a route for a proposed transmission line, “the Joint Applicants and the Commission will take into account future development when it is characterized by concrete actions on the part of the landowner that demonstrate something more than an assertion that something may happen in the future.”¹

Here, the General Partner of JJBAK, Ltd. is Bakke Development Corp.,² a bona fide developer with a long track record of successful development projects. The Property was acquired in separate transactions on the same day by JJBAK, Ltd. and Dos Mavericks, LLC in a coordinated act of future development.³ A master land plan for the Property was prepared in August 2023.⁴ In 2023 JJBAK, Ltd. worked with its legislative representatives to create the Atascosa County Municipal Utility District No. 2 with boundaries that are coterminous with the Property to facilitate the development.⁵ Clearly, future development of the Property is characterized by concrete actions on the part of JJBAK, Ltd. and Dos Mavericks, LLC, that demonstrate something more than an assertion that something may happen in the

¹ See Rebuttal Testimony and Exhibits of Denise M. Williams at 11 (PUC Interchange Item No. 202).

² See Direct Testimony of Phillip P. Bakke at 3 (PUC Interchange Item No. 185).

³ Id. at 3-4.

⁴ Id. at Exhibit 1.

⁵ See Special District Local Laws Code, Ch. 7957A.

future. Here, future development of the Property has been initiated. Further, JJJBK, Ltd. and Dos Mavericks, LLC, are not seeking to modify or alter any route segment specifically for their future development. Therefore, the future development of the Property should be considered in this case.

2. Routes of Interest

Six routes of interest have been identified in this docket: Routes M, N, U, Y, N-AB and U-Alt-2.⁶ None of the routes of interest impact the Property.

3. Conclusion

JJBK, Ltd. and Dos Mavericks, LLC, respectfully request that the ALJs recommend, and the Commission order, one of the routes of interest, as each would more favorably comply with the statutory and other routing criterion when compared to the remaining alternative routes, including those that utilize Segments 50 and 51.

Respectfully submitted,

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DOS MAVERICKS, LLC**

Certificate of Service

I hereby certify that a true and correct copy of this document has been filed in the records of Docket No. 57115 on this 20th day of December 2024.

/s/ Rene D. Ruiz

Rene D. Ruiz

⁶ See Joint Applicants Exhibit 14 (Updated).