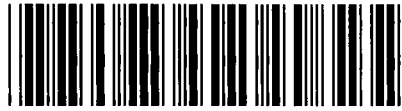




Control Number: 51023



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

APPLICATION OF THE CITY OF SAN ANTONIO TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY

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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF SAN ANTONIO
QUESTION NOS. STAFF 1-1 – 1-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that the City of San Antonio, acting by and through the City Public Service Board (CPS Energy), acting by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: October 19, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Heath D. Armstrong
Managing Attorney

/s/ Rustin Tawater
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**SOAH DOCKET NO. 473-21-0247
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on October 19, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Rustin Tawater
Rustin Tawater

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

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF SAN ANTONIO
QUESTION NOS. STAFF 1-1 – 1-3**

DEFINITIONS

- 1) "Applicant" or "you" refers to The City of San Antonio and the City Public Service Board and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF SAN ANTONIO
QUESTION NOS. STAFF 1-1 – 1-3**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

SOAH DOCKET NO. 473-21-0247
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COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF SAN ANTONIO
QUESTION NOS. STAFF 1-1 – 1-3

- Staff 1-1 Please reference pages 14 and 15 of the Application:
- a. On page 14 of the Application, it is stated that the average length of circuits/feeders is approximately 12.8 miles. It is unclear if this average is for all distribution voltages or if this value is specific to the voltage class in the project area. Please provide the average length of the circuits/feeders at the distribution voltage that will be used in this project.
 - b. Please provide CPS's system wide reliability indices.
 - c. Please provide CPS's reliability indices for The La Sierra and Fair Oaks Ranch circuits/feeders.
- Staff 1-2 Please provide the location of all existing schools in the project area and the distance each school is from the center line. If CPS is aware of any school that has been planned but not yet constructed in the project area (Planned Schools), please provide the location of any Planned Schools and the distance from the centerline of any of the proposed segments.
- Staff 1-3 Please reference Attachment 3 to the Application. Page 3 of Attachment 3 includes the substation cost estimates. The substation cost estimates appear to be the same in all categories except with regards to right-of way and land acquisition. Please provide a detailed explanation of any and all estimated cost differences between the different proposed substation sites.