



Control Number: 51023



Item Number: 388

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PUC DOCKET NO. 51023

**APPLICATION OF THE CITY OF
SAN ANTONIO, ACTING BY AND
THROUGH THE CITY PUBLIC
SERVICE BOARD (CPS ENERGY)
TO AMEND ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY FOR
THE SCENIC LOOP 138-KV
TRANSMISSION LINE IN BEXAR
COUNTY, TEXAS**

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BEFORE THE

PUBLIC UTILITY COMMISSION

OF TEXAS

**BRAD JAUER'S & BVJ PROPERTIES, L.L.C.'S
FIRST REQUESTS FOR INFORMATION TO
CITY OF SAN ANTONIO ACTING BY AND THROUGH
THE CITY PUBLIC SERVICE BOARD**

Pursuant to 16 Tex. Admin. Code § 22.144 and the Parties' agreements made at the prehearing conference (the "Parties Agreements"), Brad Jauer and BVJ Properties, L.L.C. request the City of San Antonio acting by and through the City Public Service Board ("CPS") provide, within 15 days (as adjusted for Thanksgiving in accordance with the Parties Agreements), the information requested in Attachment A.

Respectfully submitted,

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**ATTORNEY FOR BRAD JAUER & BVJ
PROPERTIES, L.L.C.**

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November 2020, notice of the filing of this document was provided to all parties of record via electronic mail in accordance with the Order Suspending Rules issued in Project No. 50664.

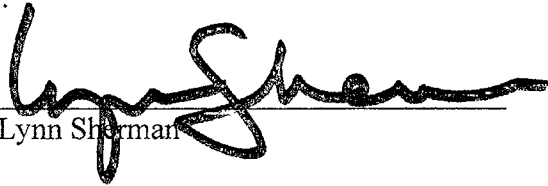

Lynn Sherman

EXHIBIT A

I. DEFINITION OF TERMS

The singular herein includes the plural and vice versa; the words “and” and “or” shall be construed as “and/or” in order to bring all information within the scope of the Request. The words, “each,” “all,” and “any,” mean “any and all” or “each and every.”

“Application” means the Application filed as PUC Docket No. 51023.

“Commission” shall mean the Public Utility Commission of Texas.

“Communication” shall include all meetings, telephone calls, conversations, discussions, letters, memoranda, notes, and other forms of communication.

“Document” or “Documents” is used in the broadest sense possible and shall mean documents within the possession, custody or control of CPS Energy, and includes, but is not limited to, every writing or record of every type and description, such as drafts, corrections, memoranda, letters, tapes, stenographic or handwritten notes, studies, publications, work papers, books, pamphlets, diaries, desk calendars, interoffice communications, records, reports, analyses, bills, receipts, checks, check stubs, checkbooks, invoices, requisitions, papers and forms filed with a court or governmental body, notes, transportation and expense logs, work papers, contracts, statistical and financial statements, corporate records of any kind, charts, graphs, pictures, photographs, photocopies, films, voice recordings, and any other written, recorded or graphic material, however denominated, by whomever prepared, and to whomever addressed, which are in your possession, custody or control. The term “document” also includes all electronic and magnetic data, including e-mail. The term “document” includes all copies of every such writing or record that are not identical copies of the original or that contain any commentary, notes, or markings that do not appear on the original.

“Including” means “including but not limited to” and “including without limitation.”

“Identify” means to state as much information as you now have or that is now subject to your control, or that you may hereafter come to have or that hereafter becomes subject to your control, including the following:

- a. when used in reference to a natural person, state the person’s full name, title, present (or last known) address, telephone number, occupation, present business affiliation or employer, business address, and exact duties and responsibilities of such individual;
- b. when used in reference to an entity, state the full name of the company, organization, association, partnership, or other business enterprise; and
- c. when used in reference to a document, state the date and title of the document and, if already produced in this case, the Bates-number of such document.

“Relate” or “relating to” includes referring to, mentioning, reflecting, containing, pertaining to, evidencing, involving, describing, discussing, responding to, supporting, opposing, constituting or being a draft, copy or summary of, in whole or in part.

“You” and “Your” refers to “CPS Energy” and/or City of San Antonio acting by and through the City Public Service Board, and includes any employees, agents, attorneys or consultants working directly or indirectly with CPS Energy, including, but not limited to, individuals, partnerships, associations, corporations or other legal or business entities, and any of the attorneys or law firms that purport to represent you in this case.

II. INSTRUCTIONS

1. Each request herein extends to any documents or information in your possession and the possession of any of the attorneys or law firms that purport to represent you in this case.
2. Each and every non-identical copy of a document, whether different from the original because of indications of the recipient(s), handwritten notes, marks, attachments, marginalia, or any other reason, is a separate document that must be produced.
3. If you object to any portion of a request on the ground of privilege, answer the nonprivileged portion of the Request by providing such non-privileged information as is responsive.
4. If you object to any portion of a request on any ground other than privilege, you should still provide documents responsive to the remaining non-objectionable portion.
5. Separately for each request to which you object in whole or in part, describe in detail and itemize each basis of your objection.
6. If the basis of an objection to any request, or any portion thereof, is a statute, contract or other agreement, or any other obstacle to production that you claim is based in the law, please identify the basis of that purported obstacle with specificity.
7. Each request herein shall be construed independently, and no request shall be viewed as limiting the scope of any other request. Please indicate where any portion of your document production in response to a request has been covered in your production in response to another request, and please specify the request numbers at issue.
8. If you claim that any document responsive to any request is lost or destroyed, (a) identify and describe such document, (b) describe how the document was lost or destroyed, and (c) identify when the document was lost or destroyed.
9. If you claim that any documents responsive to any request are already in the possession of Anaqua Springs, please identify the document with sufficient specificity to allow Anaqua Springs to locate the document.
10. The requests shall be deemed continuing so as to require additional answers if, after answering such requests, you obtain information upon the basis of which you determine that the answer was incorrect when made, or you become aware that the answer, though correct when made, is no longer true, and the circumstances are such that failure to amend the answer is in substance a knowing concealment.
11. Any document that is withheld from production pursuant to a claim of attorney/client, work product, party communication or investigative privilege shall be identified and shall be segregated and maintained for in camera submission, and a list identifying such withheld documents shall be furnished at the time and place of production. Such list shall state with respect to each document: (a) the privilege under which the document is being withheld; (b) a description of the type of document; (c) a description of the subject matter and purpose of the document; (d) the date the document was prepared; (e) the author and/or signatory of the document; (f) the identity of the persons to whom the document was sent; and (g) the present custodian of the document.
12. As part of the response to each request for information, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical

assistance, in the preparation of the response. Please also state the name of the witness in this docket who will sponsor the answer to the request and may verify the truth of the response.

III. REQUESTS FOR INFORMATION

Brad Jauer & BVJ Properties RFI 1-1

What is the current status (e.g., length, orientation, etc.) of the road just south of Segment 26, including the extent it continues west from the point where Segment 26 turns from an east/west orientation to north/south?

Brad Jauer & BVJ Properties RFI 1-2

Is there an existing distribution line along Segment 39? If so, how wide is the right-of-way (ROW) already obtained for it and any future distribution and/or transmission lines, and how does the distribution line and the associated ROW impact access, additional ROW acquisition and construction costs if Segment 39 or a portion thereof were selected?

Brad Jauer & BVJ Properties RFI 1-3

Please provide the cost, length and habitable structure count on a modified Route Q as follows: Substation 6 to Segments 50, 15 and 26; then from the point where Segment 26 goes from east/west to north/south, continue due west to Segment 39 (possibly paralleling as much as possible the road referenced in RFI No. 1-1 that appears to head west from the point where Segment 26 turns to the north); then south down Segment 39 to Segment 44. Please also provide the associated transmission line cost savings compared to Route Q.

Brad Jauer & BVJ Properties RFI 1-4

Please provide the cost, length and habitable structure count on a modified Route Q as follows: Substation 6 to Segments 50, 15 and 26; then from the point where Segment 26 goes from east/west to north/south, continue due west to the southernmost point of Segment 43. This would have Segments 26 and 43 remaining wholly on the south side of the creek currently transecting Segment 43 (as per Figure 4-1 of Attachment 1 of the Application) and following land contours as necessary and appropriate. Please also provide the associated transmission line cost savings compared to Route Q.

Brad Jauer & BVJ Properties RFI 1-5

Regarding the Environmental Field Maps provided in response to *Anaqua Springs* RFI 1-9, which delineate the "general substation siting boundary, represented by an orange line," we note that the study area extends north of the intersection of Scenic Loop and Toutant Beauregard approximately 10,600', but extends to the south of that intersection only about 6,600', representing more than 1/3 less area to the south. Was an equidistant area to the south ever included within the general substation siting boundary? If not, why not? If so, what other distribution routes and/or substations were considered to serve projected load from the more equidistant study area extending to the south?

Brad Jauer & BVJ Properties RFI 1-6

Please provide the cost, length, and habitable structure count on a modified Route W as follows: Segments 44, 53, 47, 27, 57, to 56 with a substation located southwest of the node where Segments 55 and 56 meet. Please also provide the associated transmission line cost savings

compared to Route W given its shorter length. (This substation site would have been within an equidistant “general substation siting boundary” referenced above in RFI 1-5.)

Brad Jauer & BVJ Properties RFI 1-7

Please provide the Excel version of the \$/square foot file that was referenced during the Technical Conference during the discussion of substation property costs. (Our assumption is this is detailed down to the property tract ID number and grouped by Segment and substation location).

Brad Jauer & BVJ Properties RFI 1-8

Please provide all documents relating to consideration of “Study Option 2” as described in the CCN Application, Table 15-1, page 24. This relates to tapping into and looping the La Sierra to UTSA Tap B transmission line to the proposed substation site(s), including load flow and other electrical studies.

Brad Jauer & BVJ Properties RFI 1-9

Relative to the cost estimate of Study Option 2, which is referenced above in RFI No.1-8, was the cost of routing a loop from the La Sierra to UTSA Tap B to Substation 6 ever considered? If so, please provide all documentation regarding this evaluation. Please provide the cost estimate, length and habitable structure count related to Study Option 2. (Based on CPS response to *Anaqua Springs* RFI No. 1-12, the straight line distance is 4.6 miles; using the same methodology as the previously cited Table 15-1, adding 30% for routing inefficiencies, the length might be estimated to be 5.98 miles; multiplying 5.98 miles times \$6.9million/mile equals \$41.262 million, which would be a lower cost Route than Routes P through W which interconnect from the Ranchtown to Menger Creek line terminating at Substation 6.

Brad Jauer & BVJ Properties RFI 1-10

The EA, page 2-1, states “Feasible and geographically diverse alternative routes” were considered. How can the routes evaluated be considered geographically diverse given there is only one power source which is based on the Ranchtown to Menger Creek line, and the La Sierra to UTSA B Tap line, which may be closer to the southern Substation Sites, has been excluded?

Brad Jauer & BVJ Properties RFI 1-11

Please provide all documentation regarding consideration given to tapping into the 345kV line that is closest to a proposed Scenic Loop Substation site, name the Owner of this line, and provide the corresponding straight-line distance to the closest site. This was a transmission alternative discussed in the CCN, page 22, regarding 345 kV transmission lines in the vicinity of the proposed Scenic Loop Substation.

Brad Jauer & BVJ Properties RFI 1-12

Please provide all documents regarding the consideration and/or the submittal of an interconnection request to the owner of the nearest 345 kV line to the nearest Scenic Loop Substation site.

Brad Jauer & BVJ Properties RFI 1-13

Please describe the impacts to CPS Energy, if any, of adding the capability to serve the distribution system load from a 345 kV system.

Brad Jauer & BVJ Properties RFI 1- 14

Please provide the cost, length, and habitable structure count on a modified Route X as follows: 46, 41, 34, 30, 28, 17. Please also provide the associated transmission line cost savings compared to Route X given it's shorter length.

Brad Jauer & BVJ Properties RFI 1-15

Please provide the estimated cost to acquire and locate a substation near the node Routes 28 and 17 connect, on either of parcels A 085, A 137 or A132, whichever would have the lowest total cost.

Brad Jauer & BVJ Properties RFI 1-16

Please provide all documentation regarding determining the Scope of Work for Power Engineers' work on the Scenic Loop project, both prior to and after award of contract. It is not our intent to look at hourly rates or other budgetary numbers.

Brad Jauer & BVJ Properties RFI 1-17

Please provide all documentation regarding determining the Scope of Work for Burns & McDonnell's work on the Scenic Loop project, both prior to and after award of contract. It is not our intent to look at hourly rates or other budgetary numbers.

Brad Jauer & BVJ Properties RFI 1-18

Scott Lyssy testifies that CPS is not planning to construct the transmission line over existing distribution lines because of "CPS practice." What locations, if any, would it be possible to under-hang existing distribution lines?

Brad Jauer & BVJ Properties RFI 1-19

If the easement for Segment 42 had not been donated, how would it have changed the analysis of the best meets route?