



Control Number: 51023



Item Number: 394

Addendum StartPage: 0



1  
2 THE TEXAS STATE OFFICE OF ADMINISTRATIVE HEARINGS  
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5 In re Application of the City of San Antonio,  
6 Acting By and Through the City Public Service  
7 Board (CPS Energy) To Amend its Certificate  
8 of Convenience and Necessity for the Proposed  
9 Scenic Loop 138-kV Transmission Line Project  
10 in Bexar County, Texas

Docket Number: 51023

SOAH Docket No. 473-21-0247

PATRICK CLEVELAND'S  
FIRST REQUEST FOR INFORMATION TO  
CPS ENERGY

11 I, Patrick Cleveland, pursuant to 16 Tex. Admin. Code § 22.144 and the parties' agreements  
12 made at the prehearing conference, respectfully request that CPS Energy provide, within 15 days,  
13 the information requested in this Request for Information.  
14

15 **Definitions**

16 The following definitions apply to this Request for Information:

17 "Agent" means a business or personal representative, lawyer, or sub-contractor of CPS  
18 Energy who has any involvement in the CPS-Scenic Loop Project.

19 "Documentation" means electronic or magnetic data, and all written, printed, typed,  
20 recorded, or graphic matter of every kind and description, both original and copies, and all  
21 attachments and appendices.

22 "Related" means connected by common ancestry and includes parents, full siblings, or  
23 children grandparents, grandchildren, aunts, uncles, nephews, nieces or half-siblings and first  
24 cousins.

25 "Relationship" means being involved with another person in business partnerships in any  
26 form, including but not limited to corporations, limited liability companies, partnerships, etc..

27 "Study area" means the CPS-Scenic Loop Project study area.  
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1 **Instructions**

- 2
- 3 a. Each request herein extends to any documents or information in your possession and the
- 4 possession of any of the attorneys or law firms that purport to represent you in this case.
- 5 b. The requests shall be deemed continuing so as to require additional answers if, after
- 6 answering such requests, you obtain information upon the basis of which you determine
- 7 that the answer was incorrect when made, or you become aware that the answer, though
- 8 correct when made, is no longer true, and the circumstances are such that failure to
- 9 amend the answer is in substance a knowing concealment.
- 10 c. As part of the response to each request for information, please state, at the bottom of the
- 11 answer, the name and job position of each person who substantively participated in the
- 12 preparation of the response. Please also state the name of the witness in this docket who
- 13 will sponsor the answer to the request and may verify the truth of the response.

14 **Request for Information**

- 15 1. Please provide the names of any CPS Energy employees, agents, or board members who
- 16 own property within the study area and the Bexar County tax identification of such
- 17 property.
- 18 2. Please identify every CPS Energy employee, agent or board member who is related to or
- 19 has a relationship with any property owner within the study area, the name of the
- 20 property owner, the Bexar County tax identification of such property, and the nature of
- 21 that relationship.
- 22 3. Please identify every CPS Energy employee, agent or board member who owns property
- 23 adjacent to or within 500 feet of Toutant Beauregard Road from Crow Karsch Road to
- 24 Balcones Creek and the Bexar County tax identification of such property.
- 25 4. Please identify every CPS Energy employee, agent or board member who is related to or
- 26 has a relationship with any person who owns property that is adjacent to or within 500
- 27 feet of Toutant Beauregard Road from Crow Karsch Road to Balcones Creek, the name
- 28 of the property owner, the Bexar County tax identification of that property, and the nature
- of the relationship.

- 1 5. Please provide all of the reasons CPS Energy did not propose a segment that would  
2 follow Toutant Beauregard Road until it intersects with Balcones Creek and then follow  
3 the existing distribution line ROW to the Ranchtown to Menger Creek transmission line.
- 4 6. Please explain the details and provide documentation of any promises or agreements  
5 made by or between CPS Energy and any intervenors or property owners (or parties  
6 representing property owners) with regards to the CPS-Scenic Loop Project, including the  
7 names of the property owners or parties, the location of any property, the amount of  
8 property, and the amount of money, property or anything else to be exchanged.
- 9 7. Please provide the formula or formulas and/or spreadsheets containing the formulas used  
10 to create the cost estimates provided in Attachment 3 of the CPS Application.
- 11 8. Please provide any documentation of the estimated revenue and profits expected to be  
12 generated from the CPS-Scenic Loop Project.
- 13 9. Please provide any and all correspondence, documentation and the substance of any oral  
14 communications made between Texas Parks and Wildlife Department and CPS Energy  
15 relating to the CPS-Scenic Loop Project after August 1, 2019.
- 16 10. Please admit or deny that the distance between Segment 42 and the outdoor areas  
17 accessible to children at Dr. Sara B. McAndrew Middle School is less than 323 feet.
- 18 11. Please provide the distance, if known, between Segment 42 and any outdoor areas  
19 accessible to children at Dr. Sara B. McAndrew Middle School.

20 Respectfully submitted this 1<sup>st</sup> day of December, 2020.

21  
22 /Patrick Cleveland/

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CERTIFICATE OF SERVICE

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on December 1, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

*/Patrick Cleveland/*

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Patrick Cleveland