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APPL. OF THE CITY OF SAN ANTONIO §  
TO AMEND ITS [CCN] FOR THE §  
SCENIC LOOP 138-KV TRANS. LINE IN §  
BEXAR COUNTY, TX §

STATE OFFICE OF PUBLIC UTILITY TRANSPORTATION §  
ADMINISTRATIVE HEARINGS §  
FILING CLERK

**RESPONSE TO ANAQUA SPRINGS HOA'S**  
**FIRST RFI TO SAVE HUNTRESS LANE AREA ASSOCIATION**

Save Huntress Lane Area Association (“SHLAA”), an intervenor, submits this response to the First Request for Information (“RFI”) from Anaqua Springs Homeowners Association (“AS”), which was received on December 18, 2020, therefore this response is timely (including by agreement of AS counsel). Attached hereto and incorporated herein by reference are the written responses thereto. To the extent that any of the RFI instructions or definitions seek or purport to impose obligations or conditions or to expand the scope of permissible discovery beyond that which is established by the Commission’s procedural rules or any orders entered in this docket, the responses will comply with what is required under those rules or orders. Such responses are also made without waiver of the right to contest the admissibility of any such matters upon hearing. It is hereby stipulated that the responses may be treated by all parties as if they were filed under oath.

Respectfully submitted,

By: /s/ Thomas K Anson  
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**ATTORNEYS FOR SHLAA**

Certificate of Service: I certify I served the foregoing under SOAH Order No. 3 on Jan. 7, 2021.

/s/ Thomas K Anson  
Thomas K. Anson

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AS-1-1 Please provide the date construction started on the structure circled on the Aerial Photograph.

Response: On or about February 25, 2020.

Prepared By: Counsel

Sponsoring Witness: None

AS-1-2 Please provide the street address of the structure circled on the Aerial Photograph.

Response: 24156 Tres Arroyos, San Antonio, TX 78255.

Prepared By: Counsel

Sponsoring Witness: None

AS-1-3 Please provide the dates on which electric, water, and wastewater utilities were connected to the structure circled on the Aerial Photograph, and on what date a certificate of occupancy was issued for that same structure.

Response: The Canyons Property Owners Association (“Canyons”), as a member of the SHLAA, does not have direct and ready possession of this specific information. This is because such information is not necessary for Canyon’s approval of a construction plan. Without waiving its rights now or in the future regarding the scope of SHLAA’s discovery responsibilities, Canyons on behalf of SHLAA is in the process of determining if it may be able to access such information, and SHLAA will supplement to the extent necessary.

Prepared By: Counsel

Sponsoring Witness: None

AS-1-4 Please indicate whether on December 10, 2020, there was a continuous paved roadway from a publicly accessible road to the driveway of the structure circled on the Aerial Photograph.

Response: Yes.

Prepared By: Counsel

Sponsoring Witness: None

AS-1-5 Please provide the name of the builder, architect, and purchaser of the structure circled on the Aerial Photograph.

Response:

Builder: Weston-Dean  
Architect: Weston-Dean and Ashley Collett  
Purchasers: Assem and Amanda Sherkawy

Prepared By: Counsel  
Sponsoring Witness: None

AS-1-6 Please indicate whether the structure circled on the aerial photograph was constructed after a buyer executed a contract or was constructed without a contracted buyer.

Response: The application to build was presented to Canyons by the owner of the lot (identified above in response to AS-1-5) naming Weston-Dean as the builder.

Prepared By: Counsel  
Sponsoring Witness: None



AS-1-7. Was construction started on any homes or structures in the Canyons at Scenic Loop within 300 feet of Segment 26 after the open house in October 2019?

Response:

Yes.

Prepared By: Counsel  
Sponsoring Witness: None

AS-1-8 If the answer to Anaqua Springs 1-7 is yes, please provide the locations of those homes either by street address, Bexar County parcel number, or CPS Attachment 6 parcel number.

Response:

Please see "Sheet 11 Amended" in Attachment 5 to the amended CPS Energy Application and "Sheet 12" in Attachment 6 to the original CPS Energy Application.

Habitable Structure Map ID 198 located on Parcel No. F-129 is the structure asked about in AS-1-1 through AS-1-6 plus AS-1-10.

Habitable Structure Map ID 199 located on Parcel No. 119, as page 5 of the Amendment to CPS Energy's Application indicates, is another newly constructed habitable structure located south of Segment 26 and within 300 feet thereof.

Construction has also started on a habitable structure located on Parcel No. F-106 and on a habitable structure located on Parcel No. F-131 (the latter of which has the address of 10619 Kendall Canyon).

It appears that there are additional, already-completed habitable structures within the vicinity of 300 feet of Segment 26 at the following addresses, but they may or may not be exactly within 300 feet of Segment 26:

1. 10205 Kendall Canyon
2. 10209 Kendall Canyon
3. 10215 Kendall Canyon
4. 10403 Doherty Springs
5. 10431 Doherty Springs
6. 10503 Kendall Canyon
7. 10519 Kendall Canyon
8. 10539 Kendall Canyon

Prepared By: Counsel  
Sponsoring Witness: None

AS-1-9 Was construction started on any homes or structures within 300 feet of the centerline of Segment 26 after CPS provided landowner notice of the Application?

Response:

Yes.

Prepared By: Counsel

Sponsoring Witness: None

AS-1-10 Please provide the date the road allowing access to the structure circled on the Aerial Photograph was paved.

Response: The access road was paved in November 2020.

Prepared By: Counsel

Sponsoring Witness: None