



Control Number: 51023



Item Number: 452

Addendum StartPage: 0

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THE TEXAS STATE OFFICE OF ADMINISTRATIVE HEARINGS

2021 JAN 15 AM 10:37  
PUBLIC UTILITY COMMISSION  
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In re 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 Proposed  
Scenic Loop 138-kV Transmission Line Project  
in Bexar County, Texas

Docket Number: 51023

SOAH Docket No. 473-21-0247

PATRICK CLEVELAND'S  
SECOND REQUEST FOR INFORMATION  
TO CPS ENERGY

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

### Instructions

- a. 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.
- b. 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.
- c. 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 substantively participated 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.

452

## Request for Information

- 1  
2  
3 2-1. With respect to Segment 49a, please provide any and all maps and overlays used to  
4 calculate the acreage of Golden Cheeked Warbler habitat referred to on page 3-27 of  
5 Power Engineer’s Environmental Assessment, specifically, the statement, “GIS  
6 applications, Model C habitat data and route segments were superimposed on 2010 . . .  
7 and 2019 . . . arial imagery . . . .”
- 8 2-2. Was the map of Golden Cheeked Warbler Habitat in Bexar County, (published in the  
9 Diamond, D.D., L.F. Elliot, and R. Lea. 2010 Golden-cheeked Warbler Habitat Up-date,  
10 Final Report to Texas Parks & Wildlife, Austin, Texas, USA), used as an overlay or  
11 otherwise used to calculate the acreage of Golden Cheeked Warbler habitat in the project  
12 area?
- 13 2-3. Please delineate on the appropriate maps in Attachment 6 to the Amended Application  
14 the locations on Segment 49a identified as Golden Cheeked Warbler habitat designated as  
15 3-Moderate High and 4–High Quality, and 1-Low and 2-Moderate Low Quality, with  
16 each of the two categories delineated in different colors.
- 17 2-4. Please explain how the adjustment of Map ID 17 in the Amendment to CPS Energy’s  
18 Application in the above captioned case, which changed the description from  
19 “Commercial” to “School” impacts Routes C1 and Y but not Route AA1, Route G1,  
20 Route J1 and Route EE.
- 21 2-5. Please state whether the estimated total costs of the routes in Attachment 3 of the  
22 Amended Application factor in donated ROW.
- 23 2-6. Please explain the difference, if there is one, between ROW that is donated and ROW  
24 that is available as referred to in the table on page 2 in Attachment 1 of the Amended  
25 Application.
- 26 2-7. Are Developers (the conglomeration of Toutant Ranch, Ltd., Pinson Interests, Ltd., and  
27 Crighton Development Co.) required to donate land along Route Z1 to make Route Z1  
28 \$57,133 less expensive than Route AA1, ? If so, what is the length of right of way that  
must be donated?
- 2-8. If the answer to the previous question is yes, why isn’t this donated land reflected in the  
table on page 2 in Attachment 1 of the Amended Application?

1 2-9. Are Developers (the conglomeration of Toutant Ranch, Ltd., Pinson Interests, Ltd., and  
2 Crighton Development Co.) required to donate land along Route Z1 to make Route Z1  
3 \$57,133 less expensive than Route EE? If so, what is the length of right of way that must  
4 be donated?

5 2-10. If the answer to the previous question is yes, why isn't this donated land reflected in the  
6 table on page 2 in Attachment 1 of the Amended Application?

7 2-11. Please provide your calculation of the length of Segment 49a that crosses Property B-006.

8 2-12. Please provide your calculation of the length of Segment 49a that crosses Property B-004.

9 Respectfully submitted this 15th day of January 2021.  
10

11  
12 /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 January 15, 2021, in accordance with the Order Suspending Rules, issued in  
Project No. 50664.

/Patrick Cleveland/

\_\_\_\_\_  
Patrick Cleveland