



Control Number: 51023



Item Number: 454

Addendum StartPage: 0

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PUBLIC UTILITY COMMISSION
STATE OFFICE OF ADMINISTRATIVE HEARINGS

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
ADMINISTRATIVE HEARINGS

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

Save Huntress Lane Area Association (“SHLAA”), an intervenor, submits this first supplemental response to the First Request for Information (“RFI”) from Anaqua Springs Homeowners Association (“AS”), Question AS-1-3. Attached hereto and incorporated herein by reference are the original and supplemental written responses thereto. 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 original and supplemental 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. 20, 2021.

/s/ Thomas K Anson
Thomas K. Anson

4154

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.

First Supplemental Response: As a supplement to the original answer to AS-1-3, please be advised by Canyons on behalf of SHLAA that: the section of the Canyons where the structure in question is located had been completely sold out for over approximately a year prior to the end of 2020; all of the underground water utilities including the fire hydrants had been in place for approximately 18 to 24 months prior to the end of 2020; the water was turned on for that particular property on or about November 19, 2020; Canyons does not know when electric utility services were connected to the property but assumes the electricity was turned on for that particular property in the same general time frame as the water; and Canyons does not have certificate of occupancy information. If SHLAA learns of any additional electricity and certificate of occupancy information for that property, it will supplement to the extent necessary.

Prepared By: Counsel
Sponsoring Witness: None