



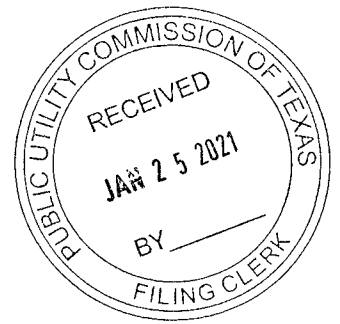
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LISA CHANDLER
JANUARY 25, 2021



SOAH DOCKET NO. 473-21-0247
PUC DOCKET NO. 51023

APPLICATION OF THE CITY § BEFORE THE
OF SAN ANTONIO TO AMEND §
ITS CERTIFICATE OF §
CONVENIENCE AND § STATE OFFICE OF
NECESSITY FOR THE SCENIC §
LOOP 138-KV TRANSMISSION §
LINE IN BEXAR COUNTY § ADMINISTRATIVE HEARINGS

LISA CHANDLER'S
FIRST REQUESTS FOR INFORMATION TO CPS ENERGY

COMES NOW, Lisa Chandler to submit the following First Requests for Information (RFIs) under 16 Texas Administrative Code (TAC) §§ 22.141 and 22.144 to the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) through its counsel of record:

Kirk D. Rasmussen
Jackson Walker LLP
100 Congress Avenue, Suite 1100
Austin, Texas 78701

Under SOAH Order No. 2, you must respond to these Requests within fifteen (15) days of receipt of the Requests. If any RFI appears ambiguous, please contact counsel for Ms. Chandler to obtain clarification.

**LISA CHANDLER'S
FIRST RFIS TO CPS ENERGY**

Respectfully submitted,

BAYLIFF LAW FIRM PLLC

420 Crosswind Drive

Blanco, Texas 78606

(512) 225-0027

(512) 480-9200 (FAX)

/sig/

By: Bradford W. Bayliff
State Bar No. 24012260
Brad@Bayliff.Law

**ATTORNEY FOR
LISA CHANDLER**

CERTIFICATE OF SERVICE

I certify that, on January 25, 2021, this document is being served on CPS Energy and submitted electronically to the Interchange System maintained by the Central Records Division of the Public Utility Commission of Texas.

/sig/

Bradford W. Bayliff

I. INSTRUCTIONS

1. Under 16 TAC § 22.144(i), the respondent to these Requests must supplement within five days of the discovery of new information any response that newly-discovered information modifies or makes incomplete a response already supplied.
2. Under 16 TAC § 22.144(c)(2), Lisa Chandler requests you answer these Requests under oath or stipulate in writing your responses can be treated exactly as if the responses were filed under oath. Each answer should identify the person or persons most knowledgeable about such response, the person or persons responsible for preparing such response, and the name of the witness in this proceeding who will sponsor the answer and guarantee the accuracy of the response.
3. In producing documents under these RFIs, number each document and indicate the question(s) or request(s) in response to which the document is being produced. If any document falls within multiple requests, multiple productions are not contemplated; one production referencing the multiple requests will be sufficient.
4. When a request asks for the production of a study, report, or supporting inputs for assumptions, such data should be in a Microsoft Office, Adobe Acrobat, or other usable PC-based electronic format, when available, on CD-ROM and be produced with your response to these requests.
5. For any information you claim is unavailable, state why it is unavailable. If you cannot respond to the request precisely as it is stated, provide any information that is available that would respond to the request at a level of detail different from that specified.
6. A request for “documents,” “all documents,” or “any documents” contemplates a complete production of materials relating to the referenced subject but is not intended to seek a duplicative or cumulative production of documents. If the production of one set of documents responds to the information requested, Ms. Chandler does not seek (and you need not produce) duplicate sets of hard copy documents that also address the same matters. This instruction does not excuse you of your obligation to produce documents in both written and electronic format where available, under Instruction # 4.
7. If the information requested is in previously-furnished exhibits, work papers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish references thereto, including Bates Stamp page citations and detailed cross-references.
8. When the RFI requests a study, report, schedule, or analysis, the response should also provide the work papers, underlying facts, inferences, suppositions, estimates, and conclusions to support each study, report, schedule, or analysis.
9. Please produce the requested documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business, and organize and label them to correspond to the categories in this request. If any part of a document responds to any request, the whole document is to be produced. If there has been any

alteration, modification or addition to a document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts or revisions, each such alteration, modification or addition is to be considered as a separate document and it must be produced.

10. These requests are directed to all documents and information in your custody or control. A document is deemed in your custody or control if you have the document or may secure such document from another person having possession. If you cannot produce a document or information based on a claim the document is not in your custody or control, state the location of such document or information when it was last in your possession, custody or control, and describe the reason the document is no longer in your possession, custody or control, and the manner in which it was removed from your possession, custody or control.

11. In responding to each Request, provide information available from all of your corporate and individual files, and from past and present employees, officers, directors, and board members.

12. The singular form of a word shall be interpreted to mean and include the plural. Words used in the plural form of a word shall be interpreted mean and include the singular.

13. The past tense of a word shall be interpreted to include the present tense and the present tense shall be construed to include the past tense.

14. If any document is withheld under any claim of privilege, furnish a list identifying each document for which a privilege is claimed, with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

15. Under 16 TAC § 22.144(h)(4), if the response to any request is voluminous, provide a detailed index of the voluminous material.

16. Please serve your Responses electronically or in person to:

Bradford W. Bayliff
Bayliff Law Firm PLLC
420 Crosswind Drive
Blanco, Texas 78606
Brad@Bayliff.Law

II. DEFINITIONS

For these discovery requests, the terms set forth below have these meanings:

1. The terms “**CPS Energy**” or “**you**” means the applicant in this proceeding and its parent, subsidiaries, affiliates, past or present; all employees, officers, directors, agents, consultants, including POWER Engineers, investigators, attorneys, and all persons acting under contractual obligations with or acting or purporting to act for

you; any merged or consolidated predecessors in interest or predecessor in interest; and any merged or consolidated successors in interest.

2. The terms “**and**” and “**or**” as used shall be construed as either conjunctive or disjunctive to make the request inclusive rather than exclusive.

3. The term “**any**” shall be construed to include “**all**” and “**all**” shall be construed to include “**any**.”

5. The term “**each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**.”

6. The term “**concerning**” includes these meanings: relating to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; comprising; supporting; contradicting; legally, logically, or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

7. The term “**including**” means and refers to “including but not limited to.”

8. The term “**communication**” includes, but is not limited to, all forms of communication, whether written, printed, oral, pictorial, or otherwise, including testimony or sworn statements, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, and symposia. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio or computer.

9. The terms “**document**” or “**documents**” are used in their broadest sense in Tex. R. Civ. P. 192.3(b) and, as described in Rule 196.4 include electronic or magnetic data (included in the definition of “document”). These words mean and include any written, printed, typed, recorded or graphic matter of every kind or description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms “**document**” and “**documents**” shall include all analyses, agreements, contracts, communications, correspondence, drawings, letters, opinion letters, telegrams, faxes, messages, emails, memorandums, records, reports, books, studies, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries or other records of meetings or conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, press releases, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants’ and expert reports, appraisals, bulletins, notes, meeting notes, telephone conversation notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, programs, data, and data

compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, magnetically stored, optically, stored, or electronically stored matter, however produced, prepared, reproduced, disseminated, or made, on any medium of any description in your actual or constructive possession, custody or control, or of which you have knowledge, upon which intelligence or information is recorded from or from which intelligence or information can be retrieved; and every copy of such writing or record where the original is not in your possession, custody, or control. The words “**document**” and “**documents**” also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that contain no markings, additions, or deletions different from the original need not be separately produced.

10. “**Identify**,” when used in connection with an act, shall mean to state a description of the act, including the place, date, and time of its occurrence, and the identity of the person, persons, or entities that engaged in or witnessed the act.

11. “**Identify**,” when used regarding a “document,” shall mean to state the type of document (*e.g.*, book, magazine, article, circular, ledger, letter, memorandums, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author/addresser (including all persons who participated in the writing of the document), addressee, indicated or blind copies, subject matter, volume and page number or other means of general identification, approximate size and number of pages, any attachments or appendices, and the date on which it was made or prepared. Identification of the document includes identifying all documents known or believed to exist, whether or not in the custody of its attorneys or other representatives. The final version and each draft of each document should be identified and produced separately. If a document is no longer in your possession or control, state what disposition was made of it. A document need not be identified if it is produced.

12. “**Identify**,” when used regarding a natural person shall mean to state the person’s first and last names, title, employer and business address.

13. “**Person**” means any natural person, firm, corporation, association, partnership, or other organization or form of legal entity.

14. “**PUC**” and “**Commission**” refer to the Public Utility Commission of Texas.

15. “**Relate, refer, mention or pertain**” means documents containing, showing, relating, mentioning, referring or pertaining, directly, or indirectly to, or in legal, logical or factual way or connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in preparing any document called for by such request.

CHANDLER-CPS ENERGY 1-1

Please consider an alternate route, named Route AA2, consisting of the following combination of segments: Sub 7-54-20-36-42a-46a-49a.

- a. Please provide CPS Energy's best available estimates of the route evaluation criteria for this alternative route in the same format as Table 4-1, Environmental and Land Use Data for Route Evaluation, which is contained in Application Attachment 1, Environmental Assessment and Route Analysis.
- b. Please provide CPS Energy's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 3, Summary of Cost Estimates.
- c. If CPS Energy is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.