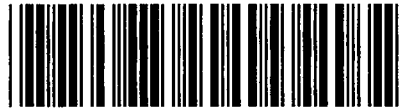




Control Number: 51023



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Addendum StartPage: 0

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

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PUBLIC UTILITY BOARD
FILES OPEN

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

**CPS ENERGY'S FIRST SET OF REQUESTS FOR
INFORMATION TO ANAQUA SPRINGS HOA**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and requests that you provide the information and answer the attached questions under oath. It is further requested that the questions be answered in the order in which they are asked with as much detail so as to fully present all of the relevant facts.

Instructions

Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the witness or witnesses who will sponsor each of your answers at the hearing in this PUC Docket No. 51023. These questions are continuing in nature and, should there be a change in circumstances that would modify or change any of your answers, then, in such case, please change or modify such answer and submit such changed answer as a supplement to the original answer within five (5) working days of your discovery that such change or modification is appropriate.

In answering these requests for information, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf. **To the extent any information responsive to a general question is also responsive to another more specific question, provide the information in response to the more specific request.**

If you are unable to answer any request fully and completely after exercising due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such request. In addition to specifying those portions, you are to state with regard to each portion:

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1. The fact on which you base the contention that you are unable to answer that portion;
2. The knowledge, information, and belief you have concerning that portion; and
3. The acts done and inquiries made by you in attempting to answer such request.

The singular includes the plural and the plural includes the singular.

Masculine, feminine, or neuter pronouns do not exclude the other genders.

The words “document” and “documents” have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. Among other things, the words “document” and “documents” mean the final form and **all drafts and revisions of any kind** of written or graphic matter, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies there from that are different in any way from the original regardless of whether designated “confidential,” “privileged,” or otherwise restricted. Without limiting the generality of the foregoing, the words “document” and “documents” also include information stored or maintained on, or which could be reproduced from, any form of storage or storage device including, without limitation, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape, compact disk, DVD, or similar means.

The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope.

The words “communication” and “communications” include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both communications and statements that are face-to-face and those that are transmitted by any writing or document or by media such as intercoms, telephones, television or radio. These words also include any communications and statements that are transmitted electronically or wirelessly, through means such as, but not limited to, email or text messages.

The words “identify” and “identification,” when used with respect to a natural person or persons, mean to state the name, address(es) and telephone number(s) of each such

person. If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “identification,” when used in reference to a person other than a natural person, mean to set forth its:

- (1) full name or title;
- (2) nature or organization, including the state under which the same was organized or incorporated;
- (3) address and telephone number (with area code prefix); and
- (4) principal line of business.

If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “describe,” when used in reference to a fact, mean to state not only the fact itself, but also:

- (1) its date, time, and place;
- (2) the name, address, and telephone number of each person with knowledge of the fact;
- (3) whether the act is supported by an oral communication, a document, or other event; and
- (4) any other evidence that supports such fact.

The words “identify” and “identification,” when used in reference to a document, mean to state:

- (1) its date;
- (2) its author;
- (3) its addressee;
- (4) the type of document (e.g., letter, memorandum, receipt, invoice, schedule, report, telegram, chart, photograph, etc.); and
- (5) its present location and identity of its custodian. If any document was, but is no longer, in your possession, custody, or control, or is no longer in existence, explain why.

If any of the foregoing information is not available, state any other available means of identifying such document. If a document is one of a series of pages contained in a book,

pamphlet, binder, folder, microfilm (or other storage device), include in your identification of such document(s) any available numerical reference (or other aid) to the pages and line or other portion thereof at which the information referred to can be found. A true and correct copy of any document may be produced and filed with your Answers hereto in lieu of the above information.

The words “identify” and “describe,” when used with respect to an oral communication, mean:

- (1) to state the substance of each such oral communication;
- (2) to state the exact words used by each person participating in the oral communication;
- (3) to identify each speaker;
- (4) to identify each person present at the making or reception of such oral communication;
- (5) to specify the date, time, and place of each oral communication;
- (6) to identify each person repeating such oral communication;
- (7) to identify every document which records, memorializes, or relates to all or part of such communication; and
- (8) to identify the mode of such communication (e.g., telephone, face-to-face, etc.).

The words “person” and “persons” as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint ventures, corporations, and any other entities.

The words “relate,” “related,” “relates,” and “relating,” as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

All computer readable data should be provided on the ShareFile site for this Project. CPS Energy will provide upload access to any party upon request before time for your response.

If you have any question concerning the attached Questions or any of these instructions, please contact Kirk Rasmussen at (512) 236-2310.

Unless the specific question permits a longer time period, answers to this Request for Information should be served on CPS Energy and filed with the Public Utility Commission of

Texas within 10 calendar days of your receipt of said request. Service on CPS Energy should be made electronically to Mr. Rasmussen at krasmussen@jw.com. Physical service can be made to Mr. Rasmussen at the following address:

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

Respectfully submitted,

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen
State Bar No. 24013374
Craig R. Bennett
State Bar No. 00793325
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100 Congress Avenue, Suite 1100
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Email: cbennett@jw.com

ATTORNEYS FOR CPS ENERGY

CERTIFICATE OF SERVICE

I certify that a copy of this document has been hand delivered or sent via facsimile transmission to all parties of record in this proceeding on this 9th day of March, 2021.

/s/ Kirk D. Rasmussen
Kirk D. Rasmussen

ADDITIONAL DEFINITIONS

1. The words “Anaqua Springs HOA,” “you,” and “your” refer to the Anaqua Springs Homeowners’ Association, and any and all of its attorneys, employees, consultants, contractors, or representatives.
2. “BVJ” means collectively Brad Jauer and BVJ Properties, L.L.C.
3. “Project” means the proposed transmission project that is the subject of the application in this docket.
4. The words “CPS Energy” and “Applicant” refer to the City of San Antonio, acting by and through the City Public Service Board.
5. “Application” means CPS Energy’s application as filed on July 22, 2020, in Commission Docket No. 51023 and amended on December 22, 2020.
6. “PUC” or “Commission” means the Public Utility Commission of Texas.
7. “POWER” means POWER Engineers, Inc.
8. “EA” or “Environmental Assessment” collectively includes the Scenic Loop 138 kV Transmission Line and Substation Project Environmental Assessment and Alternative Route Analysis, Bexar County, Texas and the Scenic Loop 138 kV Transmission Line and Substation Project Environmental Assessment and Alternative Route Analysis AMENDMENT Bexar County, Texas, both of which were prepared by POWER.
9. “ROW” means right-of-way.
10. “NISD” means the Northside Independent School District.
11. “Developers” means the Toutant Ranch, Ltd., Pinson Interests LTD LLP, and Crighton Development Co.
12. “This docket” refers to PUC Docket No. 51023 / SOAH Docket No. 473-21-0247.

QUESTIONS

- 1.1 Identify all witnesses who are providing testimony on behalf of Anaqua Springs HOA as fact witnesses.
- 1.2 Identify all witnesses who are providing testimony on behalf of Anaqua Springs HOA as an expert pursuant to the Texas Rules of Evidence 702 who is qualified by knowledge, skill, experience, training, or education regarding the subject of their testimony. For all experts identified, provide the specific subject area the witness is qualified to provide expert testimony and a detailed explanation of the basis for the qualification.
- 1.3 For all witnesses identified as “expert witnesses” in response to Question 1.2, provide:
 - a. the expert’s name, address, and telephone number;
 - b. the facts known by the expert that relate to or form the basis of the expert’s mental impressions and opinions formed or made in connection with this docket;
 - c. the expert’s mental impressions and opinions formed or made in connection with this docket, and any methods used to derive them;
 - d. any bias of the witness;
 - e. all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert’s testimony in this docket;
 - f. a listing of all proceedings in which the expert provided testimony;
 - g. the expert’s current resume and bibliography.
- 1.4 Identify all consulting experts whose mental impressions or opinions have been reviewed by an expert testifying on behalf of Anaqua Springs HOA. For each consulting expert identified, provide the expert’s name and address.
- 1.5 Identify all proceedings before any regulatory body or court where any expert witness for Anaqua Springs HOA provided consulting services to a utility applicant in the identification of possible transmission line routes. As applicable, identify the proceeding by docket number and provide a copy of any testimony and report that relied on the witness’s consulting services. For any proceedings identified, fully describe the specific nature of the consultation provided.
- 1.6 For each site reconnaissance visit performed by an expert witness for Anaqua Springs HOA in this proceeding:
 - a. Identify the date and approximate time spent on each visit.
 - b. Provide all field notes taken during the visit.

- c. Identify all persons in attendance with the witness during the visits.
 - d. Generally describe the areas visited and identify any private property that was accessed during such visits.
- 1.7 Can the Commission approve CPS Energy's Application on Route R1 Modified if CPS Energy does not amend its application to include Segments 38a and 43a as identified and described in the testimony of Mr. Mark D. Anderson?
 - 1.8 Refer to page 15, lines 21-23 of the direct testimony of Mr. Steve Cichowski. Can the Commission approve CPS Energy's Application on Segment 36 if it is moved across the street onto the Barrera family if CPS Energy does not amend its application to make such a modification and if the modification is opposed by the Barrera family?
 - 1.9 Identify and provide all communications between a representative of Anaqua Springs HOA and the NISD regarding the Project.

The following questions relate specifically to the testimony of Mr. Mark D. Anderson, who provided testimony on behalf of Anaqua Springs HOA and BVJ:

- 1.10 Refer to page 6, line 15 of Mr. Anderson's testimony. Identify all transmission line projects in Texas that Mr. Anderson was responsible for "finding the route that, among other things, best addressed community values."
- 1.11 Refer to page 5, lines 16 and 17 of Mr. Anderson's testimony. Identify all transmission line projects in Texas where Mr. Anderson had construction responsibility.
- 1.12 Refer to page 7, line 17 of Mr. Anderson's testimony. Identify by habitable structure number from the EA the three habitable structures Mr. Anderson believes will be "avoided" by Route R1 Modified.
- 1.13 Refer to page 7, line 19 of Mr. Anderson's testimony. Does Mr. Anderson agree that Segments 38a and 43a directly affect the landowners on whom those segments are located differently than Segments 38 and 43 included in CPS Energy's application?
- 1.14 Refer to page 7, line 24 of Mr. Anderson's testimony. Identify all elementary schools owned and operated by the NISD that were constructed immediately adjacent to an existing transmission line ROW.
- 1.15 Identify all elementary schools owned and operated by the NISD with sports and recreation areas within 280 feet of an existing transmission line.
- 1.16 Refer to page 8, lines 3-4 of Mr. Anderson's testimony. Identify all impacts to the Alamo Area Regional Radio System that Mr. Anderson believes will occur from construction and operation of the Project on a Route Z1.
- 1.17 Refer to page 9, line 15 of Mr. Anderson's testimony. Provide all photographs and video recordings Mr. Anderson reviewed.

- 1.18 Refer to page 10, line 19 of Mr. Anderson’s testimony. Admit or deny that Segment 38a is parallel to a parcel line, not a property line (meaning, the property on both sides of the parcel line are owned by the some entity or person).
- 1.19 Identify all cultural or natural features paralleled by Segment 43a as presented in the testimony of Mr. Anderson.
- 1.20 Refer to page 15, lines 3-5 of Mr. Anderson’s testimony. Does Mr. Anderson believe the Commission should consider recently constructed habitable structures differently than habitable structures existing for a longer time. If Mr. Anderson believes they should be considered differently, what does Mr. Anderson consider to be a “recently” constructed habitable structure. Please identify any Commission precedent Mr. Anderson believes supports his response to this question.
- 1.21 Refer to page 17, lines 17-19 of Mr. Anderson’s testimony.
 - a. Does Mr. Anderson believe the Commission considers segments in an application individually, or with respect to the total measurable impact of a route in its entirety?
 - b. Does Mr. Anderson allege that the habitable structure counts for the routes presented in the Application are not correct?
 - c. Describe in detail how POWER’s listing of the segments closest to each habitable structure in Tables 4-6 Amended through 4-36 Amended underrepresent the total number of habitable structures presented in Table 4-1 Amended.
- 1.22 Refer to page 18, lines 3-8 of Mr. Anderson’s testimony. Describe in detail Mr. Anderson’s experience with respect to the failure mechanisms of transmission line poles due to “a storm.”
- 1.23 Refer to page 19, lines 6-9 of Mr. Anderson’s testimony.
 - a. Admit or deny that 11 of the Routes included in the Application do not include Segment 54.
 - b. Admit or deny that additional forward progressing routes, not specifically included in the Application, could be created from existing Application segments that do not include Segment 54.
 - c. Admit or deny that 16 TAC § 25.101(b)(3)(B) requires utilities to consider route locations that “utilize other existing compatible rights-of-way,” including roads and highways.
- 1.24 Refer to pages 19-20 of Mr. Anderson’s testimony. Describe in detail how the number of habitable structures within 300 feet of a particular segment has relevance to the Commission’s consideration of a utility applicant’s proposed routes for a project?

- 1.25 Refer to page 21, line 7 of Mr. Anderson's testimony. Describe in detail how Segment 54 is more dangerous to the community due to an increased risk of collisions with the transmission line structures. In responding to this request, describe where Mr. Anderson believes the transmission line structures will be located with respect to the road ROW along Segment 54. Include all supporting data demonstrating the frequency of collisions with transmission line structures located 25 feet or more off of the road ROW.
- 1.26 Refer to page 21, line 10 of Mr. Anderson's testimony. Describe in detail the "relocation risk" Mr. Anderson believes will exist associated with the Commission's approval of a route that utilizes Segment 54. Provide all documents Mr. Anderson relies upon to support his assertions.
- 1.27 Identify the basis for, and provide all studies or documents that Mr. Anderson relies on for, his testimony that substations "make noise." Include all data regarding the amount of noise, if any, decibel levels, and other associated sound metrics resulting from a substation's presence.
- 1.28 Refer to page 22, lines 7-10 of Mr. Anderson's testimony. Describe in detail Mr. Anderson's understanding of the "grounding to protect these homes from induced currents" that will be necessary associated with the Commission's approval of a route that utilizes Segment 54.
- 1.29 Refer to page 24, lines 14-15 of Mr. Anderson's testimony. Admit or deny that CPS Energy has proposed a three-unit substation in this proceeding.
- 1.30 What is Mr. Anderson's understanding of the area required by CPS Energy for a three-unit substation?
- 1.31 Refer to page 30, line 15 of Mr. Anderson's testimony. Describe in detail how Mr. Anderson believes CPS Energy highly values Route Z1 over any other route included in CPS Energy's Application in this proceeding.
- 1.32 Identify all proceedings in which Mr. Anderson is aware of the Commission approving a route modification to a transmission line that was not included in an application or otherwise consented to by all directly affected landowners.
- 1.33 Identify any additional costs Mr. Anderson considered in his cost calculations for Segments 43a and 38a associated with locating the segments further interior to the property rather than more closely following the property line or other natural or cultural features.

The following questions relate specifically to the testimony of Lauren Pankratz, M.D., who provided testimony "on behalf of [herself] and Anaqua Springs HOA" (see page 2, line 5 of Dr. Pankratz' direct testimony):

- 1.34 Is Dr. Pankratz providing testimony as an expert pursuant to the Texas Rules of Evidence 702 who is qualified by knowledge, skill, experience, training, or education regarding electric and magnetic fields?

- 1.35 Is Dr. Pankratz providing testimony in this proceeding as a medical expert pursuant to the Texas Rules of Evidence 702 who is qualified by knowledge, skill, experience, training, or education regarding the potential health effects of electric and magnetic fields?
- 1.36 Is Dr. Pankratz providing testimony in this proceeding as an expert pursuant to the Texas Rules of Evidence 702 who is qualified by knowledge, skill, experience, training, or education regarding any other issue relevant to this proceeding?
- 1.37 If your answer is yes with respect to any potential expert qualification:
- a. Identify and provide all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for Dr. Pankratz in anticipation of her testimony in this docket.
 - b. Identify and provide all workpapers, draft analyses, evaluations, notes, and any other factual information related to or forming the basis of Dr. Pankratz' mental impressions and opinions in connection with this docket.
 - c. Identify and fully describe any bias Dr. Pankratz has as it relates to this docket or any parties thereto.
 - d. Identify and provide all communications between Dr. Pankratz and any member of the Anaqua Springs HOA board regarding her testimony.
- 1.38 Describe in detail the basis of Dr. Pankratz' concerns regarding electric and magnetic fields and children.
- 1.39 Describe the difference between electric and magnetic fields emitted from a 500 kV transmission line compared to a 138 kV transmission line?
- 1.40 Refer to page 4, line 11 of Dr. Pankratz' testimony. How close is "near" a 500 kV transmission line? Also identify the number and configuration of circuits on the transmission lines that were evaluated. If the transmission line evaluated had multiple circuits, also identify whether the circuits were operated with reverse phasing.
- 1.41 Refer to page 4, lines 21-22 of Dr. Pankratz' testimony. Identify the voltage of the transmission line or transmission lines referenced in the study and the number and configuration of the circuits evaluated. Also identify whether the transmission lines with multiple circuits (if any) were operated with reverse phasing.
- 1.42 Refer to page 5, lines 5-6 of Dr. Pankratz' testimony. Identify the voltage of the transmission line or transmission lines referenced in the study and the number and configuration of the circuits evaluated. Also identify whether the transmission lines with multiple circuits (if any) were operated with reverse phasing.
- 1.43 Refer to page 5, line 9 or Dr. Pankratz' testimony. Describe all of the limitations of the studies that Dr. Pankratz reviewed.

- 1.44 Refer to page 5, line 16 of Dr. Pankratz' testimony. Is Dr. Pankratz referring to any studies other than the three studies previously referenced in her testimony?
- 1.45 Identify and provide all of the studies that Dr. Pankratz reviewed that do not support a correlation between transmission lines and potential health effects.
- 1.46 Prior to September 1, 2019, describe any research or studies that Dr. Pankratz participated in related to the potential health effects of electric and magnetic fields.
- 1.47 Is Dr. Pankratz aware of any other elementary schools that are located immediately adjacent to the ROW of a transmission line in Bexar County?
- 1.48 Is Dr. Pankratz aware of any schools operated by the NISD that are located immediately adjacent to a transmission line right of way?
- 1.49 Is Dr. Pankratz aware of any recreational or educational facilities associated with the NISD, including, but not limited to, gardens, playgrounds, walking and running tracks or paths, nature walks, or athletic fields that are within or adjacent to the ROW of transmission line facilities?
- 1.50 Describe the maximum and average level of electric and magnetic fields that Dr. Pankratz believes will be present at the NISD outdoor areas where the children will be nearest to the proposed transmission line facilities if the line is constructed on a route that uses Segment 42a.
- 1.51 Describe the maximum and average level of electric and magnetic fields that Dr. Pankratz believes will be present at the NISD property line nearest to the proposed transmission line facilities if the line is constructed on a route that uses Segment 42a.
- 1.52 Describe Dr. Pankratz' understanding of reverse phasing as it has to do with the operation of multiple circuits on single transmission line poles and the levels of electric and magnetic fields potentially emitted from the transmission line facilities.
- 1.53 Describe the maximum and average level of electric and magnetic fields that Dr. Pankratz believes will be present at the edge of the ROW of the proposed transmission line facilities. Describe how this level compares to background levels of electric and magnetic fields experienced from common home appliances.

The following questions relate specifically to the testimony of Sunil Dwivedi, M.D., who provided testimony "on behalf of [himself] and Anaqua Springs Homeowners' Association" (see page 2, line 5 of Dr. Dwivedi's direct testimony):

- 1.54 Is Dr. Dwivedi providing testimony as an expert pursuant to the Texas Rules of Evidence 702 who is qualified by knowledge, skill, experience, training, or education regarding electric and magnetic fields?

- 1.55 Is Dr. Dwivedi providing testimony in this proceeding as a medical expert who is qualified by knowledge, skill, experience, training, or education regarding the potential health effects of electric and magnetic fields?
- 1.56 Describe in detail the basis of Dr. Dwivedi's concerns regarding electric and magnetic fields and children.
- 1.57 Describe the maximum and average level of electric and magnetic fields that Dr. Dwivedi believes will be present at Habitable Structure 134 from the operation of the proposed transmission line facilities if the line is constructed on a route that uses Segments 38, 39, or 43.
- 1.58 Describe the maximum and average level of electric and magnetic fields that Dr. Dwivedi believes will be present at his property line nearest to the proposed transmission line facilities if the line is constructed on a route that uses Segments 38, 39, or 43.
- 1.59 Is there a fence on Dr. Dwivedi's property between his property and the property or properties located immediately south of his property?
- 1.60 Identify any statutes, rules, regulations, or precedent of the Public Utility Commission of Texas applicable to modifying a utility's proposed transmission line routes on "the same landowners" interior to those properties farther away from property lines or other natural or cultural features as long as "fewer homes would be directly impacted by the line."
- 1.61 Identify the legal authority by which the Public Utility Commission of Texas may modify a route presented in a utility's application for an amendment of its certificate of convenience and necessity so long as the landowner crossed by the route to be modified has received notice of the proceeding.
- 1.62 Describe the basis of Dr. Dwivedi's testimony that moving the line "away from my home and my neighbors' homes . . . may be less expensive than what is currently proposed."
- 1.63 Describe all ways in which construction and operation of the transmission line facilities proposed in this proceeding on a route that uses Segments 38, 39, or 43 will impact the safety and well-being of Dr. Dwivedi's family.
- 1.64 Identify all studies, research, scientific papers, or other documents that support the assertion that "Construction sites can seem like attractive playscapes for children, and a transmission tower can seem like something fun to try to climb."
- 1.65 Describe all ways in which construction and operation of the transmission line facilities proposed in this proceeding on a route that uses Segments 38, 39, or 43 will result in immediate and long-term dangers to Dr. Dwivedi's family.
- 1.66 Describe the maximum and average level of electric and magnetic fields that Dr. Dwivedi believes will be present at the edge of the ROW of the proposed transmission line facilities. Describe how this level compares to background levels of electric and magnetic fields experienced from common home appliances.

The following questions relate specifically to the testimony of Steve Cichowski, who provided testimony on behalf of Anaqua Springs Homeowners Association on February 26, 2021:

- 1.67 Refer to page 6, lines 19-21 of Mr. Cichowski's testimony. Describe in detail what you mean by "we were in agreement that the most northern route . . . was far and away one of the better choices." If the "we" in this statement is intended to refer to CPS Energy, provide all written communication from CPS Energy stating that CPS Energy believed that a northern route was far and away one of the better choices. If no such written documentation exists, describe Mr. Cichowski's basis for this statement.
- 1.68 Admit or deny that the landowners of homes within 300 feet of Segment 54 were provided notice of this proceeding and provided an opportunity to intervene and participate.
- 1.69 Admit or deny that the landowners adjacent to Substation Site 7 were provided notice of this proceeding and provided an opportunity to intervene and participate.
- 1.70 Identify all landowners surrounding Substation Site 7 that have elected to participate in this proceeding. For those landowners identified, please state whether they oppose the Commission's approval of Substation Site 7.
- 1.71 Refer to page 12, lines 9-10 of Mr. Cichowski's testimony. Does Mr. Cichowski agree that the closest location of Segment 42a to playground areas of the McAndrew Elementary School is 280 feet?
- 1.72 Refer to page 12, lines 13-14 of Mr. Cichowski's testimony. Does Mr. Cichowski agree that the transmission line proposed in this proceeding is to be constructed on single poles, not lattice towers?
- 1.73 Describe the maximum and average level of electric and magnetic fields that Mr. Cichowski believes will be present at the NISD outdoor areas where the children will be nearest to the proposed transmission line facilities if the line is constructed on a route that uses Segment 42a.
- 1.74 Describe the maximum and average level of electric and magnetic fields that Mr. Cichowski believes will be present at the NISD property line nearest to the proposed transmission line facilities if the line is constructed on a route that uses Segment 42a.
- 1.75 Is Mr. Cichowski aware of any existing NISD school facilities operated immediately adjacent to existing transmission line ROW? If so, please identify all such facilities.
- 1.76 Describe in detail Mr. Cichowski's basis for the statement that the Anaqua Springs guardhouse may have to be demolished and relocated if the Commission approves a route for the Project using Segment 36.
- 1.77 Describe in detail Mr. Cichowski's basis for the statement that the entire traffic circulation pattern for the entrance to the Anaqua Springs community will have to be

redesigned and reconstructed if the Commission approves a route for the Project using Segment 36.

- 1.78 Identify in the Application where CPS Energy indicates that a 100 foot clear cutting at the entrance of the Anaqua Springs community will be required for the construction and operation of a route for the Project using Segment 36.
- 1.79 Provide any documents in Mr. Cichowski's possession, custody, or control dated prior to February 26, 2021, supporting the premise that real estate agents would not be willing to show potential buyers properties if they have to drive under a transmission line to access a neighborhood.
- 1.80 Describe the maximum and average level of electric and magnetic fields that Mr. Cichowski believes will be present at the Anaqua Springs guardhouse if the line is constructed on a route that uses Segment 36.
- 1.81 Refer to page 15, lines 21-23 of Mr. Cichowski's testimony. Does Mr. Cichowski agree that the relocation of Segment 36 that he describes would result in Segment 36 crossing a property designated in the National Register of Historic Places?
- 1.82 Refer to page 21, lines 2-4 of Mr. Cichowski's testimony. Describe in detail how the construction of the Project and the transmission poles proposed by CPS Energy in this proceeding will pose a continuing invitation to risk taking behavior by adventurous children.
- 1.83 Describe the maximum and average level of electric and magnetic fields that Mr. Cichowski believes will be present at the edge of the ROW of the proposed transmission line facilities. Describe how this level compares to background levels of electric and magnetic fields experienced from common home appliances.