



Control Number: 51023



Item Number: 638

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PUBLIC UTILITY COMMISSION
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THE TEXAS STATE OFFICE OF ADMINISTRATIVE HEARINGS

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
FIRST REQUEST FOR INFORMATION TO
BEXAR RANCH, L.P.

I, Patrick Cleveland, pursuant to 16 Tex. Admin. Code § 22.141 - § 22.144 and the parties' agreements made at the prehearing conference, respectfully request that you provide the following information and admissions of fact under oath.

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, experts 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.

W38

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

- 5 1. The fact on which you base the contention that you are unable to answer that portion.
- 6
- 7 2. The knowledge, information, and belief you have concerning that portion; and
- 8
- 9 3. The acts done and inquiries made by you in attempting to answer such request.

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

12 **“associated with”** means anyone living on Bexar Ranch, or the owners, members, or officers of
13 Bexar Ranch, L.P. and any relatives of the owners, members or officers of Bexar Ranch, L.P.

14

15 **“negotiation”** means inquiries, discussions, statements, or suggestions.

16

17 **“relatives”** means anyone related by blood or through marriage

18

19

20 **Request for Information**

21

22 1. Please state whether anyone associated with Bexar Ranch, L.P. in the last seven years has
23 ever entered into any negotiations with any other party regarding the sale of any part of Bexar
24 Ranch and the following:

- 25 a) The date of the negotiations;
- 26 b) A summary of the negotiations;
- 27 c) The names of the persons who were engaged in the negotiations;
- 28 d) The general location and amount of property involved in the negotiation;

1 e) Whether the negotiations are continuing or have concluded and the outcome if they have
2 concluded;

3 f) Whether there are any existing or pending contracts in relation to any sale of any part of Bexar
4 Ranch, and if so, please provide copies of such contracts.

5
6
7 Respectfully submitted this 12th day of March 2021.

8
9 /Patrick Cleveland/

10 _____
11 Patrick Cleveland
12 State Bar #24101630
13 High Country Ranch
14 26332 Willoughby Way
15 Boerne, TX 78006
16 T. 908-644-8372
17 Email: pjbwg@gvtc.com

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I certify that notice of the filing of this document was provided to all parties of record via
electronic mail on March 12, 2021, in accordance with the Order Suspending Rules, issued in
Project No. 50664.

/Patrick Cleveland/

Patrick Cleveland