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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 PUBLIC UTILITIES §
ADMINISTRATIVE HEARINGS §

**RESPONSE TO CPS ENERGY'S
FIRST RFI TO SAVE HUNTRESS LANE AREA ASSOCIATION**

Save Huntress Lane Area Association (“SHLAA”), an intervenor, submits this response to the First Request for Information (“RFI”) from CPS Energy, which was received on March 9, 2021, therefore this response is timely. Attached hereto and incorporated herein by reference are the written responses thereto. To the extent that any of the RFI instructions or definitions seek or purport to impose obligations or conditions or to expand the scope of permissible discovery beyond that which is established by the Commission’s procedural rules or any orders entered in this docket, the responses will comply with what is required under those rules or orders. 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 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 March. 19, 2021.

/s/ Thomas K Anson
Thomas K. Anson

1.1 Identify all witnesses who are providing testimony on behalf of SHLAA as fact witnesses.

Response: Ms. Cynthia Grimes, Mr. David Clark, and Mr. Jerry Rumpf.

Prepared By: Counsel

Sponsoring Witness: None

1.2 Identify all witnesses who are providing testimony on behalf of SHLAA 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.

Response: Harold L. Hughes, Jr., P.E. See the Direct Testimony of Harold L. Hughes, Jr., P.E. in this docket regarding subject area and qualifications.

Prepared By: Counsel

Sponsoring Witness: None

- 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.

Response:

- a. See the Direct Testimony of Harold L. Hughes, Jr., P.E. in this docket. His telephone number is 512/331-4949.
- b. See the Direct Testimony of Harold L. Hughes, Jr., P.E. in this docket.
- c. See the Direct Testimony of Harold L. Hughes, Jr., P.E. in this docket.
- d. None.
- e. See the Direct Testimony of Harold L. Hughes, Jr., P.E. in this docket.
- f. See Appendix B to the Direct Testimony of Harold L. Hughes, Jr., P.E. in this docket.
- g. See Appendix A to the Direct Testimony of Harold L. Hughes, Jr., P.E. in this docket.

Prepared By: Counsel
Sponsoring Witness: Harold L. Hughes, Jr., P.E.

1.4 Identify all consulting experts whose mental impressions or opinions have been reviewed by an expert testifying on behalf of SHLAA. For each consulting expert identified, provide the expert's name and address.

Response: None.

Prepared By: Counsel
Sponsoring Witness: Harold L. Hughes, Jr., P.E.

1.5 Identify all proceedings before any regulatory body or court where any expert witness for SHLAA 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..

Response: Not applicable. See the response to Question No. 1.4 above.

Prepared By: Counsel
Sponsoring Witness: None

1.6 For each site reconnaissance visit performed by an expert witness for SHLAA in this proceeding:

- a. Identify the date and approximate time spent on each visit.
- b. Provide all field notes taken during the visit, including any photographs taken for or by the expert witness.
- 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.

Response:

- a. September 30, 2021, for the entire day.
- b. None.
- c. Ms. Cynthia Grimes, her husband Mr. Rob Grimes, Mr. David Clark, Mr. Jerry Rumpf, and Mr. Derek Quick (of Clark Hill PLC). Mr. Hughes also briefly met several of the SHLAA members as he visited the SHLAA area.
- d. Mr. Hughes generally visited the entire CPS Energy study area, including the publicly accessible areas where all the proposed routes would parallel or from which they would be potentially visible, and all of the proposed substation sites. He was on the private property of the SHLAA members with whom he briefly met as he visited the SHLAA area.

Prepared By: Counsel
Sponsoring Witness: Harold L. Hughes, Jr., P.E.