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Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0247  
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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 SCENIC LOOP 138-KV §  
TRANSMISSION LINE IN BEXAR §  
COUNTY, TEXAS §

BEFORE THE STATE OFFICE

OF

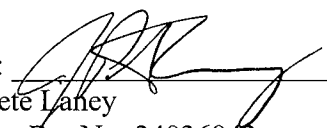
ADMINISTRATIVE HEARINGS

**NORTHSIDE INDEPENDENT SCHOOL DISTRICT'S  
RESPONSE TO CPS ENERGY'S FIRST SET OF REQUESTS FOR INFORMATION**

TO: City of San Antonio, acting by and through the City Public Service Board (CPS Energy) by and through its attorney of record, Kirk D. Rasmussen, Jackson Walker LLP, 100 Congress Avenue, Suite 1100, Austin, Texas 78701.

Northside Independent School District ("NISD") serves these Objections and Response to CPS's First Set of Requests for Information. Pursuant to the procedural rules, this Response is served within 10 days of receipt of the Request for Information, and is therefore timely served.

Respectfully Submitted,

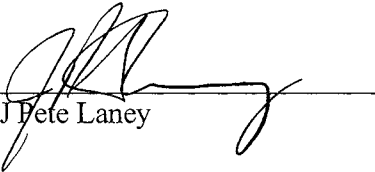
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**ATTORNEY FOR NORTHSIDE  
INDEPENDENT SCHOOL DISTRICT**

158

**CERTIFICATE OF SERVICE**

I certify hereby that a true and correct copy of the foregoing has been filed with the Commission and served on all parties of record via PUC Interchange and per request via email to counsel for CPS on this 19<sup>th</sup> day of March 2021, pursuant to the Orders issued in this docket.

  
J Pete Laney

SOAH DOCKET NO. 473-21-0247  
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APPLICATION OF THE CITY OF SAN § BEFORE THE STATE OFFICE  
ANTONIO, ACTING BY AND §  
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**NORTHSIDE INDEPENDENT SCHOOL DISTRICT'S  
RESPONSE TO CPS ENERGY'S FIRST SET OF REQUESTS FOR INFORMATION**

CPS Energy's RFI 1-1:

Identify the location of each school operated by NISD.

Response:

NISD objects to Request for Information 1.1 in that it is vague, ambiguous, overly broad, unduly burdensome, and seeks information not relevant to this matter. Subject to the objections and without waiving the same, NISD operates 80 elementary schools, 20 middle schools, 18 high schools and 4 special schools throughout the district. Information regarding the schools is publicly available at [www.nisd.net](http://www.nisd.net)

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-2:

Identify the location of each school operated by NISD with a transmission line within 300 feet of the campus.

Response:

NISD objects to the Request for Information 1.2 in that it calls for speculation, is overly broad, and unduly burdensome. In addition, the information requested is in CPS's possession or is more readily available to CPS as it the electric service provider in the area.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-3:

For each campus identified in response to Question 1.2, identify if the transmission line was in existence prior to the construction of the school.

Response:

See Response to Request for Information 1.2.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-4:

Refer to page 7, lines 11 and 19 and page 8, line 11 of Mr. Villarreal's direct testimony. Describe in detail all of the health and safety concerns associated with approval of a route for the Project with Segments 33, 34, 35, or 41 as a constituent part of the route.

Response:

NISD objects to Request for Information 1.4 in that it is overly broad as it asks for "all" health and safety concerns associated with various segments. Subject to the objections and without waiving the same, as set forth elsewhere in the direct testimony, there are concerns about any health effects of being in exposed to transmission lines. There also concerns about any potential structures that could pose a risk to curious children. In addition, any line constructed on the property could pose a safety risk during construction on the property.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-5:

Admit or deny that Segment 35 is not located on property owned by NISD.

Response:

NISD admits that proposed Segment 35, as depicted in the information provided by CPS, is not on property owned by NISD.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-6:

Admit or deny that the future middle school permanent structures must be constructed closer than 100 feet from the northern property line of tract b-002.

Response:

NISD objects to Request 1.6 in that it is vague, overly broad, and confusing. Subject to the objections and without waiving the same, NISD admits that the planned structures depicted in Exhibit No. 2 of Jacob Villarreal's direct testimony would be constructed within 100 feet of the property line, including but not limited to the perimeter fencing.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-7:

Refer to page 8, lines 7-8 of Mr. Villarreal's testimony. If construction of the transmission line occurs on Segment 41 can NISD construct and operate a middle school on property b-002?

Response:

NISD objects to Request 1.7 in that it is overly broad, vague, and confusing. Subject to the objections and without waiving the same, as set forth in the testimony NISD's construction and operation of the middle school includes a number of improvements, including the middle school classroom building, middle school athletic facilities and fields, along with other improvements and parking. Therefore, based on the information provided by CPS depicting the location of Segment 41, NISD would be restricted or prevented from constructing the middle school.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-8:

Identify all NISD campuses where NISD utilizes transmission line ROW for parking, ingress and egress, educational, recreational, or athletic activities. For each campus identified, describe the nature of the activities that occur within the transmission line ROW.

Response:

See Response to Request for Information 1.2.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-9:

Identify all NISD campuses where NISD has buildings, parking, roadways, or educational, recreational, or athletic facilities within 300 feet of a transmission line. For each campus identified, describe the nature of the activities that occur within 300 feet of the transmission line.

Response:

See Response to Request for Information 1.2.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-10:

Refer to page 9, line 3 of Mr. Villarreal's testimony. Describe in detail all impacts you allege will occur to the NISD "drain field" from construction and operation of the transmission line on Segment 42a.

Response:

NISD objects to Request for Information 1.10 in that it is overly broad and calls for speculation as to "all" impacts. Subject to the objection and without waiving the same, NISD has concerns about access, clearances, location of utility structures in relation to the drain field, and other impacts to the area which are not yet known or that can be anticipated.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-11:

Is Mr. Villarreal 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 electric and magnetic fields?

Response:

No.

If your answer is yes:

- 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 Mr. Villarreal in anticipation of his 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 Mr. Villarreal's mental impressions and opinions in connection with this docket.
- c. Identify and fully describe any bias Mr. Villarreal has as it relates to this docket or any parties thereto.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-12:

Identify and provide all communications between NISD and community members regarding this proceeding.

Response:

NISD objects to Request for Information 1.12 in that it is overly broad, unduly burdensome, and vague. Subject to the objections and without waiving the same, there are no official communications responsive to this request.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-13:

Refer to page 9, lines 18-19 of Mr. Villarreal's testimony. Describe the maximum and average level of electric and magnetic fields that Mr. Villarreal believes will be present at the NISD "outdoor areas where the children will also be" nearest to the proposed transmission line facilities if the line is constructed on a route that uses Segment 42a.

Response:

Mr. Villareal does not know the maximum level of electric and magnetic fields that will be present at the NISD "outdoor areas where the children will also be" nearest to the proposed transmission line facilities if the line is constructed on a route that uses Segment 42a.



Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-14:

Describe the maximum and average level of electric and magnetic fields that Mr. Villarreal 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.

Response:

Mr. Villarreal does not know the maximum level of electric and magnetic fields that 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.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-15:

Describe Mr. Villarreal's 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.

Response:

Mr. Villarreal is not aware of the specifics 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.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-16:

Refer to page 10, line 19 of Mr. Villarreal's direct testimony. Describe in detail how a transmission line constructed and operated near or on the property of the NISD will "pose as an attractive nuisance" for students.

Response:

Children are curious by nature and based on the districts experience children can tend to climb fencing, structures, etc. within and around the campuses. Should lines be constructed within or

adjacent to NISD property, some students may be app to climb the fences and, if possible, the transmission structures themselves.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-17:

Admit or deny that parking lots and traffic lanes on NISD property can be constructed and operated within a transmission line ROW.

Response:

NISD cannot admit or deny Request 1.17. The location of easement and transmission structures have not been defined, nor have the limitations of what can and cannot be constructed in the easement been disclosed.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal

CPS Energy's RFI 1-18:

Was construction of the middle school discussed in Mr. Villarreal's testimony included in the bond package used for purchase of property b-002?

Response:

NISD objects to Request for Information 1.18 in that it is overly broad and vague. Subject to the objections and without waiving the same, the 2010 bond package was for the purchase of property for a middle school.

Prepared By: J Pete Laney  
Sponsored By: Jacob Villarreal