



Control Number: 51023



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CHANDLERS *ET AL.*
MARCH 19, 2021

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

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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

CHANDLERS *ET AL.*
RESPONSES TO CPS ENERGY'S FIRST RFIs

COMES NOW, Lisa Chandler, Clinton R. Chandler, and Chip and Pamela Putnam (Chandlers *et al.*) to submit the following Responses to CPS Energy's First Requests for Information to Chandlers *et al.* This Response is timely filed. Chandlers *et al.* agree and stipulate all parties may treat these Responses as if the answers were filed under oath. The Responses are made without waiver of the right to contest the admissibility of any Response at the hearing on the merits.

Respectfully submitted,

BAYLIFF LAW FIRM PLLC
420 Crosswind Drive
Blanco, Texas 78606
(512) 225-0027
(512) 480-9200 (FAX)

/sig/ Bradford W. Bayliff

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

**ATTORNEY FOR
CHANDLERS *ET AL.***

LISA CHANDLER *ET AL.*
RESPONSES TO CPS ENERGY'S FIRST RFIS

CERTIFICATE OF SERVICE

I certify, on March 19, 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

CPS Energy-Chandler 1-1

To the extent not otherwise provided with Mr. Brian C. Andrews' direct testimony, provide for him:

- a. his name, address, and telephone number;
- b. the facts known by him that relate to or form the basis of his mental impressions and opinions formed or made in connection with this docket;
- c. his mental impressions and opinions formed or made in connection with this docket, and any methods used to derive them;
- d. any bias he has;
- e. all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for him in anticipation of his testimony in this docket;
- f. a listing of all proceedings in which he has provided testimony;
- g. his current resume and bibliography.

Response:

- a. Brian C. Andrews, 16690 Swingley Ridge Road, Suite 140, Chesterfield MO, 63017. (636) 898-6725.
- b. Please see the direct testimony of Brian C. Andrews generally.
- c. Please see the direct testimony of Brian C. Andrews generally.
- d. Mr. Andrews does not have any bias.
- e. Please see Attachment 1-1e.xlsx for the workpapers used by Mr. Andrews to create the exhibits for his direct testimony. All other documents provided or reviewed by Mr. Andrews are either part of CPS Energy's application or on the PUCT interchange for this proceeding.
- f. Please see Attachment 1-1f for a list of the proceedings in which Mr. Andrews has provided testimony.
- g. Mr. Andrews does not maintain a resume or bibliography. Please see Appendix A of the direct testimony of Brian C Andrews.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

LISA CHANDLER *ET AL.*
RESPONSES TO CPS ENERGY'S FIRST RFIS

Attachment 1-1f

List of proceedings in which Mr. Andrews has provided testimony

Brubaker & Associates, Inc.
Testimony Filed Since
December, 2014
by Brian C. Andrews

Date Filed	State	Docket No.	Utility	Type	Subjects	On Behalf Of
3/5/2021	KY	2020-00349	KENTUCKY UTILITIES COMPANY	Direct / Responsive	Depreciation Rates / Study / Expense	United States Department of Defense and all other Federal Executive Agencies
2/19/2021	TX	51023	CITY OF SAN ANTONIO	Direct / Responsive	Transmission Routing	Lisa Chandler, Clinton R. Chandler, and Chip and Pamela Putnam
2/19/2021	IN	45447	SOUTHERN INDIANA GAS AND ELECTRIC COMPANY D/B/A VECTREN SOUTH	Direct / Responsive	Depreciation Expense / Rates / Studies	Vectren Industrial Group
1/8/2021	TX	50830	GUADALUPE VALLEY ELECTRIC COOPERATIVE, INC	Rebuttal / Cross-Answering	Transmission Routing	Alford Farms, LTD, James H. Alford, Mary Chella Alford Gordon, Amanda Alford Urban and Robert L. Urban, Pfeiffer Revocable Trust and James and Mary Rummage
12/14/2020	TX	50812	RAYBURN COUNTRY ELECTRIC COOPERATIVE, INC	Rebuttal / Cross-Answering	Transmission Line Routing	PACCAR, Inc
12/2/2020	TX	50410	WIND ENERGY TRANSMISSION TEXAS, LLC AND ONCOR ELECTRIC DELIVERY COMPANY, LLC	Rebuttal / Cross-Answering	Transmission Line Routing	The Lonn S. McDowell III Trust #3027, The Fredonia C. McDowell Trust #2193, The Rosemary McDowell Trust and Lonn S. McDowell III
11/24/2020	TX	50830	GUADALUPE VALLEY ELECTRIC COOPERATIVE, INC	Direct / Responsive	Transmission Line Routing	Alford Farms, LTD, James H. Alford, Mary Chella Alford Gordon, Amanda Alford Urban and Robert L. Urban, Pfeiffer Revocable Trust and James and Mary Rummage
10/27/2020	TX	50812	RAYBURN COUNTRY ELECTRIC COOPERATIVE, INC	Direct / Responsive	Transmission Routing	PACCAR, Inc
10/23/2020	TX	50410	WIND ENERGY TRANSMISSION TEXAS, LLC AND ONCOR ELECTRIC DELIVERY COMPANY, LLC	Direct / Responsive	Transmission Routing	The Lonn S. McDowell III Trust #3027, The Fredonia C. McDowell Trust #2193, The Rosemary McDowell Trust, Lonn S. McDowell III, The County Road 125 Intervenor, and The BMWB Coalition
9/14/2020	TX	50545	AEP TEXAS INC	Direct / Responsive	Transmission Routing	Davidson Ranch, Ltd., NG Cummings Ranch, Briscoe Ranch Inc., and El Pescado Minerals, Ltd
8/25/2020	IL	20-0393	COMMONWEALTH EDISON COMPANY	Rebuttal / Cross-Answering	Depreciation Expense / Rates / Study	Illinois Industrial Energy Consumers & Citizen's Utility Board
8/17/2020	DC	1162	WASHINGTON GAS LIGHT COMPANY	Direct / Responsive	Depreciation Expense / Rates / Study	Office of the People's Counsel for the District of Columbia
6/30/2020	IL	20-0393	COMMONWEALTH EDISON COMPANY	Direct / Responsive	Depreciation Rate / Study / Expense	Illinois Industrial Energy Consumers & Citizen's Utility Board
12/4/2019	MO	ER-2019-0335	AMEREN MISSOURI	Direct / Responsive	Depreciation Rates / Study / Expense	Missouri Industrial Energy Consumers
11/26/2019	TX	49523	LCRA TRANSMISSION SERVICES CORPORATION	Rebuttal / Cross-Answering	Transmission Line Routing	Zorntos, LLC and Fronie Shelton
11/12/2019	MI	U-20359	INDIANA MICHIGAN POWER COMPANY	Rebuttal / Cross-Answering	Depreciation Rates / Study / Expense	Association of Businesses Advocating Tariff Equity
11/4/2019	TX	49523	LCRA TRANSMISSION SERVICES CORPORATION	Direct / Responsive	Transmission Line Routing	Zorntos, LLC and Fronie Shelton
10/30/2019	IN	45253	DUKE ENERGY INDIANA, LLC	Direct / Responsive	Depreciation Rates / Study / Expense	The Duke Industrial Group
10/17/2019	MI	U-20359	INDIANA MICHIGAN POWER COMPANY	Direct / Responsive	Depreciation Rates / Study / Expense	Association of Businesses Advocating Tariff Equity
9/24/2019	AR	19-008-U	SOUTHWESTERN ELECTRIC POWER COMPANY	Surrebuttal	Depreciation Rates / Study / Expense	The Office of the Arkansas Attorney General Leslie Rutledge
8/21/2019	MI	U-20471	DTE ELECTRIC COMPANY	Direct / Responsive	Integrated Resource Plan	Association of Businesses Advocating Tariff Equity
8/20/2019	IN	45235	INDIANA MICHIGAN POWER COMPANY	Direct / Responsive	Depreciation Rates / Study / Expense	The I&M Industrial Group
7/16/2019	AR	19-008-U	SOUTHWESTERN ELECTRIC POWER COMPANY	Direct / Responsive	Depreciation Rates / Study / Expense	The Office of the Arkansas Attorney General Leslie Rutledge
4/22/2019	OK	PUD 201800140	OKLAHOMA GAS AND ELECTRIC COMPANY	Direct / Responsive	Rate of Return / Capital Structure	Federal Executive Agencies
3/22/2019	TX	48625	SHARYLAND UTILITIES, L.P. AND LUBBOCK POWER AND LIGHT	Rebuttal / Cross-Answering	Transmission Routes	Southwestern Public Service Company, BMWB Coalition, Kelly Mills, Stacey Mills and 246 Land LLC & Fox Dairy, LTD, James E. Laney, Gloyna's, Roque, Klatt, Delung, Ray, Tomsu, Browing, and Wuthrich
3/20/2019	TX	48629	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Direct / Responsive	Transmission Routes	CBH Farms, Ltd
2/12/2019	MT	D2018 2 12	NORTHWESTERN ENERGY	Direct / Responsive	Depreciation / Rates / Study / Expense	Federal Executive Agencies and Montana Large Customer Group
11/28/2018	MI	U-20162	DTE ELECTRIC COMPANY	Rebuttal / Cross-Answering	Nuclear Surcharge	Association of Businesses Advocating Tariff Equity
11/7/2018	MI	U-20162	DTE ELECTRIC COMPANY	Direct / Responsive	Decommissioning, Voltage Level Discount	Association of Businesses Advocating Tariff Equity
8/3/2018	IL	18-0463	AMEREN ILLINOIS COMPANY D/B/A AMEREN ILLINOIS	Rebuttal / Cross-Answering	Depreciation / Rates / Study / Expense	Illinois Industrial Energy Consumers, Citizens Utility Board and Federal Executive Agencies
6/22/2018	KS	18-WSEE-328-RTS	WESTAR ENERGY, INC. AND KANSAS GAS AND ELECTRIC COMPANY	Rebuttal / Cross-Answering	Class Cost of Service / Rate Design / Revenue Allocation	Kansas Industrial Consumers Group, Inc
6/11/2018	KS	18-WSEE-328-RTS	WESTAR ENERGY, INC. AND KANSAS GAS AND ELECTRIC COMPANY	Direct / Responsive	Cost of Service, Rate Design	Kansas Industrial Consumers Group, Inc
6/5/2018	IL	18-0463	AMEREN ILLINOIS COMPANY D/B/A AMEREN ILLINOIS	Direct / Responsive	Depreciation / Rates / Study / Expense	Illinois Industrial Energy Consumers, Citizens Utility Board and Federal Executive Agencies
5/24/2018	IN	45029	INDIANAPOLIS POWER & LIGHT COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	IPL Industrial Group
5/2/2018	OK	PUD 201700496	OKLAHOMA GAS AND ELECTRIC COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Federal Executive Agencies
3/16/2018	MN	E015/AI-17-568	MINNESOTA POWER	Surrebuttal	Resource Planning	Large Power Intervenor
1/19/2018	MN	E015/AI-17-568	MINNESOTA POWER	Direct / Responsive	Capacity Purchase	Large Power Intervenor
11/7/2017	IN	44967	INDIANA MICHIGAN POWER COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Indiana Michigan Industrial Group
10/12/2017	MI	U-18370	INDIANA MICHIGAN POWER COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Association of Businesses Advocating Tariff Equity
9/18/2017	MI	U-18150	DTE ELECTRIC COMPANY	Rebuttal / Cross-Answering	Depreciation / Rates / Study / Expense	Association of Businesses Advocating Tariff Equity
8/15/2017	MI	U-18150	DTE ELECTRIC COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Association of Businesses Advocating Tariff Equity
6/2/2017	MI	U-18195	CONSUMERS ENERGY COMPANY / DTE ELECTRIC COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Association of Businesses Advocating Tariff Equity

Brubaker & Associates, Inc
Testimony Filed Since
December, 2014
by Brian C. Andrews

<u>Date Filed</u>	<u>State</u>	<u>Docket No.</u>	<u>Utility</u>	<u>Type</u>	<u>Subjects</u>	<u>On Behalf Of</u>
3/1/2017	TX	46234	AEP TEXAS NORTH COMPANY & ELECTRIC TRANSMISSION TEXAS, LLC	Rebuttal / Cross-Answering	Transmission Line Routing	McAnelly Ranch, LP, Garrett Roddie, Leroy Keese and Robert F Zesch
2/8/2017	TX	46234	AEP TEXAS NORTH COMPANY & ELECTRIC TRANSMISSION TEXAS, LLC	Direct / Responsive	Transmission Line Routes	McAnelly Ranch, LP, Garrett Roddie, Leroy Keese and Robert F Zesch
1/13/2017	FL	160186-EI / 160170-EI	GULF POWER COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Federal Executive Agencies
12/21/2016	AZ	E-01345A-16-0036	ARIZONA PUBLIC SERVICE COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Federal Executive Agencies
10/24/2016	TX	45866	LCRA TRANSMISSION SERVICES CORPORATION	Rebuttal / Cross-Answering	Transmission Line Routing	Land and Home Owners of CR 175, Mentage Homes of Texas, LLC, Stewart Crossing Homeowner Association and Trails of Shady Oak Residential Community, Inc
9/12/2016	TX	45866	LCRA TRANSMISSION SERVICES CORPORATION	Direct / Responsive	Transmission Line Routing	Land and Home Owners of CR 175, Mentage Homes of Texas, LLC, Stewart Crossing Homeowner Association and Trails of Shady Oak Residential Community, Inc
7/7/2016	FL	160021-EI	FLORIDA POWER & LIGHT COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Federal Executive Agencies
3/21/2016	OK	PUD 201500273	OKLAHOMA GAS AND ELECTRIC COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	Federal Executive Agencies
2/2/2016	TX	44837	AEP TEXAS CENTRAL COMPANY	Rebuttal / Cross-Answering	Transmission Line Routing	Coastal Prairie Alliance
1/29/2016	NM	15-00261-UT	PUBLIC SERVICE COMPANY OF NEW MEXICO	Direct / Responsive	Depreciation / Rates / Study / Expense	New Mexico Industrial Energy Consumers
1/22/2016	IN	44688	NORTHERN INDIANA PUBLIC SERVICE COMPANY	Direct / Responsive	Depreciation / Rates / Study / Expense	NIPSCO Industrial Group
12/7/2015	TX	44837	AEP TEXAS CENTRAL COMPANY	Direct / Responsive	Transmission Line Cost Estimation and Routing	Coastal Prairie Alliance
10/27/2015	AR	98-349-C	C&L ELECTRIC COOPERATIVE CORPORATION	Direct / Responsive	Interim Rates, Final Rate Agreement	Little Rock District, U S Army Corps of Engineers
7/22/2015	KS	15-WSEE-115-RTS	WESTAR ENERGY, INC AND KANSAS GAS AND ELECTRIC COMPANY	Rebuttal / Cross-Answering	Cost of Service, Rate Design	Kansas Industrial Consumers Group, Inc., Occidental Chemical Corporation, CCPS Transportation, LLC, Spirit AeroSystems, Inc., Coffeyville Resources Refining & Marketing, LLC, The Goodyear Tire & Rubber Company, Unified School District #259 and Kansas Association of School Boards
7/9/2015	KS	15-WSEE-115-RTS	WESTAR ENERGY, INC AND KANSAS GAS AND ELECTRIC COMPANY	Direct / Responsive	Cost of Service, Rate Design	Kansas Industrial Consumers Group, Inc., Occidental Chemical Corporation, CCPS Transportation, LLC, Spirit AeroSystems, Inc., Coffeyville Resources Refining & Marketing, LLC, The Goodyear Tire & Rubber Company, Unified School District #259 and Kansas Association of School Boards
12/5/2014	MO	ER-2014-0258	UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI	Direct / Responsive	Net Fuel Cost, Net Base Energy Cost	Missouri Industrial Energy Consumers

LISA CHANDLER *ET AL.*
RESPONSES TO CPS ENERGY'S FIRST RFIS

CPS Energy-Chandler 1-2

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

Response:

None.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CPS Energy-Chandler 1-3

Identify all proceedings before any regulatory body or court where any expert witness for Chandler/Putnam 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:

None.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CPS Energy-Chandler 1-4

1.4 For each site reconnaissance visit performed by an expert witness for Chandler/Putnam 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.-d. Mr. Andrews did not conduct a site visit. He reviewed the study area via Google Earth, the CPS intervenor maps, and GIS data.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews