



Control Number: 51023



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CHANDLERS *ET AL.*  
MARCH 22, 2021

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

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PUBLIC UTILITY DIVISION  
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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 *FUBM***  
**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 Anaqua Springs Homeowners Association's (Anaqua Springs HOA) 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.***

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**CHANDLERS ET AL.**  
**RESPONSES TO ANAQUA SPRINGS HOA'S FIRST RFIS**

**CERTIFICATE OF SERVICE**

I certify, on March 22, 2021, this document is being served on Anaqua Springs HOA and submitted electronically to the Interchange System maintained by the Central Records Division of the Public Utility Commission of Texas.

*/sig/ Bradford W. Bayliff*

**CHANDLERS *ET AL.***  
**RESPONSES TO ANAQUA SPRINGS HOA'S FIRST RFIS**

**Anaqua Springs HOA-Chandler 1-1**

Please provide any agreements between or among you and CPS.

Response:               None

Prepared by:           Counsel

Sponsoring witness:   None

**CHANDLERS *ET AL.***  
**RESPONSES TO ANAQUA SPRINGS HOA'S FIRST RFIS**

**Anaqua Springs HOA-Chandler 1-2**

Please provide any agreements between or among you and any other intervenor in this docket.

Response:                   None

Prepared by:               Counsel

Sponsoring witness:       None

**CHANDLERS *ET AL.***  
**RESPONSES TO ANAQUA SPRINGS HOA'S FIRST RFIS**

**Anaqua Springs HOA-Chandler 1-3**

Admit or deny that there is a natural gas or type of hydrocarbon pipeline running parallel to Toutant Beauregard Road.

Response:                   Neither admit nor deny.

Prepared by:               Counsel

Sponsoring witness:       None