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CHANDLERS *ET AL.*
MARCH 22, 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 *FU&M*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIs

COMES NOW, Lisa Chandler, Clinton R. Chandler, and Chip and Pamela Putnam (Chandlers *et al.*) to submit the following Responses to Patrick Cleveland'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,
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Blanco, Texas 78606
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/sig/ Bradford W. Bayliff

By: Bradford W. Bayliff
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ATTORNEY FOR
CHANDLERS *ET AL.*

6607

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

CERTIFICATE OF SERVICE

I certify, on March 22, 2021, this document is being served on Patrick Cleveland 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 PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-1

In PUC Case No. 30168, which was referred to in The Testimony, please admit that the route selected by the Commission did not cross, bisect, or encroach on any actively managed tract within the LBJ Grasslands.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-2

In PUC Case No. 30168, which was referred to in The Testimony, please admit that none of the proposed segments crossed a recreational area.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-3

In PUC Case No. 37464, which was referred to in The Testimony, please admit that Commission selected a route that was approximately \$6,000,000 more than the route selected by the ALJ's.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-4

In PUC Case No. 37464, which was referred to in The Testimony, please admit that the route selected by the ALJ's would have crossed the Lampasas River at a previously undisturbed site, while the route the Commission selected crossed it at a previously disturbed site.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-5

In PUC Case No. 37464, which was referred to in The Testimony, please admit that the route selected by the Commisssion did not have any length within the foreground visual zone of park and recreation areas.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-6

In PUC Case No. 38230, which was referred to in The Testimony, please admit that the route selected by the Commission had 25 habitable structures within 500 feet of the centerline, which was the second best among all proposed routes.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-7

In PUC Case No. 38230, which was referred to in The Testimony, please admit that the route selected by the Commission did not cross ~~any park~~ or recreational areas.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-8

In PUC Case No. 38354, which was referred to in The Testimony, please admit that the cost of the route selected by the Commission was approximately \$84.2 million more than the preferred route of the electric utility company.

Response:

Deny. The commission selected route MK63, which had an as-filed estimated cost of \$360.5 million. The commission modified MK63 to not include undergrounding costs on segment Y11. The underground cost of segment Y11 was \$54 million for a half-mile segment. A reasonable search of the PFD and Final Order did not uncover the above ground cost of Segment Y11. LCRA's preferred route had an estimated cost of \$266.4 million, which is \$94.1 million less than MK63 with the underground costs. It cannot be concluded the MK63 route as modified by the Commission was approximately \$84.2 million more than LCRA's preferred route.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-9

In PUC Case No. 38354, which was referred to in The Testimony, please admit that the Commission found that the lower cost of the electric utility's preferred route did not outweigh the benefits associated with paralleling more ROW.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-10

In PUC Case No. 38354, which was referred to in The Testimony, please admit that none of the most favorable routes fragmented a recreational area.

Response:

This cannot be admitted or denied. The “most favorable” routes are not defined. Further, LCRA’s preferred route, MK13, had 1.68 miles across parks/recreational areas. There is no readily available information to determine if those recreational areas were fragmented.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-11

In PUC Case No. 47808, which was referred to in The Testimony, please admit that the route selected by the Commission had two habitable structures within 300 feet of its centerline.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-12

In PUC Case No. 47808, which was referred to in The Testimony, please admit that out of all of the 144 proposed routes, the highest number of habitable structures within 300 feet of the centerline of any route was four.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-13

In PUC Case No. 47808, which was referred to in The Testimony, please admit that the route selected by the Commission did not cross any parks or recreational areas.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-14

In PUC Case No. 38597, which was referred to in The Testimony, please admit that the route selected by the Commission cost \$19,225,000 more than the preferred route of the electric utility company.

Response:

Denied. \$19,255,000 is the difference between monopole construction on Route 42 (Commission selected) and Route 2288 (Oncor preferred). The difference in lattice tower construction is \$6,416,000. The project was to be built on lattice towers, except where monopoles were required.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-15

In PUC Case No. 38597, which was referred to in The Testimony, please admit that the route selected by the Commission had less habitable structures within 500 feet of the centerline than the route preferred by the electric utility.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-16

In PUC Case No. 38597, which was referred to in The Testimony, please admit that the route selected by the Commission did not cross any parks or recreation areas, while the route preferred by the electric utility company crossed 8,285 feet of parks and recreation areas.

Response: Admit.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews

CHANDLERS *ET AL.*
RESPONSES TO PATRICK CLEVELAND'S FIRST RFIS

Cleveland-Chandler 1-17

Please state and describe any certifications or licenses issued to Brian C. Andrews by any government body in Texas.

Response: None.

Prepared by: Brian C. Andrews

Sponsoring witness: Brian C. Andrews