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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 UTILITY COUNCIL  
ADMINISTRATIVE HEARINGS  
FILING CLERK

**RESPONSE TO ANAQUA SPRINGS HOA'S  
SECOND RFI TO SAVE HUNTRESS LANE AREA ASSOCIATION**

Save Huntress Lane Area Association (“SHLAA”), an intervenor, submits this response to the Second Request for Information (“RFI”) from Anaqua Springs Homeowners Association (“AS”), which was received on March 12, 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 Mar. 22, 2021.

/s/ Thomas K Anson  
Thomas K. Anson

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AS-2-1 Refer to page 23 of Mr. Hughes' testimony. With respect to the five additional habitable structures, please indicate which of those five were constructed between the time of the open house and the time of the Application Amendment.

Response: Mr. Hughes' direct testimony on page 23 regarding five additional habitable structures referred to and was based upon the information in the CPS Energy application as amended. Please refer to the CPS Energy amended application available at <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/51023%20Application%20Amendment%20-%20Cover%20Pleading.pdf>. CPS Energy described these five on pages 5-6 thereof, and indicated that two of them were "newly constructed" habitable structures, but CPS Energy does not give any further information regarding the exact timing of their construction. Therefore, Mr. Hughes has no further information responsive to this request.

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

AS-2-2 Please provide any analysis Mr. Hughes performed on the flood plain and risks of flooding on Substation Site 7.

Response: Mr. Hughes reviewed the information in the CPS Energy application as amended, and also visited the CPS Energy study area including driving the public roads along each of the substation sites, including Substation Site 7. He also reviewed the SHLAA testimony of Cynthia Grimes, David Clark, and Jerry Rumpf and the photographs and other low water crossing information which were provided with that testimony. Figure 2-4 Constraints (Map) – Amended in the CPS Energy application as amended shows the location of Leon Creek along the back boundary line of the Substation Site 7, but unlike other areas on that map it does not identify a “Floodplain (FEMA)” area associated with Substation Site 7 or the portion of Leon Creek behind the proposed substation site, and that map also shows by the topographical lines that the Substation Site 7 would be at an elevation above the location of Leon Creek. As a result, Mr. Hughes has not performed a specific further analysis on “the flood plain and risks of flooding on Substation Site 7.”

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

AS-2-3 Please provide any communications with the property owner(s) who abut or are within 300 feet of Substation Site 7.

Response: There were no electronic or written communications.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

AS-2-4 Please provide any information regarding flooding on the property that is the location of Substation Site 7.

Response: None known.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

AS-2-5 Please provide the identities and addresses of any SHLAA members who own property abutting or within 300 feet of Substation Site 7.

Response: Ms. Sally Cody, 9627 Huntress Lane, San Antonio, Texas 78255.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

AS-2-6 Please provide any and all communications between or among any individual member or representative of SHLAA and the individuals identified in response to RFI 2-5.

Response: There were no electronic or written communications.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes

AS-2-7. Please provide any agreements relative to CPS's Application or Amended Application between or among SHLAA, Clearwater Ranch POA, and/or Bexar Ranch, including any agreements between the individual members?

Response: None.

Prepared By: Counsel

Sponsoring Witness: None

AS-2-8 Please provide any agreements between SHLAA and CPS relative to the Application or Amended Application.

Response: None.

Prepared By: Counsel  
Sponsoring Witness: None

AS-2-9 Admit or deny that the property owners in the Altair Subdivision are not directly impacted by Segments 26a, 38, and 43.

Response: SHLAA can neither admit nor deny that the property owners in the Altair Subdivision are not directly impacted by Segments 26a, 38, and 43. This is because there are residences in the Altair Subdivision located on higher elevations and until the exact location and height of any CPS Energy monopoles along Segments 26a, 38, and 43 are known the visibility of a high-voltage transmission line along Segments 26a, 38, and 43 may or may not be visible to some of the property owners in the Altair Subdivision. For utility transmission cases the Commission requires notice be provided to those with property crossed by a line segment right-of-way or with a habitable structure within a specified distance of a transmission line, but others can be directly impacted beyond those required notice circumstances, such as when the proposed transmission line may be visible to a property owner.

Prepared By: Counsel  
Sponsoring Witness: Cynthia Grimes and Jerry Rumpf

AS-2-10 Admit or deny that there are no habitable structures within 300 feet of Segments 38 on SHLAA members' properties. If anything other than admit, please provide a map showing the location of those habitable structures.

Response: It is admitted that CPS Energy's Figure 4-1 Inventory (Map) Amended shows no habitable structures within 300 feet of Segments 38 on SHLAA members' properties.

Prepared By: Counsel  
Sponsoring Witness: None