



Control Number: 51023



Item Number: 720

Addendum StartPage: 0

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

APPLICATION OF THE CITY OF	§	STATE OFFICE OF ADMINISTRATIVE
SAN ANTONIO TO AMEND ITS	§	HEARINGS
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE SCENIC	§	ON REFERRAL FROM THE
LOOP 138-KV TRANSMISSION LINE	§	PUBLIC UTILITY COMMISSION
IN BEXAR COUNTY, TEXAS	§	OF TEXAS

**FIRST REQUEST FOR INFORMATION
BY SAVE HUNTRESS LANE AREA ASSOCIATION
TO ANAQUA SPRINGS HOMEOWNERS' ASSOCIATION**

Save Huntress Lane Area Association ("SHLAA"), an intervenor, pursuant to 16 Tex. Admin. Code §§ 22.141 and 22.144, requests that Anaqua Springs Homeowners' Association and its witness Mr. Mark D. Anderson respond to the attached questions in this Request for Information under oath (or stipulate they may be treated as if under oath), in the manner set forth in 16 Tex. Admin. Code § 22.144, and within the time required by the procedural schedule in this proceeding. No privileged information is sought. For any questions concerning this Request, please contact the undersigned.

Respectfully submitted,

By: /s/ Thomas K Anson
 Thomas K. Anson (SBN 01268200)
 512-499-3608 / 512-536-5718 (fax)
TAnson@clarkhill.com
 Clark Hill PLC
 720 Brazos St. Suite 700, Austin, TX 78701

ATTORNEYS FOR SHLAA

Certificate of Service: I certify I served the foregoing under SOAH Order No. 3 on Apr. 5, 2021.

/s/ Thomas K Anson
 Thomas K. Anson

720

1. Please refer to Public Utility Commission of Texas Docket No. 50812. Admit that testimony of Mr. Mark D. Anderson was submitted in that docket. If not admitted, please provide the basis of the non-admission.
2. Please refer to that Commission Docket No. 50812. Admit that Mr. Mark D. Anderson recommended using Route West C, which consisted of Segments W1-W3-W6-W14-W22a-W22b and Tap Option A. If not admitted, please provide the basis of the non-admission.
3. Please refer to Att-10a_Directly Affected Property Map (Western).pdf in that Commission Docket No. 50812, available at <https://interchange.puc.texas.gov/search/documents/?controlNumber=50812&itemNumber=2>. Admit that the site of Tap Option A is closer to the Naomi Press Elementary School than the site of Tap Option B. If not admitted, please provide the basis of the non-admission.
4. Please refer to the Cross-Rebuttal Testimony of Mark D. Anderson in this docket. Admit that on page 6, lines 7-8, he states: “When there are options to completely avoid a school, especially an elementary school, those options should be chosen.” If not admitted, please provide the basis of the non-admission.
5. Please refer to Commission Docket No. 50812. Admit that in his testimony in that docket Mr. Mark D. Anderson did not state that the recreational areas at the Naomi Press Elementary School should be included in what counts as parks and recreational areas for environmental assessment purposes.
6. Please refer to the Cross-Rebuttal Testimony of Mark D. Anderson in this docket. Admit that on page 8, lines 14-18, he states: “But the data point is incorrect. It does not include the parks and recreational areas at Sara McAndrew Elementary School. It also does not include any of the private parkland. Whether the criterion should include private parkland is not within my field of expertise. But, without a doubt it should include the school recreational areas.” If not admitted, please provide the basis of the non-admission.
7. Please refer to Att-10a_Directly Affected Property Map (Western).pdf in that Commission Docket No. 50812, available at <https://interchange.puc.texas.gov/search/documents/?controlNumber=50812&itemNumber=2>. Admit that, in accordance with the distance scale on the map, the northwest

corner of the Naomi Press Elementary School building is approximately 550 feet from the southwest end of Segment W22b (where Segment W22b touches the edge of the Tap Option A box on the map). If not admitted, please provide the basis of the non-admission.

8. Please refer to the Cross-Rebuttal Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf in this docket. Admit that on pages 22-23 of that Cross-Rebuttal Testimony Ms. Grimes provides certain Google Earth information and states: “One can use Google Earth to see that the western point of the school building is approximately 549 feet from Segment 42a” If not admitted, please provide the basis of the non-admission.
9. Please refer to the Cross-Rebuttal Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf in this docket. Admit that Anaqua Springs Homeowners’ Association did not file any objections to that Cross-Rebuttal Testimony. If not admitted, please provide the basis of the non-admission.