



Control Number: 51023



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

APPLICATION OF THE CITY OF §  
SAN ANTONIO TO AMEND ITS §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE SCENIC §  
LOOP 138-KV TRANSMISSION LINE §  
IN BEXAR COUNTY, TEXAS §

STATE OFFICE OF ADMINISTRATIVE HEARINGS  
ON REFERRAL FROM THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS

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2021 APR 5 3:10  
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**FIRST REQUEST FOR INFORMATION  
BY SAVE HUNTRESS LANE AREA ASSOCIATION  
TO COMMISSION STAFF**

Save Huntress Lane Area Association (“SHLAA”), an intervenor, pursuant to 16 Tex. Admin. Code §§ 22.141 and 22.144, requests that Commission Staff and its witness Mr. John Poole 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  
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**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

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1. Please refer to the study area identified by the applicant in the application (as amended) in this docket. Admit that Mr. John Poole did not physically visit the site of the study area in connection with the preparation of his testimony. If not admitted, please: (a) state the date(s) of such site visit(s), the approximate time spent on each such visit(s), all persons who accompanied him during such site visit(s), the means of transportation for such site visit(s), and the portions of the study area so visited; and (2) provide all field notes, photographs, drawings, and other documents created in connection with such site visit(s).
2. Please refer to Route P proposed by the applicant in the application (as amended) in this docket. Admit that Mr. John Poole did not physically make a site visit of the area along Route P in connection with the preparation of his testimony. If not admitted, please: (a) state the date(s) of such site visit(s), the approximate time spent on each such visit(s), all persons who accompanied him during such site visit(s), the means of transportation for such site visit(s), and the portions of Route P so visited; and (2) provide all field notes, photographs, drawings, and other documents created in connection with such site visit(s).
3. Please refer to the study area identified by the applicant in the application (as amended) in this docket. Admit that Mr. John Poole did not physically by vehicle drive or ride along the portion of Huntress Lane within the study area in connection with the preparation of his testimony. If not admitted, please: (a) state the date(s) of such site visit(s), the approximate time spent on each such visit(s), all persons who accompanied him during such site visit(s), the means of transportation for such site visit(s), and the portions of Huntress Lane so visited; and (2) provide all field notes, photographs, drawings, and other documents created in connection with such site visit(s).
4. Please refer to the study area identified by the applicant in the application (as amended) in this docket. Admit that Mr. John Poole did not physically visit any of the properties along Route P in connection with the preparation of his testimony. If not admitted, please: (a) state the date(s) of such site visit(s), the approximate time spent on each such visit(s), all persons who accompanied him during such site visit(s), the means of transportation for such site visit(s), and the properties and person(s) so visited; and (2) provide all field notes, photographs, drawings, and other documents created in connection with such site visit(s).
5. Please refer to the study area identified by the applicant in the application (as amended) in this docket, and the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segment that comprise Route P and by SHLAA

- in its testimony. Admit that Mr. John Poole did not physically visit any of such habitable structures in connection with the preparation of his testimony. If not admitted, please: (a) state the date(s) of such site visit(s), the approximate time spent on each such visit(s), all persons who accompanied him during such site visit(s), all persons with whom he met during such site visit(s), the means of transportation for such site visit(s), and such habitable structures and/or person(s) so visited; and (2) provide all field notes, photographs, drawings, and other documents created in connection with such site visit(s).
6. Please refer to the proposed substation sites identified by the applicant in the application (as amended) in this docket. Admit that Mr. John Poole did not physically visit any of such proposed substation sites in connection with the preparation of his testimony. If not admitted, please: (a) state the date(s) of such site visit(s), the approximate time spent on each such visit(s), all persons who accompanied him during such site visit(s), the means of transportation for such site visit(s), and such proposed substation sites and person(s) so visited; and (2) provide all field notes, photographs, drawings, and other documents created in connection with such site visit(s).
  7. Please refer to the proposed substation sites identified by the applicant in the application (as amended) in this docket. Admit that Mr. John Poole did not physically visit proposed Substation Site 6 in connection with the preparation of his testimony. If not admitted, please: (a) state the date(s) of such site visit(s), the approximate time spent on each such visit(s), all persons who accompanied him during such site visit(s), the means of transportation for such site visit(s), and portion(s) of such proposed substation site so visited; and (2) provide all field notes, photographs, drawings, and other documents created in connection with such site visit(s).
  8. Please refer to the proposed substation sites identified by the applicant in the application (as amended) in this docket. Admit that Mr. John Poole did not physically visit proposed Substation Site 7 in connection with the preparation of his testimony. If not admitted, please: (a) state the date(s) of such site visit(s), the approximate time spent on each such visit(s), all persons who accompanied him during such site visit(s), the means of transportation for such site visit(s), and any portion(s) of proposed substation site so visited; and (2) provide all field notes, photographs, drawings, and other documents created in connection with such site visit(s).
  9. Please refer to the direct testimony of Direct Testimony of Harold L. Hughes, Jr., P.E. Admit that Mr. Hughes made a trip to the study area to look at the proposed routes and

also met with affected SHLAA landowners. If not admitted, please provide the basis of the non-admission.

10. Please refer to the direct testimony of Direct Testimony of Harold L. Hughes, Jr., P.E. Admit that during his field investigation Mr. Hughes observed each of the proposed substation sites. If not admitted, please provide the basis of the non-admission.
11. Please refer to the water wells information identified by the applicant in the application (as amended) in this docket and in the Direct Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf. Admit that (a) water wells are used by all homeowners along Huntress Lane, and (b) they have no water supplied from public sources. If not admitted, please provide the basis of the non-admission.
12. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that proposed line Segment 43 has one such habitable structure (applicant habitable structure number 201) which is located near the intersection of proposed line Segments 43 and 38. If not admitted, please provide the basis of the non-admission.
13. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that proposed line Segment 38 has one such habitable structure (applicant habitable structure number 134) which is located near the intersection of proposed line Segments 43 and 38. If not admitted, please provide the basis of the non-admission.
14. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that proposed line Segment 37 has two such habitable structures (applicant habitable structure numbers 197 and 135). If not admitted, please provide the basis of the non-admission.
15. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that proposed line Segment 25 has two such habitable structures (applicant habitable structure numbers 136 and 137). If not admitted, please provide the basis of the non-admission.
16. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that proposed line Segment 22 has three such habitable structures (applicant habitable structure numbers 148, 149 and 150). If not admitted, please provide the basis of the non-admission.

17. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that proposed line Segment 15 has the following habitable structures identified in its application as previously amended: four (147, 146, 143, 142, using the habitable structure numbers assigned by the applicant). If not admitted, please provide the basis of the non-admission.
18. Please refer to the habitable structures identified in the Direct Testimony and Cross Rebuttal Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf, and the habitable structure information in SHLAA's first supplemental response to Jauer's first request for information. Admit that proposed line Segment 15 has three additional habitable structures identified by SHLAA and not disputed by CPS Energy. If not admitted, please provide the basis of the non-admission.
19. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments, the additional habitable structures identified in the Direct Testimony and Cross Rebuttal Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf, and the habitable structure information in SHLAA's first supplemental response to Jauer's first request for information. Admit that proposed line Segment 15 has the following habitable structures: four (147, 146, 143, 142, using the habitable structure numbers assigned by the applicant) plus three (the additional habitable structures identified by SHLAA) for a total of seven. If not admitted, please provide the basis of the non-admission.
20. Please refer to the three additional habitable structures within 300 feet of the centerline of proposed line Segment 15 that are identified in the Direct Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf. Admit that Mr. John Poole did not include those three additional habitable structures in the number of habitable structures he identifies in his testimony. If not admitted, please provide the basis of the non-admission.
21. Please refer to the Direct Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf. Admit that line Segment 15 has a low water crossing along Huntress Lane that can be impassable during a flood or high water. If not admitted, please provide the basis of the non-admission.
22. Admit that line Segment 15 has a grave site within 200 feet of its centerline. If not admitted, please provide the basis of the non-admission.
23. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that approximately one-third of

the total length of Route P has only one habitable structure due to its use of proposed line Segment 43. If not admitted, please provide the basis of the non-admission.

24. Please refer to the direct and cross-rebuttal testimony of Bexar Ranch, Inc. Admit that Bexar Ranch, Inc. is in the process of creating a conservation easement for the area of Bexar Ranch, Inc. within the study area of the applicant in this docket. If not admitted, please provide the basis of the non-admission.
25. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that the habitable structures along Route P are concentrated to the east of Segment 43 in Route P. If not admitted, please provide the basis of the non-admission.
26. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments. Admit that the greatest number of habitable structures the applicant identified on the eastern portion of Route P are concentrated on Segment 15. If not admitted, please provide the basis of the non-admission.
27. Please refer to the habitable structures identified by the applicant that are within 300 feet of the centerline of the proposed line segments and the Direct Testimony and Cross-Rebuttal Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf. Admit that the number of habitable structures the applicant identified on Segment 15 should have 3 more habitable structures added to the habitable structure count based on the foregoing direct testimony. If not admitted, please provide the basis of the non-admission.
28. Please refer to the information in the application (as amended) by the applicant in this docket. Admit that on Segment 15, moving from the west to the east, there are no electric distribution lines until about 600 feet from the node between Segment 15 and Segment 50. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
29. Please refer to the information in the application (as amended) by the applicant in this docket, the additional habitable structures identified in the Direct Testimony of Cynthia Grimes, David Clark, and Jerry Rumpf, and the habitable structure information in SHLAA's first supplemental response to Jauer's first request for information. Admit that proposed Substation Site 6 abuts at least one property which has a business of providing boarding and stables for horses. If not admitted, please provide the basis of the non-

admission, including whether that is based upon personal observation during a physical site visit.

30. Admit that Substation Site 6 abuts properties with animals, including sheep, Longhorn cattle, donkeys, etc. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
31. Admit that Segment 22 crosses over properties with chickens, vegetable gardens, etc. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
32. Admit that Segment 15 crosses over properties with cows, horses, Longhorn cattle, donkeys, chickens, sheep, goats and vegetable gardens. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
33. Admit that proposed Substation Site 6 does not have as much visibility-shielding vegetation as proposed Substation Site 7. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
34. Admit that proposed Substation Site 7 is a larger parcel of land than proposed Substation Site 6. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
35. Admit that proposed Segment 22 has no electric distribution lines along that segment. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
36. Admit that proposed Segment 22 would cross over and require right-of-way (by condemnation or otherwise) on at least five individual landowner properties on Huntress Lane. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
37. Admit that the proposed high-voltage transmission line along Segment 15 would be visible to the homeowners in the area of the Canyons POA due south of that line segment. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.



38. Admit that the proposed high-voltage transmission line along Segment 54 would be visible to the homeowners along line Segments 25 and 22. If not admitted, please provide the basis of the non-admission, including whether that non-admission is based upon personal observation during a physical site visit.
39. Admit that Route P would cross the most amount of Golden Cheek Warbler habitat compared to all of the other applicant's proposed routes. If not admitted, please provide the basis of the non-admission.
40. Admit that the estimated total cost of Route P compared to Route Z1 is an additional cost of \$4,933,971. If not admitted, please provide the basis of the non-admission.
41. Admit that the estimated total cost of Route P compared to Route AA1 is an additional cost of \$5,117,170.55. If not admitted, please provide the basis of the non-admission.
42. Admit that the length of right-of-way ("ROW") using existing transmission line ROW on Route Z1 is zero. If not admitted, please provide the basis of the non-admission.
43. Admit that the length of ROW using existing transmission line ROW on Route P is zero. If not admitted, please provide the basis of the non-admission.
44. Admit that the length of ROW parallel and adjacent to existing transmission line ROW on Route Z1 is zero. If not admitted, please provide the basis of the non-admission.
45. Admit that the length of ROW parallel and adjacent to existing transmission line ROW on Route P is zero. If not admitted, please provide the basis of the non-admission.
46. Admit that the length of ROW parallel to other existing ROW (roadways, railways, canals, etc.) on Route Z1 is 1.60 miles. If not admitted, please provide the basis of the non-admission.
47. Admit that the length of ROW parallel to other existing ROW (roadways, railways, canals, etc.) on Route P is 0.85 miles. If not admitted, please provide the basis of the non-admission.
48. Admit that the length of ROW parallel to other existing ROW (roadways, railways, canals, etc.) on Route Z1 is: (a) approximately two times the length of such paralleling on Route P; and (b) more precisely (when taken out to six decimals) 1.882353 times the length of such paralleling on Route P. If not admitted, please provide the basis of the non-admission.
49. Admit that the length of ROW parallel and adjacent to apparent property lines on Route Z1 is 1.49 miles. If not admitted, please provide the basis of the non-admission.

50. Admit that the length of ROW parallel and adjacent to apparent property lines on Route P is 2.62 miles. If not admitted, please provide the basis of the non-admission.
51. Admit that a transmission line paralleling an existing roadway creates less fragmentation of habitat than paralleling an apparent property line. If not admitted, please provide the basis of the non-admission.
52. Admit that the length of Route P is longer than Route Z1. If not admitted, please provide the basis of the non-admission.
53. Admit that the length of Route P is longer than Route AA1. If not admitted, please provide the basis of the non-admission.
54. Admit that Route P has the greatest area of ROW across golden-cheeked warbler modeled habitat designated as 3-Moderate High and 4-High Quality (acres) compared to all of the routes proposed by CPS Energy. If not admitted, please provide the basis of the non-admission.
55. Admit that Route P compared to Route Z1 has more than two times the area of ROW across golden-cheeked warbler modeled habitat designated as 3-Moderate High and 4-High Quality (acres). If not admitted, please provide the basis of the non-admission.
56. Admit that Route P compared to Route AA1 has more than two times the area of ROW across golden-cheeked warbler modeled habitat designated as 3-Moderate High and 4-High Quality (acres).
57. Admit that the length of ROW across the Edwards Aquifer Contributing Zone for Route Z1 is less than for Route P. If not admitted, please provide the basis of the non-admission.
58. Please refer to Attachment 8 to the CPS Energy original application, available at <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/Attachment%208%20-%20Landowner%20Notice%20List.pdf>. Admit that the property tracts crossed by or having a habitable structure within 300 feet of the center line of a proposed line segment that is included in Route P are Tract IDs F-005 through F-029, F-058 through F-076, and P-001 through P-007. If not admitted, please provide the basis of the non-admission.
59. Please refer to Attachment 8 to the CPS Energy original application, available at <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/Attachment%208%20-%20Landowner%20Notice%20List.pdf>. Admit that the property tracts crossed by or having a habitable structure within 300 feet of the center

line of a proposed line segment that is included in Route Z are Tract IDs A-039 through A-088, B-011 through B-043, and C-011 through C-040. If not admitted, please provide the basis of the non-admission.

60. Please refer to Attachment 8 to the CPS Energy original application, available at <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/Attachment%208%20-%20Landowner%20Notice%20List.pdf>. Admit that the property tracts crossed by or having a habitable structure within 300 feet of the center line of a proposed line segment that is included in Route P total 104. If not admitted, please provide the basis of the non-admission.
61. Please refer to Attachment 8 to the CPS Energy original application, available at <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/Attachment%208%20-%20Landowner%20Notice%20List.pdf>. Admit that the property tracts crossed by or having a habitable structure within 300 feet of the center line of a proposed line segment that is included in Route Z total are 102 in number. If not admitted, please provide the basis of the non-admission.
62. Please refer to Attachment 8 to the CPS Energy original application, available at <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/Attachment%208%20-%20Landowner%20Notice%20List.pdf>. Admit that the number of property tracts crossed by or having a habitable structure within 300 feet of the center line of a proposed line segment that is included in Route P are greater in number than the number of property tracts crossed by or having a habitable structure within 300 feet of the center line of a proposed line segment that is included in Route Z. If not admitted, please provide the basis of the non-admission.
63. Please refer to the CPS Energy application as amended. Admit that the differences in the proposed location of Route Z compared to Route Z1 are the line placement modifications on the properties of Toutant Ranch, Ltd., ASR Parks, LLC, Pinson Interests Ltd LLP, and Crighton Development Co. If not admitted, please provide the basis of the non-admission.