



Control Number: 51023



Item Number: 734

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In re Application of the City of San Antonio,  
Acting By and Through the City Public Service  
Board (CPS Energy) To Amend its Certificate  
of Convenience and Necessity for the Proposed  
Scenic Loop 138-kV Transmission Line Project  
in Bexar County, Texas

Docket Number: 51023

SOAH Docket No. 473-21-0247

PATRICK CLEVELAND'S  
THIRD REQUEST FOR INFORMATION TO  
CPS ENERGY RE: LISA B. MEAUX  
REBUTTAL TESTIMONY

I, Patrick Cleveland, pursuant to 16 Tex. Admin. Code § 22.144 and the parties' agreements made at the prehearing conference, respectfully request that CPS Energy provide, on or before, April 28, 2021, the information requested in this Request for Information.

### Instructions

- a. Each request herein extends to any documents or information in your possession and the possession of any of the attorneys or law firms that purport to represent you in this case.
- b. The requests shall be deemed continuing so as to require additional answers if, after answering such requests, you obtain information upon the basis of which you determine that the answer was incorrect when made, or you become aware that the answer, though correct when made, is no longer true, and the circumstances are such that failure to amend the answer is in substance a knowing concealment.
- c. As part of the response to each request for information, please state, at the bottom of the answer, the name and job position of each person who substantively participated in the preparation of the response. Please also state the name of the witness in this docket who will sponsor the answer to the request and may verify the truth of the response.

1 **Request for Information**

2  
3 1. Please list all publications authored by Lisa B. Meaux involving the subject of hunting and  
4 provide copies of such publications or URL information.

5  
6 2. Please list all organizations or affiliations involving the subject of hunting in which Lisa B.  
7 Meaux is a member and provide copies of any membership cards (personal information  
8 redacted).

9  
10 3. Please state whether Lisa B. Meaux is or ever has been a professional hunter, and if so, the  
11 dates and locations.

12 4. Please state whether Lisa B. Meaux has ever professionally guided other hunters for payment,  
13 and if so, the dates and locations.

14  
15 5. Please state whether Lisa B. Meaux is licensed to hunt in Texas for the 2020-2021 season and  
16 provide a copy of such license (personal information redacted).

17  
18 6. Please state each year that Lisa B. Meaux has been licensed to hunt in any state or country and  
19 the type of game allowed to hunt.

20  
21 7. Please state whether Lisa B. Meaux has ever testified as an expert with respect to hunting  
22 strategies and techniques, and if so, the case names or other identifying information and dates.

23  
24 8. Please list any formal training or certificates that Lisa B. Meaux has in hunting and if so,  
25 provide copies.

26  
27 9. Please state whether Lisa B. Meaux has ever hunted in an electrical transmission line right of  
28 way, and if so, the dates and locations (GPS coordinates) and type of game hunted and killed.

1 Respectfully submitted this 13<sup>th</sup> day of April, 2021.

3 /Patrick Cleveland/

4  
5 Patrick Cleveland  
6 State Bar #24101630  
7 High Country Ranch  
8 26332 Willoughby Way  
9 Boerne, TX 78006  
10 T. 908-644-8372  
11 Email: pjb主@gvtc.com

12  
13  
14  
15  
16 CERTIFICATE OF SERVICE

17  
18 I certify that notice of the filing of this document was provided to all parties of record via  
19 electronic mail on April 13, 2021, in accordance with the Order Suspending Rules, issued in  
20 Project No. 50664.

21  
22  
23 /Patrick Cleveland/

24  
25 Patrick Cleveland