



Control Number: 51023



Item Number: 737

Addendum StartPage: 0

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THE TEXAS STATE OFFICE OF ADMINISTRATIVE HEARINGS
2021 APR 14 PM 2:07

PUBLIC UTILITY COMMISSION
FRONTIER

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
FIRST REQUEST FOR INFORMATION TO
SAVE HUNTRESS LANE ASSOCIATION
RE: SHLA 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 Save Huntress Lane Association (hereinafter SHLA) provide, on or before, April 28, 2021, the information requested in this Request for Information, which is based on rebuttal testimony in PUC Document Filing Number 51023-672 referring to the existence of recreational areas in the SHLA area.

Definitions

- a. "Parks and Recreational areas" means areas owned by a governmental body or an organized group, club, or church where recreational activities take place.

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. Information includes the knowledge of any such person as well.
- 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

737

1 correct when made, is no longer true, and the circumstances are such that failure to
2 amend the answer is in substance a knowing concealment.

- 3 c. As part of the response to each request for information, please state, at the bottom of the
4 answer, the name and job position of each person who substantively participated in the
5 preparation of the response. Please also state the name of the witness in this docket who
6 will sponsor the answer to the request and may verify the truth of the response.

7
8 **Request for Information**

- 9
10 1. Please provide and identify all parks and recreational areas in the SHLA area, including:
11 a. location (identified on a map or by GPS coordinates)
12 b. acreage
13 c. name and address of owner
14 d. types of recreational activities conducted within such areas
15 e. the approximate times when used (either daily, weekly, monthly, yearly or more)
16 f. copies of any covenants, bylaws, or rules pertaining to the recreational areas
17 g. structures or buildings used for recreation within the recreational areas
18 h. whether the recreational areas are commonly enjoyed and if so, provide the names and
19 addresses of each person who is authorized to use each recreational area.

20 Respectfully submitted this 14th day of April, 2021.

21
22 /Patrick Cleveland/

23
24 Patrick Cleveland
25 State Bar #24101630
26 High Country Ranch
27 26332 Willoughby Way
28 Boerne, TX 78006
T. 908-644-8372
Email: pjb主@gvtc.com

PATRICK CLEVELAND: REQUEST FOR INFORMATION TO SHLA RE: SHLA REBUTTAL TESTIMONY -

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CERTIFICATE OF SERVICE

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on April 14, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/Patrick Cleveland/

Patrick Cleveland