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SOAH DOCKET NO. 473-21-0247
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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 § BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS §

OBJECTIONS OF ANAQUA SPRINGS HOMEOWNERS' ASSOCIATION TO SAVE HUNTRESS LANE AREA ASSOCIATION'S FIRST REQUEST FOR INFORMATION

Anaqua Springs Homeowners' Association ("Anaqua Springs HOA") received Save Huntress Lane Area Association's ("SHLAA") First Set of Requests for Information ("RFI") on April 5, 2021. Counsel for Anaqua Springs HOA and SHLAA have negotiated diligently and in good faith but were unable to reach agreement concerning the objections below. The deadline for objections to be filed is April 15, 2021; therefore, these objections are timely filed.

Anaqua Springs HOA objects to RFI numbers 1-1, 1-2, 1-3, 1-5, and 1-7 on the basis of relevance. Each of these RFIs pose questions regarding testimony and evidence in another, unrelated docket. Like any CCN proceeding, each docket has its own set of facts and contested issues, and testimony presented in one is not relevant in another, unrelated proceeding. Subject to the relevance objection, Anaqua Springs HOA has provided answers to SHLAA's RFIs.

Pursuant to 16 Tex. Admin. Code § 22.144, counsel for Anaqua Springs HOA and SHLAA negotiated diligently and in good faith prior to filing these objections but were unable to resolve the dispute.

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Respectfully submitted,

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**ATTORNEYS FOR ANAQUA SPRINGS
HOMEOWNERS' ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been filed with the Commission and served on all other parties via the PUC Interchange on this 14th day of April 2021, pursuant to SOAH Order No. 3 issued in this docket.

Way K. Harvel
Wendy K.L. Harvel