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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

BEXAR RANCH, L.P.'S FIRST REQUESTS FOR INFORMATION AND FOR ADMISSIONS TO CPS ENERGY

BEXAR RANCH, L.P., hereby requests that the CPS ENERGY respond to the following First Requests for Information and for Admissions and that in doing so, stipulate in writing that all responses can be treated exactly as though filed under oath.

FIRST REQUESTS FOR INFORMATION AND FOR ADMISSIONS

Bexar Ranch Question No. 1-1:

On page 6 of the rebuttal testimony of Mr. Adam R. Marin, P.E., on behalf of CPS Energy, Mr. Marin states, "other alternative routes comprised solely of segments included in the CPS Energy application (as amended) are viable route alternatives." Given this testimony, and considering an alternative route named "Route Z-2" consisting of the following combination of segments included in the CPS Energy application (as amended), **Substation 7-54-20-36-42a-46-46b**, please answer the following:

- a. Admit or deny that Route Z-2 would be a viable route alternative.
- b. Admit or deny that Route Z-2 would be a constructible route alternative.
- c. Please provide updated versions of the following for Route Z-2: (a) Attachment 3 to the Amended Application; and (b) Attachment 1 to the Amended Application, Table 4-1, Environmental and Land Use Data for Route Evaluation ("Table 4-1").

Bexar Ranch Question No. 1-2:

Understanding that CPS Energy assumed a 100-foot right of way for all segments for purposes of notice and for collecting and reporting data for Table 4-1, how does Table 4-1 change, if at all, if a 75-foot right of way is used instead for Z-1 and Z-2? For purposes of this question, CPS Energy should use a 75-foot right of way only for those areas where its cost estimates also used a 75-foot right of way.

Bexar Ranch Question No. 1-3:

Assuming a 100-foot right of way for its entire length, what is CPS Energy's "Estimated Total Cost" for each of the following routes:

- a. Route Z-1 and
- b. Route Z-2.

Respectfully submitted,

SPIVEY VALENCIANO, PLLC
McAllister Plaza – Suite 130
9601 McAllister Freeway
San Antonio, Texas 78216
Telephone: (210) 787-4654
Facsimile: (210) 201-8178

By: 

James K. Spivey
jkspivey@svtxlaw.com
State Bar No. 00794680
Soledad M. Valenciano
State Bar No. 24056463
svalenciano@svtxlaw.com

ATTORNEYS FOR BEXAR RANCH, L.P.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed in the records of Docket 51023 on this 14th day of April, 2021.


Soledad M. Valenciano