



Control Number: 51023



Item Number: 744

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

APPLICATION OF THE CITY OF	§	STATE OFFICE OF ADMINISTRATIVE
SAN ANTONIO TO AMEND ITS	§	HEARINGS
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE SCENIC	§	ON REFERRAL FROM THE
LOOP 138-KV TRANSMISSION LINE	§	PUBLIC UTILITY COMMISSION
IN BEXAR COUNTY, TEXAS	§	OF TEXAS

**CORRECTED FIRST REQUEST FOR INFORMATION
BY SAVE HUNTRESS LANE AREA ASSOCIATION
TO CPS ENERGY**

Save Huntress Lane Area Association (“SHLAA”), an intervenor, pursuant to 16 Tex. Admin. Code §§ 22.141 and 22.144, requests that the City of San Antonio (“CPS Energy”) 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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Clark Hill PLC
720 Brazos St. Suite 700, Austin, TX 78701

ATTORNEYS FOR SHLAA

Certificate of Service: I certify I served the foregoing under SOAH Order No. 3 on Apr. 14, 2021.

/s/ Thomas K Anson
Thomas K. Anson

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1. With regard to the Rebuttal Testimony of Ms. Lisa B. Meaux on p. 5 regarding proximity of a transmission line to habitable structures, please refer to Appendix C to the Amended Environmental Assessment, available at <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/00%20Amendment%20Attachments.pdf>, Table 4-21 (Habitable Structures and Other Land Use Features in the Vicinity of the Primary Alternative Route P). With regard to the Single Family Residence type of structure or feature for Primary Alternative Route P as listed in said amended Table 4-21:
 - a. Admit that: (i) the total number of Single Family Residences is 12; (ii) the total number of Single Family Residences with an Approximate Distance from Route Centerline (feet) less than 200 feet is 6; (iii) the total number of Single Family Residences with an Approximate Distance from Route Centerline (feet) less than 100 feet is 1; and (iv) the arithmetic average of the Approximate Distance from Route Centerline (feet) for Single Family Residences is 191. If not admitted, please provide the basis of the non-admission and provide the numbers that CPS Energy calculates as the correct numbers based upon said amended Table 4-21.
2. With regard to the Rebuttal Testimony of Ms. Lisa B. Meaux on p. 5 regarding proximity of a transmission line to habitable structures, please refer to Appendix C to the Amended Environmental Assessment, available at <https://www.cpsenergy.com/content/dam/corporate/en/Documents/Infrastructure/ScenicLoop/00%20Amendment%20Attachments.pdf>, Table 4-31 (Habitable Structures and Other Land Use Features in the Vicinity of the Primary Alternative Route Z1). With regard to the Single Family Residence type of structure or feature for Primary Alternative Route Z1 as listed in said amended Table 4-31:
 - a. Admit that: (i) the total number of Single Family Residences is 29; (ii) the total number of Single Family Residences with an Approximate Distance from Route Centerline (feet) less than 200 feet is 7; (iii) the total number of Single Family Residences with an Approximate Distance from Route Centerline (feet) less than 100 feet is 1; and (iv) the arithmetic average of the Approximate Distance from Route Centerline (feet) for Single Family Residences is 219. If not admitted, please provide the basis of the non-admission and provide the numbers that CPS Energy calculates as the correct numbers based upon said amended Table 4-21.
3. Please refer to the responses to the foregoing Questions 1 and 2. Admit that:

- a. On average, Route Z1 is farther from the Single Family Residences listed in Appendix C to the Amended Environmental Assessment Table 4-31 than is Route P to the Single Family Residences listed in Appendix C to the Amended Environmental Assessment Table 4-31. If not admitted, please provide the basis of the non-admission.
- b. On average, Route Z1 is farther from the Single Family Residences listed in Appendix C to the Amended Environmental Assessment Table 4-31 by 28 feet than is Route P to the Single Family Residences listed in Appendix C to the Amended Environmental Assessment Table 4-31. If not admitted, please provide the basis of the non-admission and provide the number that CPS Energy calculates as the correct number based upon said amended Tables 4-21 and 4-31.
- c. On average, Route Z1 is farther from the Single Family Residences listed in Appendix C to the Amended Environmental Assessment Table 4-31 by approximately 15% than is Route P to the Single Family Residences listed in Appendix C to the Amended Environmental Assessment Table 4-31. If not admitted, please provide the basis of the non-admission and provide the percentage number that CPS Energy calculates as the correct number based upon said amended Tables 4-21 and 4-31.