



Control Number: 51023



Item Number: 754

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0247

PUC DOCKET NO. 51023

2021 APR 22 AM 10:59

APPLICATION OF THE CITY OF	§	BEFORE THE STATE OFFICE
SAN ANTONIO TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	OF
AND NECESSITY FOR THE	§	
SCENIC LOOP 138-KV TRANSMISSION	§	ADMINISTRATIVE HEARINGS
LINE IN BEXAR COUNTY	§	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Response to Patrick Cleveland’s Third Request for Information (RFI). This Response is timely filed. CPS Energy agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,

/s/ Kirk D. Rasmussen

Kirk D. Rasmussen  
 State Bar No. 24013374  
 Craig R. Bennett  
 State Bar No. 00793325  
 Jackson Walker LLP  
 100 Congress Avenue, Suite 1100  
 Austin, Texas 78701  
 (512) 236-2000  
 (512) 691-4427 (fax)  
 Email: kasmussen@jw.com  
 Email: cbennett@jw.com

**ATTORNEYS FOR CPS ENERGY**

754

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served on all parties of record on this date via the Commission's Interchange in accordance with SOAH Order No. 3.

/s/ Kirk D. Rasmussen  
Kirk D. Rasmussen

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-1:

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

Response No. 3-1:

There are no documents responsive to this request.

Prepared By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.  
Sponsored By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-2:

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

Response No. 3-2:

Ms. Lisa Meaux is not a member of any organizations or affiliations involving the subject of hunting. There are no documents responsive to this request.

Prepared By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.  
Sponsored By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-3:

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

Response No. 3-3:

Ms. Lisa Meaux is not now and has never been a “professional hunter.”

Prepared By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.  
Sponsored By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-4:

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

Response No. 3-4:

Ms. Lisa Meaux has never professionally guided other hunters for payment. There is no additional information responsive to this request.

Prepared By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.  
Sponsored By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-5:

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

Response No. 3-5:

Ms. Lisa Meaux is not licensed to hunt in Texas for the 2020-2021 season. There are no documents responsive to this request.

Prepared By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.
Sponsored By: Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-6:

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

Response No. 3-6:

Ms. Lisa Meaux has never been licensed to hunt in Texas or another state in the United States of America.

Prepared By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.  
Sponsored By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-7:

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

Response No. 3-7:

Ms. Lisa Meaux has never testified as an expert with respect to “hunting strategies and techniques.” Ms. Meaux has offered testimony in over 20 dockets before the Public Utility Commission of Texas regarding the impacts of electric transmission facilities on environmental integrity, including wildlife and hunting. In accordance with Texas Rules of Evidence 702 and 703, Ms. Meaux is an expert qualified by knowledge, skill, experience, training, and education to provide opinion testimony based on inadmissible hearsay.

Prepared By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.  
Sponsored By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY’S RESPONSE TO PATRICK CLEVELAND’S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-8:

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

Response No. 3-8:

Ms. Lisa Meaux does not have any formal training or certificates in “hunting.” See CPS Energy’s response to Patrick Cleveland Question No. 3-7. There are no documents responsive to this request.

Prepared By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.  
Sponsored By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.

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

<b>APPLICATION OF THE CITY OF</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>SAN ANTONIO TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF</b>
<b>AND NECESSITY FOR THE</b>	<b>§</b>	
<b>SCENIC LOOP 138-KV TRANSMISSION</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>LINE IN BEXAR COUNTY</b>	<b>§</b>	

**CPS ENERGY'S RESPONSE TO PATRICK CLEVELAND'S  
THIRD REQUEST FOR INFORMATION TO CPS ENERGY**

Patrick Cleveland Question No. 3-9:

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

Response No. 3-9:

Ms. Lisa Meaux has never hunted in an electrical transmission line right of way. See CPS Energy's response to Patrick Cleveland Question No. 3-7.

Prepared By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.  
Sponsored By: Lisa B. Meaux      Title: Project Manager, POWER Engineers, Inc.