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APPL. OF THE CITY OF SAN ANTONIO §
TO AMEND ITS [CCN] FOR THE §
SCENIC LOOP 138-KV TRANS. LINE IN §
BEXAR COUNTY, TX §

STATE OFFICE OF
ADMINISTRATIVE HEARINGS

THIRD SUPPLEMENTAL RESPONSE
TO THE BRAD JAUER AND BVJ PROPERTIES, L.L.C.
FIRST RFI TO SAVE HUNTRESS LANE AREA ASSOCIATION

Save Huntress Lane Area Association (“SHLAA”), an intervenor, submits this Third Supplemental Response to the First Request for Information (“RFI”) from Brad Jauer and BVJ Properties, L.L.C. (“Jauer”). Attached hereto and incorporated herein by reference is the written supplemental response thereto.

It is hereby stipulated that the supplemental response may be treated by all parties as if filed under oath. As stated in the prehearing conference, the admissibility of this supplemental response will not be objected to if offered in the course of the hearing on the merits.

Respectfully submitted,

By: /s/ Thomas K Anson
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ATTORNEYS FOR SHLAA

Certificate of Service: I certify I served the foregoing under SOAH Order No. 3 on May 2, 2021.

/s/ Thomas K Anson
Thomas K. Anson

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JAUER-1-12 On page 8 of his testimony, Harold Hughes states that he “met with affected SHLAA landowners and discussed specific impacts to their properties”. Please produce the specific names and addresses of the SHLAA landowners with whom Mr. Hughes met and impacts that he found (both generally and relative to each landowner’s property, specifically).

Response: Mr. Hughes generally visited the entire CPS Energy study area, including the publicly accessible areas where all the proposed routes would parallel or from which they would be potentially visible, and all of the proposed substation sites. He was on the private property of the SHLAA members with whom he briefly met as he visited the SHLAA area.

Those included all of the members of the leadership group for SHLAA identified in response to JAUER 1-11. It also included Randy Davila, located at 10330 Huntress Lane.

The impacts he found generally and relative to a landowner’s property are described in his direct testimony, as well as in the direct testimony of Cynthia Grimes, David Clark, and Jerry Rumpf of which he was aware and which he did not repeat in his testimony.

Supplemental Response: The original response to the foregoing RFI, Question 1-12, which referenced in the middle paragraph all members of the leadership group identified in response to Question 1-11, is not correct. Mr. David Clark and Mr. Jason J. Thompson, listed in the response to JAUER 1-11, were not individuals that should have been identified in response to Question 1-12, and Question 1-12 instead should have listed Mr. Jason Schuchardt, Project Manager at the Canyons. The Project Manager’s address is Canyons POA, 23906 Carina Canyon, San Antonio, TX 78255.

Prepared By: Counsel
Sponsoring Witness: Harold L. Hughes, Jr., P.E. (and David Clark regarding supplementation)