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

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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

**TOUTANT RANCH, LTD., ASR PARKS, LLC, PINSON INTERESTS LTD. LLP,  
AND CRIGHTON DEVELOPMENT CO.'S RESPONSES TO THE CITY OF SAN  
ANTONIO'S, ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD  
(CPS ENERGY'S) FIRST SET OF REQUESTS FOR INFORMATION**

Toutant Ranch, Ltd., Pinson Interests Ltd. LLP, ASR Parks, LLC, and Crighton Development Co. (the "Companies") file the following agreed responses to the First Set of Requests for Information ("RFIs") to Companies filed by the City of San Antonio, acting by and through the City Public Service Board ("CPS Energy"). Pursuant to 16 T.A.C. § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

51023

Respectfully submitted,

THOMPSON & KNIGHT LLP

*/s/ Michael McMillin*

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**ATTORNEYS FOR TOUTANT RANCH, LTD.,  
ASR PARKS, LLC, PINSON INTERESTS LTD.  
LLP AND CRIGHTON DEVELOPMENT CO.**

**CERTIFICATE OF SERVICE**

I, Michael McMillin, Attorney for Toutant Ranch, Ltd., ASR Parks, LLC, Pinson Interests Ltd. LLP, and Crighton Development Co., hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 5<sup>th</sup> day of May, 2021 by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.

*/s/ Michael McMillin*

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Michael McMillin

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**RFI 1-1** Mr. Dreiss, do you or development companies that you own, control, or have a significant interest in, own or control the properties crossed by Segments 42a and 46a, most of Segment 46, and portions of Segments 49a and 46b?

**RESPONSE:**

Yes. For clarity, those properties are marked as "Pinson Interest/Crighton Development" or "Toutant Ranch" on CPS Exhibit 16.

**Preparer:** Tom Dreiss/Counsel  
**Sponsor:** Tom Dreiss

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**RFI 1-2** Taking Route AA1 as an example, would you agree the length of that route would cross approximately 2 miles of property that you or the companies in which you have an interest, own or control?

**RESPONSE:**

Yes.

**Preparer:** Tom Dreiss/Counsel  
**Sponsor:** Tom Dreiss

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**RFI 1-3** From a business perspective, was it better for your subdivision developments to donate 2,059 feet of right of way in the area now designated for a portion of Segment 42a in the spring of 2020 than the routing options presented by CPS Energy at the Open House meeting across the subdivision developments?

**RESPONSE:**

Yes, as discussed in my direct testimony.

**Preparer:** Tom Dreiss/Counsel  
**Sponsor:** Tom Dreiss

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**RFI 1-4** From a business perspective, was it better for your subdivision developments to enter into an agreement with CPS Energy in November 2020 to present the Administrative Law Judges with requested changes to all or portions of Segments 46, 48, and 49 compared to how those segments were filed with CPS Energy's original application in July 2020?

**RESPONSE:**

Yes, as discussed in my direct testimony.

**Preparer: Tom Dreiss/Counsel**  
**Sponsor: Tom Dreiss**

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**RFI 1-5** From a business perspective, have your subdivision developments benefited from the agreements that you reached in the spring and fall of 2020 with CPS Energy?

**RESPONSE:**

Yes, as discussed in my direct testimony.

**Preparer:** Tom Dreiss/Counsel  
**Sponsor:** Tom Dreiss



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**RFI 1-6** To clarify your answer on pages 5 and 6 of your direct testimony, it was you and your business partner that reached out to CPS Energy and arranged to meet with CPS Energy to discuss the settlements that were reached in this case. is that right?

**RESPONSE:**

Yes.

**Preparer:** Tom Dreiss/Counsel  
**Sponsor:** Tom Dreiss