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**SOAH DOCKET NO. 473-25-02531
PUC DOCKET NO. 57115**

JOINT APPLICATION OF THE CITY	§	BEFORE THE STATE OFFICE
OF SAN ANTONIO, ACTING BY AND	§	
THROUGH THE CITY PUBLIC	§	OF
SERVICE BOARD (CPS ENERGY),	§	
AND SOUTH TEXAS ELECTRIC	§	ADMINISTRATIVE HEARINGS
COOPERATIVE, INC. (STEC) TO	§	
AMEND THEIR CERTIFICATES OF	§	
CONVENIENCE AND NECESSITY	§	
FOR THE PROPOSED HOWARD	§	
ROAD-TO-SAN MIGUEL 345-KV	§	
TRANSMISSION LINE IN BEXAR	§	
AND ATASCOSA COUNTIES	§	

**FRANK ALLEN RANCH, LLC’S FIRST REQUEST FOR INFORMATION FROM
JOINT APPLICANTS CPS ENERGY AND SOUTH TEXAS ELECTRIC
COOPERATIVE, INC.**

Pursuant to Sections 22.141 and 22.144 of the Public Utility Commission’s Procedural Rules, Frank Allen Ranch, LLC (“Frank Allen Ranch”) requests that Joint Applicants CPS Energy and South Texas Electric Cooperative, Inc. (“CPS & STEC”) provide responses to the following Requests for Information (“RFI”) and stipulate in writing that all responses can be treated exactly as though they were filed under oath. Under Section 22.144(c)(1), CPS & STEC must fully respond to these RFIs within ten (20) days of receipt of the Requests. If any RFI appears ambiguous, please contact counsel for Frank Allen Ranch to obtain clarification.

Pursuant to P.U.C. PROC. R. § 22.144(c), each response must identify the preparer or person under whose direct supervision the response was prepared, and the sponsoring witnesses, if any. In addition, each request must be answered separately and be preceded with the appropriate question.

Pursuant to P.U.C. PROC. R. § 22.144(i), CPS & STEC are under a duty to supplement any response that, in light of newly discovered information, modifies or makes incomplete an

answer already supplied to Frank Allen Ranch within five (5) days of the discovery of the new information.

The answers must have sufficient detail to fully present all the relevant facts. Frank Allen Ranch requests that CPS & STEC provide the answers in the order in which they are listed in this request for information. If responses to all the requests cannot be provided quickly, Frank Allen Ranch requests that each item of information be provided as it is available or completed.

Unless written requests for clarification are received by the undersigned, it shall be presumed that all requests are fully and completely understood.

If the items requested to be produced herein have already been provided in other discovery answers to any party, it shall not be necessary to duplicate such production. It shall be sufficient that the answer containing the requested information is clearly identified. Where only a portion of the requested information has been previously provided, this shall be disclosed and all information necessary to fully and completely answer this discovery request shall be provided in your answer.

If the requested document is found in the public records of the PUC or other governmental agency, the answering party shall describe the exact location, file name, and custodian from whom the specific referenced document can be obtained.

DEFINITIONS

1. “Applicant,” “you,” “the utility,” “CPS & STEC” refers to the City of San Antonio, acting by and through the City Public Service Board (“CPS”) and South Texas Electric Cooperative, Inc. (“STEC”) and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

2. “Application” means the Joint Application by Applicants CPS & STEC to amend their certificates of convenience and necessity for the proposed Howard Road-to-San Miguel 345-kV Transmission Line in Bexar and Atascosa Counties Texas, docketed as SOAH Docket No. 473-25-02531, PUC Docket No. 57115.

3. “Communication” means any oral, written, or electronic statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, or symposium of which CPS & STEC has knowledge, information or belief.

4. “Concerning” means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting embodying, mentioning, or constituting the subject matter identified in the request.

5. “Date” means the exact day, month, and year, if ascertainable or, if not, the best approximation.

6. “Describe” or “identify” when used in reference to a document, means you must state, to the fullest extent possible, the following:

- a. The nature (e.g. letter, handwritten note) of the document;
- b. The title or heading that appears on the document;
- c. The date of the document and the date of each addendum, supplement, or other addition or change;
- d. The identity of the author of the document; any signatory or signatories of the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and
- e. The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.

7. The terms “document” or “documents” are used in their broadest sense to include, but not be limited to, all written or graphic matter of every kind and description whether printed, produced, or reproduced, by any process whether visually, magnetically, mechanically, electronically, or by hand, whether final or draft, original or reproduction, whether privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody or control. These shall also be construed to include every copy of a document where the

copy contains any commentary or notation of any kinds that does not appear on the original or any other copy.

8. The words “link” and “segment” reference the individually numbered/lettered portions of the preferred and alternative routes described in the Application.

9. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

10. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

11. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

12. The term “including” means “including, but not limited to.”

Respectfully submitted,

BRAUN & GRESHAM, PLLC

P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
14101 Hwy. 290 W., Bldg. 1300 (Physical)
Austin, Texas 78737
512-894-5426 (telephone)
512-894-3405 (fax)

/s/Patrick L. Reznik

Patrick L. Reznik
State Bar No. 16806780
preznik@braungresham.com
Carly Barton
State Bar No. 24086063
cbarton@braungresham.com

**ATTORNEYS FOR FRANK ALLEN
RANCH, LLC**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties and counsel of record on October 8, 2024, in accordance with PUC Procedural Rule 22.74 and Orders issued in Docket No. 57115.

/s/ Patrick L. Reznik

Patrick L. Reznik

FRANK ALLEN RANCH, LLC'S FIRST REQUESTS FOR INFORMATION

Frank Allen Ranch RFI No. 1-1. Please provide a complete electronic copy of the Geographical Information System ("GIS") Shapefiles/Geodatabase you used to perform analysis to create the Environmental Assessment and Alternative Route Analysis filed with the Application as Attachment 1. Please do not remove, delete, or hide any additional information or data in these files.

Response:

Frank Allen Ranch RFI No. 1-2. Please provide a Google Earth .kmz file that has the segments, segment labels, routes, habitable structures, and substation locations of the proposed project. Please do not remove, delete, or hide any additional information or data in these files.

Response:

Frank Allen Ranch RFI No. 1-3. Please provide all workpapers, in complete electronic format, with all formulas and links intact, that support the cost estimates for each link and route as presented in your Application.

Response:

Frank Allen Ranch RFI No. 1-4. Please provide, in electronic format, the type (e.g., tangent, angle, dead-end, etc. for steel monopole, h-frame, lattice, etc. type construction) of structures used on each route and the quantity of each structure type used on your proposed routes. Also, for each structure type provided, please provide a cost estimate of a single structure.

Response:

Frank Allen Ranch RFI No. 1-5. Explain and describe your process for preparing the cost estimates. As part of your response, state whether you developed the cost estimates using a "top down" method where average lengths per mile are computed and multiplied by the different lengths or using a "bottom up" method where detailed estimates were made for costs such as labor, material, interest, engineering, and right-of-way costs?

Response:

Frank Allen Ranch RFI No. 1-6. Did you adjust the cost estimates for the different routes for known factors, such as road crossings, that may cause increases in costs? If so, identify the conditions that you expect may or will cause cost increases and state how much you estimate each condition may or will increase costs.

Response:

Frank Allen Ranch RFI No. 1-7. Please provide Tables 4-1 and 4-2 of Environmental Assessment and Alternative Route Analysis filed with the Application as Attachment 1, in Microsoft Excel format with all formulas and links intact.

Response: