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SOAH DOCKET NO. 473-04-8361  
PUC DOCKET NO. 29705

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PUBLIC UTILITY COMMISSION  
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APPLICATION OF SAM HOUSTON	§	
ELECTRIC COOPERATIVE, INC., FOR	§	BEFORE THE PUBLIC
A CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR A PROPOSED	§	UTILITY COMMISSION
TRANSMISSION LINE IN SAN	§	
JACINTO COUNTY, TEXAS	§	OF TEXAS

OBJECTIONS OF GEORGE RUSSELL TO SHECO's FIRST  
REQUESTS FOR INFORMATION

COMES NOW George Russell and makes this response to three RFIs as to which an objection was originally raised by Russell and as to which Judge Broyles granted SHECO's motion to compel to three of the RFIs propounded of him by SHECO in its first information requests of him. The information requests and the grounds for objection are as follows. These answers may be used as though sworn.

RFI 15.

At the time that the first individual was buried in the Ethician Family Cemetery, were you aware of the existing easements across the property?

Answer:

I was aware of a 20-foot distribution and transmission line easement and a 40-foot trim easement, but I was not aware of any others.

Sponsored by George Russell.

RFI 16:

At the time that the first individual was buried in the Ethician Family Cemetery, were you aware of the planned location of Sam Houston's transmission line across the property?

Answer:

I was aware the lines would be in the 20-foot transmission and distribution easement. I was not aware, and still am not aware, that the lines would invade the trim easement.

Sponsored by George Russell.

RFI 21:

Is it your intention to bury more individuals on property over which Sam Houston's proposed transmission line will cross?

Answer:

I have no present intention to bury any individuals in the 20-foot transmission and distribution easement. I have not allowed any to be buried there, yet. I generally do not select the grave sites, but, rather, the prospective deceased selects the site. As you know, we disagree as to SHECO's rights in the 40-foot trim easement, but I do not have any present intention to select sites – to the extent I ever select sites – in that easement, either.

Sponsored by George Russell.

Sincerely,

A handwritten signature in black ink, appearing to read "David Frederick", written over the printed name.

David Frederick

State Bar No. 07412300

Lowerre & Frederick

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COUNSEL FOR George Russell