



Control Number: 37448



Item Number: 167

Addendum StartPage: 0

SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448

RECEIVED  
09 NOV 25 PM 2:18  
PUBLIC UTILITY COMMISSION  
FILING CLERK

APPLICATION OF LCRA § PUBLIC UTILITY COMMISSION  
TRANSMISSION SERVICES §  
CORPORATION TO AMEND ITS §  
CERTIFICATE OF CONVENIENCE § OF TEXAS  
AND NECESSITY FOR THE §  
GILLESPIE TO NEWTON 345-KV §  
CREZ TRANSMISSION LINE IN §  
GILLESPIE, LLANO, SAN SABA, §  
BURNET, AND LAMPASAS §  
COUNTIES, TEXAS §

**CITY OF GARLAND'S RESPONSES TO COMMISSION STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION TO ALL INTERVENORS**

To: Commission Staff, by and through its attorney of record, Scottie C. Aplin, Attorney-Legal Division, Public Utility Commission of Texas, P. O. Box 13326, Austin, Texas 78711-3326.

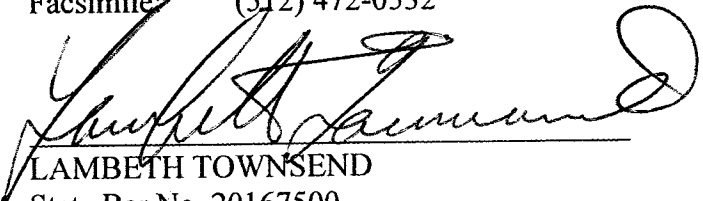
City of Garland ("Garland") files its Responses to Commission Staff's ("Staff") First Set of Requests for Information to All Intervenors. This response may be treated by all parties as if it were filed under oath. This response is timely filed.

Respectfully submitted,

BRAD NEIGHBOR  
State Bar No. 14869300  
City Attorney  
CITY OF GARLAND  
200 North 5th Street, Suite 416  
Garland, Texas 75040  
Telephone: (972) 205-2380  
Facsimile: (972) 205-2389

ATTORNEY FOR THE  
CITY OF GARLAND

LLOYD GOSSELINK  
ROCHELLE & TOWNSEND, P.C.  
816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
Telephone: (512) 322-5830  
Facsimile: (512) 472-0532

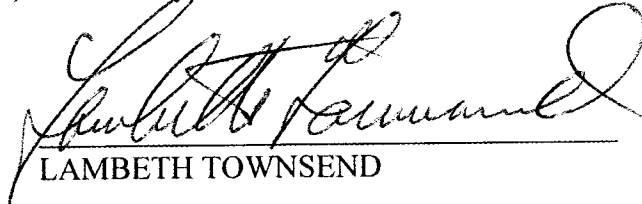
  
LAMBETH TOWNSEND  
State Bar No. 20167500

JOYCE BEASLEY  
State Bar No. 01987300

ATTORNEYS FOR THE CITY OF GARLAND

**CERTIFICATE OF SERVICE**

I, Lambeth Townsend, attorney, certify that a copy of this document was served on all parties of record in this proceeding on this 25th day of November, 2009, in the following manner: hand delivered, sent via facsimile, or mailed by U.S. First Class Mail.

  
LAMBETH TOWNSEND

**SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448**

**GARLAND'S RESPONSES TO STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION**

**BA-1-1      Do you have a habitable structure (According to Subst. Rule 25.101, a habitable structure is a structure that is normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis.) near one or more of the links of the proposed transmission line? If so, describe the structure, identify the link(s) and estimate how far the proposed line is from the habitable structure?**

**RESPONSE:** No.

Prepared by: Joyce Beasley  
Sponsored by: To be determined

**SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448**

**GARLAND'S RESPONSES TO STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION**

**BA-1-2** Will one or more of the links of the proposed transmission line cross your property? If so, identify the links and any features like a property line, pipeline, power line or road that the proposed transmission line will follow through your property.

**RESPONSE:** No.

**SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448**

**GARLAND'S RESPONSES TO STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION**

**BA-1-3      Have you discussed any modifications to the proposed transmission line route on your property with a representative of LCRA TSC? If so, what were the modifications to the proposed route that you suggested and what was the response of LCRA TSC?**

**RESPONSE:** No.

Prepared by: Joyce Beasley  
Sponsored by: To be determined

**SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448**

**GARLAND'S RESPONSES TO STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION**

**BA-1-4      What are your specific concerns about the proposed transmission line?**

**RESPONSE:** Garland contends that the Legislature's directive in PURA § 39.904(g)(2) to develop a transmission plan to serve the CREZs in a manner that is "most beneficial and cost-effective to the customers" applies to the route to be selected in this proceeding. Garland is also concerned about the cost of the transmission line and its impact on the wholesale transmission rate it is required to pay. In addition, Garland contends that this proceeding is the product of an invalid final order issued in Docket No. 35665, Commission Staff's Petition for the Selection of Entities Responsible for Transmission Improvements Necessary to Deliver Renewable Energy from Competitive Renewable Energy Zones. Therefore, no certificate of convenience and necessity should be granted in this proceeding.

Also see Garland's Motion to Intervene and Garland's Reply to Staff's and LCRA's Objections to Garland's Motion to Intervene.

Prepared by: Joyce Beasley  
Sponsored by: To be determined

**SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448**

**GARLAND'S RESPONSES TO STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION**

**BA-1-5      Did you attend any open houses presented by the utility concerning this proposed transmission line? If so, when and where? Did you provide written comments to LCRA TSC at or after the open house?**

**RESPONSE:** No.

Prepared by: Joyce Beasley  
Sponsored by: To be determined



**SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448**

**GARLAND'S RESPONSES TO STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION**

**BA-1-6      Are your property boundaries represented accurately on the maps provided by the utility? If not, please explain any discrepancies and provide a modified LCRA TSC map or drawing to indicate the discrepancies?**

**RESPONSE:** Not applicable.

Prepared by: Joyce Beasley  
Sponsored by: To be determined

**SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448**

**GARLAND'S RESPONSES TO STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION**

**BA-1-7      What is the primary use for your property and, in your opinion, will this use  
be impacted by the proposed transmission line?**

**RESPONSE:** Not applicable.

**SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448**

**GARLAND'S RESPONSES TO STAFF'S FIRST SET OF  
REQUESTS FOR INFORMATION**

**BA-1-9      In your opinion, is there any feature about your land that you believe should be considered when routing a transmission line on your property? If so, please explain.**

**RESPONSE:** Not applicable.