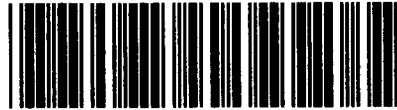




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**PUC DOCKET NO. 37448
SOAH DOCKET NO. 473-10-1097**

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

**CJ RANCH'S FIRST REQUEST FOR INFORMATION TO
LCRA**

TO: LCRA Transmission Services Corporation, by and through its attorney of record, Mr. Fernando Rodriguez, Associate General Counsel, LCRA Transmission Services Corporation, 3700 Lake Austin Blvd, Austin, Texas 78703.

Pursuant to the Texas Rules of Civil Procedure, the Texas Administrative Code, and the Procedural Rules of the Public Utility Commission, CJ Ranch, L.L.C. ("CJ Ranch"), an intervenor and party in the above-styled proceeding, submits this, its First Request for Information to LCRA Transmission Services Corporation. Responses to this set of RFIs should be served on counsel for CJ Ranch at the address below. The documents requested may be sent to CJ Ranch's counsel on disc or transmitted electronically via email.

INSTRUCTIONS AND DEFINITIONS

1. In those instances in which you refuse to respond to a request on the basis of privilege, please comply with the requirements of Texas Rule of Civil Procedure 193.3(a).
2. "You," "your," or "LCRA" means LCRA Transmission Services Corporation, its agents, representatives, and all other persons acting in concert with it, or under its control, whether directly or indirectly, including any attorney.
3. The "Case" means SOAH Docket No. 473-10-1097 / PUC Docket No. 37448, Application Of LCRA Transmission Services Corporation To Amend Its Certificate Of Convenience And Necessity for the Gillespie to Newton 345 kV CREZ Transmission Line In Gillespie, Llano, San Saba, Burnet and Lampasas Counties, Texas.

**CJ RANCH'S FIRST REQUEST FOR INFORMATION TO
LCRA TRANSMISSION SERVICES**

4. The "Application" means the Application of LCRA Transmission Services Corporation to Amend Its Certificate of Convenience and Necessity for the Gillespie to Newton 345 kV CREZ Transmission Line in Gillespie, Llano, San Saba, Burnet, and Lampasas Counties, Texas in the above referenced docket.
5. "Document" and "documents" shall be used in their broadest sense within the scope of discovery allowed under the Texas Rules of Civil Procedure and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, both originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, electronic mail, telegrams, telexes, messages, memoranda, records, books, summaries or other personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, visitor records, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, notices, marginal notations, notebooks, telephone bills or records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, files, printouts, compilations, tabulations, purchase orders, receipts, sell orders, confirmations, checks, canceled checks, letter of credit, envelopes or folders or similar containers, voucher analyses, studies, surveys, transcripts of hearings, transcripts of testimony, expense reports, microfilm, microfiche, articles, speeches, tape or disc recordings, sound recordings, video recordings, film, tapes, photographs, punch cards, programs, data compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made. The terms "document" and "documents" shall include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which to not contain any markings, additions, or deletions different from the original need not be separately produced. "Document" and "documents" means and includes all matter within the foregoing description that is in the possession, control or custody of Plaintiff or in the possession, custody or control of any attorney for Plaintiff. Without limiting the term "control," a document is deemed to be within your control if you have ownership, possession or custody of the document, or the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.
6. "Communication" means any contact or act by which any information or knowledge (in the form of facts, ideas, inquiries or otherwise) is transmitted or conveyed between or among two or more persons, including, without limitation, written contact by such means as letters, memoranda, telegrams, telexes, electronic mail, telefax, or any other documents, and/or all contact by such means as face-to-face meetings and telephone conversations.
7. For any information which exists in electronic form, CJ Ranch requests that you produce the responsive information in its native form (e.g., for all spreadsheets traditionally stored in Excel, please produce the Excel file in electronic form), unless otherwise indicated in the

individual Request. If production in native form is problematic or burdensome, please contact counsel for CJ Ranch to arrange for alternative forms of production. Unless otherwise indicated, production of emails in paper form is sufficient to satisfy CJ Ranch's requests.

CJ RANCH'S FIRST REQUEST FOR INFORMATION TO LCRA

1-1. Please produce a digital ESRI shape file with the coordinate system indicated of the most recent versions of the "Base Maps" referenced in response to question 17 of the Application, also identified as Figures 3-1a, 3-1b, and 3-1c, titled *Environmental and Land Use Constraints within the Study Area*.

1-2. Please produce any other digital ESRI shape files with the coordinate system indicated that depicts the preferred and alternative routes filed by LCRA in its Application.

1-3. If LCRA does not have possession, custody or control of any documents referenced in Requests 1-1 and 1-2, above, please produce in digital format, not pdf format, the most recent versions of the "Base Maps" referenced in response to question 17 of the Application, also identified as Figures 3-1a, 3-1b, and 3-1c, titled *Environmental and Land Use Constraints within the Study Area*.

Respectfully submitted,



William B. Steele, III
State Bar No. 19107400

LOCKE LORD BISSELL & LIDDELL, LLC
100 Congress Avenue, Suite 300
Austin, Texas 78701
Tel.: (512) 305-4734
Fax: (512) 305-4800

ATTORNEYS FOR CJ RANCH, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of December, 2009, a copy of the foregoing was served on the parties of record in at least one of the following manners: hand delivered, sent via facsimile, email transmission or mailed by First Class Mail.



William B. Steele III