



Control Number: 37448



Item Number: 292

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

**APPLICATION OF LCRA TRANSMIS-  
SION SERVICES CORPORATION TO  
AMEND ITS CERTIFICATE OF CON-  
VENIENCE AND NECESSITY FOR THE  
GILLESPIE TO NEWTON 345 KV CREZ  
TRANSMISSION LINE IN GILLESPIE,  
LLANO, SAN SABA, BURNET, AND  
LAMPASAS COUNTIES, TEXAS**

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**BEFORE THE  
STATE OFFICE OF ADMINISTRATIVE  
HEARINGS**

**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

COMES NOW LCRA Transmission Services Corporation (LCRA TSC) and files this, its Response to Gillespie Substation Intervenors' First Request for Information. Per an agreement with Gillespie Substation Intevenors' counsel of record, the following questions have been withdrawn: Questions 1-1 through 1-24, 1-28 through 1-37, 1-47 through 1-49, portions of questions 1-53 and 1-54 referring to "Segment ABC", 1-73 through 1-77, and subparts d and e of question 1-82. This Response is timely filed. LCRA TSC agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,

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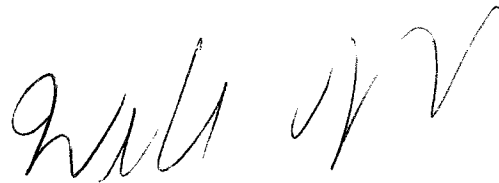
By: 

William T. Medaille

ATTORNEYS FOR LCRA TRANSMISSION  
SERVICES CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on the propounding party of record on this the 14<sup>th</sup> day of December 2009, by email, facsimile, First-Class U.S. mail, or by hand delivery.



William T. Medaille

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-25:**

Please state whether and on what date LCRA TSC and/or any affiliates or agents purchased the property identified as the extension or expansion of the Gillespie Substation in the aerial photograph attached as JWH-1 to Mr. Hicks' prefiled testimony. Please provide all documents concerning your answer.

**Response No. 1-25:**

LCRA TSC acquired a 4.49-acre parcel that adjoins the Gillespie Station to the north. This parcel was acquired on October 4, 2009. A copy of the agreement is included as Gillespie Sub\_1st\_Q.\_1-25 Attachment 1 and the purchase price of the property has been redacted from this document.

Preparer: Wayne Hicks  
Sponsor: Wayne Hicks

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

## AGREEMENT

On September 21, 2009, Carletta Smith and husband Patrick Smith (Grantor) deposited into escrow with Hill Country Title a general warranty deed for the conveyance to LCRA Transmission Services Corporation (Grantee) fee title to 4.49 acres of land, more or less (the Property), situated in Gillespie County, Texas, being part of the Jose Antonio Navarro Survey No. 135, Abstract No. 522, a copy of which deed is attached hereto.

In addition to a payment of [REDACTED] to Grantor for the conveyance of the Property, Grantee has agreed to allow Grantor to continue to store on the Property Grantor's personal property consisting of materials, supplies, and equipment that is currently stored there and to keep such property there through December 31, 2009, in order to allow Grantor sufficient time to find a new storage site and to relocate the personal property to the new site. Grantor's use of the Property shall be for storage and removal of the personal property currently located on the Property, and Grantor shall have no further right to use the Property from and after December 31, 2009. Grantee anticipates that Grantee's site preparation activities will begin in December 2009. Any of Grantor's personal property still remaining on the Property in December 2009 may be relocated by Grantee to another location on the Property, if necessary, to avoid interference with Grantee's site preparation activities. Grantee shall not be liable for any damages to Grantor's personal property. Any of Grantor's personal property remaining on any part of the Property after December 31, 2009, shall be considered abandoned, and Grantee shall have the right to remove and dispose of such property.

LCRA Transmission Services Corporation



By: \_\_\_\_\_

Larry Clendennen, Authorized Agent

Date: 9/30/09

Carletta Smith  
Carletta Smith

Date: 10/4/09

Patrick Smith  
Patrick Smith

Date: 10/4/09

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-26:**

Explain your claim in response to discovery requests that the north side of the expansion site will require extensive cut and fill. State whether that extensive cut and fill could have been eliminated or reduced by selecting a site south of the Gillespie Substation for the expansion.

**Response No. 1-26:**

The need for cut and fill is based on the topography of the area north of the existing Gillespie Station. Expansion to the south would require similar amounts of cut and fill as the topography is not substantially different to the south of the station. An expansion in that direction would require the filling and relocation of the existing Gillespie Station storm water detention facility.

Preparer: Wayne Hicks  
Sponsor: Wayne Hicks

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-27:**

Please state whether it was and/or is physically and technically feasible for LCRA TSC to locate the expansion of the Gillespie Substation on the south side of the Substation near the existing T-130, 192, 266, 448 ROW, instead of on the north side. Please explain in reasonable detail why LCRA did not propose to locate the expansion of the Gillespie Substation on the south side. Please provide all documents concerning LCRA TSC's decision and your answer.

**Response No. 1-27:**

It is not physically and technically feasible to expand the Gillespie Station to the south because adequate land is not available. Extending the station to the south would be constricted by the convergence of US Highway 87 and Balcones Drive and the presence of a commercial establishment, and would also require relocation of six existing 138 and 69-kV transmission lines. See Exhibit JWH-1 to the Direct Testimony of J. Wayne Hicks.

Preparer: Wayne Hicks  
Sponsor: Wayne Hicks

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-38:**

Please state whether it is physically and technically feasible to use the route of the existing T-130 lines (to be retired) for the 345 kV Line proposed in this case? Please explain your answer and provide all documents concerning your answer. Would using the T-130 route eliminate the need to purchase, cut, and build new rights-of-way for Links C1 and C3?

**Response No. 1-38:**

Yes, except for the first 1.1 miles out of the Gillespie Station, it is physically and technically feasible to use the route of the existing T-130 line for the 345-kV line proposed in this case. Unlike most of the existing T-130 line, the first 1.1 miles of T-130 is constricted within a narrow ROW bounded by habitable structures and located on common structures with a radial 138-kV transmission line that is the sole transmission source to the existing Nimitz Station.

Therefore, since the first 1.1 miles of the T-130 line out of Gillespie cannot be used, the portion of the T-130 route that can be used will not eliminate the need to purchase, clear, and build new rights-of-way for Links C1 and C3.

Additionally, please see the Direct Testimony of Mr. Curtis Symank at page 7.

Co-Preparer: Curtis Symank  
Co-Preparer: Sergio Garza  
Co-Sponsor: Curtis Symank  
Co-Sponsor: Sergio Garza

Title: Engineering Supervisor, LCRA  
Title: System Planning & Protection Mgr, LCRA  
Title: Engineering Supervisor, LCRA  
Title: System Planning & Protection Mgr, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-39:**

Please state whether it is physically and technically feasible to install the proposed Line on the existing structures currently used by line T-130, 192, 266, or 448 in Segment ABC. Please state whether it is possible to do so at other points along T-130 ROW? Please explain your answer. Please provide all documents concerning your answer.

**Response No. 1-39:**

The proposed 345-kV line cannot be installed on these structures because doing so would violate the structural strength and electrical clearance requirements of the National Electrical Safety Code. It is not feasible to install the proposed line on the existing structures currently used by T130, T266, T192, and T448 in segment ABC. These structures are designed for smaller conductors operating at lower voltages than the proposed transmission line. Please refer to the Direct Testimony of Curtis Symank, page 6, lines 13-17.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-40:**

Please state whether it is physically and technically possible to route the proposed Line in Segment ABC (the existing T-130, 192, 266, 448 ROW) by placing the Line beside existing lines within the existing T-130, 192, 266, and 448 ROW or by placing the Line on monopoles higher than the existing structures within the existing T-130, 192, 266, and 448 ROW. Please explain your answer and provide all documents concerning your answer.

**Response No. 1-40:**

No. There is not enough room within these existing ROWs to place new 345-kV structures alongside the existing structures, because doing so would either violate the electrical clearance requirements between the existing transmission lines as specified in the National Electrical Safety Code or not provide enough space to reliably, safely, and efficiently operate and maintain the lines, or both.

Co-Preparer: Curtis Symank  
Co-Preparer: Sergio Garza  
Co-Sponsor: Curtis Symank  
Co-Sponsor: Sergio Garza

Title: Engineering Supervisor, LCRA  
Title: System Planning & Protection Mgr, LCRA  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-41:**

Please state whether and describe how in evaluating LCRA TSC's proposed routes for the Line within and out of the Gillespie Substation, LCRA, LCRA TSC, the consultants, or any other preparer considered whether any habitable structures near existing rights of way were built before or after the construction and placement in service of existing transmission lines.

**Response No. 1-41:**

Neither PBS&J nor LCRA considered whether any habitable structures were built before or after construction of existing transmission lines.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-42:**

Please admit that Segment DC (first 6.200 of Line C3), as LCRA TSC has proposed it, will pass closer than 500 feet to existing habitable structures on the Gillespie Intervenors' properties.

**Response No. 1-42:**

Yes, there are habitable structures on the Gillespie Intervenors' properties within 500 feet of the proposed Link C3 centerline, occurring in the first 6,200 feet of the link beginning at the junction of Link C3 with Links C1/C2.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-43:**

Please admit that, as proposed, LCRA TSC's proposed Link C3 will cross within 50 feet of the habitable structure on Connie and Ruben Crenwelge's property.

**Response No. 1-43:**

According to Attachment 5 (revised) to the Application, habitable structure No. 16 is located on property owned by Connie S. Crenwelge and Artie Williams. PBS&J measured habitable structure No. 16, as shown in Table 6-3 and on Figure 6-1a of the EA (Attachment 1 to the Application), as being approximately 45 feet south of the centerline of Link C3.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-44:**

Please admit that LCRA TSC's proposed Link C3 will, as proposed, cross within 400 feet of the habitable structures on Karl and Mary Ransleben's property.

**Response No. 1-44:**

According to Attachment 5 (revised) to the Application, habitable structures No. 17 and 18 are located on property owned by Karl A. and Mary Ransleben. PBS&J measured habitable structure No. 17, as shown in Table 6-3 and on Figure 6-1a of the EA (Attachment 1 to the Application), as being approximately 395 feet south of the centerline of Link C3. PBS&J measured habitable structure No. 18, as shown in Table 6-3 and on Figure 6-1a of the EA (Attachment 1 to the Application), as being approximately 365 feet south of the centerline of Link C3.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-45:**

Please admit that the Crenwelge's and Ransleben's habitable structures are not currently in or near any existing ROW.

**Response No. 1-45:**

Deny. The Crenwelges' (Habitable Structure No. 16) and Ranslebens' (Habitable Structure Nos. 17 and 18) habitable structures, as identified on Attachments 4 (Sheet 12 of 12) and 5 of the Application, are not located within any LCRA TSC ROWs. However, their habitable structures are located within 2,500 feet of the Gillespie Station, and within approximately 1,500 to 1,800 feet of existing LCRA TSC transmission lines T-214, T-130, T-266, T-192, T-448, and of an existing American Electric Power transmission line.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox  
Co-Sponsor: Curtis Symank

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-46:**

Please admit that LCRA TSC's proposed Link C3 will physically divide each of the properties of Connie and Ruben Crenwelge, Karl and Mary Ransleben, and Charles and Becky Anderson.

**Response No. 1-46:**

Deny. Link C3 would cross their properties but would not "physically divide" their properties.

Co-Preparer: Rob R. Reid  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-50:**

Will LCRA TSC agree to use rusted steel monopoles for Segment ADC (Links C1 and first approx. 6,200 feet of C3)? If not, please explain. Provide all documents concerning your answer.

**Response No. 1-50:**

No. LCRA TSC will construct the project using whatever structures are ordered by the Public Utility Commission. Please refer to the Direct Testimony of Curtis D. Symank.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-51:**

Will LCRA TSC agree to move the originating point of Link C3 further north from its proposed originating point at the convergence with Links C1 and C2 to move the Line north of and off of the Crenwelge's property and further north on the Ransleben's and Anderson's property?

**Response No. 1-51:**

LCRA TSC does not have sufficient information to agree or disagree with this proposal. LCRA TSC agrees to investigate the route modification proposed by the Gillespie Substation intervenors and described as moving the originating point of Link C3 further north from its proposed originating point at the convergence with Links C1 and C2, in order to move the link north and potentially off of the Crenwelges' property and further north on the Ranslebens' and Andersons' property based on the maps provided by Mr. Brazell on December 8, 2009, depicting proposed route modifications.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Preparer: Curtis Symank  
Co-Sponsor: Rob R. Reid  
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GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-52:**

Does LCRA TSC maintain that it must use the structures proposed in its Application and cannot use galvanized steel or rusted steel monopole structures or the structures currently existing in the T-130, 192, 266, and 448 right of way? Please explain.

**Response No. 1-52:**

Please refer to the responses to Questions 1-39 and 1-50.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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

<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE   STATE OFFICE OF ADMINISTRATIVE   HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-53:**

Please provide a list of structures required to construct Segment ADC (Links C1 and first approx. 6,200 feet of C3). Please provide a similar list of the structures required to construct the Line in Segment ABC (the existing T-130, 192, 266, and 448 ROW). Please provide any documents that show the proposed or possible placement of such structures along each Segment. Please also provide ground elevation and tower height of the structures that LCRA TSC proposes for Segment ADC and would proposed if the Line were built in Segment ABC (the existing T-130, 192, 266, 448 ROW).

**Response No. 1-53:**

By agreement with intervenors' counsel, the portions of this question relating to "Segment ABC" have been withdrawn.

The structures required to construct segment ADC are not known at this time, and placement, ground elevation, and tower height will not be known until final detailed design is complete after the PUC Final Order in this CCN proceeding.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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

<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-54:**

Please describe all communications by LCRA TSC, LCRA, its consultants, agents, and/or affiliates regarding the feasibility of using monopoles for the proposed Line. Please describe any communications regarding the feasibility of using monopoles for Segments ADC (Links C1 and first approx. 6,200 feet of C3) and/or ABC (the existing T-130, 192, 266, 448 ROW) or any other routes into, within, through, or around the Gillespie Substation. Please provide all documents concerning such communication and your answer.

**Response No. 1-54:**

By agreement with intervenors' counsel, the portions of this question relating to "Segment ABC" have been withdrawn.

The response to the other portions of this question are under discussion and will be filed subsequently.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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

<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE   STATE OFFICE OF ADMINISTRATIVE   HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-55:**

What impact, if any, will the surface elevation, terrain, soil, geology of Segment ADC (Links C1 and first approx. 6,200 feet of Link C3) have on the feasibility of constructing Segment DC of Link C3 with monopoles?

**Response No. 1-55:**

The response to this question is under discussion and will be filed subsequently.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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

<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-56:**

Please admit that the citizens of Fredericksburg, Gillespie County, and the surrounding environs have identified the scenic beauty of the Texas Hill Country as a priority community value.

**Response No. 1-56:**

LCRA TSC cannot admit or deny that "the citizens of Fredericksburg, Gillespie County, and the surrounding environs have identified the scenic beauty of the Texas Hill Country as a priority community value." However, many citizens, organizations, and municipal and county authorities in Fredericksburg and Gillespie County have identified the scenic beauty of the Texas Hill Country as a community value. A summary of public input is provided in Sections 6.1.1 and 6.1.2 of the Environmental Assessment.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

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<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE   STATE OFFICE OF ADMINISTRATIVE   HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-57:**

Please admit that the citizens of Fredericksburg, Gillespie County, and the surrounding environs have identified placing the Line in existing rights of way as a priority community value.

**Response No. 1-57:**

LCRA TSC cannot admit or deny that "the citizens of Fredericksburg, Gillespie County, and the surrounding environs have identified placing the line in existing rights of way as a priority community value." However, many citizens, organizations, and municipal and county authorities in Fredericksburg and Gillespie County have identified placing the line in existing rights-of-way as a community value. A summary of public input is provided in Sections 6.1.1 and 6.1.2 of the Environmental Assessment.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

**SOAH DOCKET NO. 473-10-1097  
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<b>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</b>	§ § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-58:**

Please admit that the citizens of Fredericksburg, Gillespie County, and the surrounding environs have stated that the use of monopole structures is a priority community value as it pertains to the proposed Line.

**Response No. 1-58:**

LCRA TSC cannot admit or deny that "the citizens of Fredericksburg, Gillespie County, and the surrounding environs have stated that the use of monopole structures is a priority community value as it pertains to the proposed line." However, many citizens, organizations, and municipal and county authorities in Fredericksburg and Gillespie County have stated that they prefer the use of monopole structures. A summary of public input is provided in Sections 6.1.1 and 6.1.2 of the Environmental Assessment.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

**SOAH DOCKET NO. 473-10-1097  
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<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE   STATE OFFICE OF ADMINISTRATIVE   HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-59:**

Please admit that the citizens of Fredericksburg, Gillespie County, and the surrounding environs have identified the preservation of visitor goodwill regarding the aesthetic value of the area as a priority community value.

**Response No. 1-59:**

LCRA TSC cannot admit or deny that "the citizens of Fredericksburg, Gillespie County, and the surrounding environs have identified the preservation of 'visitor goodwill' regarding the aesthetic value of the area as a priority community value." However, many citizens, organizations, and municipal and county authorities in Fredericksburg and Gillespie County have emphasized the value of the Hill Country, including Enchanted Rock State Natural Area, to tourism, eco-tourism, and the economic benefits associated with these activities to the local economy. A summary of public input is provided in Sections 6.1.1 and 6.1.2 of the Environmental Assessment.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

**SOAH DOCKET NO. 473-10-1097  
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<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-60:**

Please admit that the citizens of Fredericksburg, Gillespie County, and the surrounding environs have identified the preservation of the economic benefits from recreation and tourism as priority community values.

**Response No. 1-60:**

LCRA TSC cannot admit or deny that "the citizens of Fredericksburg, Gillespie County, and the surrounding environs have identified the preservation of the economic benefits from recreation and tourism as priority community values." See the response to Question 1-59.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

**SOAH DOCKET NO. 473-10-1097  
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<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-61:**

Please admit that placing lattice structures and clearing right of way along Segment ADC (Link C1 and the first approx. 6,200 feet of Link C3) will have a negative impact on the community values identified in the requests in this section.

**Response No. 1-61:**

Deny.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

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<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-62:**

Please admit that Segment ADC, as LCRA TSC has proposed it, (Links C1 and first approx. 6,200 feet of C3) will traverse the summit of hills and ridgelines visible from Fredericksburg, the Fredericksburg area, and the surrounding hills and countryside near and around Fredericksburg.

**Response No. 1-62:**

LCRA TSC agrees that some portions of the referenced segment of the proposed route will be visible from a limited area of the City of Fredericksburg and the surrounding hills and countryside, as are the existing Gillespie Station and several existing transmission lines in the vicinity, including existing lattice structures.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

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<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-63:**

Please admit that the height of the trees on Segment ADC, as LCRA TSC has proposed it, (Links C1 and first approx. 6,200 feet of C3) average 30 to 35 feet.

**Response No. 1-63:**

LCRA TSC cannot verify the claims in this statement.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

**SOAH DOCKET NO. 473-10-1097  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-64:**

Please admit that if the towers proposed by LCRA TSC for Segment ADC (Links C1 and first approx. 6,200 feet of C3) are from 115 to 185 feet in height and the trees on the same Segment average 30 to 35 feet in height, the height of the towers will exceed the height of the trees by from 80 to 155 feet.

**Response No. 1-64:**

Deny.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

**SOAH DOCKET NO. 473-10-1097  
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<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-65:**

Please provide ground elevations and existing or proposed structure heights for the structures LCRA TSC proposes to place in or at the Gillespie Substation, along Segment ADC (Link C1 and first approx. 6,200 feet of Link C3).

**Response No. 1-65:**

Please refer to the response to Question 1-53.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

**SOAH DOCKET NO. 473-10-1097  
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<b>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</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-66:**

Please admit that placing the proposed towers on the summits of the hillsides or along ridges north of Fredericksburg on Segment DC (first approx. 6,200 feet of Link C3) will have a negative impact on the community values identified by the citizens of Fredericksburg, Gillespie County, and the surrounding environs in minimizing the visibility of the Line.

**Response No. 1-66:**

Deny. Please refer to the response to Question 1-62.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox  
Co-Sponsor: Curtis Symank

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-67:**

Please provide a copy of any and all studies LCRA TSC, LCRA, PBS&J, and any other preparer conducted, commissioned, reviewed, or relied on, or is aware of concerning the aesthetics of Fredericksburg, the Fredericksburg area, and the hills and countryside near and around Fredericksburg, the economic effect, impact, and value of such aesthetics, the impact on tourism and recreations of such aesthetics, and/or in the impact of Segment ADC (Link C1 and first approx. 6,200 feet of C3) on such values and aesthetics. Please describe LCRA TSC's, LCRA's, PBS&J's, or any other preparer's use of and mental impressions drawn from such studies.

**Response No. 1-67:**

Other than information presented in the Environmental Assessment, included as Attachment 1 to the Application, and information provided by the public, organizations, and municipal and county authorities (see the responses to Questions 1-59 and 1-60), neither PBS&J nor LCRA TSC relied on additional studies that address the variety of issues described in this question. Information provided in Dennis Palafox's Direct Testimony (p. 21 lines 8 to 23, p. 27 lines 22 to 31, and p. 28 lines 1 to 3) addresses factors that contribute to the aesthetic appeal and the importance of the Hill Country as a tourist destination.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-68:**

Does LCRA TSC acknowledge that the aesthetic value of Fredericksburg, the Fredericksburg area, and the hills and countryside near and around Fredericksburg is high? Does LCRA TSC acknowledge that Fredericksburg, the Fredericksburg area, and the hills and countryside near and around Fredericksburg are recognized throughout the State and the U.S. for their scenic beauty?

**Response No. 1-68:**

As stated in Section 2.9 of the Environmental Assessment (EA), the study area, which includes the Fredericksburg area, exhibits a medium to high level of aesthetic quality overall with some portions or features exhibiting very high aesthetic values.

Preparer: Dennis Palafox  
Co-Sponsor: Dennis Palafox  
Co-Sponsor: Rob R. Reid

Title: Sr. Regulatory Case Mgr, LCRA  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J

**SOAH DOCKET NO. 473-10-1097  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-69:**

Has LCRA TSC, LCRA, PBS&J, or any other preparer photographed, video taped, recorded, or otherwise commemorated the visual impact from Fredericksburg and the surrounding valley of proposed Segment ADC (Link C1 and first approx. 6,200 feet of Link C3)? If so, please provide copies. If not, please explain.

**Response No. 1-69:**

No, at this time LCRA TSC has not "commemorated" the visual impact from Fredericksburg and the surrounding valley of proposed Segment ADC (Link C1 and first approx. 6,200 feet of Link C3). The PUC does not require applicants to "commemorate" impacts to views.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-70:**

Did LCRA TSC or PBS&J physically drive or walk any portion of Segment ADC (Link C1 and first approx. 6,200 feet of Link C3) or Segment ABC (the existing T-130, 192, 266, and 448 ROW)?

**Response No. 1-70:**

No, neither PBS&J staff nor LCRA TSC representatives trespassed on private property to walk or drive the centerline of Link C1 or the first approximately 6,200 feet of Link C3 (Segment ADC). PBS&J staff and LCRA TSC representatives did drive public roads in the area to view Segment ADC, where feasible, for observational purposes.

Co-Preparer: Rob R. Reid  
Co-Preparer: France Davis  
Co-Preparer: Dennis Palafox  
Co-Sponsor: Rob R. Reid  
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J  
Title: Sr. Project Mgr, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA  
Title: Principal Project Director, PBS&J  
Title: Sr. Regulatory Case Mgr, LCRA

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

<b>APPLICATION OF LCRA TRANSMIS- SION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CON- VENIENCE AND NECESSITY FOR THE GILLESPIE TO NEWTON 345 KV CREZ TRANSMISSION LINE IN GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-71:**

Describe in detail the conclusions, values, standards, and priorities reached, relied on, or applied by LCRA TSC, LCRA, PBS&J, or any other preparer in evaluation the aesthetics and scenic beauty of Fredericksburg, the Fredericksburg area, and the hills and countryside near and around Fredericksburg and the impact on such aesthetics and scenic beauty caused by Segment ADC (Link C1 and first approx. 6,200 feet of Link C3).

**Response No. 1-71:**

Please refer to sections 2.9 and 5.2.5 of the EA, included as Attachment 1 to the Application, and the Direct Testimonies of Rob R. Reid and Dennis Palafox.

Co-Preparer: Rob R. Reid	Title: Principal Project Director, PBS&J
Co-Preparer: France Davis	Title: Sr. Project Mgr, PBS&J
Co-Preparer: Dennis Palafox	Title: Sr. Regulatory Case Mgr, LCRA
Co-Sponsor: Rob R. Reid	Title: Principal Project Director, PBS&J
Co-Sponsor: Dennis Palafox	Title: Sr. Regulatory Case Mgr, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-72:**

Please admit that preserving the scenic beauty of Fredericksburg, Gillespie County, and the surrounding environs for the benefit of the community and other Texas citizens may justify expenditures above those that might be incurred to build transmission lines in other, less scenic parts of the State.

**Response No. 1-72:**

Deny. This issue is for the Public Utility Commission to decide.

Preparer: Dennis Palafox  
Sponsor: Dennis Palafox

Title: Sr. Regulatory Case Mgr, LCRA  
Title: Sr. Regulatory Case Mgr, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
GILLESPIE SUBSTATION INTERVENORS' FIRST REQUEST FOR INFORMATION**

**Question No. 1-78:**

What is LCRA TSC's expected, preferred, intended, or proposed method for constructing facilities that cross the terrain of rural land, including its methods for constructing facilities over rough terrain? through valleys? over hills, slopes, and/or ridges? Does LCRA TSC expect, prefer, intend, or propose to excavate into the sides of hills, slopes, and/or ridges? Does LCRA TSC expect, prefer, intend, or propose to create large gashes in the scenic landscape? Does LCRA TSC expect, prefer, intend, or propose to excavate or disturb the existing terrain to create ditches that would prevent vehicular traffic from crossing through pasture land to care for livestock or wildlife or for recreational purposes?

**Response No. 1-78:**

Please refer to Chapter 1 of the Environmental Assessment included as Attachment 1 to the Application. LCRA TSC construction methods will not create ditches that would prevent vehicular traffic from crossing through pasture land.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-79:**

How will LCRA access the proposed rights-of-way of proposed Links C1, C2, and C3 before, during, and after the engineering, construction, and maintenance of the proposed 345 kV Line?

**Response No. 1-79:**

Specific details of LCRA TSC's access to any proposed rights-of-way (ROW) will not be determined until the detail design of the project is complete. Typically, access is obtained through easements, along or adjacent to the ROW or from other properties as necessary.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-80:**

What consideration has LCRA TSC given, what studies has it done, what does it propose, and what procedures will it use to protect cultural resources not heretofore identified that may exist or be found on rights-of-way on proposed Links C1, C2, and C3?

**Response No. 1-80:**

Please see Section 1.3 of the Environmental Assessment provided as Attachment 1 to the Application.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-81:**

What consideration has LCRA TSC given, what studies has it done, what does it propose, and what procedures will it use to protect wildlife and livestock during birthing seasons during construction, maintenance, and operation?

**Response No. 1-81:**

Please refer to Chapter 1 of the Environmental Assessment included as Attachment 1 to the Application, and the Direct Testimony of Curtis Symank for considerations given to wildlife and livestock, although not specifically to the protection of birthing livestock during construction, maintenance, and operation.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-82:**

Please respond to the following requests regarding clearances. Please explain your answers and provide all documents concerning your answers:

- a. How close may a 345 kV line be safely located near or next to an inhabited habitable structure?
- b. What scientific research exists regarding the health effects of running a 345 kV line within 10 feet, 25 feet, 50 feet, 100 feet, 200 feet, 300 feet, 400 feet, or 500 feet of an inhabited habitable structure?
- c. What is the minimum clearance height above ground for a 345 kV line?
- d. How much wider, if any wider, would the existing T-130, 192, 266, and 448 ROW (Segment ABC) have to be to accommodate the 345 kV Line proposed in this docket, assuming monopoles were used instead of lattice towers?
- e. How much wider, if any wider, would the existing T-130, 192, 266, and 448 ROW (Segment ABC) have to be to accommodate the 345 kV Line proposed in this docket, assuming existing or new lattice towers were used?

**Response No. 1-82:**

By agreement with intervenors' counsel, subparts d. and e. of this question have been withdrawn.

- a. Safe distances from 345-kV lines to a building, including a house and an "inhabited habitable structure", are specified by the National Electrical Safety Code (NESC). From the NESC, a 345-kV line may safely span directly over such a building with a 19 feet vertical clearance to roofs not accessible to pedestrians and a 20 feet vertical clearance to roofs accessible to pedestrians. Alongside a 345-kV line, again from the NESC, a 345-kV line may be located safely next to such a building with an 11 feet horizontal clearance to the side of the building with conductor sag and sway under applicable wind conditions and with a 14 feet clearance to the side of the building without wind. Of course, if the NESC

vertical clearances are met, then the NESC horizontal clearances are moot (and vice versa).

- b. There is an extensive body of scientific research on EMF, including the power frequency fields associated with electric power. This research was reviewed recently by the World Health Organization (WHO). The WHO 2007 report on EMF is publicly available on the WHO website (see <http://www.who.int/peh-emf/en/>). WHO states on its website that "Despite extensive research, to date there is no evidence to conclude that exposure to low level electromagnetic fields is harmful to human health."
- c. The National Electrical Safety Code specifies the closest distance from 345-kV lines to ground at 28 feet.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-83:**

Assume a property on Link C3 were to become a recreational facility operated by a chapter of the Boys & Girls Club of America to provide disadvantaged children the opportunity to experience the educational aspects of the beauty, charm, and rural tranquility of nature in the Texas Hill Country:

- a. Which type of structure is safest on a property that has young adults and children camping and playing in a rural setting? Lattice towers? Monopoles?
- b. How are lattice towers and monopoles protected from being accessed by human beings without creating a prison-like fence around the structure every few hundred yards?
- c. What are the potential dangers from routing a 345 kV line over stock tanks, lakes, or ponds when people are using the water for recreational or commercial purposes?

**Response No. 1-83:**

LCRA TSC cannot speculate on such a counter-factual scenario. However, LCRA TSC will attempt to answer the general questions posed in subparts a, b, and c.

- a. All structures are equally safe because they will be designed to meet the requirements of the National Electrical Safety Code (NESC).
- b. LCRA TSC will not install climbing devices close to the ground (i.e., not within 30 feet of the ground).
- c. LCRA TSC can safely route 345-kV lines over stock tanks, lakes, and ponds with people using the water for recreational or commercial purposes because these lines will be designed to meet NESC requirements, which address such bodies of water and uses thereof.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
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**Question No. 1-84:**

Please provide a description of and instructions regarding the post-approval process described in the Application for seeking and negotiating minor routes revisions. Please include the names, addresses, and other contact information of the LCRA TSC employees to contact to seek and negotiate such minor route revisions. Please state the timing and schedule for seeking and negotiating such minor route revisions. What does LCRA TSC define as minor adjustment?

**Response No. 1-84:**

Please refer to p. 25, lines 20 to 29 of the Direct Testimony of Curtis Symank. The name of the LCRA employee to contact for negotiation of minor route revisions will be determined later, and will be provided to affected landowners when they are notified about the final disposition of this project.

Preparer: Curtis Symank  
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA  
Title: Engineering Supervisor, LCRA