



Control Number: 37448



Item Number: 343

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**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 §

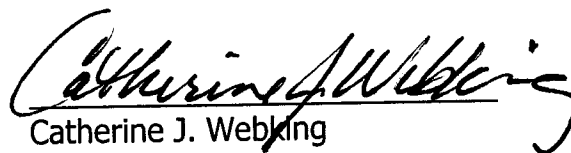
BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

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**KREUZ FAMILY'S**  
**RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR**  
**INFORMATION**

The Kreuz Family files these Responses to Commission Staff's (Staff) First Request for Information (RFI) on behalf of the Kreuz Family. All responses offered are to be considered to be offered under oath by Mrs. Kreuz herself.

Respectfully submitted,



Catherine J. Webking  
State Bar No. 21050055  
1302 Overland Stage Road  
Dripping Springs, TX 78620  
(512) 264-9121  
(512) 264-9122 fax

**Attorney for the Kreuz Family**

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Request BA 1-1  
Kreuz Family's Response

**COMMISSION STAFF'S FIRST REQUEST 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

Yes we have a home near link C-4 of the proposed transmission line. It is a 2-story home, approximately 3,000 square feet, and my husband Charles and I live there year round. The proposed line is approximately 1,630 feet from our home.

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Request BA 1-2  
Kreuz Family's Response

**COMMISSION STAFF'S FIRST REQUEST 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

Yes, C-4 link of the proposed transmission line will cross our property. The proposed transmission line will follow the Atmos pipeline. However, the dirt over the pipe and on our property generally is very shallow. It would be very difficult to construct under these circumstances.

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Request BA 1-3  
Kreuz Family's Response

**COMMISSION STAFF'S FIRST REQUEST 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

Yes, I have discussed modifications with Jim Shotwell, Case Manager and Dennis Palafox, Senior Case Manager. I suggested not using the C-4 link to the proposed transmission line because it is the road to Enchanted Rock, hardwood trees would be destroyed, and that Ranch Road 965 is not suitable because it is narrow, winding, very hilly, and scenic. LCRA TSC said they "can't do away with any of the routes", because there must be alternatives.

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Request BA 1-4  
Kreuz Family's Response

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

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

Response

My concerns about the proposed transmission line are the destruction of hardwood trees, Enchanted Rock, the fragility of soil, and ruining the aesthetic qualities of this area. Any additional concerns developed throughout this case will be presented in testimony.

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Request BA 1-5  
Kreuz Family's Response

**COMMISSION STAFF'S FIRST REQUEST 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

Yes, I attended the open house meeting at the Fredericksburg Pioneer Pavillion.  
And, yes, I did provide written comments.

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Request BA 1-6  
Kreuz Family's Response

**COMMISSION STAFF'S FIRST REQUEST 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

There are no property lines representing our property boundaries on maps provided by the utility.

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Request BA 1-7  
Kreuz Family's Response

**COMMISSION STAFF'S FIRST REQUEST 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

We use our property for hunting, grazing sheep, and recreation. The proposed transmission line will destroy pastures and impact the sheep as well as the wildlife. We are also concerned about aesthetics. With shallow pipelines there could be ruptures and explosions.

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Request BA 1-9  
Kreuz Family's Response

**COMMISSION STAFF'S FIRST REQUEST 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

Features to be considered on our property when routing a transmission line are the hills, and shallow soil along with the concerns mentioned in BA-1-7.

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