

Control Number: 37448



Item Number: 404

Addendum StartPage: 0

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

APPLICATION OF LCRA	§	
TRANSMISSION SERVICES	§	BEFORE THE STATE OFFICE
CORPORATION TO AMEND ITS	§	
<b>CERTIFICATE OF CONVENIENCE AND</b>	§	
NECESSITY FOR THE GILLESPIE TO	§	OF
NEWTON 345-KV CREZ	§	
TRANSMISSON LINE IN GILLESPIE,	§	
LLANO, SAN SABA, BURNET, AND	§	ADMINISTRATIVE HEARINGS
LAMPASAS COUNTIES, TEXAS	§	

# STARR GM ENDEAVORS LP'S RESPONSE TO KANE-GLENSPRINGS RANCH, LTD.'S FIRST SET OF REQUESTS FOR INFORMATION TO CERTAIN INTERVENORS

Starr GM Endeavors LP ("Starr GM") files this response to Kane-Glensprings Ranch.

Ltd.'s First Set of Requests for Information to Certain Intervenors. This response new bettereated by all parties as if it were filed under oath.

Respectfully submitted,

Shannon K. McClendon State Bar No. 13412500

Matthew D. Durham

State Bar No. 24040226

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ATTORNEYS FOR STARR GM ENDEAVORS LP

### **CERTIFICATE OF SERVICE**

I certify that a copy of the above has been sent via electronic mail or via facsimile as designated by all parties of record in this proceeding on this 21st day of December, 2009.

Matthew D. Durham

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**RFI 1-1** Attached is a copy of the document provided by the LCRA showing the eleven (11) alternate routes for the proposed transmission line. Please identify the alternate route, or routes, that you prefer.

RESPONSE: Counsel for Starr GM attempted in good faith to negotiate objections to and responses to this question with counsel for Kane-Glensprings Ranch, Ltd. as required by P.U.C. PROC. R. § 22.144(d). Starr GM considers any such information as privileged and/or confidential at this time. Therefore, there are no documents or information responsive to this request at this time.

Starr GM continues to study LCRA TSC's filed application and develop its case. This issue will likely be addressed in Starr GM's direct testimony.

Sponsoring Witness: Lloyd McCarley

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**RFI 1-2** The attached document shows Link C-1 through Link C-31A. Please state which of these links traverse your property.

RESPONSE: This information is part of the administrative record. Therefore, this question is duplicative and burdensome. But, as a courtesy to the requesting party, Starr GM asserts that it is affected by Segment C31. See Starr GM Endeavor LP's Motion to Intervene (Nov. 30, 2009) and Attachment 5 to LCRA TSC's filed application (Oct. 28, 2009).

Sponsoring Witness: Lloyd McCarley