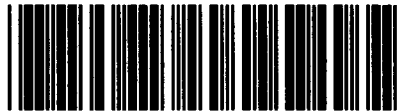




Control Number: 37448



Item Number: 406

Addendum StartPage: 0

**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**

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

FILED
JUL 21 PM 3:00
CLERK

**MR. BOB KOEHLER'S
RESPONSE TO KANE-GLENSPRINGS RANCH, LTD.'S FIRST SET OF
REQUESTS FOR INFORMATION TO CERTAIN INTERVENORS**

Mr. Bob Koehler files this response to Kane-Glensprings Ranch, Ltd.'s First Set of Requests for Information to Certain Intervenors. This response may be treated by all parties as if it were filed under oath.

Respectfully submitted,



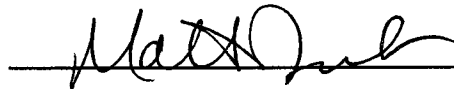
Shannon K. McClendon
State Bar No. 13412500
Matthew D. Durham
State Bar No. 24040226

LAW OFFICES OF SHANNON K. McCLENDON
400 West 15th Street, Suite 720
Austin, Texas 78701
(512) 651-0550 phone
(512) 264-9122 fax

ATTORNEYS FOR MR. BOB KOEHLER

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

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

**MR. BOB KOEHLER'S RESPONSE TO KANE-GLENSPRINGS RANCH, LTD.'S
FIRST SET OF REQUESTS FOR INFORMATION TO CERTAIN INTERVENORS**

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 Mr. Koehler 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). Mr. Koehler 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.

Mr. Koehler continues to study LCRA TSC's filed application and develop his case. This issue will likely be addressed in Mr. Koehler's direct testimony.

Sponsoring Witness: Bob Koehler

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

**MR. BOB KOEHLER'S RESPONSE TO KANE-GLENSPRINGS RANCH, LTD.'S
FIRST SET OF REQUESTS FOR INFORMATION TO CERTAIN INTERVENORS**

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, Mr. Koehler asserts that he is affected by Segment C31. *See* Bob Koehler's Response to Commission Staff's Objection to Motion to Intervene (Dec. 7, 2009) and Attachment 5 to LCRA TSC's filed application (Oct. 28, 2009).

Sponsoring Witness: Bob Koehler