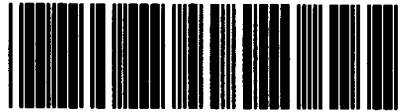


Control Number: 37448



Item Number: 430

Addendum StartPage: 0

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

<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</b>	§ § § § § § § § § §	<b>BEFORE THE STATE OFFICE</b>      <b>OF</b>      <b>ADMINISTRATIVE HEARINGS</b>
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FILED  
MAY 11 2011  
PUC CLERK

**CHANAS RANCH, LP'S SECOND REQUEST FOR INFORMATION  
TO LCRA TRANSMISSION SERVICES CORPORATION**

NOW COMES Chanas Ranch, LP ("Chanas Ranch") and requests that LCRA Transmission Services Corporation ("LCRA") answer the following questions under oath. Please present your response in accordance with the requirements of P.U.C. PROC. R. 22.144(c)(2) and Order No.1. State the name of the witness in this matter who will sponsor the answer to the question and can vouch for the truth of the answer. The answer should be filed under oath, or the responding party should stipulate in writing that the answer can be treated by all parties as if filed under oath.

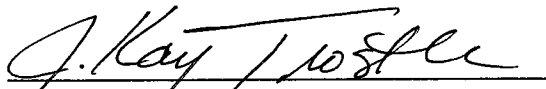
Provide your response to the undersigned counsel at the address and fax number listed below and submit an original and five copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, Suite 8-100, Austin, Texas 78701.

These RFIs are intended to not be duplicative of other discovery propounded by any other party, therefore to the extent any information requested herein is found in responses to other discovery, LCRA should so state rather than producing additional responses. If any information

sought herein has already been filed in the Docket then reference to the location of that information is a sufficient response.

Respectfully submitted,

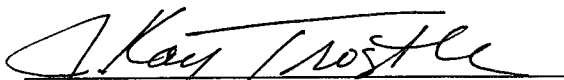
**SMITH TROSTLE LLP**  
707 West Avenue, Ste. 202  
Austin, Texas 78701  
(512) 494-9500 - Voice  
(512) 494-9505 - Fax

By:   
J. Kay Trostle  
State Bar No. 20238300

**ATTORNEYS FOR CHANAS RANCH, LP**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of December 2009, a true and correct copy of the foregoing document is being served via electronic mail (email) to LCRA.

  
J. Kay Trostle

## **DEFINITIONS**

**"You" and "Your"** refers to the LCRA Transmission Services Corporation ("LCRA") and/or LCRA.

**"Document" and "Documents"** are used herein in their broadest sense as set forth in Tex. R. Civ. P. 192.3(b), and specifically include electronic or magnetic data as described in Rule 196.4. These words mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms "Document" and "Documents" shall include all agreements, contracts, communications, correspondence, letters, opinion letters, telegrams, telexes, telefaxes, messages, memoranda, records, reports, books, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries, or other records of meetings and conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants' and experts' reports, appraisals, bulletins, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs and 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, magnetically-stored, optically-stored, or

electronically stored matter, however and by produced, prepared, reproduced, disseminated, or made. The words "Document" and "Documents" also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that do not contain any markings, additions, or deletions that are different from the original do not have to be separately produced.

The term "**communication**" includes, without limitation of its generality, statements, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by media such as intercoms, telephones, television, radio, or computer.

**The terms "relate" or "relating"** to any given subject, when used to specify a document, communication, statement, or correspondence mean any document, communication, statement or correspondence that constitutes, contains, evidences, embodies, reflects, identifies, states, discusses, refers to, deals with, or is in any manner whatsoever pertinent to that subject.

The term "**identify,**" when used in reference to a natural person means to provide his or her (1) full name, (2) present or last known residence and mailing address and telephone numbers (designating which), and (3) present or last known position or business affiliation, job title, employment address, and telephone number (designating which).

The terms "**identify**" and "**describe,**" when used in reference to facts, an event, or an **allegation**, means to include: (a) a detailed description of the facts, events, or allegation at issue; (b) the date or dates on which the facts or event occurred, or the time period involved in the events giving rise or relating to the allegation; (c) the name, address, telephone number, and affiliation of all persons involved in the facts, event, or allegation; and (d) the date, author,

addressee or recipient, and type of document of any document relating to or concerning the event or allegation.

The term **“LCRA”** shall refer to LCRA Transmission Services Corporation, the petitioner in this proceeding.

The term **“Application”** refers to the CCN Application filed by LCRA and assigned PUC Docket No. 37448, SOAH Docket No. 473-10-1097.

The term **“Docket”** refers to LCRA’s CCN application, which has been assigned PUC Docket No. 37448, SOAH Docket No. 473-10-1097.

**CHANAS RANCH, LP'S SECOND REQUEST FOR INFORMATION TO  
LCRA TRANSMISSION SERVICES CORPORATION**

- 2-1 Please reference LCRA's December 18, 2009 errata which contains at Tab G a portion of an aerial map that includes the intersection of links C13, C15 and C16:
- A. Please provide a copy of the map with a compass rose to confirm that as presented, the top of the map is *not* North;
  - B. Please include a scale for the map which allows a determination to be made of the distance between the original alignment and the revised alignment of Link C15.
  - C. Please state the distance that LCRA TSC proposes to deviate the affected links, e.g., it appears that LCRA intends to extend Link C13 to the northeast – please state how many feet that extension will be; similarly, the proposed modification to link C15 begins at the extension of link C13, and then angles back to re-join the original alignment of C15 – please state how many feet there are from the proposed intersection of the extended C13 link and C15 link, to the point at which the proposed modified C15 will rejoin the original alignment of C15.
  - D. In the errata at page 2, LCRA states that the deviation avoids two small lots and a previously unknown habitable structure near the Llano River – please identify on the map the two small lots and the previously unknown habitable structure and identify the owners of those lots and habitable structure.
  - E. Please confirm that the proposed minor route deviation does not affect the alignment of C16, except the starting point of Link C16 is moved slightly northeast due to the minor deviation proposed by LCRA at the intersection of C16, C13 and C15, as described in response to C, above.