



Control Number: 37448



Item Number: 458

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**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 GILLEPIE, LLANO, SAN SABA, BURNET AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § § § §	<b>BEFORE THE STATE OFFICE   OF   ADMINISTRATIVE HEARINGS</b>
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**LANDOWNERS' PRESERVATION GROUP'S  
FIRST SET OF REQUESTS FOR INFORMATION  
TO THE STAFF OF THE PUBLIC UTILITY COMMISSION**

The Landowners' Preservation Group's<sup>1</sup> First Set of Requests for Information ("RFIs") to the Staff of the Public Utility Commission of Texas (Staff) are hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Jim Boyle, Herrera & Boyle, PLLC at 816 Congress Avenue, Suite 1250, Austin, Texas 78701, within ten (10) days of service hereof or no later than January 11, 2010, in conformance with the requirements of PUC Procedural Rule 22.144(c)(16 T.A.C. §22.144(c)). Exhibit A is attached hereto and incorporated herein for all purposes.

Definitions

1. "LCRA" refers to the Lower Colorado River Authority.
2. "TSC" refers to the Transmission Services Corporation.
3. "Applicant" refers to LCRA TSC.

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<sup>1</sup> The Landowners Preservation Group includes intervenors: William R. Hinckley, Garrett Marital Trust, Ronald Shroyer, Roy Shroyer, Kaye Fischer-Hales, Catherine Rainwater, Richard & Ann Moore Johnson, Ed and Jacqueline Harrell, Jeffrey & Carolin Harrell, Jack Clark, Cynthia Clark, Jerry Hobbs, Terry Lowe, Janice Perry, Jana Perry, Ronald Griffin, Jane Moore Gamel, Doris Moore Faubion, Jack Goodman, Jack Haby, Early Hamby, Sr., Gordon Griffin, Al & Susann Friedrichs, and Mike Atkinson.

4. "Oncor" refers to Oncor Electric Delivery Company.
5. "Staff" refers to the Staff of the Public Utility Commission of Texas
6. "You," "yours," and "your" refer to Staff, including its directors, officers, employees, consultants, agents and attorneys.
7. PUC Docket No. 37464 refers to the *Application of Oncor Electric Delivery Company, LLC to Amend a Certificate of Convenience and Necessity (CCN) for a Proposed CREZ 345 kV Transmission Line Within Brown Mills, Lampasas, McCulloch and San Saba Counties*.
8. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
9. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of LCRA TSC.
5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of Staff or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.

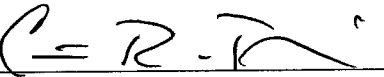
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.

#### Instructions

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If LCRA TSC considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if LCRA TSC objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if LCRA TSC receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

**HERRERA & BOYLE, PLLC**  
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**ATTORNEYS FOR  
LANDOWNERS' PRESERVATION GROUP**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 30<sup>th</sup> day of December 2009, a true and correct copy of the foregoing document was served upon LCRA TSC by electronic mail, facsimile and/or First-class mail United States mail, postage paid.

By:   
Carrie R. Tournillon

**EXHIBIT A**

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

**LANDOWNERS' PRESERVATION GROUP'S  
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TO THE STAFF**

- 1-1 Has Staff compared the location in Lampasas County of LCRA TSC routes entering the Oncor Newton Substation being proposed in this proceeding to the Oncor alternate routes that enter the same substation and that are being proposed in PUC Docket No. 37464? If yes, please describe in detail how and where the LCRA TSC proposed routes parallel the Oncor proposed routes, including but not limited to the distance between the lines where they parallel one another.
- 1-2 If the LCRA TSC lines were to parallel the Oncor lines in Lampasas County, which line segments would need to be included in the selected route?
- 1-3 What is the Commission's policy on routing transmission lines so that one line parallels the Right of Way of another when possible?
- 1-4 Would the routing of the LCRA TSC transmission line on a route that incorporates the LCRA TSC line segments that parallel the Oncor line segments in Lampasas County moderate the impact on the affected community and landowners?