



Control Number: 37448



Item Number: 463

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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 GILLESPIE, LLANO, SAN SABA, BURNET, AND LAMPASAS COUNTIES, TEXAS</b>	§ § § § § § § §	<b>BEFORE THE  STATE OFFICE OF ADMINISTRATIVE  HEARINGS</b>
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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
CJ RANCH'S SECOND REQUEST FOR INFORMATION**

COMES NOW LCRA Transmission Services Corporation (LCRA TSC) and files this Response to CJ Ranch's Second Request for Information. This Response is timely filed. LCRA TSC agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

**RECEIVED  
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Respectfully submitted,

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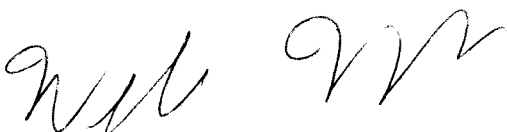
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By:   
\_\_\_\_\_  
William T. Medaille

ATTORNEYS FOR LCRA TRANSMISSION  
SERVICES CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on the propounding party (pursuant to Order No. 1) on this the 30<sup>th</sup> day of December 2009, by email, facsimile, First-Class U.S. mail, or by hand delivery.

  
\_\_\_\_\_  
William T. Medaille

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
CJ RANCH'S SECOND REQUEST FOR INFORMATION**

**Question No. 2-1:**

Please refer to the Loomis Partners report dated June 1, 2009, referenced in LCRA's response to Question 12 in Hinckley's Second Set of RFIs ("Loomis Report"). Has LCRA or any of its consultants, including but not limited to PBS&J, provided a copy of the Loomis Report to U.S. Fish & Wildlife Service ("F&W") or to Texas Department of Parks & Wildlife ("TPWD")? If not, please explain why the Loomis Report was not furnished to one or both of these agencies.

**Response No. 2-1:**

LCRA TSC has objected to the portions of this request relating to the U.S. Fish & Wildlife Service.

**Regarding TPWD:**

No. The Loomis report referenced in LCRA TSC's response to Question 12 in Hinckley's Second Set of RFIs was prepared for LCRA by Loomis specifically for LCRA TSC's CREZ projects. This report was prepared using data from a computer model that was prepared for TPWD and USFWS (see the Diamond 2007 reference in Section 6.0 of the Loomis report prepared for LCRA). In the Loomis report prepared for LCRA TSC, Loomis states that the model was described in an Endangered Species Act Section 6 report prepared for the USFWS and TPWD. As a result, LCRA TSC presumes that TPWD already has a copy of the model that includes the data Loomis used to prepare its report for LCRA TSC.

Co-Preparer: Dennis Palafox  
Co-Preparer: Erik Huebner  
Sponsor: Dennis Palafox

Title: Sr. Regulatory Case Manager, LCRA  
Title: Environmental Coordinator Sr., LCRA  
Title: Sr. Regulatory Case Manager, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
CJ RANCH'S SECOND REQUEST FOR INFORMATION**

**Question No. 2-2:**

Has LCRA or any of its consultants, including but not limited to PBS&J, discussed the Loomis Report or any portion of the contents of the Loomis Report with F&W or TPWD? If not, please explain why such discussions have not occurred.

**Response No. 2-2:**

LCRA TSC has objected to the portions of this request relating to the U.S. Fish & Wildlife Service.

Regarding TPWD:

No. LCRA TSC has not discussed the Loomis Report with TPWD because the TPWD has no regulatory authority under the federal Endangered Species Act.

Preparer: Dennis Palafox  
Sponsor: Dennis Palafox

Title: Sr. Regulatory Case Manager, LCRA  
Title: Sr. Regulatory Case Manager, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO  
CJ RANCH'S SECOND REQUEST FOR INFORMATION**

**Question No. 2-3:**

If LCRA, PBS&J, or any other consultant to LCRA either furnished a copy of the Loomis Report to or discussed any portion of the contents of the Loomis Report with either F&W or TPWD, please (i) identify by date and name of person contacted at the agency each such communication, (ii) describe the subject matter and a summary of the contents of each such communication, and (iii) provide copies of all documents reflecting communications with either F&W or TPWD regarding the Loomis Report of its contents.

**Response No. 2-3:**

LCRA TSC has objected to the portions of this request relating to the U.S. Fish & Wildlife Service.

**Regarding TPWD:**

There are no communications with the TPWD regarding the Loomis Report.

Preparer: Dennis Palafox  
Sponsor: Dennis Palafox

Title: Sr. Regulatory Case Manager, LCRA  
Title: Sr. Regulatory Case Manager, LCRA