



Control Number: 37448



Item Number: 580

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 CEZ)
TRANSMISSION LINE IN GILLESPIE,)
LLANO, SAN SABA, BURNET AND)
LAMPASAS, COUNTIES)

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

RECEIVED
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PUBLIC UTILITIES COMMISSION
FILING CLERK

JULIA CRENWELGE AND CLARA NEILSEN'S
FIRST SET OF REQUESTS FOR INFORMATION TO THE
LOWER COLORADO RIVER AUTHORITY

TO: Lower Colorado River Authority (LCRA)
By and through their attorney
Fernando Rodriguez, Legal Dept
Lower Colorado River Authority
P.O. Box 220
Austin, TX 78767 (512) 473-3354
VIA: docket37448CREZ@lcra.org

On December 17, 2009 at 12:32:42 PM, through an inadvertent mistake, Ms. Crenwelge and Ms. Neilsen, through their POA Carol J. Latta, only emailed their First Set of Requests for Information to the Lower Colorado River Authority to docket37448crez@lcra.org thinking this was the correct filing procedure in this case. On January 6, 2010, Ms. Crenwelge and Ms. Neilsen found out from Rhonda Faught at the SOAH (512-475-4996) that this was not the correct filing procedure.

Therefore, in following the correct filing procedural rules, Julia Crenwelge and Clara Neilsen resubmit their First Set of Requests for Information ("RFIs") to the Lower Colorado River Authority ("LCRA") as hereby filed in this docket. Response to the RFIs set forth on Exhibit A should be served on Carol J. Latta, at P.O. Box 841, Fredericksburg, Texas, in conformance with the requirements of PUC Procedural Rule 22.144. 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.

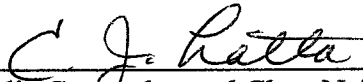
3. "Applicant" refers to LCRA TSC.
4. "You", "yours", and "your" refer to LCRA TSC (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
5. "document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but no 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 or 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.
6. 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 the LCRA TSC.
7. "Identification" of the 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 identify of each person who received the document or reviewed it, (j) the location of the document, and (k) the identify 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 LCRA TSC or in the custody of its attorneys or other representatives or agents.
8. "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.
9. "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 individual.

2. If 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 become 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 contact the undersigned individual 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 contact the undersigned individual as soon as possible.
6. If any document is withheld under any claim or 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,



Julia Crenwelge and Clara Neilsen
by Carol J. Latta, POA
P.O. Box 841
Fredericksburg, Texas 78624

CERTIFICATE OF SERVICE

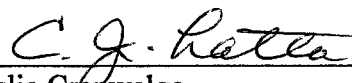
I hereby certify that Julia Crenwelge and Clara Neilsen's First Set of Requests for Information to the Lower Colorado River Authority has been sent to the following on this the 7th day of January, 2010.

Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 13326
(888) 782-8477

VIA OVERNIGHT MAIL
(original and 6 copies)

Fernando Rodriguez, Legal Department
Lower Colorado River Authority
P.O. Box 220
Austin, TX 78767
(512) 473-3354

VIA: docket37448CREZ@lcra.org



Julia Crenwelge
Clara Neilsen
by Carol J. Latta, POA

EXHIBIT A

SOAH DOCKET NO. 473-10-1097

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**JULIA CRENWELGE AND CLARA NEILSEN'S
FIRST SET OF REQUESTS FOR INFORMATION TO THE
LOWER COLORADO RIVER AUTHORITY**

1-1 How did Link C-4 get created?

RESPONSE:

1-2 What is the cost of using Link C-4?

RESPONSE:

1-3 Compare and contrast using Link C-4 versus using the Preferred Route.

RESPONSE:

1-4 What are the condemnation costs of using Link C-4 versus the condemnation costs of using the Preferred Route?

RESPONSE:

1-5 Please identify the maps of the Bureau of Economic Geology at the University of Texas at Austin which were utilized in connection with determining the Preferred Route.

RESPONSE:

1-6 Describe in full all facts and circumstances that would cause the LCRA to abandon the Preferred Route and utilize Link C-4.

RESPONSE: