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APPLICATION OF LCRA §  
TRANSMISSION SERVICES §  
CORPORATION TO AMEND ITS §  
CERTIFICATE OF CONVENIENCE AND § STATE OFFICE OF ADMINISTRATIVE  
NECESSITY FOR THE GILLESPIE TO §  
NEWTON 345 KV CREZ §  
TRANSMISSION LINE IN GILLESPIE, § HEARINGS  
LLANO, SAN SABA, BURNET, AND §  
LAMPASAS COUNTIES, TEXAS §

**LCRA TRANSMISSION SERVICES CORPORATION'S FIRST REQUEST  
FOR INFORMATION TO LANDOWNERS PRESERAVATION GROUP  
INTERVENOR S. ALAN SKINNER**

LCRA Transmission Services Corporation (LCRA TSC) requests that ALAN SKINNER, LANDOWNERS PRESERVATION GROUP INTERVENOR, provide the following information and answer the following question(s) under oath. The question(s) are to be answered in sufficient detail to fully present all of the relevant facts, within 10 days as per Order No. 1 in this docket. These question(s) are continuing in nature, and if there is a relevant change in circumstances, you are to submit an amended answer, under oath, as a supplement to your original answer.

LCRA TSC requests the answers to these questions to the extent that the information requested is not answered in the Direct Testimony of S. Alan Skinner filed on January 7, 2010. If material in your testimony or position fully presents relevant facts and presents the information called for in a question, you may respond, "See Testimony" or "See Statement."

Please copy the question immediately above the answer to each question. Please also state the name of the witness in this case who will sponsor the answer to the question and can vouch for the truth of the answer.

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Respectfully submitted,

**BICKERSTAFF HEATH DELGADO**

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**Lower Colorado River Authority**

**P.O. Box 220**

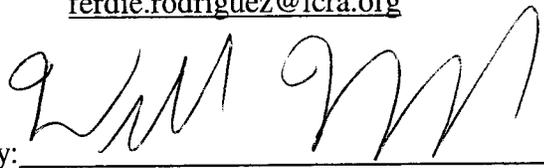
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By: 

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 Landowners Preservation Group, this the 15<sup>th</sup> day of January 2010 by e-mail, facsimile, First-Class U.S. mail, or by hand delivery.

A handwritten signature in cursive script, appearing to read "William T. Medaille", written in black ink.

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William T. Medaille

## DEFINITIONS

As used in the Requests for Information, the terms listed below have the following meanings:

1. The terms “concern” or “concerning” include referring to, alluding to, responding to, relating, connected with, commenting on, in respect of, about, regarding, discussing, showing, recording, describing, mentioning, reflecting, analyzing, constituting, evidencing, or pertaining to.
2. The terms “document” and “documents” are used in their broadest sense and include, among other things, all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, facsimiles, messages, memoranda, records, reports, books, summaries, tape recordings or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants’ reports appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilations from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated or made. If any of the documents provided pursuant to these requests is in machine-readable form (such as punch cards, paper or magnetic tapes, drums, diskette or core storage), for each such document state the type of computer and software program(s) or other machinery or equipment required to read the information.
3. The term “LCRA” means the Lower Colorado River Authority; “LCRA TSC” means the LCRA Transmission Services Corporation.
4.
  - a. The term “identify” when used with a natural person means to supply a full name, business address, and business telephone number or, if the above information is unavailable, some other means of identifying the person and his present location. The identification must also include a job title and name of employer.
  - b. The term “identify” when used with a person (as defined below) other than a natural person means to provide its name, its nature (e.g. corporation, partnership, etc.), its street and mailing addresses, and its telephone number.

c. The term “identify” when used with a document means to provide the following:

- (i) the full name and address of the author(s) by whom the document was written, prepared recorded, or made;
- (ii) the date the document was prepared;
- (iii) the title and “re” of the document;
- (iv) the subject matter of the document;
- (v) the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
- (vi) the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
- (vii) if the document has been lost, shredded or destroyed (whether intentionally or unintentionally), an explanation of the reasons for the cause of such loss, shredding or destruction).

d. The term “identify” when used with any other thing or matter means to provide as detailed a description as is necessary to permit LCRA TSC to identify it and to determine its present location.

- 5. The terms “person” and “persons refer to and include natural persons, corporations, partnerships, proprietorships, joint ventures, unincorporated associations, trusts, estates, governments (and agencies thereof), municipalities, quasi-public entities and all other forms of specifically identifiable legal entities.
- 6. The term “you” or “yours” refers to the person to whom the particular request for information is directed as well as (but not limited to), for example, any other member of the group, entity, association, trust, etc. of which the person is a part.

LCRA TSC's 1<sup>st</sup> RFI to LPG Intervenor S. Alan Skinner

- 1-1. To the extent not explained in response to PUC Staff's 1<sup>st</sup> or 2<sup>nd</sup> RFI, questions BA 1-4, 1-7, or 1-9, if your objection to any route proposed by LCRA TSC in this CCN application is based on an allegation that there is an adverse effect on your property, please list and describe in detail what you believe those adverse effects may be, and how your particular interest in the property may be affected. Please provide any documents that support your objection and allegations.
- 1-2. If your objection to any route proposed by LCRA TSC in this application is not based on an allegation that there is an adverse affect on your property, but to the community in general, please list and describe in detail what you believe those adverse effects may be, and how your particular interest in the property may be affected. Please provide any documents that support your objection and allegations.
- 1-3. Please list and produce all documents (including photographs) in your possession relevant to any claim that a route proposed by LCRA TSC in this docket may adversely affect your property or the community in general. To the extent that photographs are included in this response, please include a written indication of the location of the photo, time and date it was taken, person who took it, and what you believe the photo is intended to illustrate.
- 1-4. Have you recorded any telephone conversations, conversations of any sort, or meetings with LCRA TSC representatives or other individuals involved with this project (e.g. contractors working for LCRA or LCRA TSC, other landowners, elected officials, etc.) without their knowledge? If so, please produce a copy of such recorded conversations or meetings.
- 1-5. Please list the names of any witness, expert or factual, who will testify on your behalf in this docket. For each such witness please provide the name and address of the witness, the subject matter of the testimony, any particular expertise the witness may have on any subject matter on which the witness will testify, and a brief summary of the subject matter the witness will address. If the witness is an expert witness, please provide in addition to the information sought above, a current resume and any associated bibliographies, as well as a list of cases or dockets in which the witness has previously testified.
- 1-6. Please answer the following:
  - a. Please identify each meeting you, your client, group, entity you represent, or person(s) representing you or speaking on your behalf has had with each person or group of persons, including landowners, other intervenors, expert witnesses, community leaders, LCRA or LCRA TSC representatives, or governmental officials regarding the proposed transmission line.

- b. For each of the above meetings, please identify to the best of your knowledge and recollection the date of each meeting, person(s) involved, identification of the involvement of each person, group/company/agency/governmental organization, subject) of the discussions, and the location of each meeting.
  - c. Please provide all documents, including notes and e-mail correspondence (see definition of "document" above) related in any way to such meetings.
- 1-7. Please provide a copy of any document that you may have in your possession dealing in any way with the proposed project. Documents include, but may not be limited to the following: email, presentations, letters, reports, memos, notes (including notes from meetings with LCRA personnel, telephone conferences with LCRA personnel or notes taken at LCRA TSC Open Houses), maps, photographs, studies. It is not necessary for you to provide copies of documents that have been provided to you by LCRA TSC.
- 1-8. To the extent not provided in response to a previous LCRA TSC RFI or PUC Staff's 1<sup>st</sup> or 2<sup>nd</sup> RFI, Questions BA 1-1, BA 1-4, BA 1-6, BA 1-7, or BA 1-9, please provide a map clearly depicting your property that may be potentially affected by the proposed project. Include on the map locations of houses, barns, and any other improvements.
- 1-9. To the extent an alternate route or routes you indicated that you "prefer" in response to Kane-Glensprings Ranch, Ltd.'s 1<sup>st</sup> RFI Question 1-1 does not represent a satisfactory solution to any concerns you have in this docket, what do you propose as a solution to your concerns in this docket? In other words, what end result in this docket would be satisfactory to you, your client, group, business, or other associated interest?
- 1-10. To the extent not previously identified in response to Staff's 1<sup>st</sup> or 2<sup>nd</sup> RFI to intervenors in this docket or in response to previous RFIs in this set of Questions (LCRA TSC's 1<sup>st</sup> RFI to Intervenor), please explain any legal or factual impediments you contend will limit the use or paralleling by LCRA TSC of any existing transmission line easement on your property. (If you have no existing transmission line easements on your property, please indicate "Not Applicable").
- 1-11. To the extent not previously provided in response to Staff's 1<sup>st</sup> or 2<sup>nd</sup> RFI or previously in response to this LCRA TSC's 1<sup>st</sup> RFI, please provide:
- a. Copies of any document provided by you or persons acting on your behalf to any federal, state or local governmental entity or agency.
  - b. Copies of any document provided to you or persons acting on your behalf to any federal, state or local governmental entity or agency.

As in response to Question No. 1-7 above, it is not necessary for you to provide copies of documents that have been provided to you by LCRA TSC.

1-12. Please precisely identify the location of any cemeteries on or in the vicinity of your property, and provide any maps or other documentation in your possession showing or discussing such sites.