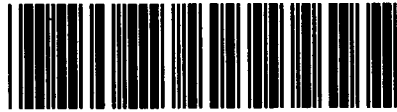




Control Number: 37448



Item Number: 810

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, TEXAS</b>	<b>§ § § § § § § § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**LANDOWNERS' PRESERVATION GROUP'S REQUEST FOR EXTENSION TO  
RESPOND TO LCRA TSC'S RFI'S**

NOW COMES the Landowners' Preservation Group (LPG) and files this request for an extension to respond to discovery and would respectfully show as follows:

LCRA TSC filed several requests for information (RFIs) on intervenors in the Landowners' Preservation Group and the LPG's expert witness, S. Alan Skinner. These RFIs include LCRA TSC's Second Set of RFIs to William R. Hinckley, LCRA TSC's First Set of RFIs on S. Alan Skinner, and LCRA TSC's First RFIs to All Parties Listed in Attachment A. These RFIs were filed between 2:41 and 2:43 p.m. on Friday, January 15, 2010, before the Martin Luther King, Jr. holiday.

The LPG currently has twenty-three members,<sup>1</sup> including Mr. Hinckley. Thus, when you include the set of RFIs that was served on the group's expert witness, counsel for LPG must prepare and file responses for twenty-four persons. The deadline to file the responses is today Monday, January 25, 2010. However, counsel for LPG has been faced with many other deadlines this week and next. The deadline to respond to objections on intervenor direct testimony was January 20, 2010. The deadline for intervenors to file

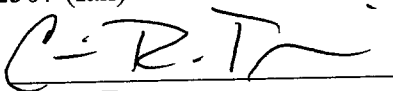
<sup>1</sup> The Landowners Preservation Group includes intervenors: William R. Hinckley, Garrett Marital Trust, Ronald Shroyer, Roy Shroyer, Kaye Fischer-Hales, Catherine Rainwater, Richard & Ann Moore Johnson, Ed and Jacqueline Harrell, Jeffrey & Carolin Harrell, Jack Clark, Cynthia Clark, Jerry Hobbs,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

cross rebuttal testimony was January 22, 2010, and the deadline for discovery on Staff's direct case, for which testimony was filed on January 20, 2010, is January 26, 2010. Counsel for LPG has been working diligently to meet all of these deadlines, as well as review the Direct Testimony of Brian Almon, filed on behalf of Commission Staff, prior to the close of discovery on Staff's direct case. While counsel has begun the process of contacting its members and expert witness to seek answers and documents responsive to LCRA TSC's RFIs, counsel will not be able to timely respond to the discovery requests.

Counsel for LPG respectfully requests that the group and its expert witness be granted an extension to file responses to LCRA TSC's recent discovery requests, referenced above. In light of the RFIs being filed and served late on the Friday before the Martin Luther King, Jr. holiday weekend, counsel for LPG requests that the RFIs be treated as if they were filed on Tuesday, January 19, 2010, to permit the deadline to file responses to the RFIs to be extended until January 29, 2010. However, LPG will file some of the responses earlier than January 29, 2010, as the information is received. LPG prays that this motion be granted especially considering the number of members of LPG from whom information must be gathered and considering LPG has had only four working days to gather information.

Respectfully submitted:

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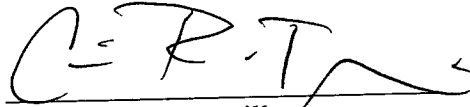
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CARRIE R. TOURNILLON  
State Bar No. 24053062

**ATTORNEYS FOR  
LANDOWNERS' PRESERVATION GROUP**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 25<sup>nd</sup> day of January 2010 a true and correct copy of the foregoing document was served upon all parties of record by electronic transmission, facsimile and/or First-class mail United States mail, postage paid.

By:   
Carrie R. Tournillon