



Control Number: 37448



Item Number: 829

Addendum StartPage: 0

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

INTERVENOR RICHARD THOMPSON'S RESPONSES TO LCRA TRANSMISSION
SERVICES CORPORATION'S FIRST REQUEST FOR INFORMATION TO ALL PARTIES
LISTED IN ATTACHMENT A

Richard Thompson, pursuant to Public Utility Commission Procedural Rules 22.144, files these responses to LCRA Transmission Services Corporation's first requests for information. The following answers may be treated by all parties as if the answers were filed under oath.

- 1-1. To the extent not explained in response to PUC Staff's 1st or 2nd 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.
- Answer: See prior supplement response (37448-233); See prior answers to RFIs (37448-328 and 37448-329). See Statement of Position (37448- 542).
- 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.

Answer: See prior supplemental response (37448-233); See prior answers to RFIs (37448-328 and 37448-329). See Statement of Position (37448-542).

- 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.

Answer: See the topographical map attached to my Statement of Position (37448-542)

- 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.

Answer: No

- 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.

Answer: None. A statement of position was filed. No direct testimony was filed.

- 1-6. 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.

Answer:

My wife and I attended the December 3, 2009 pre-hearing conference at the Marriott Courtyard in downtown Austin. My wife and I spoke with a number of landowners, intervenors, and their attorneys at that conference.

My wife and I have discussed the Gillespie to Newton transmission line project with my brothers, Robert Thompson and David Thompson on various occasions. I have met with my brother Robert Thompson at his home in Llano County and at my home in Llano County to discuss the Gillespie to Newton transmission line project. I have met with my cousin, Susan Jenkins and her husband, Mark Jenkins M.D. at my home in Llano County in November, 2009 to discuss the Gillespie to Newton transmission line project.

My wife attended the LCRA open house in Fredericksburg, Texas and spoke with other landowners including my brother, Robert Thompson.

My wife had a meeting with Stephen Fain and Carroll Fain in Llano, Texas on September 19, 2009 to discuss the Gillespie to Newton transmission line project. My wife had a meeting with Stephen Fain and Jonathan Schoolar on September 21, 2009 at Mr.

Schoolar's office in Austin to discuss the Gillespie to Newton transmission line project.

My wife had a meeting with Mark Davis and Stephen Fain in Austin on October 16, 2009 to discuss the Gillespie to Newton transmission line project.

My wife attended various meetings held by SOSHCE (Save our Scenic Hill Country Environment) in Fredericksburg between July, 2009 and January, 2010. My wife attended two community wide meetings held by SOSHCE in Fredericksburg at the Farm Bureau building in July, 2009 and in November, 2009.

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.

Answer: See answer above for detail regarding the meetings.

C. Please provide all documents, including notes and e-mail correspondence (see definition of "document" above) related in any way to such meetings.

Answer: Materials reviewed at the meetings were materials made available by the LCRA, either on their website or mailed directly to landowners.

- 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.

Answer: My wife communicated with Dennis Palafox of the LCRA in late October or early November, 2009 to determine whether our property was "directly affected" and whether a neighboring landowner's property was directly affected. My wife had a phone conversation with Ferdie Rodriguez in early December to obtain copies of maps and other materials from the LCRA.

- 1-8. To the extent not provided in response to a previous LCRA TSC RFI or PUC Staff's 1st or 2nd 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.

Answer: See attached map.

- 1-9. To the extent an alternate route or routes you indicated that you "prefer" in response to Kane-Glensprings Ranch, Ltd.'s 1st 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?

Answer: The route chosen should utilize segments C5 and C9 in Gillespie County and Llano County. Utilize monopoles to minimize the impact of the transmission lines wherever the lines are located.

- 1-10. To the extent not previously identified in response to Staff's 1st or 2nd RFI to intervenors in this docket or in response to previous RFIs in this set of Questions (LCRA TSC's 1st 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").

Answer: Not applicable. No existing electric transmission line easement is on my property.

1-11. To the extent not previously provided in response to Staff's 1st or 2nd RFI or previously in response to this LCRA TSC's 1st 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.

Answer: None

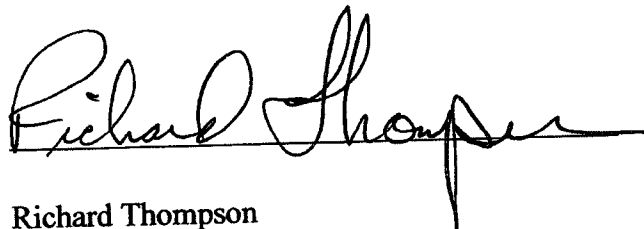
B. Copies of any document provided to you or persons acting on your behalf to any federal, state or local governmental entity or agency.

Answer: None

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.

Dated: 1/24, 2010

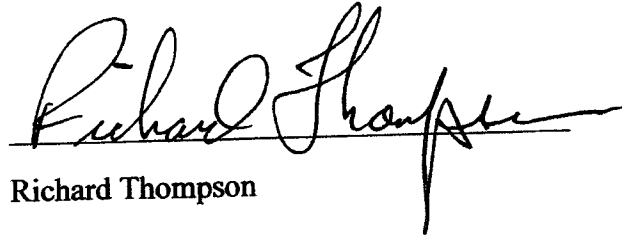
Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Richard Thompson", written over a horizontal line.

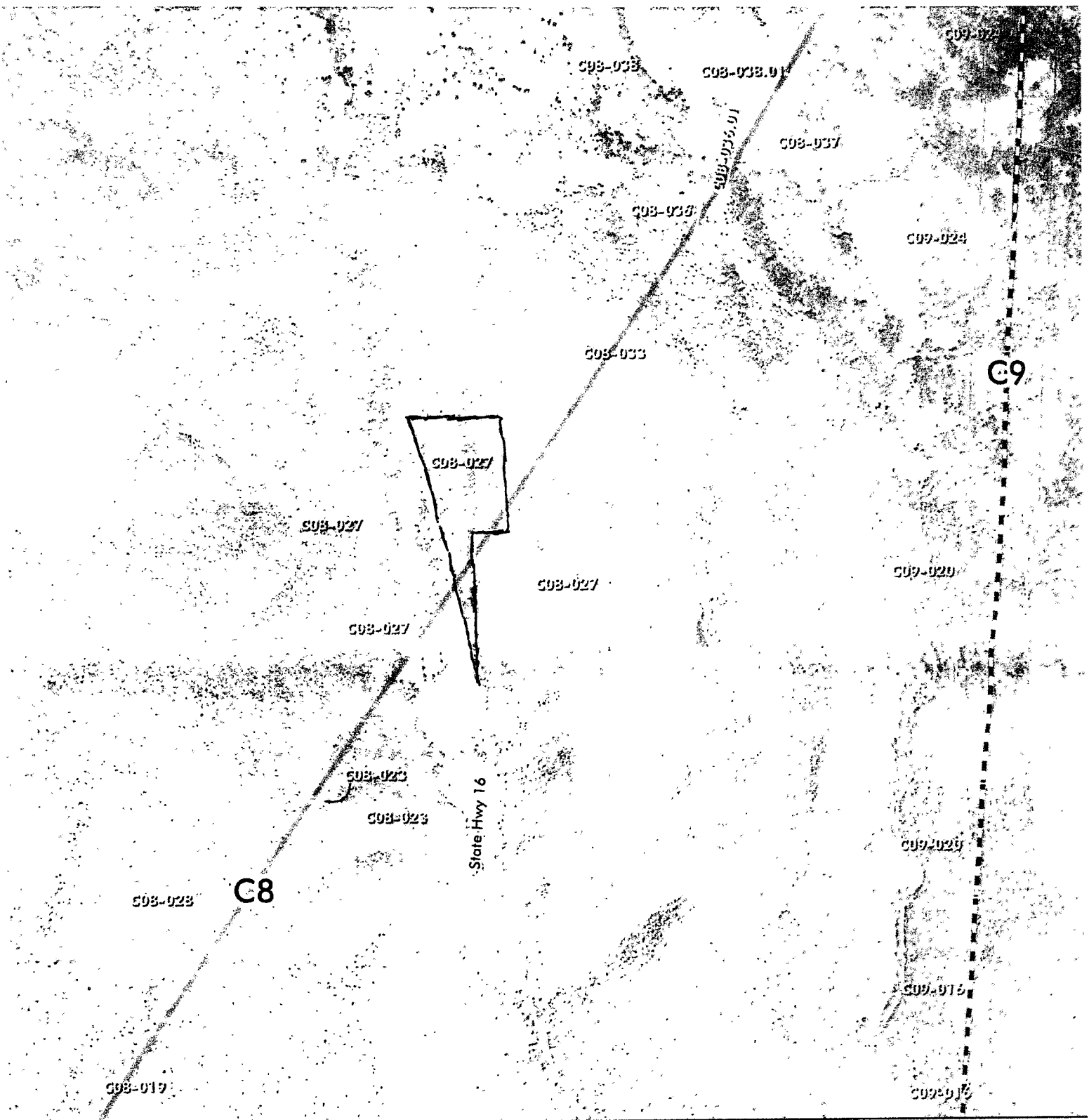
Richard Thompson

Certificate of Service

I certify that pursuant to Order No. 1 in this docket, this document will be served on 1/24, 2010 on the party propounding these requests for information, and filed with the P.U.C. pursuant to Subchapter E of the Commission's procedural rules.

A handwritten signature in cursive script, reading "Richard Thompson", is written over a horizontal line. The signature is fluid and stylized, with the first name "Richard" and last name "Thompson" clearly legible despite the cursive style. The line underneath the signature is a simple horizontal stroke.

Richard Thompson



Approximate Property Boundaries

○ Habitable Structures

----- Preferred Routes