



Control Number: 37448



Item Number: 883

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**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
CREZ TRANSMISSION LINE IN
GILLEPIE, LLANO, SAN SABA,
BURNET AND LAMPASAS
COUNTIES, TEXAS**

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**RECEIVED
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FILING CLERK**

**LANDOWNERS' PRESERVATION GROUP'S
FIRST SET OF REQUESTS FOR INFORMATION
TO KDCB GARRETT RANCH, LTD.**

The Landowners' Preservation Group's¹ First Set of Requests for Information ("RFIs") to KDCB Garrett Ranch, Ltd. ("Garrett Ranch") are hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Jim Boyle, Herrera & Boyle, PLLC at 816 Congress Avenue, Suite 1250, Austin, Texas 78701, within ten (10) days of service hereof or no later than February 8, 2010, in conformance with the requirements of PUC Procedural Rule 22.144(c)(16 T.A.C. §22.144(c)). Exhibit A is attached hereto and incorporated herein for all purposes.

Definitions

1. "Garrett Ranch," refers to intervening party KDCB Garrett Ranch, Ltd.
2. "Applicant" refers to Garrett Ranch.
3. "You," "yours," and "your" refer to Garrett Ranch (as defined above), including its directors, officers, employees, consultants, agents and attorneys.

¹ 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, Ronald Griffin, Jane Moore Gamel, Doris, Moore Faubion, Jack Goodman, Jack Haby, Early Hamby, Sr., Gordon Griffin, Al & Susann Friedrichs, and Mike Atkinson.

4. "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 not 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 of 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.
5. 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 Garrett Ranch.
5. "Identification" of a 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 identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity 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 Garrett Ranch or in the custody of its attorneys or other representatives or agents.
6. "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.
7. "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 counsel.
2. In 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 becomes available.
5. If Garrett Ranch considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if Garrett Ranch objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
6. If any document is withheld under any claim of 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 Garrett Ranch 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,

HERRERA & BOYLE, PLLC
816 Congress Avenue, Suite 1120
Austin, Texas 78701
(512) 474-1492 (voice)
(512) 474-2507 (fax)

BY: _____
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FELIPE ALONSO III

State Bar No. 24045400

**ATTORNEYS FOR
LANDOWNERS' PRESERVATION GROUP**

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of January 2010, a true and correct copy of the foregoing document was served upon Garrett Ranch by electronic mail, facsimile and/or First-class mail United States mail, postage paid.

By: _____
Jim Boyle

EXHIBIT A

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**LANDOWNERS' PRESERVATION GROUP'S
FIRST SET OF REQUESTS FOR INFORMATION
TO KDCB GARRETT RANCH, LTD.**

- 1-1. On what date(s) did Mr. Billy Snow visit the Llano County Courthouse in preparation for his rebuttal testimony?
- 1-2. Please provide a copy of all revisions and replats of the Indian Hills Subdivision and any notes made while at the Llano County Courthouse or the Appraisal District for Llano County.
- 1-3. Please provide any and all documents which provide evidence of an easement or right-of-way retained by LCRA in the Indian Hills Subdivision.
- 1-4. Please provide any and all pictures, or photographs taken by Mr. Billy Snow after January 7, 2010 in or near Links C14 or C17 which have not been attached to his Rebuttal Testimony.
- 1-5. Please provide a full size copy of the plat of Indian Hills Subdivision, a small size copy was attached to the Rebuttal Testimony of Mr. Billy Snow.
- 1-6. Please provide a full size copy of the plat for the Deer Hills Subdivision, a small size copy was attached to the Rebuttal Testimony of Mr. Billy Snow.
- 1-7. Please provide a copy of any and all contracts, agreements, or written understandings regarding Mr. Billy Snow's scope of work for this proceeding or any documents which set forth his hourly rate for work performed in this proceeding, including work performed in connection with his rebuttal testimony.
- 1-8. Please provide a copy of any and all emails either sent to or received from Mr. Snow with regard to his rebuttal testimony.