



Control Number: 37448



Item Number: 884

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SOAH DOCKET NO. 473-10-1097
PUC DOCKET NO. 37448

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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 §

BEFORE THE STATE OFFICE

OF

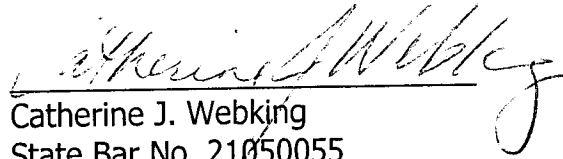
ADMINISTRATIVE HEARINGS

**KREUZ FAMILY'S, JAMES MUNCEY, AND MR. AND MRS. HARRIS'
RESPONSES TO LCRA TSC'S FIRST REQUEST FOR INFORMATION**

The Kreuz Family, James Muncey, and Mr. and Mrs. Harris (Joint Respondents) file these joint responses to LCRA TSC's First Request for Information. All responses offered are to be considered to be offered under oath by Mr. Kreuz.

Undersigned counsel has attempted to reach counsel for LCRA TSC with regard to the timing of these responses. These messages were not returned. Undersigned counsel was in hearing at the time the discovery requests were originally filed. Because the entities upon whom discovery is requested were not in the style of the pleading, there was some delay in submittal of these responses. Based on the nature of these responses, LCRA TSC is in no way prejudiced by the timing of these responses.

Respectfully submitted,

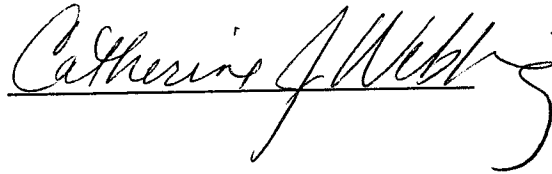


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CERTIFICATE OF SERVICE

I certify that a copy of the above has been sent in a manner consistent with the procedural orders in this case on this 27th day of January, 2010.



Question 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 objections and allegations.

Response

Please see the responses to Staff's RFIs and the Direct Testimony of Mr. James Kreuz.

Sponsoring Witness: James Kreuz

Question 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 particular interests in the property may be affected. Please provide any documents that support your objection and allegations.

Response

As described in the testimony of Mr. James Kreuz, construction of the proposed transmission line along Link C-4 would have a negative effect on all visitors to Enchanted Rock State Park. This unparalleled natural site has high value in the community and the community would be detrimentally impacted by the degradation of the Enchanted Rock State Park.

Sponsoring Witness: Mr. James Kreuz

Question 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.

Response

Please see the Direct Testimony of James Kreuz.

Sponsoring Witness: Mr. James Kreuz

Question 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.

Response

No.

Sponsoring Witness: Mr. James Kreuz

Question 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.

Response

Please see the Direct Testimony of Mr. James Kreuz.

Sponsoring Witness: Mr. James Kreuz

Question 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.

Response

Other than participation in the Open House associated with this project, there have been no other meetings.

Sponsoring Witness: Mr. James Kreuz

Question 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.

Response

Other than documents provided by LCRA TSC and other documents filed in this proceeding, there are no other documents responsive to this request.

Sponsoring Witness: Mr. James Kreuz

Question 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.

Response

No such maps have been created.

Sponsoring Witness: Mr. James Kreuz

Question 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?

Response

Respondents do not oppose any particular route as long as Segment C-4 is not utilized in the route.

Sponsoring Witness: Mr. James Kreuz

Question 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").

Response

Not applicable.

Sponsoring Witness: Mr. James Kreuz

Question 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 your or persons acting on your behalf to any federal, state or local governmental entity or agency.
- b. Copies of any documents 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.

Response

None.

Sponsoring Witness: Mr. James Kreuz