



Control Number: 37778



Item Number: 371

Addendum StartPage: 0

SOAH DOCKET NO. 473-10-2461  
PUC DOCKET NO. 37778

APPLICATION OF LCRA § BEFORE THE  
TRANSMISSION SERVICES §  
CORPORATION TO AMEND ITS §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE TWIN § STATE OFFICE OF  
BUTTES TO MCCAMEY D 345-KV §  
CREZ TRANSMISSION LINE §  
IN TOM GREEN, IRION, AND §  
SCHLEICHER COUNTIES, TEXAS § ADMINISTRATIVE HEARINGS

SLAUGHTER INTERESTS, LTD.'S  
SUPPLEMENTAL RESPONSES TO LCRA TRANSMISSION SERVICES  
CORPORATION'S FIRST REQUEST FOR INFORMATION

Slaughter Interests, Ltd. submits the attached Supplemental Responses to LCRA Transmission Services Corporation's First Request for Information, Questions 1-1 and 1-4. Pursuant to Public Utility Commission Procedural Rule §22.144(c)(2)(F), Slaughter Interests, Ltd. stipulates that the attached responses may be treated by all parties as if the answers were filed under oath.

Respectfully submitted,  
SCOTT, DOUGLASS & McCONNICO, L.L.P.  
600 Congress Avenue, Suite 1500  
Austin, Texas 78701-2589  
(512) 495-6300  
(512) 474-0731 Fax

By



Christopher D. Sileo  
State Bar No. 24027977  
[csileo@scottdoug.com](mailto:csileo@scottdoug.com)  
John K. Hicks  
State Bar No. 24050755  
[jhicks@scottdoug.com](mailto:jhicks@scottdoug.com)

ATTORNEYS FOR  
SLAUGHTER INTERESTS, LTD.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on LCRA Transmission Services Corporation in accordance with Order No. 5 in this docket by fax on April 1, 2010.

A handwritten signature in black ink, appearing to read 'Christopher D. Sileo', is written over a horizontal line.

Christopher D. Sileo

**SOAH DOCKET NO. 473-10-2461  
PUC DOCKET NO. 37778**

**SLAUGHTER INTERESTS, LTD.'S  
SUPPLEMENTAL RESPONSE TO LCRA TRANSMISSION SERVICES  
CORPORATION'S FIRST REQUEST FOR INFORMATION**

- 1-1 Please list the links and route you oppose and state the general factual bases why you oppose each links/routes.

**ORIGINAL RESPONSE**

Slaughter Interests, Ltd. ("Slaughter") opposes Link A13 because it would cut right through the middle of Slaughter's property, known as Arden Ranch, from north to south and come very close to Arden Ranch's headquarters, which is an historic home known as the Maier House and is a Recorded Texas Historic Landmark. According to information in LCRA's application this historic home would be approximately 339 feet from the centerline of Link A13.

Slaughter opposes Link A7 because it too would bisect Arden Ranch, and it would necessarily be used with Link A13. Slaughter also opposes Link A9, and any route that uses Link A9, because it would cross Slaughter's ranch and would necessarily be used in conjunction with Link A13.

Slaughter opposes Route TM6, which uses Link A7 and Link A13, and Route TM8, which uses Link A9 and Link A13. Arden Ranch is essentially rectangular shaped and both of these two routes run essentially the full length of Arden Ranch, cutting through it in multiple places. Either of these routes would have a significant negative impact on the aesthetic value and, accordingly, the financial value of Arden Ranch. Slaughter is also concerned about the potential health effects from the electric and magnetic fields created by these transmission lines, as well as the fact that residents and guests to Arden Ranch will be concerned about such potential health effects. These routes would have a significant negative impact to the wildlife on the ranch. In addition, the existence of the line through the prime tourism and hunting areas of Arden Ranch would reduce or eliminate Slaughter's tourism and hunting revenue.

**SUPPLEMENTAL RESPONSE**

Although still preferring the preferred route or any route using segment A8, and still opposing routes using A13, after reviewing the Direct Testimony of H.R. Warlaw III, and the LCRA's Response to the Wardlaw Brothers Ranch, Ltd's First

Request for Information to LCRA TSC, Slaughter supplements its response to LCRA TSC RFI 1-1 to state that if route TM6 or TM6 modified is selected, it strongly supports the use of the modified link A13A that Mr. Wardlaw has described in his direct testimony and that is described in the Wardlaw RFI to LCRA TSC.

After reviewing the direct testimony of various witnesses for the M.D. Bryant Family Trust and LCRA's answers to the M.D. Bryant Trust's Second RFI to LCRA, Slaughter supplements its response to state that it also opposes the M.D. Bryant Family Trust's modified link A-13A. The supposed benefit of that route seems to be to move existing link A-13 further away from the residential areas directly across FM 2335. Moving the line just a few hundred feet further west can hardly be said, in Slaughter's view, to accomplish that goal. Slaughter is also concerned that small landowners along FM 2335 are not being given notice of the change and do not have a fair voice in this proceeding. Slaughter is concerned in generally with unnoticed modifications to routes, when people, including Slaughter, have developed plans and made decisions based routes and segments set forth for months and months by the LCRA. Slaughter has proposed a segment A12-A would move the line a more impressive distance from the residential areas along and east of FM 2335 while maintaining an alignment that is still relatively far east on the M.D. Bryant Ranch and in the largely cultivated areas of the M.D. Bryant Ranch.

Slaughter also notes that Wardlaw's modified A-13A, which Slaughter supports if TM6 or TM6 modified is selected could be further modified by moving the south line of that modification slightly further north and possibly the east line slightly further west to be entirely within Slaughter land, specifically on the tract immediately east of A13-002 to the extent this would cure any notice problems as identified by the LCRA in their response to Wardlaw's discovery.

Please also see the Direct and Rebuttal Testimony of Lon Slaughter and Lane Prickett on file that discuss these issues in more detail.

**SOAH DOCKET NO. 473-10-2461  
PUC DOCKET NO. 37778**

**SLAUGHTER INTERESTS, LTD.'S  
SUPPLEMENTAL RESPONSE TO LCRA TRANSMISSION SERVICES  
CORPORATION'S FIRST REQUEST FOR INFORMATION**

- 1-4. What routes, if any, do you prefer? To the extent an alternate route or routes you indicated that you prefer 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?

**ORIGINAL RESPONSE**

Slaughter prefers Route TM5.

**SUPPLEMENTAL RESPONSE**

In addition to Route TM5, Slaughter proposes as a satisfactory solution the new proposed link a7A described in RFI 1-32 of Slaughter's First Requests for Information to LCRA Transmission Services Corporation, but only if link a7A were to be used in conjunction with link a8. Even though almost 100% of link a7A would be on Slaughter's property, Slaughter supports this new link if it were to be used with link a8 such that the direct impact on the Slaughter property would be limited to the effect caused by link a7A. Because 100% of the length of the proposed link a7A would parallel an existing roadway, if link a7A and the northern portion of original link a7 are substituted in place of link a6, the modified preferred route, TM5-mod, would parallel existing transmission lines for a significantly greater distance than current TM5 and would also parallel existing roadways for a significantly greater distance than TM5.

Please also see the Supplemental Response to LCRA's RFI 1-1, which discusses Wardlaw's modified A-13A, which Slaughter strongly supports if route TM6 or route TM6 modified is selected among other issues.

Please also see the Direct and Rebuttal Testimony of Lon Slaughter and Lane Prickett on file that discuss these issues in more detail.

- 1-6. 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**

Lon Slaughter. Mr. Slaughter's address is PO Box 1508, San Angelo, Texas 76902, although for purposes of this docket, parties should contact him through undersigned counsel. Mr. Slaughter will testify as to the adverse impact of the proposed transmission lines on Slaughter Interests, Ltd. and on the property the lines would cross.

Lane Prickett. Mr. Prickett's address is 323 Congress Avenue, Suite 150, Austin, Texas 7870, although for purposes of this docket, parties should contact him through undersigned counsel. Mr. Prickett will testify as to the adverse impact of the proposed transmission lines on Slaughter Interests, Ltd. and on the property the lines would cross.

### **SUPPLEMENTAL RESPONSE**

Both Mr. Slaughter and Mr. Prickett will also testify in rebuttal to testimony by other intervenors and concerning proposed modifications to several segments offered by others and in rebuttal to those offered by others.

Additionally, Slaughter may offer additional rebuttal testimony from third-party witnesses concerning the proposed revision to segments. Slaughter has not yet made this determination, but will timely file any such testimony and will include the name and address of any such witnesses.