



Control Number: 38140



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Addendum StartPage: 0

WILLIAM AND KATHRYN LAMPMAN
JULY 27, 2010

SOAH DOCKET NO. 473-10-4109
PUC DOCKET NO. 38140

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PUBLIC UTILITY COMMISSION
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**APPLICATION OF ONCOR
ELECTRIC DELIVERY COMPANY
LLC TO AMEND A CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR THE RILEY-KRUM WEST 345-
KV CREZ TRANSMISSION LINE
(FORMERLY OKLAUNION TO WEST
KRUM) IN ARCHER, CLAY, COOKE,
DENTON, JACK, MONTAGUE,
WICHITA, WILBARGER, AND WISE
COUNTIES, TEXAS**

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**INTERVENORS WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO
COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION AND
FIRST SET OF REQUESTS FOR ADMISSION TO ALL INTERVENORS**

COME NOW, William and Kathryn Lampman ("Lampman") to file this, their response to Commission Staff's ("Staff") First Set of Requests for Information ("RFIs") and First Set of Requests for Admission ("RFAs") to all Intervenors and shows as follows:

I. Written Responses

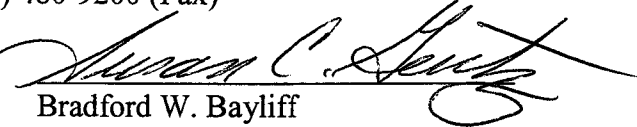
Attached hereto and incorporated herein by reference are written responses to the aforementioned requests for information and requests for admission. Each response is set forth on or attached to a separate page on which the request has been restated. All responses are made without waiver of Lampman's right to contest the admissibility of any matters upon hearing. Lampman stipulates that their responses may be treated by all parties exactly as if they were filed under oath.

II. Inspections

In those instances where materials are to be made available for inspection or where the materials are voluminous, the response will so state. Voluminous materials and materials available for inspection may be inspected at the offices of Casey, Gentz & Magness, L.L.P. Please call Brad Bayliff at the number listed below in advance for an appointment to view any voluminous materials.

Respectfully submitted,

CASEY, GENTZ & MAGNESS, L.L.P.
98 San Jacinto Boulevard, Suite 1400
Austin, Texas 78701
(512) 480-9900
(512) 480-9200 (Fax)

By: 
Bradford W. Bayliff
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**ATTORNEYS FOR
CROSS TIMBERS CONSERVANCY
AUTHORIZED REPRESENTATIVE FOR
WILLIAM AND KATHRYN LAMPMAN**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Response to Commission Staff's First Set of Requests for Information and First Set of Requests for Admission to All Intervenors has been served on John M. Zerwas, Jr., Attorney – Legal Division of the PUC, by U.S. Mail, facsimile, hand delivery, or electronically on this 27th day of July, 2010.


Bradford W. Bayliff

William and Kathryn Lampman's Response to Staff's First Requests for
Information and Requests for Admissions
July 27, 2010

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-1**

Staff 1-1 Do you have a habitable structure, as defined by P.U.C. SUBST. R. 25.101(a)(3), near one or more of the segments of the proposed transmission line? If so, describe the structure, identify the segment(s) and estimate how far the segments are from the habitable structure. P.U.C. SUBST. R. 25.101(a)(3) defines "habitable structures" as follows: "Structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis. Habitable structures include, but are not limited to, single-family and multi-family dwellings and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, and schools."

Response to Staff RFI 1-1:

Yes.

Responsible Party: William Lampman

William and Kathryn Lampman's Response to Staff's First Requests for
Information and Requests for Admissions
July 27, 2010

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-2**

Staff 1-2: Does one or more of the segments of the proposed transmission line cross your property? If so, identify the segments and any features including but not limited to a property line, pipeline, power line or road that segments follow through your property.

Response to Staff RFI 1-2:

No.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-3**

Staff 1-3: Do any existing transmission or distribution lines cross your property? If so, please describe how and where they cross your property.

Response to Staff RFI 1-3:

Yes. Across the front of our property running parallel to Wise Rd., Wise County.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-4**

Staff 1-4: Are any existing transmission or distribution lines visible from your property? If so, please describe from where the lines are visible, approximately how far away the lines are located and how the current lines affect your property, if at all.

Response to Staff RFI 1-4:

Yes. Looking toward the front of our property, 1,000 feet from our home. The lines lower property value and are a nuisance.

Responsible Party: William Lampman

William and Kathryn Lampman's Response to Staff's First Requests for
Information and Requests for Admissions
July 27, 2010

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-5**

Staff 1-5: Do you currently have any windmills located on your property? If so, please describe the location of the windmills and how many are located on your property.

Response to Staff RFI 1-5:

No.

Responsible Party: William Lampman

July 27, 2010

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-6**

Staff 1-6: Are you aware of any directly affected landowner that did not receive notice of the proposed transmission line project from Oncor? If so, please identify the landowner and describe as best possible the location of the property affected. A directly affected landowner is any landowner from which Oncor would need to obtain an easement or other property interest if it built the transmission line using one or more of the segments of the proposed transmission line, or whose land contains a habitable structure that is within 500 feet of the centerline of one or more of the segments of the proposed transmission line.

Response to Staff RFI 1-6:

No.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-7**

Staff 1-7: Have you discussed any modifications to the proposed transmission line route on your property with a representative of Oncor? If so, what were the modifications to the proposed route that you suggested and what was the response of Oncor?

Response to Staff RFI 1-7:

No.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-8**

Staff 1-8: What are your specific concerns about the proposed transmission line?

Response to Staff RFI 1-8:

It will affect the natural beauty of the landscape. The property's value will be greatly devalued and I have heard that these types of lines contribute to cancer in humans and in animals.

Responsible Party: William Lampman

William and Kathryn Lampman's Response to Staff's First Requests for
Information and Requests for Admissions
July 27, 2010

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-9**

Staff 1-9: Did you attend any open houses presented by Oncor concerning this proposed transmission line? If so, when and where? Did you provide written comments to Oncor at or after the open house? If so, please provide them.

Response to Staff RFI 1-9:

No. We were not notified of any open houses or meetings.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-10**

Staff 1-10: Are your property boundaries for the property you own represented accurately on the maps provided by Oncor in its Application at Appendix E of Attachment No. 1 (Figures 3-1A through 3-1J)? If not, please explain any discrepancies and provide a modified Oncor map or drawing to indicate the discrepancies.

Response to Staff RFI 1-10:

We cannot answer this. Oncor did not furnish us with any maps, routes, or any other information.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-11**

Staff 1-11: What is the primary use for your property and, in your opinion, will this use be impacted by the proposed transmission line?

Response to Staff RFI 1-11:

It is our home as well as our family farm. Yes.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-12**

Staff 1-12: In your opinion, is there any feature about your land that you believe should be considered when routing a transmission line on your property? If so, please explain.

Response to Staff RFI 1-12:

Not on my property.

Responsible Party: William Lampman

William and Kathryn Lampman's Response to Staff's First Requests for
Information and Requests for Admissions
July 27, 2010

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-13**

Staff 1-13: Please identify all persons with an ownership interest in your property.

Response to Staff RFI 1-13:

William and Kathryn Lampman.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSE TO STAFF'S
FIRST REQUEST FOR INFORMATION NO. 1-14**

Staff 1-14: If the transmission is routed on your property, please identify specifically the location that you would prefer for the right-of-way of the line. Use a map to show the location.

Response to Staff RFI 1-14:

Not applicable.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSES TO STAFF'S
FIRST REQUEST FOR ADMISSIONS NO. 1-1**

Staff RFA 1-1: Admit or deny that you do not own or reside in a habitable structure within 500 feet of the centerline of any proposed transmission line route in this docket.

Response to Staff RFA 1-1:

Admit.

Responsible Party: William Lampman

**WILLIAM AND KATHRYN LAMPMAN'S RESPONSES TO STAFF'S
FIRST REQUEST FOR ADMISSIONS NO. 1-2**

Staff RFA 1-2: Admit or deny that the property boundaries for the property(ies) you own are accurately represented on the maps provided by Oncor.

Response to Staff RFA 1-2:

We cannot answer this because we have not seen Oncor's maps.

Responsible Party: William Lampman