



Control Number: 38230



Item Number: 1010

Addendum StartPage: 0

**SOAH DOCKET NO. 473-10-4398  
DOCKET NO. 38230**

**APPLICATION OF LONE  
STAR TRANSMISSION, LLC  
FOR A CERTIFICATE OF  
CONVENIENCE AND NECESSITY  
FOR THE CENTRAL A TO CENTRAL  
C TO SAM SWITCH/NAVARRO  
PROPOSED CREZ TRANSMISSION  
LINE**

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**BEFORE THE STATE OFFICE OF  
ADMINISTRATIVE HEARINGS**

FILED  
JUL 16 PM 12:01  
TALLAHASSEE

**LONE STAR TRANSMISSION, LLC'S FIRST REQUEST FOR INFORMATION  
TO FRENCH LAND & CATTLE, LTD.**

Lone Star Transmission, LLC ("Lone Star") requests that you provide the following information and answer the following questions(s) under oath. The question(s) should be answered in sufficient detail to fully present all of the relevant facts, within 10 days of receipt of these requests, as per Order No. 1 in this PUC Docket No. 38230.

The Commission's Procedural Rules provide that these question(s) are continuing in nature, and if there is a relevant change in your answer after you submit it such that it is no longer complete or accurate, submit an amended answer, under oath, as a supplement to your original answer within five (5) working days of your discovery that such amendment is appropriate. The Commission's Procedural Rules require that you state the name of the witness or witnesses in this cause who will sponsor the answer to the question at the hearing and can vouch for the truth of the answer.

Provide your response to the undersigned counsel at the e-mail address listed below and submit an original and five copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, Suite 8-110D, Austin, Texas 78701.

Respectfully submitted,



Chris Reeder  
State Bar No. 16692300  
S. Scott Shepherd  
State Bar No. 24013498  
Kathleen E. Magruder  
State Bar No. 12827700  
Marianne Carroll  
State Bar No. 03888800  
Brown McCarroll, L.L.P.  
111 Congress Ave., Suite 1400  
Austin, Texas 78701  
512.479.1154 (Phone)  
512.481.4868 (Fax)  
[creeder@brownmccarroll.com](mailto:creeder@brownmccarroll.com)  
[sshepherd@brownmccarroll.com](mailto:sshepherd@brownmccarroll.com)  
[kmagruder@brownmccarroll.com](mailto:kmagruder@brownmccarroll.com)  
[mccarroll@brownmccarroll.com](mailto:mccarroll@brownmccarroll.com)

**For Service:** [LoneStarCCN@brownmccarroll.com](mailto:LoneStarCCN@brownmccarroll.com)

ATTORNEYS FOR LONE STAR  
TRANSMISSION, LLC

**Certificate of Service**

It is hereby certified that notice of the filing of the foregoing has been sent to [dk38230@soah.state.tx.us](mailto:dk38230@soah.state.tx.us) on this 16th day of August, 2010, and served upon the party to whom the pleading is directed by first class mail, electronic mail, or facsimile, consistent with Order No. 5.



Chris Reeder

## **DEFINITIONS**

As used in the Requests for Information, the terms listed below have the following meanings:

“You” and “your” refers to French Land & Cattle, Ltd., all its directors, officers, employees, consultants, agents and attorneys.

“Document” and “documents” as used herein in their broadest sense as set forth in Tex. R. Civ. P. 192.3(b), and specifically includes electronic or magnetic data as described in Rule 196.4. These words mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms “Document” and “Documents” shall include all agreements, contracts, communications, correspondence, letters, opinion letters, telegrams, telexes, telefaxes, messages, memoranda, records, reports, books, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries, or other records of meetings and conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants' and experts' reports, appraisals, bulletins, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs and data compilations from which information can be obtained (including matter used

in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, magnetically-stored, optically-stored, or electronically stored matter, however and by produced, prepared, reproduced, disseminated, or made. The words "Document" and "Documents" also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that do not contain any markings, additions, or deletions that are different from the original do not have to be separately produced.

The terms "identify" and "describe," when used in reference to facts, an event, or an allegation, means to include: (1) a detailed description of the facts, events, or allegation at issue; (2) the date or dates on which the facts or event occurred, or the time period involved in the events giving rise or relating to the allegation; and (3) the name, address, telephone number, and affiliation of all persons involved in the facts, event, or allegation.

"Lone Star Transmission Project" shall refer to the proposed Central A to Central C to Sam Switch/Navarro 345 kV Transmission Line Project as set forth in its Application for a Certificate of Convenience and Necessity, filed in this docket on May 24, 2010 and as subsequently amended and supplemented.

### **INSTRUCTIONS**

Electronic or magnetic data shall be produced in its native computer readable format with an identification of its associated software application and computer system on CD-ROM's readable by PC computers. The data produced must contain an exact and complete image copy of the source hard drives, or other electronic or magnetic media or storage device containing the original data and include not only active files, but all deleted, erased or discarded copies, and prior versions or drafts of the data.

All duplicates or copies of documents are to be provided to the extent they have handwriting, additions, or deletions of any kind different from the original document being produced.

Please comply with PUC PROC. R. 22.72 (g)(2)(B), which per subsection (a) specifically applies to discovery responses, and which provides that: "All pages of the copy filed pursuant to this paragraph, starting with the first page of the table of contents, shall be consecutively numbered through the last page of the document, including attachments, if any."

**LONE STAR TRANSMISSION, LLC'S  
FIRST REQUEST FOR INFORMATION TO  
FRENCH LAND & CATTLE, LTD.**

1. For all direct testimony you file in this proceeding, please produce in their native format all attachments, exhibits and other documents appended to or filed in support of the direct testimony. This request includes but is not limited to all photographs, spreadsheets, diagrams, maps, and graphs filed with or in support of the direct testimony.
2. Please produce all workpapers of each witness filing direct testimony on your behalf in this proceeding. This includes, but is not limited to, all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the witness in anticipation of testifying in this docket.