



Control Number: 38230



Item Number: 1104

Addendum StartPage: 0

**SOAH DOCKET NO. 473-10-4398
PUC 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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**IONI CREEK CONSERVATION GROUP'S
FIRST SET OF REQUESTS FOR INFORMATION
TO SOUTH GREEN RANCH**

FROM SEGMENT C INTERVENORS:

Ioni Creek Conservation Group's¹ (ICCG's) First Set of Requests for Information ("RFIs") to South Green Ranch are hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera & Boyle, PLLC at 816 Congress Avenue, Suite 1250, Austin, Texas 78701, within ten (10) calendar days of service hereof or no later than August 27, 2010, in conformance with the requirements of PUC Procedural Rule 22.144(c)(16 T.A.C. §22.144(c)) and SOAH Order No. 1. Exhibit A is attached hereto and incorporated herein for all purposes.

¹ Ioni Creek Conservation Group includes the following aligned intervenor landowners, located on link HH in Segment C, who oppose the preferred route: Sarah Lew Link and David N. Grimes, Amy Grimes Ehrlich, D. Link Grimes, Sarah Ann Grimes Honeycutt, and Matthews-Link Properties, Ltd.'s (L. C. Link Ranch); Ellen Gordon Stuart Trust, W.B. and Ellen Gordon Stuart Trust, S. J. and Margaret Gordon Stuart Trust (Stuart Ranch); Elizabeth Crawford Life Estate (Crawford Ranch); and the Guy U. Robinson Trust, Dorothy Robinson Eckols Trust, Eira Virginia Jones SAIAA, and Virginia Robinson Trust (Robinson Ranch).

Definitions

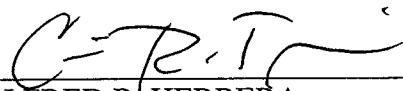
1. "Intervenor" includes the person to whom these RFIs are addressed and any person acting on the intervenor's behalf in this proceeding, including but not limited to witnesses and persons preparing and/or sponsoring responses to RFIs.
2. "Document" and "documents" mean any written, recorded, filmed, 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.
3. 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 the Intervenor, as defined above.
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 the intervenor 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 Intervenor 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 Intervenor 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 Intervenor 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,

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CERTIFICATE OF SERVICE

I hereby certify that on this the 17th day of August 2010, a true and correct copy of Ioni Creek Conservation Group's First Set of Requests for Information to South Green Ranch was served upon South Green Ranch by facsimile and/or First-class mail United States mail, postage paid.

By: 
CARRIE R. TOURNILLON

EXHIBIT A

SOAH DOCKET NO. 473-10-4398

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IONI CREEK CONSERVATION GROUP (ICCG)

**FIRST SET OF REQUESTS FOR INFORMATION
TO SOUTH GREEN RANCH**

- 1-1 With regard to the mobile home mentioned on page 4, lines 22 and 23, of the Direct Testimony of William Henry Green:
- a. Please provide all documents relating to the potential purchase and location of the home.
 - b. Can the potential home be placed in a location that is more than 1000 feet distant from the proposed line? If not, please explain why not and provide all documents supporting your answer.
- 1-2 With regard to the Indian burial sites described on page 7, line 5, of the Direct Testimony of William Henry Green:
- a. Where are these sites with regard to the proposed line?
 - b. Have the sites been reported to the Texas Historical Commission or the Texas Archeology Society?
 - c. Have the sites been examined by an archeologist? If so, please provide all documents related to such examination.
 - d. Are cattle allowed to graze on or near these sites?
 - e. Is wildlife restricted from going on these sites? If so, please describe how the wildlife is restricted.
 - f. Are hunters warned about the site locations? If so, please provide all documents given to hunters regarding such sites.