



Control Number: 38230



Item Number: 1184

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 345-KV CREZ §  
TRANSMISSION LINE §  
§  
§

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

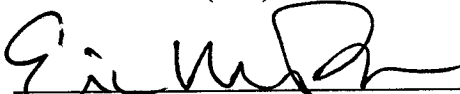
SHANE STARK'S RESPONSE TO JOHN A. MATTHEWS, JR.'S  
FIRST REVISED SET OF REQUESTS FOR INFORMATION

To: John A. Matthews, Jr., by and through his attorney of record, Walter W. Pfluger, P. O.  
Box 2540, San Angelo, Texas 76902-2540.

Shane Stark ("Mr. Stark") files this response to John A. Matthews, Jr.'s  
("Mr. Matthews") First Revised Requests for Information ("Revised RFIs"). Mr. Matthews  
propounded his First Revised RFIs on Mr. Stark on August 16, 2010. Therefore, this response is  
timely filed. This response may be treated by all parties as if it were filed under oath.

Respectfully submitted,

LLOYD, GOSSELINK,  
ROCHELLE & TOWNSEND, P.C.  
816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
Telephone: (512) 322-5830  
Facsimile: (512) 472-0532



LAMBETH TOWNSEND  
State Bar No. 20167500

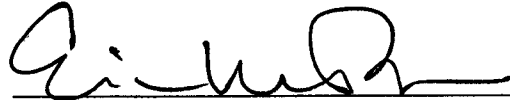
EILEEN MCPHEE  
State Bar No. 24060273

ATTORNEYS FOR SHANE STARK

1184

**CERTIFICATE OF SERVICE**

I, Eileen McPhee, attorney, certify that a copy of this document was served on counsel for John A. Matthews, Jr. this 23rd day of August, 2010, in the following manner: sent via facsimile, emailed or mailed by U.S. First Class Mail.

  
EILEEN MCPHEE

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

**SHANE STARK'S RESPONSE TO  
JOHN A. MATTHEWS, JR.'S  
FIRST REVISED SET OF REQUESTS FOR INFORMATION**

Request 1-1 Do you own property located between Central C substation and the Sam Switch substation which will be crossed or touched by any line segment in the Lone Star 345 kV transmission line project? [If your answer to this Request No. 1-1 is no, then none of the remaining questions pertain to you and you should not answer any of them.]

RESPONSE: Yes. Proposed Link AA on the preferred route cuts directly through our property, dividing it almost in half.

Prepared by: Jason Stark  
Sponsored by: Jason Stark

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Request 1-2 If your answer is yes to RFI No. 1-1 above, please identify each line segment which crosses or touches your property.

RESPONSE: Proposed Link AA on the preferred route cuts directly through our property, dividing it almost in half.

Prepared by: Jason Stark  
Sponsored by: Jason Stark

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Request 1-3 For each line segment which you identified in Request No. 1- 2 above, please provide the following information:

- (1) What is the approximate length across your property of each such line segment;
- (2) Does this line segment parallel any compatible right of way across your property and, if so, what type of compatible right of way and for what distance does it so parallel;
- (3) Is this line segment adjacent or contiguous to any apparent boundary line and, if so, for what distance is it adjacent or contiguous to such apparent boundary line;
- (4) Does this line segment wholly or partially fail to parallel or follow compatible rights of way or apparent boundary lines across your property and, if such is the case, what is the length of that part of this line segment crossing or touching your property that neither parallels nor follows compatible rights of way or apparent boundary lines;
- (5) If your property is crossed or touched by more than one line segment, please explain which line segment you believe to be the most damaging line segment to your property along with the reasons for your answer.

**RESPONSE:**

- (1) Proposed Link AA cuts directly through our property for approximately 2640 feet.
- (2) No, proposed Link AA does not parallel any compatible right of way across our property for the entire distance it crosses our property, which is approximately 2640 feet. Please see the Direct Testimony of Jason Stark, p. 4 and Attachment A, filed August 16, 2010.
- (3) No, proposed Link AA is not adjacent or contiguous to any apparent property line, but cuts directly through the middle of our property and directly through our area of high fencing. Please see the Direct Testimony of Jason Stark, p. 4 and Attachment A, filed August 16, 2010.

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- (4) Link AA wholly fails to parallel or follow either compatible rights of way or apparent boundary lines across our property. Proposed Link AA cuts directly through our property for the length of approximately 2640 feet. Please see the Direct Testimony of Jason Stark, p. 4 and Attachment A, filed August 16, 2010.
- (5) Not applicable.

Prepared by: Jason Stark  
Sponsored by: Jason Stark