



Control Number: 38230



Item Number: 1605

Addendum StartPage: 0

SOAH DOCKET NO. 473-10-4398
PUC DOCKET NO. 38230
Blackard Intervenor
Doris Blackard, Rodger Blackard Estate Trust
(Doris Blackard Trustee) Nolan and Audra
(Blackard) von Roeder, Lonnie and Susan Blackard

October 13, 2010

**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 SWITHC/NAVARRO
PROPOSED CREZ TRANSMISSION
LINE**

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

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BLACKARD INTERVENORS

RESPONSE TO

SOAH ORDER NO. 14

Exhibits:

Exhibit	Description	
Map	Exhibit DT-S-2A Page 1 of 1	p. 9
Map	Exhibit 1 Project Location Map Central A – Tonkawa 345kv Transmission Line Project (PUC Docket No. 37409 CCN Application for ONCOR)	p.10
Map	Route Adjustments – Lone Star Exhibit 1 p. 99 Modification of Alternative Routes following Public Involvement Program	p.11
Table.....	Exhibit DT-S-1	p.12

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1 As requested by the Administrative Law Judges, Blackard Intervenors respectfully
2 submit the following reference documentation in regard to:

- 3 1. Lone Star Central A - Central C (A-C segment) Transmission Line Project PUC Docket
4 No. 38230
5 2. ONCOR Central A to Tonkawa Transmission Line Project in PUC Docket No. 37409
6 which was approved by the Commission on March 8, 2010.¹

7 Portions of these documents were provided in Blackard Intervenors Direct Testimony
8 and in the Bound Notebook which contains information from the PUC Docket No. 37409.²

¹ PUC Docket No. 37409, Item No. 171, p. 2, #3, Affidavit Attesting to the Provision of Notice of Final Order to Landowners

² BI 2 Yellow Tab (Direct Testimony of Susan Blackard on behalf of Blackard Intervenors)
BI 3 Red Tab (All pages from Bound Notebook – Exhibit A, submitted in PUC Docket 37409)

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9 **Information Requested:**

10 All references contained in the record that indicate in which specific location and to what
11 extent the Lone Star Proposed links parallel any other PUC – approved CREZ transmission lines,
12 including but not limited to the ONCOR Electric Delivery Company Central A to Tonkawa
13 Project transmission line, recently approve in Docket No. 37409.

14 Due to the overwhelming number of references, I will attempt to provide your Honors
15 with items of importance contained in the record to the best of my ability. These items have
16 been submitted to PUC Central Records as documents in PUC Docket No. 37409 or PUC Docket
17 No. 38230. The majority are contained within Lone Star Exhibits or Blackard Intervenor
18 Exhibits.

19 **Lone Star Exhibits**

- 20 1. “At or near the Central A Substation, some of Lone star’s proposed routes parallel
21 Oncor’s approved Central B to Central A to Tonkawa 345kv line up to approximately
22 five miles (Link B).”³
- 23 2. “A table showing the amount of paralleling and number of crossings per
24 Lone Star link is attached as Exhibit DT-S-1.”⁴ (Link B shows no paralleling of other
25 345kv transmission lines, which is incorrect as the B Link parallels the Central A –
26 Tonkawa for 4.5 miles.)

³ Lone Star Exhibit 19, 6/24/10, Interchange #444 Supplemental Direct Testimony of David K. Turner, P.E
p. 3 lines 1-3

⁴ Lone Star Exhibit 19, 6/24/10, Interchange #444 Supplemental Direct Testimony of David K. Turner, P.E
p. 4 lines 1-3, Exhibit DT-S-1 Table p. 16

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- 27 3. Oversized Map - Exhibit DT-S-2A Page 1 of 1 (All lines paralleling and exiting the
28 Central A substation are illustrated on this map, PUC approved and Proposed)
29 Central A Map illustrating approved CREZ transmission lines and proposed CREZ
30 transmission lines.⁵
- 31 4. "The portion of Link B departing the Central A site was adjusted at a landowner's request
32 to follow property lines and to follow Oncor's preferred route for its proposed Central A
33 to Tonkawa transmission line project. The landowners stated that if the preliminary
34 routes crossed their property, their preference would be to have both proposed
35 transmission lines (Oncor and Lone Star) in the same corridor along their property
36 boundary."⁶
37 Map – Modification of Alternative Routes following Public Involvement Program⁷
38 Route adjustment at request of Blackard Intervenors. (Questionnaire returned to Lone
39 Star.)
- 40 5. Map – Exhibit 1 Project Location Map, Central A – Tonkawa 345kv Transmission Line
41 Project. Illustrates Preferred and Alternate Routes.⁸

⁵ Lone Star Exhibit 19, 6/24/10, Interchange #444 Supplemental Direct Testimony of David K. Turner, P.E
p. 18

⁶ BI 2 Yellow Tab p. 31 paragraph 3 beneath 6.1 (underlined)

⁷ PUC Docket 38230 Lone Star Exhibits Disk 1 of 3 CD
Lone Star Exhibit 1CD's with Entire Filing, Application Attachment 1 EA Report,
Section 6.0, p. 99, Modification of Alternative Routes

⁸ PUC Docket No. 37409, PUC Interchange, Item #2, 9/16/2009 ONCOR Electric Delivery Company LLC
CCN Application Map mailed to Affected Landowners (unknown page no. - Oversized map at Central
Records)

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The previous items support the following Blackard Intervenor references:

6. Map – County Property Owner map drawn by Susan Blackard illustrating the paralleling of the ONCOR Central A – Tonkawa and the Lone Star B link including WETT proposed transmission line routes.⁹
7. Q. Do you support Lone Star’s Alternate Route B from Central A (Scurry South) – Central C?
- A. Yes, ABSOLUTELY!! Route B is our first choice as it parallels the Central A (Scurry South) – Tonkawa which we requested be approved in our settlement with ONCOR in PUC Docket No. 37409 and was stipulated in the Final Order.¹⁰
8. 2. Oncor will not oppose Lone Star paralleling an approved Oncor transmission line with one of Lone Star’s transmission lines along Link C3, as described in the application or the “Settlement Link” for the Central B – Central A portion of the Proposed Transmission Line Project.
3. Oncor will not oppose Lone Star paralleling an approved Oncor transmission line with one of Lone Star’s transmission lines along links A, B, C, or D of the Central A to Tonkawa portion of the Proposed Transmission Line Project, as described in the Application.¹¹

⁹ BI 2 Yellow Tab p. 7

¹⁰ BI 2 Yellow Tab pages 14 – 15

¹¹ BI 2 Yellow Tab p. 27 or PUC Interchange, Docket No. 37409, Item #159, page 3, #2-#3

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9. Map referencing Lone Star transmission line proposed route and ONCOR transmission line sketched on a Lone Star Preliminary map to determine distance from oil wells to property line.¹²
10. “However, the parallel route to the ONCOR Central A – Tonkawa transmission line is sufficient to accomplish our goal of not dividing another Blackard or von Roeder property into smaller sections.”¹³
11. Scurry County Landowner map obtained from the Scurry County Appraisal Office. Prepared by Susan Blackard illustrating the four transmission lines exiting the Central A substation to be constructed by ONCOR, Lone Star and WETT. Preliminary preferred and alternate routes.^{14 / 15}
12. “The Route B was requested that – during the Oncor 37409 docket, we requested that Lone Star be allowed to parallel the Central A Tonkawa route, which would be the lower route, and we did have that approved, and that is the route we would prefer.”¹⁶
13. Q. “Okay. If it had to be put on your property, would you prefer it to parallel the Oncor Central B, Central A?”
- A. “No.”
- Q. “What would be your preference if it had to go on your property?”
- A. “That it would parallel the Central A to Tonkawa.”¹⁷

¹² BI 2 Yellow Tab p. 30

¹³ BI 2 Yellow Tab p. 32, lines 15-17

¹⁴ BI 3 Red Tab p. 5

¹⁵ BI 3 Red Tab p. 19

¹⁶ Hearing of the Merits, Transcripts, Volume 4, lines 5-9, page 899

¹⁷ Hearing of the Merits, Transcripts, Volume 4, lines 2-9, page 906

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Doris Blackard, Rodger Blackard Estate Trust
(Doris Blackard Trustee) Nolan and Audra
(Blackard) von Roeder, Lonnie and Susan Blackard

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Respectfully Submitted,

Susan Blackard

Susan Blackard on Behalf of the Blackard
Intervenors: Doris Blackard, Rodger Blackard
Estate Trust, Nolan and Audra (Blackard)
von Roeder, Lonnie and Susan Blackard
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Certificate of Service

I certify that notification of this document has been provided to Ms. Norma Lopez and that this document was submitted by regular mail and electronic mail to the PUC Central Records on this 14th day of October, 2010.

Susan Blackard

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**Oversized Map
Available in
Central Records**

Exhibit DT – S – 2A¹⁸

¹⁸ Lone Star Exhibit 19, 6/24/10, Interchange #444 Supplemental Direct Testimony of David K. Turner, P.E.
p. 18

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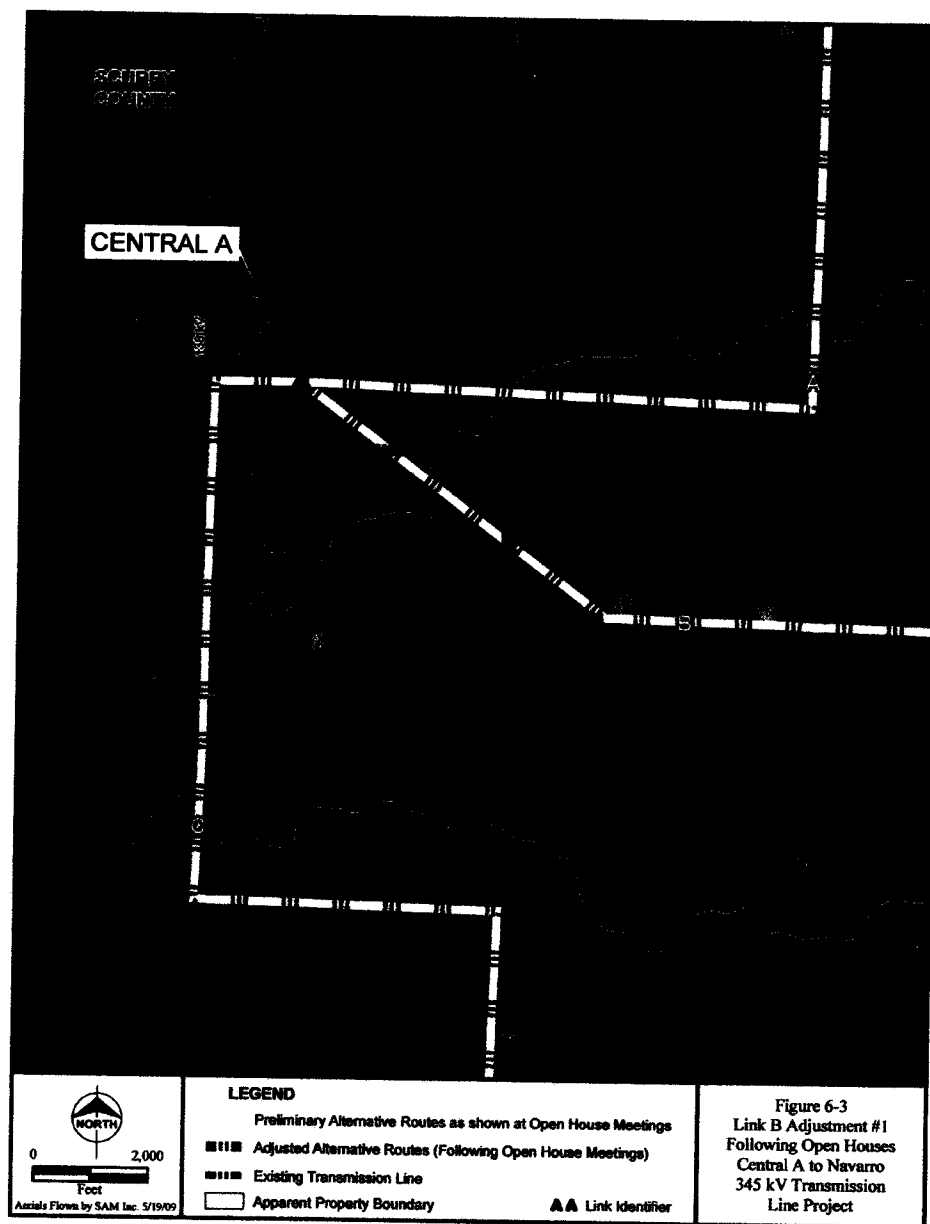
78

**Oversized Map
Available in
Central Records**

**Exhibit 1
Project Location Map
Central A – Tonkawa
345kv Transmission Line Project¹⁹**

¹⁹ PUC Docket No. 37409, PUC Interchange, Item #2, 9/16/2009 ONCOR Electric Delivery Company LLC CCN Application Map mailed to Affected Landowners (unknown page no. - Oversized map at Central Records)

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Docket No. 38230
Exhibit DT-S-1
Page 1 of 1

CENTRAL A - (Refers to Exhibit DT-S-2A)

	WETT			ONCOR	
	<u>Crossings</u>	<u>Parallel</u>		<u>Crossings</u>	<u>Parallel</u>
Link A	none	none	Link A	2	0
Link B	none	none	Link B	up to 2	4.6
Link C	2 to 7	2	Link C	1	0.9

CENTRAL C Refers to Exhibit DT-S-2B)

	WETT	
	<u>Crossings</u>	<u>Parallel</u>
Link G	up to 5	5.9
Link J	up to 3	6
Link AA	1	2.2

SCURRY / FISHER COUNTY BORDER (Refers to Exhibit DT-S-2C)

	WETT	
	<u>Crossings</u>	<u>Parallel</u>
Link C	3	10.1
Link F	up to 1	5.4