



Control Number: 38230



Item Number: 201

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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21 APR 11:37
PUC STAFF

**RESPONSE OF PALO PINTO COUNTY MUNICIPAL WATER DISTRICT NO. 1
(INTERVENOR) TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR
INFORMATION AND FIRST SET OF REQUESTS FOR ADMISSION TO
TO ALL INTERVENORS**

Staff 1-1 Do you have a habitable structure, as defined by PUC Subst. Rule 25.101(a)(3), near one or more of the segments of the proposed transmission line? If so, describe the structure, identify the segments(s) and estimate how far the proposed line is 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."

ANSWER: No.

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 the segments follow through your property.

ANSWER: The proposed transmission line appears to follow an existing BEPC electric transmission line to the North of the Town of Gordon which passes through the water shed of the Intervenor's Municipal Water Supply Lake Palo Pinto.

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

ANSWER: There are BEPC electric transmission lines adjacent to Lake Palo Pinto which pass through the water shed area to Lake Palo Pinto

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which is operated by Palo Pinto County Municipal Water District No. 1. Location of line shown on Exhibit A. Exhibit A also shows the location of proposed Turkey Peak Reservoir. The Water District has spent considerable sums in planning for this reservoir which will be constructed as soon as all planning and permitting is completed which will be several years from now. The existence of another electric transmission line through the proposed lake area, should the present application of Lone Star result in such relocation, would be of disastrous cost to the Water District.

Staff 1-4 Are any existing transmission or distribution lines visible from your property? If so, please describe them 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.

ANSWER: The existing transmission lines are shown on attached Exhibit A made a part hereof and included herein.

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?

ANSWER: No.

Staff 1-6 Are you aware of any directly affected landowner that did not receive notice of the proposed transmission line project from Lone Star? 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 Lone Star 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.

ANSWER: No.

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

ANSWER: No.

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

ANSWER: Palo Pinto County Municipal Water District No. 1 is not concerned about the location proposed for the transmission line, but if through hearings on the proposed transmission line, it should be determined that the relocated transmission line would pass through or over either

Lake Palo Pinto or the proposed Turkey Peak Reservoir, then it would be of material concern to the Water District. If the Water District can receive assurances from the Applicant or the PUC that no changes to the location of the line will be made that will cross either the existing Lake Palo Pinto or the proposed Turkey Peak Reservoir, it will no longer be necessary for the Water District to participate in these proceedings.

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

ANSWER: No.

Staff 1-10 Are your property boundaries for the property you own represented accurately on the maps provided by the Lone Star in its Application? If not, please explain any discrepancies and provide a modified Lone Star map or drawing to indicate the discrepancies. Online versions of the maps can be viewed at <http://www.lonestar-transmission.bgtpartners.com/open-house-materials.html>. In addition, Lone Star will provide hard copies of these maps at each location where its Application is available for public view (such locations are listed in Lone Star's notice) and will provide a hard copy to any party upon request.

ANSWER: Not applicable.

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?

ANSWER: Not applicable.

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.

ANSWER: Not applicable

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

ANSWER: Not applicable

Staff 1-14 If the transmission line 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. Online versions of the maps can be viewed at <http://www.lonestar-transmission.bgtpartners.com/open-house-materials.html>. In addition, Lone Star will provide hard copies of these maps at each location where its Application is available for public view (such locations are listed in Lone Star's notice) and will provide a hard copy to any party upon request.

ANSWER: Not applicable.

**SOAH DOCKET NO. 473-10-4398
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**RESPONSE OF PALO PINTO COUNTY MUNICIPAL WATER DISTRICT NO. 1
(INTERVENOR) TO COMMISSION STAFF'S FIRST SET OF REQUESTS
FOR ADMISSIONS TO ALL INTERVENORS**

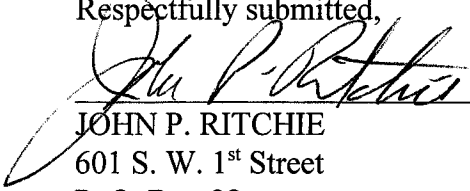
Staff RFA 1-1: Admit or deny that you do not own or reside in a habitable structure within 500 feet of the centerline of any proposed transmission line route in this docket.

ANSWER: Admitted.

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

ANSWER: Not applicable

Respectfully submitted,



JOHN P. RITCHIE

601 S. W. 1st Street

P. O. Box 98

Mineral Wells, Texas 76068

Telephone: 940.325.6228

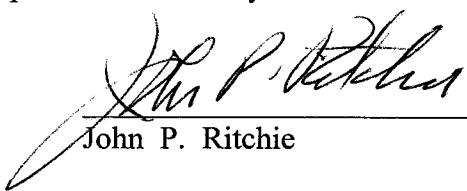
Facsimile: 940.325.5711

SBOT #16945000

ATTORNEY FOR PALO PINTO COUNTY
MUNCIPAL WATER DISTRICT NO. 1

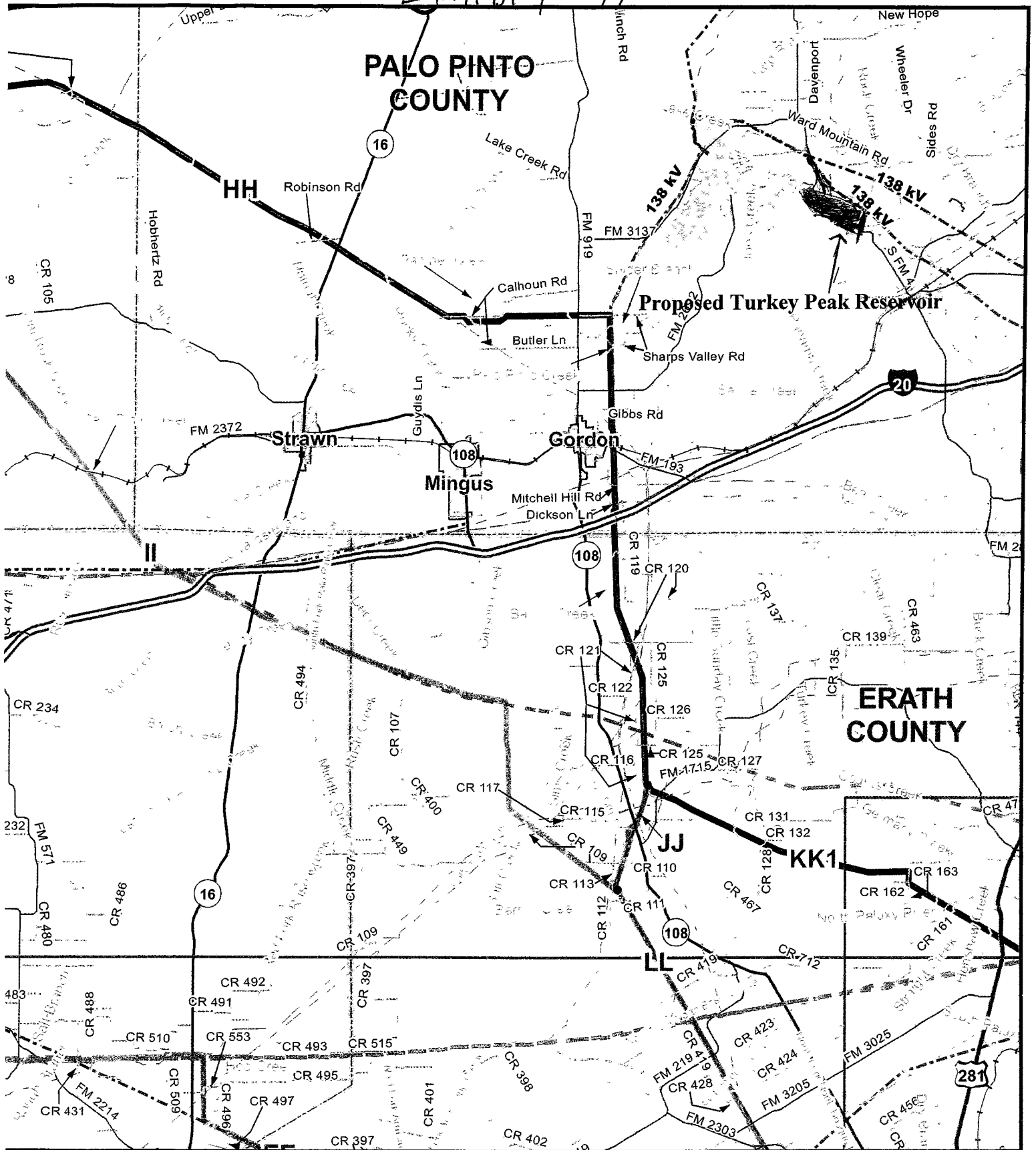
CERTIFICATE OF SERVICE

I hereby certify that on this the _____ day of June, 2010, a true and correct copy of the foregoing Response to Request for Information and Admissions of Palo Pinto County Municipal Water District No. 1 was served upon all parties of record by First-class mail, United States mail, postage prepaid.



John P. Ritchie

Exhibit A



Boundaries			
ints	— FM Roads	— Railroad	
lines	— Other Roads	— Existing Transmission Lines	
ameter	== Interstate	Creeks	
ameter	— U.S. Highway	Municipal Boundary	
r	— State Highway	County Boundary	

LONEstar



Lone Star Transmission, LLC
Central A to Navarro
345 kV Transmission Line Project
Notice Map
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