



Control Number: 38230



Item Number: 521

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

RECEIVED
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PUBLIC UTILITY COMMISSION
FILING CLERK

**SHANE STARK'S FIRST REQUEST FOR INFORMATION TO
LONE STAR TRANSMISSION, LLC**

To: Lone Star Transmission, LLC ("Lone Star"), by and through its attorney of record, Chris Reeder, Brown McCarroll, L.L.P., 111 Congress Ave., Suite 1400, Austin, Texas 78701.

This document is directed to Lone Star Transmission, LLC ("Lone Star") by and through its designated representative of record.

1. Pursuant to 16 TEX. ADMIN. CODE § 22.144 and the Texas Rules of Civil Procedure, Shane Stark ("Mr. Stark") propounds to Lone Star the requests for information set forth in the attached Exhibit "A".

2. On or before ten days after receipt of these requests, Lone Star must answer each of the requests for information separately, fully, in writing, and under oath and serve a signed copy of the answers to these requests upon counsel for Mr. Stark, Lambeth Townsend, at the following address: Lloyd, Gosselink, Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas, 78701.

3. All definitions and instructions governing discovery in the Texas Rules of Civil Procedure, the procedural rules of the Public Utility Commission of Texas ("PUC"), and the State Office of Administrative Hearings ("SOAH") and all applicable orders issued herein shall apply to these discovery requests. Specific definitions and instructions are set forth below.

4. Unless written requests for clarification are received by the undersigned, it shall be presumed that all requests are fully and completely understood.

5. If the items requested to be produced herein have already been provided in other discovery answers to Mr. Stark or to another party, it shall not be necessary to duplicate such production. It shall be sufficient that the answer containing the requested information is clearly identified. Where only a portion of the requested information has been previously provided, this shall be disclosed and all information necessary to fully and completely answer this discovery request shall be provided in your answer.

6. If the answer to any request consists of a document(s) obtained by the answering party from Mr. Stark, it shall not be necessary to produce the document. It shall only be necessary to describe the document, its date, subject matter, and when/how it was obtained from Mr. Stark. If the requested document is found in the public records of the PUC or other governmental agency, the answering party shall describe the exact location, file name, and custodian from whom the specific referenced document can be obtained.

DEFINITIONS

The following definitions apply to all of the requests for information in their entirety, including the instructions noted below:

1. "Application" means the application by Lone Star to amend its certificate of convenience and necessity for the Central A to Central C to Sam Switch/Navarro 345-KV CREZ transmission line, docketed as SOAH Docket No. 473-10-4398, PUC Docket No. 38230.
2. "Communication" means any oral, written, or electronic statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, or symposium of which Lone Star has knowledge, information, or belief.
3. "Concerning" means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting, embodying, mentioning, or constituting the subject matter identified in the request.

4. "Date" means the exact day, month, and year, if ascertainable or, if not, the best approximation.
5. "Describe" or "identify," when used in reference to a **document**, means you must state, to the fullest extent possible, the following:
 - (a) The nature (*e.g.*, letter, handwritten note) of the document;
 - (b) The title or heading that appears on the document;
 - (c) The date of the document and the date of each addendum, supplement, or other addition or change;
 - (d) The identity of: the author of the document; any signatory or signatories of the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and
 - (e) The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.
6. "Describe" or "identify," when used in reference to an **entity**, means you must state, to the fullest extent possible, the following:
 - (a) The entity's full and correct legal name;
 - (b) The nature of the entity's structure and/or organization;
 - (c) The address, telephone and fax number of the entity's principal offices;
 - (d) The principal line(s) of the entity's business or activity; and
 - (e) The officer, employee, or agent most closely connected with the subject matter of the request for information, and the officer who is responsible for supervising that officer or employee.
7. "Describe" or "identify," when used in reference to a **person or individual**, means you must state, to the fullest extent possible, the following:
 - (a) The individual's full name;
 - (b) The individual's present or last known residential address, including zip code;

- (c) The individual's present or last known occupation, job title, employer, employer's address, including zip code, and employer's telephone and facsimile number(s);
 - (d) The occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular request for information; and
 - (e) In the case of any person other than an individual, identify the officer, employee, or agent most closely connected with the subject matter of the request for information, and the officer who is responsible for supervising that officer or employee.
8. "Document(s)" or "documentation" means all written, typed, or printed matters, and all magnetic or other records, papers, or documentation of any kind or description (including, without limitation, letters, correspondence, telegrams, memoranda, notes, minutes, contracts, agreements, notations of telephone or in-person conversations, conferences, inter-office communications, e-mail, microfilm, bulletins, circulars, accounts, writings, drawings, graphs, charts, pamphlets, books, facsimiles, invoices, tape recordings, video recordings, photographs, computer printouts and work sheets), including all originals and all drafts and copies not identical to the originals, all photographs and graphic matter, however produced or reproduced, and all compilations of data from which information can be obtained, and any and all writings or recordings of any type or nature, whether or not prepared by you, in your actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former directors, officers, employees, representatives, consultants, accountants, attorneys, agents, other natural persons, business or legal entities, presently or formerly acting in concert with, under the direct or indirect control of, or on behalf of Opposing Party.
9. "Entity" means any partnership, association, corporation, joint venture, firm, proprietorship, agency, board, authority, commission, governmental body, trust, contractor, or any other organization, legal or business entity, and all other predecessors or successors in interest.
10. "Person(s)" or "Individual(s)" means any natural person.
11. "Possession, custody or control" of an item means that the person either has physical possession of the item or has a right to possession of the item that is equal or superior to the person who has physical possession of the item.
12. "Proposed line" means the proposed 311 mile 345 kilovolt double/single circuit transmission line for the Central A to Central C to Sam Switch/Navarro CREZ Transmission Line, as described in further detail in the Application.

13. The word "and" means "and/or."
14. The word "or" means "or/and."
15. "You," and "your," means Lone Star, its members, officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of Lone Star.
16. The words "link" and "segment" reference the individually numbered/lettered portions of the preferred and alternative rouges described in the Application.

INSTRUCTIONS


1. As to any request for information to which you are unable to respond to in whole or in part, for any reason, please state the grounds for your inability to respond. When you believe that a complete answer to a particular request for information or part thereof is not possible, please answer each request for information to the extent possible and furnish a statement explaining: 1) the reason for your inability to respond further; and 2) whatever information or knowledge you have concerning the non-responsive portion.
2. For each document or other requested information that you assert is privileged, please comply with the requirements of Rule 193.3 of the Texas Rules of Civil Procedure and P.U.C. PROC. R. 22.144.
3. For every document that no longer exists or cannot be located: identify the document; state how and when the document passed out of existence, or when it could no longer be located; and state the reason(s) for the disappearance; identify each person having knowledge about the disposition or loss of the document; and identify each document evidencing the existence or nonexistence of each document that cannot be located.
4. It is requested that all documents that might impact on the subject matter of the Application be preserved and that any ongoing process of document destruction involving such documents cease.
5. Furnish all requested documents available to you and known by you, or in your possession, custody, or control or that of your agents and attorneys.
6. In those instances where you choose to answer a request for information by referring to a specific document or record, it is requested that the specification be in sufficient detail to permit Mr. Stark to locate and identify the record(s) and/or document(s) from which the answer is to be ascertained, as readily as can Lone Star.
7. In those instances when requested information or documents are stored only on software, computer based information, or other data compilations, you should either produce the raw data along with all codes and programs for translating it into usable form, or produce

the information or documents in a finished usable form that includes all necessary glossaries, keys, and indices for interpretation of the material.

8. Please respond to each request for information and indicate clearly the request for information to which each response is responsive. When requests for information contain subparts, indicate in your answer the subpart to which each particular part of your response is in response.
9. You are under a duty to supplement your responses to these requests for information that are incomplete or incorrect when made. Furthermore, you are under a duty to timely supplement and/or amend your responses if you receive, obtain, or generate information within the scope of any request for information between the time of the original responses and the conclusion of this proceeding.
10. Unless otherwise indicated, the discovery requested in these requests for information relate to the time period from January 2008 through and including the present. All requested documents, data compilations, and recordings whenever actually prepared or generated that relate to this time period are to be produced

Respectfully submitted,

LLOYD GOSSELINK
ROCHELLE & TOWNSEND, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
Telephone: (512) 322-5800
Facsimile: (512) 472-0532

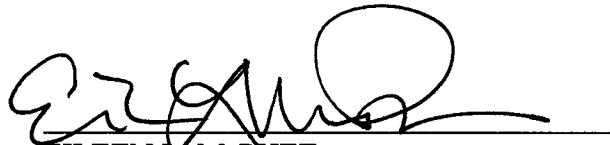

LAMBETH TOWNSEND
State Bar No. 20167500

EILEEN L. MCPHEE
State Bar No. 24060273

ATTORNEYS FOR SHANE STARK

CERTIFICATE OF SERVICE

I, Eileen McPhee, attorney, certify that a copy of Shane Stark's First Request for Information was served on Lone Star Transmission, LLC on the 28th day of June, 2010, via e-mail.


EILEEN L. MCPHEE

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

**SHANE STARK'S
FIRST REQUESTS FOR INFORMATION
TO LONE STAR TRANSMISSION, LLC**

EXHIBIT A

- 1-01. Please provide cost estimates for the following routes as listed in EA Table 6-2:
- CSS 154, CSS 155, CSS 156, CSS 162, CSS 164, CSS 167, CSS 168, CSS 169,
CSS 173, CSS 174, CSS 175, CSS 181, CSS 183, CSS 186, CSS 187, CSS 188,
CSS 192, CSS 193, CSS 194, CSS 200, CSS 202, CSS 205, CSS 206, CSS 207,
CSS 208, CSS 209, CSS 210, CSS 214, CSS 215, CSS 216, CSS 222, CSS 224,
CSS 227, CSS 228, CSS 229, CSS 230, CSS 231, CSS 232, CSS 236, CSS 237,
CSS 238, CSS 244, CSS 246, CSS 249, CSS 250, CSS 251, CSS 252, CSS 253,
CSS 254, CSS 255, CSS 256, CSS 257, CSS 258, CSS 259, CSS 260, CSS 261,
CSS 262, CSS 263, CSS 264, CSS 265.