



Control Number: 38230



Item Number: 654

Addendum StartPage: 0

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

RECEIVED
JUL 12 PM 3:00
PUBLIC UTILITY COMMISSION
FILED

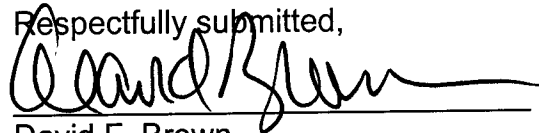
APPLICATION OF LONE STAR §
TRANSMISSION COMPANY FOR §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE §
CENTRAL A TO CENTRAL C TO §
SAM SWITCH TO NAVARRO §
PROPOSED CREZ §
TRANSMISSION LINE §

PUBLIC UTILITY COMMISSION
OF TEXAS

**CHALK MOUNTAIN COMMUNITY ALLIANCE, LLC'S RESPONSES TO
COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION AND
FIRST SET OF REQUESTS FOR ADMISSION TO KATHERINE CORNETT**

Chalk Mountain Community Alliance, LLC ("Chalk Mountain") files the following Responses to Commission Staff's First Set of Requests for Information and First Set of Requests for Admission (the "Requests") on behalf of Katherine Cornett ("Respondent"). The Requests were received on June 30, 2010; accordingly these Responses are timely under PUC Proc. R. §22.144(c)(1) and Order No. 1. Respondent stipulates that these Responses may be treated by all parties as if the answers were filed under oath.

Respectfully submitted,



David F. Brown
State Bar No. 03108700
david.brown@klgates.com
Craig L. Reid
State Bar No. 24038710
craig.reid@klgates.com
K&L Gates LLP
111 Congress Avenue, Suite 900
Austin, Texas 78701
Telephone: 512.482.6800
Facsimile: 512.482.6859
**ATTORNEYS FOR CHALK MOUNTAIN
COMMUNITY ALLIANCE, LLC**

CERTIFICATE OF SERVICE

I, David F. Brown, hereby certify that a copy of this document was served in accordance with PUC and SOAH rules and Orders issued in this Docket on this the 12th day of July, 2010.

A handwritten signature in black ink, appearing to read "David Brown", written over a horizontal line.

David F. Brown

RESPONSES

Staff-1-1 Do you have a habitable structure, as defined by P.U.C. SUBST. R. 25.101(a)(3), near one or more of the segments of the proposed transmission line? If so, describe the structure, identify the segment(s) and estimate how far the segments are 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."

RESPONSE: No.

Preparer: Katherine Cornett

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.

RESPONSE: Link KK2 crosses my property. There is a windmill near the proposed route. United Cooperative services has power distribution lines that cross my property and will be in the vicinity of the proposed transmission line.

Preparer: Katherine Cornett

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

RESPONSE: United Cooperative services has power distribution lines that cross my property and will be in the vicinity of the proposed transmission line.

Preparer: Katherine Cornett

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

RESPONSE: There are no existing transmission lines visible from my property.

Preparer: Katherine Cornett

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.

RESPONSE: Yes, I have a windmill on a water well near where the proposed transmission line will cross.

Preparer: Katherine Cornett

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.

RESPONSE: I am not aware of any affected landowner who did not receive notice.

Preparer: Katherine Cornett

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?

RESPONSE: No, I have not discussed any modifications to the proposed transmission line with a representative of Lone Star.

Preparer: Katherine Cornett

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

RESPONSE: I am concerned that if the proposed transmission line crosses my property it will significantly degrade the environmental quality of my property, damage endangered species habitat, devalue my property, mar the beauty and views of parts of the county; and limit the use of my property.

Preparer: Katherine Cornett

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? If so, please provide them.

RESPONSE: No, I did not attend any of the open houses.

Preparer: Katherine Cornett

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.lonestartransmission.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 review (such locations are listed in Lone Star's notice) and will provide a hard copy to any party upon request.

RESPONSE: It appears that my property boundaries are accurately represented on the maps provided by Lone Star.

Preparer: Katherine Cornett

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?

RESPONSE: The primary use of my property at this time is agriculture and hunting but I have plans to build a home on the property in the near future. The proposed transmission line will substantially affect the use of my property as I have pointed out above.

Preparer: Katherine Cornett

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.

RESPONSE: Yes, If the transmission line does go through my property I would ask that it be placed on the easterly or westerly boundary so as to limit the impact.

Preparer: Katherine Cornett

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

RESPONSE: Katherine Cornett is the sole owner of the property.

Preparer: Katherine Cornett

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.lonestartransmission.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 review (such locations are listed in Lone Star's notice) and will provide a hard copy to any party upon request.

RESPONSE: There is no potential routing of the proposed transmission line across our property that will not substantially affect its aesthetic appeal, environmental integrity, recreational uses, and economic value. Rather than a drawing on a map, if the proposed transmission line could be routed either on the easterly or the westerly boundary of my property it would have the least impact.

Preparer: Katherine Cornett

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.

RESPONSE: Admit.

Preparer: Katherine Cornett

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

RESPONSE: Admitted.

Preparer: Katherine Cornett