



Control Number: 38230



Item Number: 658

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

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

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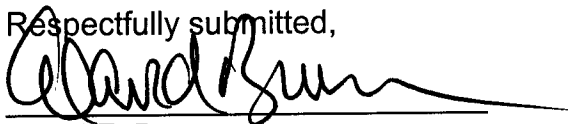
PUBLIC UTILITY COMMISSION
OF TEXAS

FILED
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FILING CLERK

**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 KRIS HARDING**

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 Kris Harding ("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. Respondents stipulate that these Responses may be treated by all parties as if the answers were filed under oath.

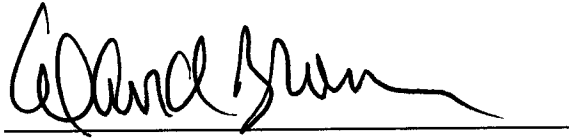
Respectfully submitted,



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**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: Kris Harding

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: Yes. Link KK2 crosses my property shown as Tract 10.7 on Lone Star provided drawing Sheet 31 along the eastern property line. Proposed Link KK2 follows an existing local distribution line that provides power service to local surrounding properties.

Preparer: Kris Harding

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: Yes. An existing distribution line runs north to south along the eastern fence/property line. This line provides power service to local surrounding properties.

Preparer: Kris Harding

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: Yes. An existing distribution line runs north to south along the eastern fence/property line. This line provides power service to local surrounding properties. They are conventional distribution lines similar to those found in a typical neighborhood. They are visible when looking to the east.

Preparer: Kris Harding

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: No.

Preparer: Kris Harding

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: No.

Preparer: Kris Harding

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.

Preparer: Kris Harding

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

RESPONSE: I have consulted with a survey company that surveys for other power transmission line projects in Texas and have learned that the size of the towers and the size of the easement would prevent me from building a home and other structures on a large portion of my land. It would also substantially affect the quality and aesthetics of my land, including the destruction of endangered species habitat and how it could be used in the future.

Preparer: Kris Harding

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.

Preparer: Kris Harding

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: No. The area shown to be my property, identified as Tract 10.7 on sheet 31 is not accurately noted. The entire property is shown 2000-3000 ft east of its correct location. The property lines should be adjusted 2000-3000 ft due west continuing along CR1012.

Preparer: Kris Harding

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: This property was bought as a future residence and retirement location. I intend to build a home, shop, and barn in the future. This proposed transmission line will prevent me from using this property for what it was originally intended. This is a fairly small plot of land and the proposed transmission would consume a large portion of it. This land was chosen specifically for its location, views, and seclusion. I believe a transmission line of this size will substantially affect my use of my property.

Preparer: Kris Harding

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 There is no potential routing of the proposed transmission line across my property that will not substantially affect its aesthetic appeal, environmental integrity, recreational uses, and economic value. If the proposed transmission line is routed on my property, I would prefer it only crosses the northernmost part of the land.

Preparer: Kris Harding

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

RESPONSE: Kris Harding

Preparer: Kris Harding

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 my property that will not substantially affect its aesthetic appeal, environmental integrity, recreational uses, and economic value. If the proposed transmission line is routed on my property, I would prefer that it only crosses the northern most part of the land of possible.

Preparer: Kris Harding

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: Admitted.

Preparer: Kris Harding

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 the Lone Star.

RESPONSE: Denied.

Preparer: Kris Harding