



Control Number: 38290



Item Number: 191

Addendum StartPage: 0

SOAH DOCKET NO. 473-10-4790
PUC DOCKET NO. 38290

FILED
10 AM 11:36
FILING CLERK

APPLICATION OF SHARYLAND
UTILITIES, L.P., TO AMEND ITS
CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR THE
HEREFORD TO WHITE DEER
345-KV CREZ TRANSMISSION LINE
(FORMERLY PANHANDLE AB TO
PANHANDLE BA) IN ARMSTRONG,
CARSON, DEAF SMITH, OLDHAM,
POTTER AND RANDALL COUNTIES

§
§
§
§
§
§
§
§
§
§

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

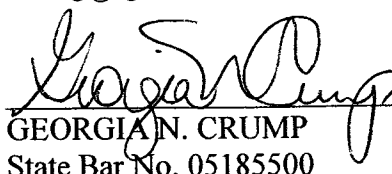
**CURRIE FAMILY INTERESTS' OBJECTION AND
RESPONSE TO GR CHAPMAN'S FIRST SET OF
REQUESTS FOR INFORMATION TO ALL INTERVENORS**

Currie Family Interests ("CFI"), files this objection and response to GR Chapman's ("Chapman") First Set of Requests for Information ("RFI") to all Intervenors. The RFI was received on August 9, 2010 and thus this objection and responses are timely filed. Counsel for CFI has conferred with counsel for Chapman regarding the objection diligently and in good faith prior to the filing hereof, as required by P.U.C. PROC. R. 22.144(d). This response may be treated by all parties as if it was filed under oath.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)
gcrump@lglawfirm.com
mlong@lglawfirm.com

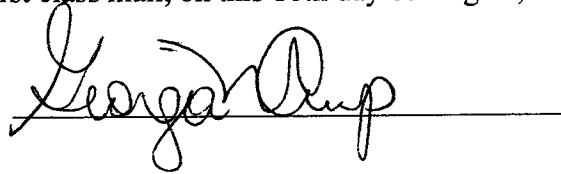

GEORGIA N. CRUMP
State Bar No. 05185500

MELISSA A. LONG
State Bar No. 24063949

ATTORNEYS FOR CURRIE FAMILY INTERESTS
ET AL.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was provided to counsel for GR Chapman by email and/or first class mail, on this 16th day of August, 2010.

A handwritten signature in cursive script, appearing to read "Melissa Long", is written over a horizontal line.

**CURRIE FAMILY INTERESTS' OBJECTION
AND RESPONSE TO CHAPMAN'S
FIRST RFI TO ALL INTERVENORS**

CHAPMAN 1.01:

Of the 12 alternative routes proposed by Sharyland in this proceeding, which route or routes are you opposed to, and what is the factual basis for your opposition to that/those route(s)?

RESPONSE:

Please see our Responses to Staff-1-2, Staff-1-8, and Staff-1-11.

Prepared by: Tully Currie, Jim Currie, Dr. Hugh Bob Currie, Ginger Green, David H. Currie, II, Robert Lane Currie, Susan M. Rogers, and Daniel L. Rogers
Sponsored by: Susan M. Rogers

**CURRIE FAMILY INTERESTS' OBJECTION
AND RESPONSE TO CHAPMAN'S
FIRST RFI TO ALL INTERVENORS**

CHAPMAN 1.02:

If more than one of the 12 alternative routes proposed by Sharyland in this proceeding would cross your property, are you more opposed to any of those alternative routes than you are to any other alternative route that crosses your property? If so, please identify the route(s) and explain the reasons you are more opposed to that route or routes, relative to the other route(s).

RESPONSE:

Please see our Responses to Staff-1-2, Staff-1-8, and Staff-1-11.

Prepared by: Tully Currie, Jim Currie, Dr. Hugh Bob Currie, Ginger Green, David H. Currie, II, Robert Lane Currie, Susan M. Rogers, and Daniel L. Rogers
Sponsored by: Susan M. Rogers

**CURRIE FAMILY INTERESTS' OBJECTION
AND RESPONSE TO CHAPMAN'S
FIRST RFI TO ALL INTERVENORS**

CHAPMAN 1.03:

Do you contend that the Preferred Route (Route 1) is not the best alternative route proposed by Sharyland? If so, which route do you contend is the best alternative, and what is the factual basis for your contention?

RESPONSE:

No.

Prepared by: Tully Currie, Jim Currie, Dr. Hugh Bob Currie, Ginger Green, David H. Currie, II, Robert Lane Currie, Susan M. Rogers, and Daniel L. Rogers
Sponsored by: Susan M. Rogers

**CURRIE FAMILY INTERESTS' OBJECTION
AND RESPONSE TO CHAPMAN'S
FIRST RFI TO ALL INTERVENORS**

CHAPMAN 1.04:

Do you contend that Route 6 is a better alternative route under applicable law than any other route (1-5 and 7-12) proposed by Sharyland in this proceeding? If so, please identify each route that you contend is not a better alternative than Route 6 and describe the factual basis for your contention as to each route you have identified.

RESPONSE:

None of the routes that cross the North Palo Duro Canyon are acceptable alternatives for the routing of this project. For details, please see our Responses to Staff-1-2, Staff-1-8, and Staff-1-11.

Prepared by: Tully Currie, Jim Currie, Dr. Hugh Bob Currie, Ginger Green, David H. Currie, II, Robert Lane Currie, Susan M. Rogers, and Daniel L. Rogers
Sponsored by: Susan M. Rogers

**CURRIE FAMILY INTERESTS' OBJECTION
AND RESPONSE TO CHAPMAN'S
FIRST RFI TO ALL INTERVENORS**

CHAPMAN 1.05:

Do you intend to offer expert testimony in support of your position in this proceeding? If so, please identify each such expert and provide a summary of his or her opinions.

OBJECTION

The Currie Family Interests object to this request for the reason that it is in violation of Rule 195.1 of the Texas Rules of Civil Procedure. This Rule provides: "[a] party may request another party to designate and disclose information concerning testifying expert witnesses only through a request for disclosure under Rule 194 and through depositions and reports as permitted by this rule." Therefore, a request for information regarding expert testimony that is not in compliance with Rule 194 is improper and objectionable.

RESPONSE:

The Currie Family Interests respond to this RFI subject to, and without waiving, their objections to this RFI being in violation of Rule 195.1 of the Texas Rules of Civil Procedure. The Currie Family Interests are still in the process of fully developing their case and testimonies and do not know which, if any, experts will offer testimony in support of their position.

Prepared by: Tully Currie, Jim Currie, Dr. Hugh Bob Currie, Ginger Green, David H. Currie, II, Robert Lane Currie, Susan M. Rogers, and Daniel L. Rogers
Sponsored by: Susan M. Rogers