



Control Number: 38324



Item Number: 424

Addendum StartPage: 0

**SOAH DOCKET NO. 473-10-4789  
PUC DOCKET NO. 38324**

**APPLICATION OF ONCOR  
ELECTRIC DELIVERY  
COMPANY, LLC TO AMEND A  
CERTIFICATE AND NECESSITY  
FOR THE WILLOW CREEK-  
HICKS 345-KV CREZ  
TRANSMISSION LINE IN DENTON,  
PARKER, TARRANT, AND WISE  
COUNTIES, TEXAS**

**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

FILED  
AUG 20 AM 9:49  
LTD

**RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR  
INFORMATION AND FIRST SET OF REQUESTS FOR ADMISSION TO ALL  
INTERVENORS**

**DATE: AUGUST 17, 2010**

**REGARDING: Segment PPP, Tract 1157**

**RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUEST FOR  
INFORMATION TO ALL INTERVENORS**

**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 segments(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 follow: "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 building, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, and schools."

424

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, have a habitable structure within approximately 300 feet of segment PPP, Tract 1157, of the proposed transmission line. My home, the habitable structure, is a single family dwelling consisting of a 1900 sq ft frame house with an in ground swimming pool, and water well, a 900 sq ft metal shop with an approximately 1600 sq ft attached awning, and a 576 sq ft barn. Since a habitable structure cannot be within 500 ft of the proposed transmission centerline my home and approximately 6 acres of our 10 acre tract of land would be directly affected by the route defined by Segment PPP, Tract 1157.

**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:** This response was prepared by Catherine Warren.  
I, Catherine Warren, have my home within approximately 300 ft of Segment PPP, Tract 1157, of the proposed transmission line. Segment PPP, Tract 1157 does not cross my property but runs parallel with the Northeast corner along a pipeline easement and does include my homestead and approximately 6 or my 10 acre tract of land within the 500 ft centerline regulations of the proposed transmission line.

**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:** This response was prepared by Catherine Warren.  
I, Catherine Warren, do not have any existing transmission or distribution lines across my property.

**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.

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, can see existing transmission or distribution lines to the North of my property. The lines run parallel with my property and are on the 138 k v Oncor Reno easement line. They are located approximately 1500 to 2000 feet from my property and do not affect my property.

**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:** This response was prepared by Catherine Warren.  
I, Catherine Warren, do not have any windmills located on my property.

**STAFF-1-6** Are you aware of any directly affected landowner that did not receive notice of the proposed transmission line project from Oncor? 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 Oncor would need to obtain an easement of 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:** This response was prepared by Catherine Warren.  
I, Catherine Warren, am not aware of any directly affected landowner that did not receive notice of the proposed transmission line project from Oncor.

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

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, as of the date of this response have not discussed any modifications to the proposed transmission line route regarding my property with any representative of Oncor.

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

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, have specific concerns about the proposed transmission line. My home is located within the 500 ft of the centerline of the proposed transmission line route in Segment PPP, Tract 1157. This means the home my husband and I built over the last 36 years along with a majority of the 10 acre tract of land we own would be uninhabitable. We would lose our home along with decreasing the value of our remaining land. There are not enough words to express the magnitude of our concerns or the emotional devastation at the thought of losing our home.

**STAFF-1-9** Did you attend any open houses presented by Oncor concerning this proposed transmission line? If so, when and where? Did you provide written comments to Oncor at or after the open house? If so, please provide them.

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, did not as of the date of this response attend any open houses presented by Oncor concerning this proposed transmission line.

**STAFF-1-10** Are your property boundaries for the property you own represented accurately on the maps provided by Oncor in its Application at Appendix E of Attachment No. 1(Figure 6-97)? If not, please explain any discrepancies and provide a modified Oncor map or drawing to indicate the discrepancies.

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, am not aware of any discrepancies regarding the property boundaries for the property I own and that said boundaries have been represented accurately on the maps provided by Oncor.

**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:** This response was prepared by Catherine Warren.  
I, Catherine Warren, have my home on the property located within 500 feet of the centerline of the proposed transmission line route in Segment PPP, Tract 1157. The primary use for my property is homestead. The impact the proposed transmission line would have would destroy my home and everything my husband and I have built over the last 36 years.

**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:** This response was prepared by Catherine Warren.  
I, Catherine Warren, believe the proposed transmission line route through Segment PPP, Tract 1157 would destroy my home and make a majority of the 10 acre tract of land I own uninhabitable. Since my home and much of my property is located within 500 feet of the centerline of the proposed route, the route should be moved over at least 300 feet or more from my existing East property line and 500 feet for the existing North property line. This would eliminate the destruction of my home and only make approximately 3 to 4 acres of my 10 acre tract uninhabitable. The land East and North of my property is used for agriculture purposes (costal & cattle) and no homes are within the 500 ft centerline if moved as I suggested.

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

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, own my property along with my husband, Gayland W. Warren.

**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.

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, prefer the right-of-way line of the proposed transmission line route through Segment PPP, Tract 1157, to be moved at least 300 feet from the East end of my property line and at least 500 feet from the North side of my property line. I have enclosed an estimation of my proposal on the survey attached as Exhibit "A".

**SOAH DOCKET NO. 473-10-4789  
PUC DOCKET NO. 38324**

**REPONSES 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:** This response was prepared by Catherine Warren.  
I, Catherine Warren, hereby admit that I own and reside in a habitable structure within the 500 ft of the centerline of any proposed route in this docket, more specifically known as Segment PPP, Tract 1157.

**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 Oncor.

**Answer:** This response was prepared by Catherine Warren.  
I, Catherine Warren, hereby admit to the best of my knowledge as of the date of this response that the property boundaries for the property I own are accurately represented on the maps provided by Oncor.

**DATE: AUGUST 17, 2010**

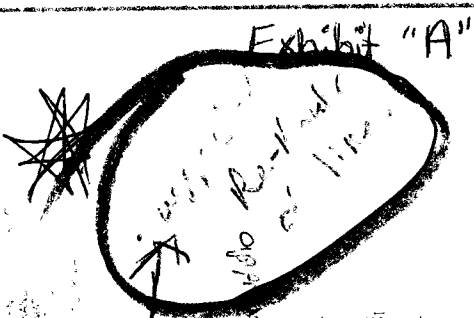
Respectfully Submitted,

---

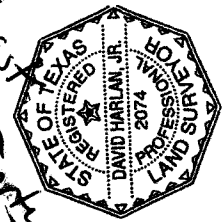
Catherine Warren  
580 Virginia Place  
Springtown, TX. 76082

80 VIRGINIA PLACE  
 BEING A PORTION OF "HIMEL & PRR COMPANY SURVY"  
 2.0 ACRES SITUATED IN AND BEING A PORTION OF "HIMEL & PRR COMPANY SURVY"  
 SECTION No. 37, ABSTRACT No. 942, PARKER COUNTY, TEXAS

SEE LEGAL DESCRIPTION



At least 500 ft from property line



SUSSEX HIGHLAND EST. 35  
 PLAT "CABINET" A SURVY

RECORDED IN PUBLIC RECORDS OF PARKER COUNTY, TEXAS  
 BOOK 15, PAGE 149  
 THIS SURVEY

VIRGINIA PLACE  
 (PUBLIC ROAD)