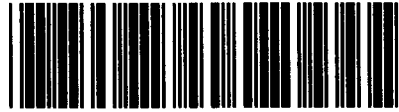




Control Number: 38324



Item Number: 431

Addendum StartPage: 0

APPLICATION OF ONCOR ELECTRIC § BEFORE THE STATE OFFICE
DELIVERY COMPANY LLC TO AMEND §
A CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE WILLOW § OF
CREEK-HICKS 345-KV CREZ §
TRANSMISSION LINE IN DENTON, §
PARKER, TARRANT AND WISE §
COUNTIES § ADMINISTRATIVE HEARINGS.

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**RESPONSE OF JOE L. WRIGHT TO COMMISSION
STAFF' FIRST SET OF REQUESTS FOR INFORMATION AND
FIRST SET OF REQUESTS FOR ADMISSIONS TO ALL INTERVENORS**

TO: The Staff of the Public Utility Commission, by and through their attorney of record, John M. Zerwas, Jr., Legal Division, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Joe L. Wright files his Responses to Commission Staff's ("Staffs") First Set of Requests for Information and First Set of Requests for Admissions. These responses may be treated by all parties as if they were filed under oath.

Respectfully submitted,

SMITH • ROSE • FINLEY
A Professional Corporation
P.O. Box 2540
San Angelo, Texas 76902-2540
325/653-6721
FAX 325/653-9580

By: 
WALTER W. PFLUGER
State Bar No. 15891020


ATTORNEYS FOR JOE L. WRIGHT

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CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing has been served on Commission Staff via facsimile to Mr. John M. Zerwas, Jr. at the following address on this the 18th day of August, 2010.

Mr. John M. Zerwas, Jr.
Attorney - Legal Division
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
Facsimile: 512-936-7268


Walter W. Pfluger

RESPONSES TO COMMISSIONS STAFF'S FIRST REQUEST FOR INFORMATION

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. 25101(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 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:

There is a habitable structure which is inhabited by humans located on the property. However, it would not fall within 500 feet of the proposed transmission line.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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. Segment PP crosses my property.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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:

There are no existing electrical transmission lines on my property. There is an overhead distribution line for electricity which comes from Highway 51. I call these service lines. They are not real close to the proposed transmission line. There is a gas well that has a pump or might have a solar panel. It is located on the East side, fairly close to Highway 51 in the middle of the property and runs North to South.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

Staff 1-4:

Are any existing transmission or distributions 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:

No, except for the distribution line which enters my property.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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. There are no water windmills or wind turbines on my property.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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 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.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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?

RESPONSE:

No.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

Staff 1-8:

What are our specific concerns about the proposed transmission line?

RESPONSE:

I do not want the proposed transmission line to cross my property at all. The route as it is would bisect the property. There are pecan orchards and a heavily wooded drainage branch located near the proposed line. If the trees in this area were cleared, the soil would be subject to erosion and the stationary drainage branch would erode and become a tank.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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.

RESPONSE:

No. I was never provided notice of any open houses.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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.

RESPONSE:

The maps I received from Oncor only specify proposed routes and do not specify property boundaries. I do not have access to the Application and therefore cannot comment on the accuracy of the maps. I will supplement this response when I have access to the maps.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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 the property is for pecan orchards, hay meadows and I also have a cow and calf operation. The proposed alternate route would clear out my pecan orchard and effect the business and production of the hay meadows and cow and calf operation. The pastures on my property are all improved. I have spent countless time and money to get the grasses in the shape that they are in.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

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:

The heavily wooded, pecan and branch (drain) portions of the property should definitely be considered when routing the transmission line. The property has topography to it. The clearing of the route would erode everything that I have worked hard on and invested a considerable amount of money in.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

Staff 1-13:

Please identify all persons with an ownership interest in your property.

RESPONSE:

The persons with ownership interests are my wife, Balla Wright and myself.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

Staff 1-14:

If the transmission line is routed on your property, please identify specifically the location that you would prefer the right-of-way of the line. Use a map to show the location.

RESPONSE:

If a transmission line were to cross my property, I would request that the line follow boundary lines of my property. I will supplement this response as soon as my attorney and I receive and review a map.

Prepared by: Joe L. Wright
Compiled by: Walter W. Pfluger

Title: Intervenor
Attorney for Intervenor

**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.

RESPONSE:

Admit.

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.

RESPONSE:

These maps were not presented to be in a reasonable manner. I do not have access to the maps and Oncor never sent them to me. However, as soon as I receive the maps I will supplement my responses regarding property boundaries.