



Control Number: 38324



Item Number: 441

Addendum StartPage: 0

RECEIVED
SOAH DOCKET NO. 473-10-4789

NOV 26 PM 2:39
PUC DOCKET NO. 38324

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

§ PUBLIC UTILITY COMMISSION
§ BEFORE THE STATE OFFICE
§
§ OF
§
§ ADMINISTRATIVE HEARINGS
§

**RICHARD SNIDER'S
RESPONSE TO COMMISSION'S STAFF'S FIRST SET OF
REQUEST FOR INFORMATION AND FIRST SET OF REQUEST FOR ADMISSION
TO ALL INTERVENORS**

Richard Snider as part of the Group of Allied Landowners (GOAL), files this his Response to Commission Staff's First Request for Information ("RFIs") and First Requests for Information and First Set of Request for Admission to All Intervenors. These responses are timely filed.

I. Written Responses.

Richard Snider files these written responses to Staff's First RFIs are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. Richard Snider's responses are made in the spirit of cooperation without waiving their right to contest the admissibility of any of these matters at hearing. Each response lists the person who provided information responsive to the question. When Richard Snider provides certain information sought by the request while objecting to the provision of information, he does so without prejudice to his objection in the interests of narrowing discovery disputes pursuant to P.U.C. PROC. R 22.144(d)(5). Pursuant to P.U.C. PROC. R 22.144(c)(2)(F),

Richard Snider stipulates that his responses may be treated by all parties as if they were made under oath by the respective respondent.

II. Inspections.

If responsive documents are more than 100 pages but less than eight linear feet in length, the response will indicate that the attachment is VOLUMINOUS and, pursuant to P.U.C. PROC. R 22.144(h)(2), the attachment will be made available for inspection at Herrera & Boyle, PLLC, 816 Congress, Ste. 1250, Austin, Texas, 78701. If a response or the responsive documents are provided pursuant to the protective order in this docket, the response will indicate that it or the attachment is either CONFIDENTIAL or HIGHLY SENSITIVE as appropriate under the protective order. Highly sensitive responses will be made available for inspection at Herrera & Boyle, PLLC, 816 Congress, Ste. 1250, Austin, Texas, 78701, unless they form a part of a response that exceeds eight linear feet in length; then they will be available at their usual repository in accordance with the following paragraph. Please call in advance for an appointment to ensure that there is sufficient space to accommodate your inspection.

If responsive documents exceed eight linear feet in length, the response will indicate that the attachment is subject to the FREIGHT CAR DOCTRINE, and, pursuant to Commission Procedural Rule 22.144(h)(3), the attachment will be available for inspection at its usual repository, Herrera & Boyle, PLLC, 816 Congress, Ste. 1250, Austin, Texas, 78701, unless otherwise indicated. CCPC requests that parties wishing to inspect this material provide at least 48 hours' notice of their intent by contacting Herrera & Boyle, PLLC, 816 Congress, Ste. 1250, Austin, Texas, 78701; telephone number (512) 474-1492; fax number (512) 474-2507. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and Richard Snider's operations as possible.

Respectfully submitted,

HERRERA & BOYLE, PLLC
816 Congress Avenue, Suite 1250
Austin, Texas 78701
(512) 474-1492
(512) 474-2507 FAX

By: 
Alfred R. Herrera
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Jim Boyle
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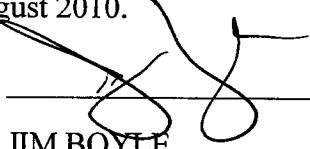
Felipe Alonso III
State Bar No. 24045400

Carrie R. Tournillon
State Bar No. 24053062

**ATTORNEYS FOR THE
GROUP OF ALLIED LANDOWNERS**

CERTIFICATE OF SERVICE

I certify that I have served a copy of Richard Snider's Responses to Staff's First Set of Requests for Information and First Set of Requests for Admission to All Parties upon Commission Staff by fax and/or first class mail on this the 26th day of August 2010.


JIM BOYLE

**SOAH DOCKET NO. 473-10-4789
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Response To Staff's

First Request for Information

Staff-1-1 Do you have a habitable structure, as defined by P.U.C. SUBST. Rule 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 proposed line is from the habitable structure. P.U.C. SUBST. R. 25.101(a)(3) defines "habitable structure" as follows: "Structures normally inhabited by humans or intended to be inhabited by humans on a daily 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:

Yes, I have two habitable structures on my property near the proposed Link PPP. One structure is 119 feet and the other is 204 feet.

Prepared by: Richard Snider

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Response To Staff's

First Request for Information

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 proposed transmission line will follow through your property.

Response:

Link PPP will cross my property diagonally starting near the northeast corner and exiting not far from the southwest corner. Link PPP will not follow a power line or gas line on my property. In fact, Link PPP will cross another 345 kV line on the back of my property at about 45 degree angle. Link PPP does not follow a property line on my property. It cuts through the middle of a wooded area on my property less than 215 feet from my house.

Prepared by: Richard Snider

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Response To Staff's

First Request for Information

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. There is a 345 kV line on the back of my property, running east and west, and a distribution line that runs north and south on the west side of my property. There is also a gas line that runs north and south on my property on the west side of my property.

Prepared By: Richard Snider

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Response To Staff's

First Request for Information

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:

See the Response to Staff-1-4. The distribution line is probably 100 feet or so from my house and the 345 kV line is probably around 500 feet. The proposed line, Link PPP will come within 215 feet of my house.

Prepared By: Richard Snider

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Response To Staff's

First Request for Information

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.

Prepared By: Richard Snider

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**Response To Staff's
First Request for Information**

Staff-1-6 **Are you aware of any 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.**

Response:

No, other than myself. I don't recall receiving notice.

Prepared by: Richard Snider

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Response To Staff's

First Request for Information

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.

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Response To Staff's

First Request for Information

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

Response:

My house on my property is my homestead. The new line on Link PPP will cut diagonally across my property. It cuts right through a heavily wooded area on my property, primarily oaks and pecan trees. Virtually it makes my property worthless. I intended to put a shop on the back of property in order to restore classic automobiles from the '50s and that will not be a possibility with the line cutting diagonally across my property. Restoring classic cars is my principal hobby and enjoyment.

A huge problem is the fact that Link PPP will cross at about a 45 degree angle an existing 345 kV line on my property. It is my understanding that taller towers than normal may have to be used in order for the new line to cross the other line. My property is small, I don't have hundreds of acres like some of the large landowners. The impact of this line crossing diagonally on my property and then crossing an existing 345 kV line is devastating. My daughter and granddaughter live with me. My granddaughter has Down's Syndrome and I am very worried what impact the new line will have on her health given how close the line comes to my house.

Prepared by: Richard Snider

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**Response To Staff's
First Request for Information**

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? Is so, please provide them.

Response:

No. I didn't receive notice.

Prepared by: Richard Snider

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Response To Staff's

First Request for Information

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

Response:

It is difficult to tell. The maps are from a very high altitude so the features of my property do clearly show up on the maps I have seen.

Prepared By: Richard Snider

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**Response To Staff's
First Request for Information**

Staff-I-11 What is the primary use for your property and, in your opinion, will this use be impacted by the proposed transmission line?

Response:

Please take a look at my response to Staff-1-8. Thanks.

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Response To Staff's

First Request for Information

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:

Please see my response to Staff-1-8. Thanks.

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**Response To Staff's
First Request for Information**

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

Response:

Richard Snider

Prepared by: Richard Snider

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Response To Staff's

First Request for Information

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.**

Response:

I am sorry but I can't think of any way that the line could be routed on my property without devastating effect. From the map, the line comes from Dr. Pearson's property to the north of mine and it appears there is no way to route the line without crossing the existing 345 kV line on my property.

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**Response To Staff's
First Request for Admission**

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:

Deny. I do own two habitable structures which are less than 215 feet from Link PPP.

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**Response To Staff's
First Request for Admission**

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 Oncor.

Response:

I can't admit or deny. It is impossible to tell from the maps.

Prepared By: Richard Snider