



Control Number: 38324



Item Number: 601

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

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

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

RECEIVED  
SEP 17 AM 10:47  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**RESPONSE OF TODD GROUP, LTD. TO ONCOR ELECTRIC DELIVERY'S FIRST  
REQUEST FOR INFORMATION**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Todd Group, Ltd. ("Todd") files this Response to the aforementioned requests for information.

Attached hereto and incorporated herein by reference are Todd's written responses to the aforementioned requests for information. Each request has been answered separately, and each response is preceded by the request to which the answer pertains. Such responses are also made without waiver of Todd's right to contest the admissibility of any such matters upon hearing. Todd hereby stipulates that its responses may be treated by all parties as if they were filed under oath.

601

Respectfully submitted,

McDONALD SANDERS,  
A Professional Corporation

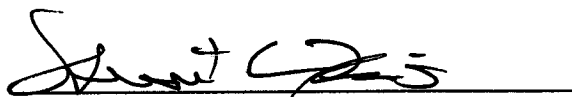
By: 

Rick G. Sorenson  
State Bar No. 18848350  
Stuart B. Lumpkins, Jr.  
State Bar No. 12686600  
777 Main Street, Suite 1300  
Fort Worth, Texas 76102  
(817) 336-8651  
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ATTORNEYS FOR TODD GROUP, LTD.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be served on the requesting party on this 16<sup>th</sup> day of September, 2010, in accordance with Order No. 1 in this docket.

  
Stuart B. Lumpkins, Jr.

Oncor RFI- 1-1: Please list each Route or Link that you contest in this proceeding.

Response: The following response was prepared by or under the direct supervision of Ron Rawdon, the sponsoring witness for this response:

Links OOO, JJJ and GGG.

Oncor RFI- 1-2: Please provide the general factual bases for why you contest each Route and Link that you contest.

Response: The following response was prepared by or under the direct supervision of Ron Rawdon, the sponsoring witness for this response:

The proposed segment for GGG cuts the Todd Group's property in half (tract 545). Segment OOO also cuts through the middle of the eastern edge of tract 545 and the southeastern corner of tract 212/213. The segments do not follow property boundaries or right of way for existing pipelines and transmission lines. Furthermore, if GGG is constructed on the proposed route, then the property will be burdened by both GGG cutting through the middle and the existing transmission lines running along its southern boundary. The transmission lines create both physical and visual barriers that will severely restrict, if not totally eliminate, future uses of the property. Stray voltage is also a concern, given the transmission lines already in the area. Please refer to my Direct Testimony filed in this matter on behalf of Todd Group, Ltd. for more details concerning our objections to these links.

Oncor RFI- 1-3: Please list and describe all Structures that exist on any property you own that will be crossed by one of Oncor's proposed transmission line routes and provide the date the structures were installed or constructed and the height of each structure and describe where each structure is located, where each structure is located in relation to the proposed transmission line and its distance from the proposed transmission line.

Response: The following response was prepared by or under the direct supervision of Ron Rawdon, the sponsoring witness for this response:

No Structures exist on the subject property of Todd Group, Ltd.

Oncor RFI- 1-4: Please provide a copy of any documents concerning communications or correspondence you have had with any other Intervenor related to this docket or the issues arising in this docket.

Response: The following response was prepared by or under the direct supervision of Ron Rawdon, the sponsoring witness for this response:

None.

Oncor RFI- 1-5: Is any witness on your behalf testifying as an expert in this docket? If so, please provide the following:

- a. the expert's name, address and telephone number;
- b. the subject matter on which the expert will testify;
- c. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this docket regardless of which and how the factual information was acquired;
- d. the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them;
- e. all documents, tangible things, reports, models or data compilations that have been provided to, reviewed by or prepared by or for the expert in anticipation of a testifying expert's testimony;
- f. the expert's current resume and bibliography;
- g. a listing of cases in which the expert has submitted testimony. Further, provide the docket number, jurisdiction, the company for whom testimony was submitted and the topics addressed in his testimony;

- h. a complete copy of all prior testimonies submitted by the expert relating to the topic the expert will address in this docket. This should include all exhibits and rebuttal testimony; and
- i. all articles, speeches, published materials and peer-reviewed material written by the expert.

Response: The following response was prepared by or under the direct supervision of Ron Rawdon, the sponsoring witness for this response:

No witness will be testifying as an expert on behalf of Todd Group.

Oncor RFI- 1-6: If in response to RFI 1-5 above, you identified a testifying expert witness in this docket, please provide the following for any consulting expert in this docket employed by you whose mental impressions or opinions have been reviewed by a testifying expert:

- a. the expert's name, address and telephone number;
- b. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this docket regardless of when and how the factual information was acquired;
- c. the expert's mental impressions and opinions formed or made in connection with this docket and any methods used to derive them;
- d. all documents, tangible things, reports, models or data compilations that have been provided to, reviewed by or prepared by or for the consulting expert in anticipation of a testifying expert's testimony; and
- e. the consulting expert's current resume and bibliography.

Response: Not applicable.

Oncor RFI- 1-7: For any non-expert witness testifying on your behalf in this docket, please provide the following:

- a. the witness' name, address and telephone number;

- b. the witness' resume and work history;
- c. the subject matter on which the witness will testify;
- d. copies of all articles, speeches, published materials created by or attributed to the witness; and
- e. a list of all dockets in which the witness has submitted testimony and/or testified.

Response:

The following response was prepared by or under the direct supervision of Ron Rawdon, the sponsoring witness for this response:

- a. Ronald Rawdon  
Bank of America, N.A.  
Asset Management Group  
Trust Real Estate (TX1-497-02-15)  
P.O. Box 1479  
Fort Worth, Texas 76101-1479  
Telephone: (817) 390-6994
- b. Ron Rawdon is currently the Vice President of the Specialty Asset Management Group, Farm and Ranch Group, at Bank of America. He has worked at Bank of America, or its predecessor, for the past 29 years assisting the Bank in managing real property. The Todd Group property is one of the properties the Bank manages.
- c. Ron Rawdon will testify concerning objections and related comments relating to segments OOO, JJJ and GGG which cut through the middle of the Todd Group property (tracts 212/213 and 545) rather than following property lines and existing pipeline or transmission line right of way. Even though Todd Group objects to the proposed transmission line crossing its property, Ron Rawdon will be submitting modified routes in an attempt to decrease the burden on the property in the event a route is chosen that crosses it.
- d. None.
- e. None

Oncor RFI- 1-8: If you are not the only owner of your property affected by Oncor's proposed transmission line, please identify the other owner(s).

Response: The following response was prepared by or under the direct supervision of Ron Rawdon, the sponsoring witness for this response:

Todd Group, Ltd. owns the property. An Oil and Gas Lease exists with Devon Energy Holdings, L.L.C., Pacesetter Exploration and Production, Ltd., Germany Resources, Ltd., and Victoria Energy Corporation. Gas transmission line easements also affect the property.