



Control Number: 38324



Item Number: 621

Addendum StartPage: 0

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

APPLICATION OF ONCOR ELECTRIC §
DELIVERY COMPANY, LLC TO §
AMEND ITS CERTIFICATE OF §
CONVENIENCE 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

RECEIVED
10 SEP 20 PM 2:46
PUBLIC UTILITY COMMISSION
FILING CLERK

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

Wise Transmission Group, LLC, hereinafter referred to as "WTG" files this Response to Oncor Electric Delivery's ("Oncor") First RFI and First RFA to Wise Transmission Group, LLC in the above styled and numbered proceeding, as follows:

I. Written Responses

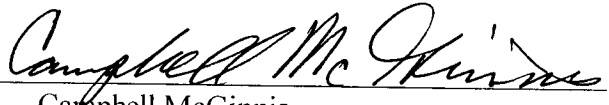
Attached hereto and incorporated herein by reference are WTG's written responses to the aforementioned requests for information and requests for admission. Each response is set forth on or attached to a separate page on which the request has been restated. All responses are made without waiver of WTG's right to contest the admissibility of any matters upon hearing. WTG stipulates that its responses may be treated by all parties exactly as if they were filed under oath.

II. Inspections

In those instances where materials are to be made available for inspection or where the materials are voluminous, the response will so state. Voluminous materials and materials available for inspection may be inspected at the offices of McGinnis, Lochridge & Kilgore, L.L.P. Please Call Campbell McGinnis in advance for an appointment; telephone 512/495-6046.

Respectfully submitted,

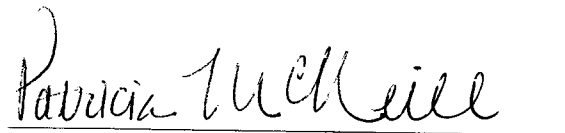
McGINNIS, LOCHRIDGE & KILGORE, L.L.P.
600 Congress Avenue #2100
Austin, Texas 78701
(512) 495-6046
(512) 505-6346 FAX
cmcginnis@mcginnislaw.com

By: 
Campbell McGinnis
State Bar No. 13630500

ATTORNEYS FOR
WISE TRANSMISSION GROUP, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the above and foregoing Responses have been mailed, first class mail, postage prepaid, hand-delivered, and/or emailed or telecopied to Oncor, on this the 20th day of September, 2010.


Patricia McNeill

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

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

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

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

RESPONSE:

Respondent/Preparer	Response
Mark and Wendy Armstrong	Route 222, Links J & OO
Alvin Baker	Route 222, Links J & OO
Mitch Baker	Route 222, Links J & OO
Boyd Highland Oaks, L.P.	Route 222, Links J & OO
Donald H. Brown	Route 222, Links J & OO
Roberta Campbell	Route 222, Links J & OO
Jim and Linda Cowell	Route 222, Links J & OO
Robert Crawford	Route 222, Links J & OO
J. Fred and Jean Davis	Route 222, Links J & OO
Jean C. Davis Family L.P.	Route 222, Links J & OO
Evia Lou Dillehay	Route 222, Links J & OO
Bill and Pat Goodger	Route 222, Links J & OO
Judy Taylor	Route 222, Links J & OO
Rosalie Gregg	Route 222, Links J & OO
Jamberly Corporation	Route 222, Links J & OO
Jim Joling	Route 222, Links J & OO
Bill and Donna Lewis	Route 222, Links J & OO
Earl Lewis	Route 222, Links J & OO
Lecia Lewis and Brian Brookhouse	Route 222, Links J & OO
Jim Massey	Route 222, Links J & OO
Greg and Toni Moore	Route 222, Links J & OO
Lynn and Kay Moore	Route 222, Links J & OO
Charles Nelon	Route 222, Links J & OO
Mike Rawlings	Route 222, Links J & OO

Ben and Anita Remmele	Route 222, Links J & OO
Debbie Remmele-Baber	Route 222, Links J & OO
Michael Richardson	Route 222, Links J & OO
Leora Spain	Route 222, Links J & OO
Norman and Nelda Stephens	Route 222, Links J & OO
Trevor Stephens	Route 222, Links J & OO
Susan Stevens	Route 222, Links J & OO

Sponsor: Jim Joling

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

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

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

1-2 Please provide the general factual bases for why you contest each Route and link that you contest.

RESPONSE: See Response of Wise Transmission Group, LLC to Staff 1-8 and Staff 1-12. See Direct Testimony of Mayor Brent Wilson, Greg Moore, DVM, Larry Cole and Jim Joling on behalf of Wise Transmission Group LLC.

Respondent/Preparer:

Mark and Wendy Armstrong
Alvin Baker
Mitch Baker
Tommy and Glenda Blessing
Boyd Highland Oaks, L.P. (Larry Cole, General Manager)
Donald H. Brown
Roberta Campbell
Jim and Linda Cowell
Robert Crawford
J. Fred and Jean Davis
Jean C. Davis Family L.P.
Evia Lou Dillehay
Bill and Pat Goodger
Judy Taylor
Rosalie Gregg
Jamberly Corporation
Jim Joling
Bill and Donna Lewis
Earl Lewis
Lecia Lewis
Brian Brookhouse
Jim Massey

Greg and Toni Moore
Lyon and Kay Moore
Lynn Moore
Charles Nelon
Mike Rawlings
Ben and Anita Remmele
Debbie Remmele-Baber
Michael Richardson
Leora Spain
Norman and Nelda Stephens
Trevor Stephens
Susan Stevens

Sponsor: Jim Joling

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

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

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

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: See Response of Wise Transmission Group, LLC to Staff 1-1. In addition, Wise Transmission Group, LLC provides the following:

Respondent/Preparer:	Response
Mark and Wendy Armstrong	<p>(1) 1800 Sq. Ft. home built in 2006 standing 18' high, approx. 150' feet from centerline.</p> <p>(2) 2880 Sq. Ft. livestock barn-tractor storage-tack room 13' tall, approx. 175' from centerline. (2007-2009)</p> <p>(3) 144 Sq. Ft. well house 9' tall approx 175' from centerline. (2007)</p> <p>* (4) 5x5 Steel arena light standards standing 20' tall approx 200' from centerline. (2009)</p> <p>*400' of steel pipe fence corral with (4) 14' tall pipe overheads approx. 125' from centerline. (2010)</p> <p>*septic tanks and field sit on South side of home less than 150' from centerline. (2006)</p> <p>Also note Attachment JJ-9 of the same testimony detailing habitable structures not identified by Oncor or its engineering firm.</p>
Alvin Baker	See Attachment JJ-3 of the written testimony of James A

	<p>Joling for details. Additionally, please note the following:</p> <p>1996 – Our home and water well. It's 20 ft. tall and within the 160 ft. easement. 2000 – Business workshop. It's 15 ft. tall and within the 160 ft. easement. 2002 – Workshop. It's 15 ft. tall and within the 160 ft. easement. 2003 – Livestock barn. It's 10 ft. tall and within the 160 ft. easement. 2006 – Livestock barn and corral. It's 12 ft. tall and within the 160 ft. easement.</p>
Mitch Baker	<p>The potential 4 home sites planned and flagged inside the proposed right-of-way would all be two storied, approximately 50ft high. They would all be within 250 feet of the proposed transmission line.</p> <p>The present structure is inside the right-of-way and approximately 150 feet from the transmission line. The dimensions are approximately 10.6 ft high, 8ft wide and 40 ft long. We do not know the date of installation or construction of the present habitable structure but estimate the time within the past 5-6 years</p>
Boyd Highland Oaks, L.P.	<p>See Attachment JJ-10A and JJ-10B from the written testimony of James A Joling for details as to the lots currently platted and under development. In addition, there are three homes already built that are not identified in any of Oncor's maps or testimony.</p>
Donald H. Brown	<p>OO tract 105.2</p> <p>Dairy barn – built in the 1930s, east of and behind the main house, 2009 converted to art studio 40'x20'x16'h, located in the right of way</p> <p>Shed – built in 1999, attached to north side of barn 20'x12'x8'h, located in the right of way</p> <p>Old well house – built in 1908, east side and behind the main house, converted to garden shed 8'x8'x8'h, located in the right of way</p> <p>New well house – built in 2005, west side and in front of main house, 8'x8'x9'h, located in the right of way</p> <p>Carport – built in 1999, north side of house, 20'x18'x20'h, located in the right of way</p> <p>Habitable structure 343- Our House – built in 1908, restored and expanded 1999, 42'x76'x26'h, located in the right of way</p>
Roberta Campbell	<p>See Attachment JJ-3 of the written testimony of James A Joling for details.</p>
Jim and Linda Cowell	<p>OO tract 105.2</p> <p>Dairy barn – built in the 1930s, east of and behind the main house, 2009 converted to art studio 40'x20'x16'h, located in the right of way</p>

	<p>Shed – built in 1999, attached to north side of barn 20’x12’x8’h, located in the right of way</p> <p>Old well house – built in 1908, east side and behind the main house, converted to garden shed 8’x8’x8’h, located in the right of way</p> <p>New well house – built in 2005, west side and in front of main house, 8’x8’x9’h, located in the right of way</p> <p>Carport – built in 1999, north side of house, 20’x18’x20’h, located in the right of way</p> <p>Habitable structure 343- Our House – built in 1908, restored and expanded 1999, 42’x76’x26’h, located in the right of way</p>
Robert Crawford	<p>Section J, Track #46.1 and Track #47: I have two structures at 4006 FM Rd 2123 and one structure in a pasture southwest of my residence that is not addressed.</p> <p>The two structures at 4006 FM Rd 2123 are approximately 1200 yards south of the proposed line. My residence at 4006 FM Rd 2123 is a one story brick home that is approximately 24’X60’, which was constructed in 1984. The other structure at this address is a one story metal shop that is 40’X60’, which was constructed in 2007. Both structures at 4006 FM Rd 2123 are approximately 16’ tall from the ground to the top of the roofs.</p>
Bill and Pat Goodger	<p>The line is on a direct path of a tank battery on our property, we think that the line will be moved to the west so it does not cross the battery. If this occurs it will be only 250 feet from barns, stalls and our home. The barn is a metal structure that is a hay barn and has stalls for our horses.</p>
Judy Taylor	<p>Our home was built in 1984 is rock structure with a metal roof. If the line is moved to the west to miss the tank battery it will be only 200 yards from home.</p>
Rosalie Gregg	<p>See Attachment JJ-3 of the written testimony of James A Joling for details as to current structures and those under construction.</p>
Jamberly Corporation	<p>While there are no structures currently on our property, this development would consist of 55 large lots with homes valued between \$350 and \$450 thousand, 44 higher density lots with homes valued between \$150 and \$250 thousand and 7 commercial lots including planned child care center. None of these will be developed if the proposed Link OO is selected as it cuts through the heart of this proposed development. See Attachment JJ-10B</p>

	from Jim Joling's written testimony for details on the planned subdivision.
Jim Joling	<p>Our home is 2,800 sq ft and has a covered deck (see Attachment JJ-3 to the written testimony of Jim Joling for photos) and is located 152' from the proposed centerline of the route 222, link OO and is inhabited by my wife and me. This is a one and half story structure that measures 26' tall. We have a 40' X 9" class A motor home which has full services (see Attachment JJ-3) which is located 62' from the proposed centerline of the route 222, link OO which is inhabited by our grand children and children when they visit. There is a 50' X 36' barn with habitable structures in it that is inhabited by our children and visitors to our farm. The barn is 22' tall and is less than 50' from the proposed centerline of the route 222, link OO. Our riding arena has four 27' tall light poles the closest of which is 20' from the center of the proposed route 222, link OO. All of these structures can be clearly seen in Attachment JJ-3 referenced above.</p> <p>We have a 72' by 36' horse barn with wash rack and tack room located 156' from the centerline of the proposed route 222, link OO. This barn is 15' tall and has horse turnouts on both sides.</p> <p>Our hay barn and shop measures 24' by 32' , is 15' tall and is located 218' from the centerline of the proposed route 222, link OO.</p> <p>Three of our pastures are in the proposed right of way with fence lines less than 20' from the proposed centerline of route 222, link OO.</p>
Bill and Donna Lewis	Historic house built in 1939 located 500' from route
Earl Lewis	<p>At this time the preferred route is on my south property line. My property fall within the 500 feet of the center of the preferred route. My nearest structure is my water well which is 80 feet from my south border. The well head is 3 feet tall and 200 feet deep. The well was dug in 1995</p> <p>My second structure is my all steel barn. It was built in 1995, it is 15 feet tall with 900 square feet. and it is also 80 feet from my southern border.</p> <p>My third structure is my workshop. It was there when we bought the land . It is 400 square feet cinder block building with a 20 X 12 metal storage building that is</p>

	<p>attached. It is 140 feet from my southern border. We lived in this building for 14 months while we built our home. It does have power ,water and septic.</p> <p>My fourth structure is my all steel 2 car garage. It was built in 1995 and is 160 feet from my southern border. It is 20x24 feet 480 square feet and is 15 feet tall. It is located 160 feet from my southern border.</p> <p>My fifth structure is my home built in 1996. It's a 2000 square foot two story rock home with a sheet metal roof. It is 240 feet from southern border.</p> <p>We also have a TV tower attached our home , it's all steel and 35 feet tall. We use it for satellite and computer service. My home is the farthest structure from the center of the preferred route which extends another 250 beyond my home..</p>
<p>Lecia Lewis and Brian Brookhouse</p>	<ol style="list-style-type: none"> 1. 2200 square foot brick home located 30 yards from transmission center line. Built in 1975 and remodeled (\$80,000) in 2009. Height is approximately 20 feet tall. 2. 100 square foot well house located 49 yards from transmission center line. Built in 1975. Height is approximately 10 feet tall. 3. 250 square foot hobby shop with upstairs storage located 96 yard from the transmission center line. Built in 1982. Height is approximately 20 feet tall. 4. 500 square foot metal hay barn located 96 yards from the transmission center line. Built in 2005. Height is approximately 16 feet tall. 5. 300 square foot 2 stall metal horse barn located 78 yards from the transmission center line. Built in 1985. Height is approximately 12 feet tall. 6. 2800 square foot metal shop with office and bathroom located 65 yards from the transmission center line. Built in 1985. Height is approximately 25 feet tall. 7. 100 square foot greenhouse located 62 yards from the transmission center line. Built in 1990. Height is approximately 10 feet tall.

	8. 10,000 gallon in ground pool located 55 yards from the transmission center line. Built in 1995. Ground level.
Jim Massey	<ol style="list-style-type: none"> 1. Home, approximately 3000 square feet 30 foot high located in the center of the property. installed in 1992 2. Metal barn/shop all 2000 square feet of concrete, 30 foot high located in the center of property. installed in 1995 3. Pool house, approximately 1000 square foot under A/C, 20 foot height located in the center of the property. installed in 1995 4. Detached garage/storage, approximately 1000 square foot, 20 foot height located in the center of the property. Installed in 1993 5. Two storage containers, one 8' X 40' X 10 and one 8' X 53' X 10', located in the center of the property. 2002 and 2005 <p>All structures are 500 foot from the transmission line</p>
Greg and Toni Moore	<ol style="list-style-type: none"> 1. one story brick dwelling 3200 sq. ft located 1000 feet from the proposed transmission route 2. 41' X 65' barn located 1100 feet from the proposed transmission route 3. 20' X 41' barn located 1150 feet from the proposed transmission route 4. 30' X 40' barn located 1175 feet from the proposed transmission route 5. 25' X 40' barn located 1100 feet from the proposed transmission route 6. 15' X 25' shed located 1050 feet from the proposed transmission route 7. 15' X 25' shed located 1150 feet from the proposed transmission route 8. 15' X 25' shed located 1250 feet from the proposed transmission route 9. 13' X 16' shed located 1500 feet from the proposed transmission route 10. 13' X 16' shed located 1525 feet from the proposed transmission route 11. 13' X 16' shed located 1575 feet from the proposed transmission route 12. 15' X 25' shed located 1350 feet from the proposed transmission route
Charles Nelson	Section J, Track #66: I have three structures at 571 CR 3470 and two structures at 497 CR 3470. All five

	<p>structures are approximately 900 feet from the center of the proposed line.</p> <p>My residence at 571 CR 3470 is a one story brick home that is approximately 24'X72', which was constructed in 1966. The second structure at 571 CR 3470 is a 40'X40' metal shop constructed in approximately 1975. The third structure at 571 CR 3470 is a metal equipment barn that is approximately 20'X50', which was constructed in approximately 1977.</p> <p>The first structure at 497 CR 3470 is a 1984 double-wide mobile home. The mobile home is 28'X60.' The second structure at 497 CR 3470 is a 26'X26' car port.</p> <p>All five structures are approximately 16' tall from the ground to the top of the roofs.</p>
Mike Rawlings	<p>Our home is a brick ranch-style structure with a metal roof containing 2400 sq. ft. and is 20' in height. It was built in 1967 and was extensively remodeled in 2007-2009. The transmission line enters our property from the northwest side and exits at the back on the southeast. Our home is directly in the construction right of way at the entry point and 200' from the center line. Directly south of our home is a 30' X 50' metal shop building with concrete floors, 3 roll up doors, an attic area and enclosed room for storage. It was built in 1985, is 17' tall and 150' from the center of the line. On the east side of the shop a 30' x 30' metal barn built in 1990 is 15' tall and 200' from the center of the line. Between our home and this barn is an 8' X 20' brick building which houses our water well. It was built in 1967, is 8' tall and 200' from the center of the line. On the southeast toward the back of our property is a 20' X 40' metal barn with pipe fenced lots built in 1968. An attached covered area with concrete flooring, a work chute and scales for cattle was added in 1995. This structure is 15' tall and sits 175' from the center line.</p>
Ben and Anita Remmele	<p>Our home, constructed in 2004: 45' x 70' x 20'. Car port (2004) with attached tool shed: 34'x 20'x 10'. Both less than 500' from proposed route. Windmill (1940s): 8'x 8' x 24'. Within 100' of proposed route. Barn and pens (1973): 60' x 60' x 25', approximately 1000' from proposed route.</p>
Michael Richardson	<p>My house 58' x 46' x 24' tall, built in 2006 and occupied on Feb 15, 2007, is 530 ft from the line center. I have a barn/shop next to the house (built at the same time as the</p>

	<p>house) that is 78' x 40' x 18' tall and lies 580 ft from the line center.</p> <p>I also have a 14' x 10' x 8' tall storage building/well house that is 555 ft from the line center, built in 2003. I also have a total of 4900 ft of grapevine trellis constructed that is 225 ft from the line center. The trellis is constructed of wood and metal posts with hi-tensile wire running along each. The individual rows average 200 ft each in length, are spaced 10' apart and are 6' tall. This trellis was constructed in 2008, 2009, and Spring of 2010 (reference aerial satellite map in testimony).</p>
Susan Stevens	<p>Barn with internal two bedroom apartment. I do not know the date of the barn construction, but the apartment was added in 1996 and has been continuously occupied. Structure is approximately 25 feet high. This structure is less than 500 feet from the proposed center line of the transmission line.</p>

Sponsor: Jim Joling

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

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

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

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: By agreement with counsel for Oncor, this request does not seek documents concerning communications or correspondence protected by the attorney-client and work-product privileges. No documents concerning communications or correspondence with any other Intervenor related to this docket or the issues arising in this docket exist outside of privileged communications.

Respondent/Preparer:

Mark and Wendy Armstrong
Alvin Baker
Mitch Baker
Tommy and Glenda Blessing
Boyd Highland Oaks, L.P. (Larry Cole, General Manager)
Donald H. Brown
Roberta Campbell
Jim and Linda Cowell
Robert Crawford
J. Fred and Jean Davis
Jean C. Davis Family L.P.
Evia Lou Dillehay
Bill and Pat Goodger
Judy Taylor
Rosalie Gregg
Jamberly Corporation
Jim Joling
Bill and Donna Lewis

Earl Lewis
Lecia Lewis
Brian Brookhouse
Jim Massey
Greg and Toni Moore
Lyon and Kay Moore
Lynn Moore
Charles Nelon
Mike Rawlings
Ben and Anita Remmele
Debbie Remmele-Baber
Michael Richardson
Leora Spain
Norman and Nelda Stephens
Trevor Stephens
Susan Stevens

Sponsor: Jim Joling

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

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

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

- 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 the 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: No.

Respondent/Preparer:

Mark and Wendy Armstrong
Alvin Baker
Mitch Baker
Tommy and Glenda Blessing

Boyd Highland Oaks, L.P. (Larry Cole. General Manager)
Donald H. Brown
Roberta Campbell
Jim and Linda Cowell
Robert Crawford
J. Fred and Jean Davis
Jean C. Davis Family L.P.
Evia Lou Dillehay
Bill and Pat Goodger
Judy Taylor
Rosalie Gregg
Jamberly Corporation
Jim Joling
Bill and Donna Lewis
Earl Lewis
Lecia Lewis
Brian Brookhouse
Jim Massey
Greg and Toni Moore
Lyon and Kay Moore
Lynn Moore
Charles Nelon
Mike Rawlings
Ben and Anita Remmele
Debbie Remmele-Baber
Michael Richardson
Leora Spain
Norman and Nelda Stephens
Trevor Stephens
Susan Stevens

Sponsor: Jim Joling

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

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

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

- 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:
- the expert's name, address and telephone number;
 - 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;
 - the expert's mental impressions and opinions formed or made in connection with this docket and any methods used to derive them;
 - 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
 - the consulting expert's current resume and bibliography.

RESPONSE: None.

Respondent/Preparer:

Mark and Wendy Armstrong
Alvin Baker
Mitch Baker
Tommy and Glenda Blessing
Boyd Highland Oaks, L.P. (Larry Cole, General Manager)
Donald H. Brown
Roberta Campbell
Jim and Linda Cowell
Robert Crawford
J. Fred and Jean Davis

Jean C. Davis Family L.P.
Evia Lou Dillehay
Bill and Pat Goodger
Judy Taylor
Rosalie Gregg
Jamberly Corporation
Jim Joling
Bill and Donna Lewis
Earl Lewis
Lecia Lewis
Brian Brookhouse
Jim Massey
Greg and Toni Moore
Lyon and Kay Moore
Lynn Moore
Charles Nelon
Mike Rawlings
Ben and Anita Remmele
Debbie Remmele-Baber
Michael Richardson
Leora Spain
Norman and Nelda Stephens
Trevor Stephens
Susan Stevens

Sponsor: Jim Joling

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

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

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

- 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:

- a) See Direct Testimony of Mayor Brent Wilson, Larry Cole, Greg L. Moore, DVM, and Jim Joling, on behalf of Wise Transmission Group, LLC.
- b) See Direct Testimony of Mayor Brent Wilson, Larry Cole, Greg L. Moore, DVM, and Jim Joling, on behalf of Wise Transmission Group, LLC.
- c) See Direct Testimony of Mayor Brent Wilson, Larry Cole, Greg L. Moore, DVM, and Jim Joling, on behalf of Wise Transmission Group, LLC.
- d) By agreement with counsel for Oncor, this request does not seek documents that are not relevant to this case, with the exception of documents related to proposed development, and O&G issues.
- e) By agreement with counsel for Oncor, this request does not seek a list of dockets that are not relevant to this case, with the exception of dockets related to proposed development, and O&G issues.

In addition, see below:

Respondent/Preparer	Response
<p>Mark and Wendy Armstrong Alvin Baker Mitch Baker Tommy and Glenda Blessing Boyd Highland Oaks, L.P. (Larry Cole, General Manager) Donald H. Brown Roberta Campbell Jim and Linda Cowell Robert Crawford J. Fred and Jean Davis Jean C. Davis Family L.P. Evia Lou Dillehay Bill and Pat Goodger Judy Taylor Rosalie Gregg Jamberly Corporation Jim Joling Bill and Donna Lewis Earl Lewis Lecia Lewis Brian Brookhouse Jim Massey Greg and Toni Moore Lyon and Kay Moore Lynn Moore Charles Nelon Mike Rawlings Ben and Anita Remmele Debbie Remmele-Baber Michael Richardson Leora Spain Norman and Nelda Stephens Trevor Stephens Susan Stevens</p>	<p>a) Honorable Mayor Brent Wilson City of Boyd, Texas 100 Rock Island Avenue Boyd, Texas 76023 940.433.5166</p> <p>b) High School graduate Mayor of the City of Boyd Texas - Current Wise County Board of Directors 2003-2009 Chairman of Wise County Board of Directors 2005-2009 City of Boyd Council 2002-2004</p> <p>c) The financial impact of the preferred route 222, Link OO on the City of Boyd. The negative impact on the future growth plans of the City of Boyd from the Link OO and its impact on the platted developments of Boyd Highland Oaks.</p> <p>d) None exist related to any transmission line or PUC docket</p> <p>e) None</p> <p>a) Larry Cole Principal, Larry Cole Communities Partner, Boyd Highland Oaks, L.P. 200 Pate Orr Road South Keller, Texas 76248 940.379.1400</p> <p>b) Bachelor of Civil Engineering from the University of Minnesota – 1970. Professional Football player, Dallas Cowboys 1968 – 1980. Soil Engineer with Southwestern Laboratories 1970- 1971. Homebuilder 1973 – Present. Real Estate Developer 1978 - Present with over 2,000 lots developed in multiple neighborhoods. President of the Fort Worth Builders Association, 1993- 1994. Life Director of the National Association of</p>

	<p>Homebuilders. Director of Harris Hospital, HEB 1973-1980. Director of Riverside national Bank 1984-1994</p> <p>c) The negative impact Link OO will have on the platted development of Boyd Highland Oaks. The relationship between Boyd Highland Oaks and the City of Boyd Texas. The negative impact Link OO will have on the current residents of Boyd Highland Oaks.</p> <p>d) No articles, speeches or published materials related to electric transmission facilities exist.</p> <p>e) None</p> <p>a) Greg L. Moore, DVM Southlake Animal Hospital 200 West Northwest Parkway Southlake, Texas 76092 817.481.2014</p> <p>b) Doctor of Veterinary Medicine from Auburn University 1981. Surgical Internship at Texas A&M University 1982. Chief of Avian and Exotic Medicine at the Animal Medical and Surgical Hospital of Irving, Texas 1982-1992. President and Chief of Medicine and Surgery at the Southlake Animal Hospital, Southlake, Texas 1995 – Present. Staff Veterinarian at the International Exotic Animal Sanctuary, Boyd, Texas – 1977 – Present. State of Texas and Federal Falconry licenses since 1971. State of Texas and Federal permits to house, treat and rehabilitate all migratory and non-migratory birds. State of Texas and Federal propagation permits to breed and reproduce birds of prey including threatened species such as the peregrine falcon.</p> <p>c) Provide background information regarding the specialty veterinary practice for the treatment and rehabilitation of raptors affected by the proposed Oncor transmission line. Describe the location of the proposed Oncor</p>
--	---

	<p>transmission line on Track OO as it affects the specialty veterinarian practice regarding the treatment and rehabilitation of raptors. Identify other threatened species impacted by the proposed Oncor transmission line over links J and OO.</p> <p>d) None exist that are related to any transmission lines or PUC dockets</p> <p>e) None</p> <p>a) Jim Joling PO Box 1137 Boyd, Texas 76023 940.433.5507</p> <p>b) BS, Business Law – 1969 Law degree – 1971 Xerox Branch Manager 1970-1980 Honeywell Communications Branch Manager 1980-1989 Tellabs, Vice President, General Manager 1989-2002 Consulting Services 2004-2008 Director, New Business Development, tii Network Technologies 2008-Present.</p> <p>c) Provide background on the members of WTG, LLC and their properties. Provide information on historical sites and artifacts that would be impacted by the transmission lines on links J and OO. Provide information on habitable structures on links J and OO not identified by Oncor or Power Engineers. Provide information on the impact of the proposed transmission line Links J and OO on the properties of the members of WTG, LLC. Detail the missed boundary of the City of Boyd, Texas. Detail the impact Links J and OO will have on housing developments not identified by Oncor or Powers Engineers.</p> <p>d) None exist for issues relating to any electrical</p>
--	---

	<p>transmission facility. Documents relating to the Texas Railroad Commission hearing in the Gas and Oil Division can be found in the Texas Railroad Commission archives under Oil and Gas Docket 09-0236695.</p> <p>e) Texas Railroad Commission, Oil and Gas Docket 09-0236695.</p>
--	---

Sponsor: Jim Joling

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

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

RESPONSE OF WISE TRANSMISSION GROUP LLC
TO ONCOR ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION TO
WISE TRANSMISSION GROUP, LLC

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:

Respondent/Preparer	Response
Mark and Wendy Armstrong Alvin Baker Mitch Baker Tommy and Glenda Blessing Boyd Highland Oaks, L.P. (Larry Cole, General Manager) Donald H. Brown Roberta Campbell Jim and Linda Cowell Robert Crawford J. Fred and Jean Davis Jean C. Davis Family L.P. Evia Lou Dillehay Bill and Pat Goodger Judy Taylor Rosalie Gregg Jamberly Corporation Jim Joling Bill and Donna Lewis Earl Lewis Lecia Lewis Brian Brookhouse Jim Massey	See Response of Wise Transmission Group, LLC to Staff 1-13. In addition, see below:

<p>Greg and Toni Moore Lyon and Kay Moore Lynn Moore Charles Nelon Mike Rawlings Ben and Anita Remmele Debbie Remmele-Baber Michael Richardson Leora Spain Norman and Nelda Stephens Trevor Stephens Susan Stevens</p>	
<p>Charles Nelon</p>	<p>My property is listed on the tax rolls only in my name. However, my family consisting of Joan Nelon, Alan & Chase Bell, Rob & Wendy Graham, Bruce & Dana Gietzen and Don & Laura Quattlebaum certainly have a vested interest in this property from both an inheritance and a development standpoint. For example, my daughter, Chase Bell, has had to delay her plans to construct a new home on the south side of the proposed line, possibly within 500' of the center of the line, pending the outcome of this docket.</p>

Sponsor: Jim Joling