



Control Number: 38597



Item Number: 1552

Addendum StartPage: 0

SOAH DOCKET NO. 473-11-0072
PUC DOCKET NO. 38597

APPLICATION OF ONCOR
ELECTRIC DELIVERY COMPANY
LLC TO AMEND A CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR THE KRUM WEST TO ANNA
345-KV CREZ TRANSMISSION LINE
IN COLLIN, COOKE, DENTON, AND
GRAYSON COUNTIES, TEXAS

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

FILED
OCT 25 PM 12:18
STATE OFFICE OF ADMINISTRATIVE HEARINGS
DALLAS, TEXAS

INTERVENORS RESPONSE TO FIRST SET OF REQUESTS FOR INFORMATION
AND FIRST SET OF REQUESTS FOR ADMISSION

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

I, Kathleen Edwards provides the following response to
the Public Utility's Commission of Texas's First Set of Request for Information and First
Set of Requests for Admissions and states under oath that all answers are true.

Sign Name Kathleen Edwards

Print Name Kathleen Edwards

Date 10-20-10

Mailing Address 6602 Miller Rd, Krum, Tx 76249

1552

Staff -1-1 Do you have a habitable structure, as defined by P.U.C., SUBST. 5. 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. 25.101(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 are not limited apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, and schools."

RESPONSE: *yes, habitable structure - home*

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: *NO*

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: *NO*

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 visible, approximately how far away the lines are located and how the current lines affect your property, if at all.

RESPONSE: *yes, lines are visible on horizon.
Current lines do not affect 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.

RESPONSE: *NO*

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*

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*

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

RESPONSE: *my property will be surrounded on three sides by transmission lines. Further, lines will be over large gas line.*

Specific concerns are:

- safety*
- property value*
- re-sale value*
- quality of life*

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*

Staff-1-10 Are your property boundaries for the property you own represented accurately on the maps provided by Oncor in its Application at Attachment No. 5? If no, please explain any discrepancies and provide a modified Oncor map or drawing to indicate the discrepancies.

RESPONSE: *unable to determine at this time.*

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:

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: *N/A, however gas line on
route less than 500 feet from
home.*

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

RESPONSE: *self, Bank of America*

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: *N/A*

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: *I own or reside in a habitable structure within 500 feet of the proposed transmission line.*

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: *It is difficult to tell due to the lack of detailed maps, but appears to be accurate as far as I can tell.*