



Control Number: 38597



Item Number: 1731

Addendum StartPage: 0

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

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

RESPONSE OF  
TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR  
INFORMATION/ADMISSIONS FROM INTERVENORS

I, Shelley Pugh, hereby file the following response to the  
First Set of Requests for Information (RFIs) and Requests for Admission (RFAs) from  
Commission Staff.

Respectfully submitted,

Shelley Pugh  
Signature

Shelley Pugh  
Print Name

10/25/10  
Date

**STAFF RFI 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 segments(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 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, my primary residence is within approximately 50 feet from the 27 segment. There is a shop within 75 feet of the power line. This is a single-family structure.

**STAFF RFI 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, the 27 segment crosses diagonally from Southwest to Northeast through the middle of the property.

**STAFF RFI 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, a 138KV transmission line and a local distribution line mounted on wood "H" frame structures across my property.

**STAFF RFI 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:**

yes, they are visible from inside the house and from throughout the property.

**STAFF RFI 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 RFI 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 or the proposed transmission line.

**RESPONSE:**

NO

**STAFF RFI 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 RFI 1-8. What are your specific concerns about the proposed transmission line?

RESPONSE: 1) The proposed structures are much bigger

2) The new lines will possibly cause our shop to be within the new easement.

3) We are planning to put in a pool this Spring and the new easement will affect these plans

4) I operate a state registered home daycare from my home. Families are concerned about EMF.

5) The new structure will take up an unproportional amount of our 1.45 acres.

STAFF RFI 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, there were not any.

**STAFF RFI 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 not, please explain any discrepancies and provide a modified Oncor map or drawing to indicate the discrepancies.

**RESPONSE:** The map is rough and not precise.

**STAFF RFI 1-11.** What is the primary use for your property and, in your opinion, will this use be impacted by the proposed transmission line? If so, please explain.

**RESPONSE:** It is my residence. My home is also my place of work. We are also a licensed foster care home.

**STAFF RFI 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:**

This is a country residence and would look industrialized area.

**STAFF RFI 1-13.** Please identify all persons with an ownership interest in your property.

**RESPONSE:**

Emmett Pugh, JR.  
Shelley Pugh

**STAFF RFI 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:**

It should not be placed on my property or in my neighborhood.



**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 reside in my primary residence,  
a single family home, which is  
about 50 feet <sup>SE</sup> from the proposed  
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:**

Appears to be accurate but I  
cannot verify.