



Control Number: 38597



Item Number: 1755

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	§ § § § § § § § § §	BEFORE THE STATE OF OFFICE OF ADMINISTRATIVE HEARINGS
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FILED
11-2-11 AM 9:23
CLERK

**INTERVENOR WILLIAM H. RASOR RESPONSES TO COMMISSION STAFF'S
FIRST SET OF REQUESTS FOR INFORMATION TO INTERVENORS**

William H. Rasor ("Rasor") serves and files the following answers to Commission Staff's First Set of Requests For Information and First Set of Requests For Admission to Intervenors in the above-captioned and numbered docket.

**I.
ANSWERS**

Staff-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) and estimate how far the segments are from the habitable structure. 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."

ANSWER: Yes. A single family residence appears to be located within 500 feet of the Line Segment X3. This property is generally located north of FM 121 and south of Austin Road along X3.

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.

ANSWER: Yes, I own several properties that are impacted by proposed line segments R41 and X3. Line Segment R41 crosses through an approximate 96 acres located on FM 902. It appears this proposed route follows my west property boundary, although it is not clear from the Oncor maps.

Line Segment X3 crossed through an 800 acre tract of land located on both the east and west sides of Farmington Road and south of Austin Road and Bellweather Drive . The proposed route follows an existing 138 KV line for a short distance before it heads west then north/south. It does not appear to follow any property boundaries.

Line Segment X3 crosses through an approximate 250 acre tract of land located north of FM 121 and south of Austin Road. This proposed route does not follow any existing rights of way or property boundaries and does come within 500 ft of a habitable structure located on the property.

Staff-1-3 Do any existing transmission or distribution lines cross your property? If so, please describe how and where they cross your property.

ANSWER: Yes. An existing 138 KV line does cross the 800 acres described above.

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.

ANSWER: Yes. See previous answer.

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.

ANSWER: 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.

ANSWER: 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?

ANSWER: No.

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

ANSWER: The proximity of Line Segment X3 to the existing home on the property. Line Segment X3's failure to follow my property boundaries. The financial impact the power line will have on my remaining property and its development potential.

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.

ANSWER: 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?¹ If not, please explain any discrepancies and provide a modified Oncor map or drawing to indicate the discrepancies.

ANSWER: I do not know at this time. The only map I have seen showing the proposed line segments does not delineate property boundaries.

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?

ANSWER: The properties are currently being used for residential, ranching and farming.

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.

ANSWER: Existing property boundaries, existing rights of way and habitable structures.

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

ANSWER: The 96 acres impacted by Line Segment R41 is owned by William H. Razor, Morgan Byran Ainsworth and Lura Razor Smith.

The 800 acres impacted by Line Segment X3 is owned by William H. Razor and Lura Razor Smith.

The 250 acres impacted by Line Segment X3 is owned by Lura Razor Smith and William H. Razor.

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.

ANSWER: Generally speaking, my preference is that any proposed easement parallel existing easements on the property or follow property boundaries and avoid habitable structures. Since I am unclear as to the size of Oncor's proposed easement or the structures that will be used in the easement, I am unable to form an preference at this time.

**COMMISSION STAFF'S FIRST SET O1 REQUESTS FOR ADMISSIONS
TO INTERVENORS**

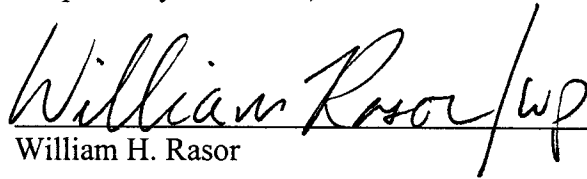
Staff RFA 1-1: Admit or deny that you do not own or reside in a habitable structure within 500 feet of the centerline of any proposed transmission line route in this docket.

ANSWER: Deny.

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.

ANSWER: Razor is unable to admit or deny this request based on the information currently available. The Oncor maps provided do not depict property boundaries.

Respectfully submitted,


William H. Rasor

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document has been forwarded to all counsel of record on this 28 day of October, 2010.

Filing Clerk
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