



Control Number: 38597



Item Number: 1847

Addendum StartPage: 0

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

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

§
§
§
§
§
§
§
§
§

**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**RECEIVED
2008 NOV 12 AM 9:20
PUBLIC FILING CLERK**

**INTERVENOR MARY A. McCUTCHEON'S ANSWERS TO COMMISSION STAFF'S
FIRST SET OF REQUESTS FOR INFORMATION AND FOR ADMISSIONS TO
INTERVENORS**

Intervenor MARY A. McCUTCHEON files this her answers to the Commission Staff's First Set of Requests for Information and Requests For Admissions as follows:

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 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 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 by Intervenor MARY A. McCUTCHEON:

NO, I do not have a habitable structure near one of the segments of the proposed transmission lines.

The above response was prepared by Mary A. McCutcheon personally.

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 by Intervenor MARY A McCUTCHEON:

YES, the segment H1021 crosses the property of the Haisler Family Estate in which I have 33% interest. This property runs parallel to and is located East of FM 2164 and North of Loop 288. The proposed route designated as the preferred transmission line would follow along the existing TMPA 138 KV transmission line and the existing natural gas pipeline across the entire width of the property.

The above response was prepared by Mary A. McCutcheon personally.

Staff-1-3 Do any existing transmission or distribution lines cross your property? If so, please

1847

describe how and where they cross your property.

Answer by Intervenor MARY A. McCUTCHEON

YES, a single pole TMPA utility line and a natural gas pipeline run the entire width of the property from East to West, parallel to the proposed Oncor line.

The above response was prepared by Mary A. McCutcheon personally.

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 by Intervenor MARY A. McCUTCHEON:

YES, the existing TMPA line is visible from the property North of Loop 288, but not South of the loop. It has a negative impact on the development value of the property, which will only be increased with the addition of another larger transmission line. The much taller transmission line would be visible from all of the property, therefore having a huge negative impact on the value of the prime development property South of loop 288.

The above response was prepared by Mary A. McCutcheon personally.

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 by Intervenor MARY A. McCUTCHEON:

NO, there are no windmills located on this property.

The above response was prepared by Mary A. McCutcheon personally.

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 by Intervenor MARY A McCUTCHEON:

NO, I am not aware of any directly affected landowner that did not receive notice of the proposed transmission line project from Oncor.

The above response was prepared by Mary A. McCutcheon personally.

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 by Intervenor MARY A. McCUTCHEON:

NO. I have not had any discussions with anyone from Oncor.

The above response was prepared by Mary A. McCutcheon personally.

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

Answer by Intervenor MARY A. McCUTCHEON:

This property was purchased by my parents, Joe B. and Rosa Haisler in 1945. At the death of our father in 2006, I inherited this property along with my 2 brothers. Our intent is to sell this land for development. With the addition of a high voltage 150 foot tall transmission line, the property would be drastically devalued and the development potential would be destroyed. The city of Denton Planning and Zoning Commission has designated this land for residential use. No potential developer would put houses next to or near a high voltage line.

The above response was prepared by Mary A. McCutcheon personally.

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 alter the open house? If so, please provide them.

Answer by Intervenor MARY A. McCUTCHEON:

NO. I did not attend any open house presented by Oncor concerning this proposed transmission line.

The above response was prepared by Mary A. McCutcheon.

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 by Intervenor MARY A. McCUTCHEON:

YES, as far as I can tell on the map that I received from Oncor.

The above response was prepared by Mary A. McCutcheon.

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 by Intervenor MARY A. McCUTCHEON:

The primary and best use of this property is for development. The proposed transmission line would render this property useless for residential development purposes as it is currently zoned.

The above response was prepared by Mary A. McCutcheon..

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 by Intervenor MARY A. McCUTCHEON:

YES. The proposed transmission line cuts the property approximately in half, thus destroying the development potential for all of the property.

The above response was prepared by Mary A. McCutcheon personally.

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

Answer by Intervenor MARY A. McCUTCHEON:

The persons with ownership interest in this property are: Mary A. McCutcheon, J.B. Haisler, Jr., and Melvin R. Haisler.

The above response was prepared by Mary A. McCutcheon personally.

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 by Intervenor MARY A McCUTCHEON:

If the transmission line must cross our property, I would prefer that it run along the Northern boundary line.

The above response was prepared by Mary A. McCutcheon personally.

I, Mary A. McCutcheon, the undersigned, do hereby state and stipulate in writing that I am the person who prepared the answers to the above responses to Requests for Information and the responses can be treated by all parties as if the answers were filed under oath in accordance with P.U.C. Proc. R. 22.144 (C).

Signed on this the 9th day of November, 2010.

Mary A. McCutcheon 10/9/2010
Mary A. McCutcheon

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

**COMMISSION STAFF'S FIRST SET OF 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 by Intervenor MARY A. McCUTCHEON:

I ADMIT that I do not own or reside in a habitable structure within 500 feet of the centerline of any proposed transmission line route in this docket.

The above response was prepared by Mary A. McCutcheon personally.

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 by Intervenor MARY A. McCUTCHEON:

I ADMIT that, insofar as I can tell, the property boundaries for the property(ies) I own are accurately represented on the maps provided by Oncor.

The above response was prepared by Mary A. McCutcheon personally.

I, Mary A. McCutcheon, the undersigned, do hereby state and stipulate in writing that I am the person who prepared the answers to the above responses to Requests for Admissions and the responses can be treated by all parties as if the answers were filed under oath in accordance with P.U.C. Proc. R. 22.144 (C).

Signed on this the 9th day of November, 2010.

Mary A. McCutcheon 11/9/2010
Mary A. McCutcheon