



Control Number: 38597



Item Number: 2412

Addendum StartPage: 0

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

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PUBLIC UTILITY COMMISSION  
OF TEXAS

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PUBLIC UTILITY COMMISSION  
FILED

**BERT FIELDS, JR.'s RESPONSES TO ONCOR'S  
FIRST SET OF REQUESTS FOR INFORMATION TO BERT FIELDS, JR.**

Bert Fields, Jr. ("Fields") files this response to Oncor Electric Delivery LLC ("Oncor") First Set of Requests for Information ("RFIs") to Bert Fields, Jr. Oncor's First RFIs were received on November 18, 2010. Pursuant to SOAH Order No. 1 issued September 23, 2010, Parties shall have ten (10) calendar days to respond to RFIs and RFAs, making this response due by November 29, 2010. Fields' response is therefore timely. All Parties may treat the answers as if they were filed under oath.

Fields files these responses without agreeing to the relevance of the information sought and without waiving his right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,

JACKSON WALKER L.L.P.

By: Kathleen M. LaValle

Kathleen M. LaValle  
State Bar No. 11998600  
901 Main Street, Suite 6000  
Dallas, TX 75202  
(214) 953-6144; (214) 661-6664 (fax)  
klavalle@jw.com

**ATTORNEYS FOR BERT FIELDS, JR.**

**CERTIFICATE OF SERVICE**

This is to certify that on this 29 day of November, 2010, a true and correct copy of the foregoing document was served on Oncor via facsimile, United States mail, and/or hand delivery .

  
Kathleen M. LaValle

**BERT FIELDS, JR.'S RESPONSES TO ONCOR'S FIRST SET OF  
REQUESTS FOR INFORMATION FROM BERT FIELDS, JR.**

**1-1** Please list each Route or Link that you contest in this proceeding.  
**RESPONSE** Links 01-02-05, T5, N

**BERT FIELDS, JR.'S RESPONSES TO ONCOR'S FIRST SET OF  
REQUESTS FOR INFORMATION FROM BERT FIELDS, JR.**

**1-2** Please provide the general factual bases for why you contest each Route and  
**RESPONSE** link that you contest.  
See Direct Testimony of Frank Abbott.

**BERT FIELDS, JR.'S RESPONSES TO ONCOR'S FIRST SET OF  
REQUESTS FOR INFORMATION FROM BERT FIELDS, JR.**

**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**

Consistent with discussions with counsel for Oncor, information regarding Structures on the Fields properties is included in the Direct Testimony of Frank Abbott. Also, a CD containing image files showing the location of Structures is being provided with this Response.

**BERT FIELDS, JR.'S RESPONSES TO ONCOR'S FIRST SET OF  
REQUESTS FOR INFORMATION FROM BERT FIELDS, JR.**

**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**

Consistent with discussions with counsel for Oncor, Eland is not responding as to communications that are privileged or subject to a common interest exemption. Copies of other communications are attached to this Response.

**LaValle, Kathleen**

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**From:** Zerwas, John [John.Zerwas@puc.state.tx.us]

**Sent:** Thursday, October 21, 2010 3:48 PM

**To:** LaValle, Kathleen

**Subject:** RE: 38597 - Oncor Krum West to Anna

Kathleen, Andres is now available. Give us a call at his office, 512-936-7285. I'll come in there as well when you call.

**John M. Zerwas, Jr.**

Attorney - Legal Division

The Public Utility Commission of Texas

1701 N. Congress Ave.

Austin, Texas 78711

Tel: (512) 936-7297

Fax: (512) 936-7268

**From:** LaValle, Kathleen [mailto:KLaValle@jw.com]

**Sent:** Thursday, October 21, 2010 3:26 PM

**To:** Zerwas, John

**Subject:** Re: 38597 - Oncor Krum West to Anna

John - In transit and running a few minutes behind. I'll call as soon as I'm out of my car.

Thanks,  
Kathleen

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**From:** Zerwas, John

**To:** LaValle, Kathleen

**Sent:** Wed Oct 20 15:34:10 2010

**Subject:** RE: 38597 - Oncor Krum West to Anna

Actually I am just realizing that I have a lunch event that may last until my staff meeting. Sorry about that, I forgot until now. You want to just shoot for 3:30?

**John M. Zerwas, Jr.**

Attorney - Legal Division

The Public Utility Commission of Texas

1701 N. Congress Ave.

Austin, Texas 78711

Tel: (512) 936-7297

Fax: (512) 936-7268

**From:** LaValle, Kathleen [mailto:KLaValle@jw.com]

**Sent:** Wednesday, October 20, 2010 3:32 PM

**To:** Zerwas, John

**Subject:** Re: 38597 - Oncor Krum West to Anna

John - Would 1 pm work?

11/29/2010

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Kathleen

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**From:** Zerwas, John  
**To:** LaValle, Kathleen  
**Sent:** Wed Oct 20 15:15:51 2010  
**Subject:** RE: 38597 - Oncor Krum West to Anna  
Kathleen,

I don't think Andres is available but I can probably speak with you Thursday afternoon. What time works for you? I have a staff meeting from 2 to 3.

**John M. Zerwas, Jr.**  
Attorney - Legal Division  
The Public Utility Commission of Texas  
1701 N. Congress Ave.  
Austin, Texas 78711  
Tel: (512) 936-7297  
Fax: (512) 936-7268

**From:** LaValle, Kathleen [mailto:KLaValle@jw.com]  
**Sent:** Tuesday, October 19, 2010 9:54 PM  
**To:** Medrano, Andres; Zerwas, John  
**Subject:** 38597 - Oncor Krum West to Anna

Andres and John -

Would you have any availability tomorrow or Thursday for an informal and very brief call regarding Oncor's application? I represent a number of intervening landowners. Other than a luncheon I need to attend from 12 to 2 and a flight at 4, other times tomorrow work and Thursday is wide open.

Thanks,  
Kathleen M. LaValle

11/29/2010

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**BERT FIELDS, JR.'S RESPONSES TO ONCOR'S FIRST SET OF  
REQUESTS FOR INFORMATION FROM BERT FIELDS, JR.**

**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 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**

Consistent with discussions with counsel for Oncor, subsection i. is limited to those directly related to the subject matter of the docket.

For responses a. through d., *see* Direct Testimony of Frank Abbott. For responses to e., g. and h., *see* Fields' Response 1-1 to Walton's RFI to Fields. For a response to f., *see* attached resume.



Kimley-Horn  
and Associates, Inc.

### ***Frank G. Abbott, Jr., P.E.***

Frank Abbott provides technical and managerial expertise for a wide range of Kimley-Horn's engineering, planning, and surveying projects. His experience encompasses the full spectrum of engineering and planning services related to land development including master planning, zoning assistance, preliminary and final design for water distribution, wastewater, storm drainage, paving and roadway facilities. Frank has managed Kimley-Horn's open-ended, multiyear General Services Agreement with the Frisco Economic Development Committee since 1994.

#### ***Professional Credentials***

- Bachelor of Science, Civil Engineering, Texas A&M University, 1987
- Professional Engineer in Texas

#### ***Relevant Experience***

- 52-Acre University Park (Industrial Office Park)— McKinney, TX
- 65-Acre Gateway Park(Mixed-Use Development) — McKinney, TX
- 220-Acre Mustang Business Park (Zoning & Entitlements) – Carrollton, TX
- 350-Acre Wade Tract (Planning & Entitlements) – Frisco, TX
- 450-Acre Kirk Ranch (Zoning Assistance)- Celina, TX
- 600-Acre Collins/Celina Tract (Zoning Assistance) – Celina, TX
- Arts of Collin County Site Selection — Allen and Frisco, TX
- Bert Fields Properties (Zoning, Entitlements, ROW Negotiations) – Frisco and Argyle, TX
- Buxton Properties (Entitlements & Planning) – Frisco, TX
- Camp Warehouse — Frisco, TX
- City of Weston Future Land Use Plan – Weston, TX
- Cobb Business Park – Frisco, TX
- Colonial Bank – Frisco, TX
- Comstock Office Bldg. – Frisco, TX
- Cotton Gin Phase 2 Roadway Design – Frisco, TX
- Creekside at Stonebriar Phase I & II (Residential Development)— Frisco, TX
- Dave's 5-Star Car Wash — Frisco, TX
- Diversified Office Bldg. – Frisco, TX
- Eagle Gymnastics Center – Frisco, TX
- Ebby Halliday Office Bldg. – Frisco, TX
- Eland Energy Properties (Zoning, Entitlement and ROW Negotiations) – Frisco and Allen, TX
- Eldorado Commons Development (Entitlements & Planning) – Frisco, TX
- Eldorado Self Storage Facility – Frisco, TX
- Emerald Office Center — Frisco, TX
- Ericsson Parking Expansion – Plano, TX



***Frank G. Abbott, Jr., P.E.***

- Exchange Parkway (East) – TXDOT Roadway Design — Allen, TX
- Exchange Parkway (West) – Alignment Study – Allen, TX
- FEDC John Hickman/DNT Sanitary Sewer – Frisco, TX
- Folsom 14 Acre Comm NWC Legacy @ Lebanon — Frisco, TX
- Frisco Bridges — Frisco, TX
- Frisco Bridges – Frisco, TX
- Frisco EZ Storage Facility – Frisco, TX
- Frisco First Baptist Church – Frisco, TX
- Frisco Market Place (Retail Development) – Frisco, TX
- Frito Lay Offsite Sanitary Sewer – Plano, TX
- Gates of Prosper (Planning & Zoning Efforts) – Prosper, TX
- GKLT Sanitary Sewer Design – Frisco, TX
- Greenway Shopping Center — Allen, TX
- Hampton Inn – Frisco, TX
- Hibernia Banks – North Texas Sites, TX
- Hillcrest Geriatrics Center — Frisco, TX
- Holiday Inn – Denison, TX
- Hutson Waterline Design – Frisco, TX
- Lakeside Office Park – Frisco, TX
- Legacy Bank of TX – Frisco, TX
- Legacy Commons Phases 1-5 (Mixed Use) – Frisco, TX
- Mateo Office Park – Frisco, TX
- McDermott Road (FM 2170) Alignment Study — Allen, TX
- McDermott Square (Retail Development) – Frisco, TX
- McKinney 1,400-Acre Tract (Planning & Zoning Efforts)— McKinney, TX
- McKinney 461-Acre Tract (Planning & Zoning Efforts) — McKinney, TX
- McKinney Airport Master Drainage Plan – McKinney, TX
- McKinney Corners (Preliminary Planning) — McKinney, TX
- Medical Center Drive — McKinney, TX
- Meridian Industrial Park Traffic Impact Analyses & Zoning Assistance— Frisco, TX
- Midtown Sewer Project – Frisco, TX
- Millennium Drive and Century Parkway (Business Park) — Allen, TX
- Newman Village (Residential Development) – Frisco, TX
- Oakmont Sanitary Sewer Design – Frisco, TX
- O'Hanlon Ranch –Phase 2 Residential Development – Sherman, TX
- Platinum Business Park (Planning & Entitlements) – Frisco, TX
- Platinum Parkway Roadway Design (Ph 1) – Frisco, TX
- Preston Parkway Retail Center – Prosper, TX
- Preston Stonebrook Plaza (Retail Development) — Frisco, TX
- Preston – Wade Storage Facility – Frisco, TX
- PSI Office Building – Frisco, TX



Kimley-Horn  
and Associates, Inc.

***Frank G. Abbott, Jr., P.E.***

- Razor Tract--Preliminary Planning/Engineering/Zoning 243 Acres — McKinney, TX
- Shepards Hills Residential Development (Ph 1 & 2) – Frisco, TX
- Silverado Apartments — Frisco, TX
- Sinacola Aggregate Facility (Zoning) – Frisco, TX
- Sinacola Industrial Park – Terrell, TX
- Sinacola Medical Technology Park Phase I (Office Bldg) – Frisco, TX
- Sports Village USA Development (Planning & Entitlements) – Frisco, TX
- Sports Village Fieldhouse Project – Frisco, TX
- St. Andrews Ct. Rehab Project – Frisco, TX
- St. Charles Apartments (Ph I) – Frisco, TX
- Sterling Ranch Ph I & II (Residential Development) — Frisco, TX
- Stewart Creek Office Building – Frisco, TX
- Stewart Creek Office Park – Frisco, TX
- Stone Manor Apartments — Frisco, TX
- Stone Plaza Office Building — Dallas, TX
- Stonebriar Assisted Living Center — Frisco, TX
- Stonebriar Golf Course Expansion — Frisco, TX
- Stonebriar Parking Lot Expansion and Cart Barn — Frisco, TX
- Surrey Path Roadway Design – Frisco, TX
- Teel Village (Retail Development) – Frisco, TX
- Tennyson Office Bldg – Plano, TX
- The Tribute / Wynnwood Peninsula Development (Residential Development) – The Colony, TX
- The Vineyards Apartments – Frisco, TX
- Throne Hall Roadway Design – Frisco, TX
- Town & Country Development at Stonebriar (Planning & Zoning Efforts) — Frisco, TX
- Town & Country Blvd Design (PH 1, 2 & 3) – Frisco, TX
- Town & Country Westin Hotel Addition — Frisco, TX
- Trike Properties (Zoning & Entitlements) – Frisco, TX
- Vaquero Development (Residential Development) — Westlake, TX
- Wade Boulevard and Ohio Drive (Roadway Design) — Frisco, TX
- Watermark Community Church – Dallas, TX
- Wells Tract (Preliminary Planning) – Celina, TX
- World Serve Office Bldg. Expansion – Frisco, TX

**BERT FIELDS, JR.'S RESPONSES TO ONCOR'S FIRST SET OF  
REQUESTS FOR INFORMATION FROM BERT FIELDS, JR.**

**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:

- a. the expert's name, address and telephone number;
- b. 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 when and how the factual information was acquired;
- c. the expert's mental impressions and opinions formed or made in connection with this docket and any methods used to derive them;
- d. 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
- e. the consulting expert's current resume and bibliography.

**RESPONSE**

Not applicable.

**BERT FIELDS, JR.'S RESPONSES TO ONCOR'S FIRST SET OF  
REQUESTS FOR INFORMATION FROM BERT FIELDS, JR.**

**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 for testified.

**RESPONSE**

Not applicable.

**BERT FIELDS, JR.'S RESPONSES TO ONCOR'S FIRST SET OF  
REQUESTS FOR INFORMATION FROM BERT FIELDS, JR.**

**1-8** If you are not the only owner of your property affected by Oncor's proposed  
**RESPONSE** transmission line, please identify the other owner(s).  
Not applicable.