



Control Number: 38597



Item Number: 2636

Addendum StartPage: 0

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 §

PUBLIC UTILITY COMMISSION
OF TEXAS

2010 DEC 10 PM 1:32
PUC-UTL 11/13/10 06:11 PM

**CELINA GROUP 2 (R22)'S FIRST SUPPLEMENTAL RESPONSE TO ONCOR
ELECTRIC DELIVERY'S FIRST REQUESTS FOR INFORMATION**

TO THE HONORABLE STEVEN D. ARNOLD, ADMINISTRATIVE LAW JUDGE:

CELINA GROUP 2 (R22) files this First Supplemental Response to Oncor Electric Delivery
First Request for Information from the CELINA GROUP 2(R22) and would show as follows:

**Oncor Electric Delivery First Requests for Information from the Celina Group 2(R22) and
Celina Group 2(R22)'s First Supplemental Responses**

Request 1-1 Please list each Route or Link that you contest in this proceeding.

RESPONSE 1-1:

A. Sharon Scott: Link R22

Request 1-2 Please provide the general factual bases for why you contest each Route and Link
that you contest.

RESPONSE 1-2:

A. Sharon Scott:

Routing the lines on my western property line of the two tracts of land I own
would be a financial catastrophe for me. The lines would take out the entire
western tree line that I planted large trees (adding to the natural line that is
heavy in some places and sparse in others) so that the beauty of the land would

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be diminished and would allow for visibility of several other homes and barns. And these power lines would be visible and would dramatically reduce my property's value. I own two tracks of land that this line would be put on which includes my primary residence—total value of all approximately \$2,625,000. I estimate that these lines would reduce the value by 20% to 25%. One of the tracks will be sold one day for my retirement fund so this would drastically effect my ability to support myself in my elder years—and it is my main source for my retirement. Also my agricultural tax exemption is for wildlife management which includes, but is not limited to, improving habitat for native non-game species, restoring, maintaining and improving habitat and wildlife diversity, providing supplemental food and water to migrating birds and natural wildlife and if these lines were to be erected it would effect that due to the large number of trees that would have to be removed. Three of the four tanks I've dug in this land could be effected by run-off from ground pollution. Also I have a live oak tree farm (also planned as retirement income) on one track of land and any ground water pollution could effect the growth rate of these trees. In addition, I specifically looked in 1996 for land to buy that had no high voltage transmission lines on it as I was, and am, concerned about the effect of emfs. There remains much controversy in this area and mixed results from research. I do not want to be part of an experiment concerning my health.

Request 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 1-3:

A. Sharon Scott:

My property will have its entire western property line crossed by the proposed transmission lines. No structures are directly on that line; however, the line is solid with trees that I've planted as well as some natural. In addition, there is a small cemetery that is approximately 100 yards from that line. Also a water storage tank and a storeroom are perhaps 75 yards from that line.

Request 1-4 Please provide a copy of any documents concerning communications or correspondence you have had with any other Intervener related to this docket or the issues arising in this docket.

RESPONSE 1-4:

A. Sharon Scott:

I've had no communication except e-mails concerning hiring an attorney and when payment was due. I've deleted those.

Request 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;
- E. The general substance of the expert's mental impressions and opinions and a brief summary of the basis for them;
- D. 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;
- E. The expert's current resume and bibliography;
- F. 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;
- G. 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
- H. All articles, speeches, published materials and peer-reviewed material written by the expert.

RESPONSE 1-5:

- A. **Sharon Scott: Intervenor reserve the right to supplement should documents become available. None at this time.**

Request 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 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 1-6:

- A. **Sharon Scott: Not applicable. Intervenor reserve the right to supplement should documents become available. None at this time.**

Request 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/or testified.

RESPONSE 1-7:

- A. **Sharon Scott: Intervenor reserve the right to supplement should documents become available. None at this time.**

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

RESPONSE 1-8:

- A. **Sharon Scott: I am the sole property owner.**

Respectfully submitted,

HAYES, BERRY, WHITE & VANZANT LLP

By: 

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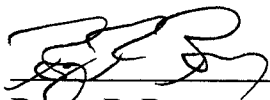
940-387-3518

Fax: 866-576-2577

Attorney for Celina Group 2(R22)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing First Supplemental Responses to Oncor Electric Delivery First Requests for Information From the Celina Group 2(R22) has been forwarded on this 9th day of December, 2010 all parties of record.


Byron R. Berry