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FILED

APPLICATION OF WIND ENERGY § BEFORE THE STATE OFFICE
TRANSMISSION TEXAS, LLC §
(WETT) TO AMEND ITS §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY (CCN) FOR THE §
LONG DRAW TO SAND BLUFF, SAND §
BLUFF TO DIVIDE, AND SAND BLUFF § OF
TO BEARKAT 345-KV CREZ §
TRANSMISSION LINES IN BORDEN, §
COKE, GLASSCOCK, HOWARD, §
MITCHELL, AND STERLING §
COUNTIES § ADMINISTRATIVE HEARINGS

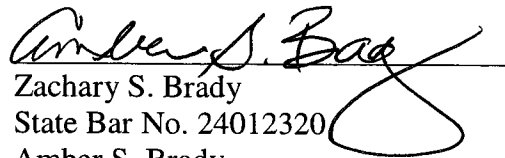
**LARRY GLASS' RESPONSES TO COMMISSION STAFF'S
FIRST SET OF REQUESTS FOR INFORMATION AND
FIRST SET OF REQUESTS FOR ADMISSION TO INTERVENORS**

TO: Commission Staff, by and through their attorney of record, Scottie Aplin, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326

Intervenor Larry Glass ("Glass") files this, his Responses to Commission Staff's ("Staff") First Set of Requests for Information and First Set of Requests for Admission. These responses may be treated by all parties as if they were filed under oath.

Respectfully submitted,

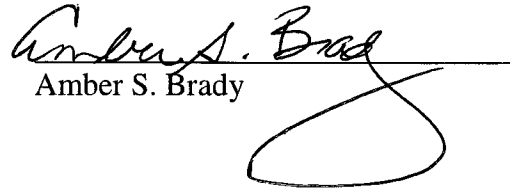
ZS BRADY & Co.



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ATTORNEYS FOR INTERVENOR
LARRY GLASS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties known of record via facsimile, U.S. mail, or electronically on this 4th day of January, 2011.


Amber S. Brady

RESPONSES TO STAFF'S FIRST REQUESTS FOR INFORMATION ("RFI")

Staff RFI No. 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."

Response:

No.

Prepared by: Larry Glass
Prepared by: Zach Brady, Amber Brady

Title: Intervenor
Title: Attorneys for Intervenor

Staff RFI No. 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 following segments would cross my property in Glasscock County: CA7, CB7, BT7, BX7, and BW7. These are all part of the Sand Bluff to Bearkat portion of the proposed transmission line.

Prepared by: Larry Glass
Prepared by: Zach Brady, Amber Brady

Title: Intervenor
Title: Attorneys for Intervenor

Staff RFI No. 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; an REA distribution line crosses my property along Section 45, Block 33, T 4 South, in a North-South direction. This line provides electric service to an electric well house that is approximately ¼ mile from the proposed transmission line.

Prepared by: Larry Glass
Prepared by: Zach Brady, Amber Brady

Title: Intervenor
Title: Attorneys for Intervenor

Staff RFI No. 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:

The distribution line mentioned in Response to Staff RFI No. 1-3 is visible from my property. In addition, I can see an existing 138-kV transmission line that is located northeast of my property. The current lines have little to no effect on my property; the distribution line is small, and the transmission line is visible from a distance.

Prepared by: Larry Glass

Title: Intervenor

Prepared by: Zach Brady, Amber Brady

Title: Attorneys for Intervenor

Staff RFI No. 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:

I do have three traditional, water-producing windmills on my property. The windmills are located in the following tracts: Section 39, Block 33, T4 South; Section 3, Block 33, T5 South; Section 48, Block 33, T4 South. All three windmills would be located within 2 miles of the proposed transmission line routes.

I do not have any wind turbines on my property.

Prepared by: Larry Glass

Title: Intervenor

Prepared by: Zach Brady, Amber Brady

Title: Attorneys for Intervenor

Staff RFI No. 1-6:

Are you aware of any directly affected landowner that did not receive notice of the proposed transmission line project from WETT? 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 WETT 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.

Response:

No.

Prepared by: Larry Glass

Title: Intervenor

Prepared by: Zach Brady, Amber Brady

Title: Attorneys for Intervenor

Staff RFI No. 1-7:

Have you discussed any modifications to the proposed transmission line route on your property with a representative of WETT? If so, what were the modifications to the proposed route that you suggested and what was the response of WETT?

Response:

No.

Prepared by: Larry Glass
Prepared by: Zach Brady, Amber Brady

Title: Intervenor
Title: Attorneys for Intervenor

Staff RFI No. 1-8:

What are your specific concerns about the proposed transmission line?

Response:

I am opposed to the construction of the proposed transmission line along any of the segments mentioned in Response to RFI No. 1-2, because of the following concerns I have about the proposed transmission line. I am concerned about the impact of the line on the production agriculture activities that take place on my property, and the impact that the proposed line could have on commercial quail hunting that occurs here. I am also concerned that the proposed transmission line will impose a severe negative effect on the property aesthetics that I value. Most importantly, I am concerned that the proposed transmission line will have a negative effect on my property values.

Prepared by: Larry Glass
Prepared by: Zach Brady, Amber Brady

Title: Intervenor
Title: Attorneys for Intervenor

Staff RFI No. 1-9:

Did you attend any open houses presented by WETT concerning this proposed transmission line? If so, when and where? Did you provide written comments to WETT at or after the open house? If so, please provide them.

Response:

No.

Prepared by: Larry Glass
Prepared by: Zach Brady, Amber Brady

Title: Intervenor
Title: Attorneys for Intervenor

Staff RFI No. 1-10:

Are your property boundaries for the property you own represented accurately on the maps provided by WETT in its Application at Attachment No. 3 (Sheets 1-28)? If not, please explain any discrepancies and provide a modified WETT map or drawing to indicate the discrepancies.

Response:

Given the size and scale of the maps that I have been able to review up to now, coupled with the lack of metes and bounds descriptions of the property boundaries, and/or a true survey of the property, I am unable to affirm that the property boundaries are accurately represented. However, it appears that the maps fairly depict the property boundaries within the survey area.

Prepared by: Larry Glass

Title: Intervenor

Prepared by: Zach Brady, Amber Brady

Title: Attorneys for Intervenor

Staff RFI No. 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:

My property is primarily used for cattle and sheep production. As I explained earlier, in my opinion, these primary uses will be negatively impacted by the proposed transmission line.

Prepared by: Larry Glass

Title: Intervenor

Prepared by: Zach Brady, Amber Brady

Title: Attorneys for Intervenor

Staff RFI No. 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:

See my responses to RFI No. 1-8 and 1-11.

Prepared by: Larry Glass

Title: Intervenor

Prepared by: Zach Brady, Amber Brady

Title: Attorneys for Intervenor

Staff RFI No. 1-13:

Please identify all persons with an ownership interest in your property.

Response:

The property at issue is owned by Lacy Creek Ranches, LLC. I serve as the Manager of Lacy Creek Ranches, LLC.

Prepared by: Larry Glass

Title: Intervenor

Prepared by: Zach Brady, Amber Brady

Title: Attorneys for Intervenor

Staff RFI No. 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:

I am opposed to construction of the transmission line using any of the segments that would cross my property. However, if the approved proposed transmission line is to cross my property, I would prefer the use of Link CB7, and I am willing to visit more with company officials about this.

Prepared by: Larry Glass

Title: Intervenor

Prepared by: Zach Brady, Amber Brady

Title: Attorneys for Intervenor

RESPONSES TO STAFF'S FIRST REQUESTS FOR ADMISSION ("RFA")

Staff RFA No. 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:

Admit.

Prepared by: Larry Glass
Prepared by: Zach Brady, Amber Brady

Title: Intervenor
Title: Attorneys for Intervenor

Staff RFA No. 1-2:

Admit or deny that the property boundaries for the property(ies) you own are accurately represented on the maps provided by WETT in its Application at Attachment No. 3, Sheets 1-28.

Response:

Unable to admit or deny. Again, given the size and scale of the maps that I have reviewed up to now, coupled with the lack of metes and bounds descriptions of the property boundaries, and/or a true survey of the property, I am unable to affirmatively admit or deny that the property boundaries are accurately represented. However, it appears that the maps fairly depict the property boundaries within the survey area.

Prepared by: Larry Glass
Prepared by: Zach Brady, Amber Brady

Title: Intervenor
Title: Attorneys for Intervenor