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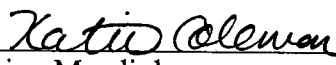
APPLICATION OF WIND ENERGY	§	
TRANSMISSION TEXAS, LLC TO	§	PUBLIC UTILITY COMMISSION
AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY FOR	§	
THE LONG DRAW TO SAND BLUFF,	§	
SAND BLUFF TO DIVIDE, AND SAND	§	
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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
FIRST SET OF REQUESTS FOR INFORMATION AND
FIRST SET OF REQUESTS FOR ADMISSION TO INTERVENORS**

Dorothy Garrett Family Partnership, LP, Sue Partee, Matthew Garrett Turner, Lindley Cole Turner, and Austin Trust Company, Matthew Garrett Turner and Lindley Cole Turner, co-trustees of the Matthew Garrett Turner Trust u/w/o Dorothy Ann Turner, deceased, and the Lindley Cole Turner Trust u/w/o Dorothy Ann Turner, deceased (collectively, "Garrett Family Partnership") files the following responses to the First Set of Requests for Information (RFIs) and Requests for Admission (RFAs) from Commission Staff. Garrett Family Partnership received these RFIs and RFAs on December 16, 2010. By agreement with Staff, Garrett Family Partnership's response is timely filed. Pursuant to P.U.C. Proc. R. 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,
ANDREWS KURTH LLP



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ATTORNEYS FOR GARRETT FAMILY
PARTNERSHIP

CERTIFICATE OF SERVICE

I, Katherine Coleman, hereby certify that a copy of this document was served on the parties in this proceeding on this 6th day of January, 2011 in accordance with Order Nos. 1 and 5.



Katherine Coleman

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**GARRETT FAMILY PARTNERSHIP’S RESPONSES TO COMMISSION STAFF’S
FIRST SET OF REQUESTS FOR INFORMATION TO INTERVENORS**

Staff RFI 1-1: Do you have a habitable structure, as defined by P.U.C. SUBST. R. 25.202(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. 25.202(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: Yes. A two story, historic ranch house, approximately 4-5,000 square feet, built circa 1906 is located on our property. The ranch house is architecturally unique and was built by Ms. Dora Roberts, one of the original settlers of Howard County. Ms. Roberts is the great grandmother of Intervenor Sue Partee and the great-great grandmother of Intervenor Matthew Garrett Turner and Lindley Cole Turner. Another single family residence occupied by ranch personnel is located approximately 75 feet from the ranch house. The ranch house and other residence are located approximately 2,200 feet from segment DQ5 and an unknown distance from DT5.

Prepared by or under the direct supervision of: Jordan Partee

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 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: Links DH5, DM5, FD5, DQ5 of the preferred route and links DT5, DL5, DG5 and EA5 of alternate routes cross our main ranch property. Links FP5 and FQ5 of the preferred route, and links EZ5, BD5, AI5, BM5, and BP5 of alternate routes cross our other parcels of property.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 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, the main ranch property has already been impacted by three transmission lines. An existing 345-kV line bisects our property, parallel in part to proposed links DL5 and DG5. Another 138-kV line crosses our property perpendicular to the 345-kV line, parallel in part to link DQ5. Another 138-kV line also crosses our property near its southern boundary, parallel to link EA5.

In addition, a 69-kV line bisects a separate parcel of property that will be paralleled by proposed links BD5 and AI5, and a 138-kV transmission line impacts an additional parcel of property perpendicular to proposed link EZ5.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 1-4: Are any existing transmission or distribution lines visible from your property? If so, please describe how and where they cross your property.

RESPONSE: Please see the response to Staff RFI 1-3. In addition, there are distribution lines serving the needs of the main ranch property.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 1-5: Do you currently have any windmills on your property? If so, please describe the location of the windmills and how many are located on your property.

RESPONSE: We do not have any wind turbines. We do have small windmills for watering for livestock on the main ranch property.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 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.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 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: We have not.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 1-8: What are your specific concerns about the proposed transmission line?

RESPONSE: We are still evaluating the impact the proposed line may have on our properties and will provide additional information through testimony.

Our main ranch property contains one of the two most historically significant geographical landmarks of Howard County: Signal Peak. Segment DH5 passes just to the west of this historic site. There are also many Native American artifacts on our property, as well as an old pioneer homestead. We are concerned that the proposed line could adversely affect the archeological significance and historical integrity of our property. We are also concerned that the line may interfere with ranching and agricultural activities.

In addition, our main ranch property has already been burdened with numerous transmission lines that intersect on our property and do not parallel each other. We are concerned that adding another transmission line that will bisect our property vertically, and not in parallel to any property boundaries or existing transmission lines, will further adversely impact our use and enjoyment of the property.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 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 near the open house? If so, please provide them.

RESPONSE: We did not attend an open house.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 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: In addition to the parcel boundaries identified on WETT's maps, we also own adjacent parcels that form one contiguous property. A map of the property boundary for the main ranch is attached.

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Lease and Fee Information

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 1-11: What is the primary use for your property and, in your opinion, will this use be impacted by the proposed transmission line on your property? If so, please explain.

RESPONSE: We own several separate impacted properties. The parcels not associated with the main ranch are primarily used for agricultural purposes. The main ranch is used for ranching, historical preservation and wildlife management. We are still evaluating how the proposed lines will impact these various property uses.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 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 response to RFI 1-8.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
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Staff RFI 1-13: Please identify all persons with an ownership interest in your property.

RESPONSE: Please see our Motion to Intervene in this proceeding, which lists all persons or entities with an ownership interest in the affected properties.

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Staff RFI 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 line. Use a map to show the location.

RESPONSE: We have not located a specific placement that would be suitable at this time. Generally, we would prefer for the line to parallel our property boundaries rather than cutting through the center of the main ranch. Please see the response to Staff RFI 1-10 for a map of the main ranch property.

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**GARRETT FAMILY PARTNERSHIP'S RESPONSES TO COMMISSION STAFF'S
FIRST SET OF REQUESTS FOR ADMISSION 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.

RESPONSE: Admit based on our current knowledge. We are still confirming that the habitable structure located near proposed segment DT5 is not within 500' of the centerline.

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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 WETT in its Application at Attachment No. 3, Sheets 1-28.

RESPONSE: Deny. The parcel boundaries are accurately represented to the best of our knowledge, but the property boundaries formed from all contiguous parcels comprising the main ranch are not represented on WETT's maps. Please see the response to Staff RFI 1-10.

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