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SOAH DOCKET NO. 473-11-1266

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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'S RESPONSE TO
WIND ENERGY TRANSMISSION TEXAS, LLC OBJECTIONS AND MOTIONS TO
STRIKE PORTIONS OF CERTAIN INTERVENOR PREFILED DIRECT TESTIMONY**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

COMES NOW Larry Glass, and submits the following Response to Wind Energy Transmission Texas, LLC's ("WETT") Objections and Motions to Strike Certain Intervenor Prefiled Testimony. The Procedural Schedule in this docket specifies that Responses to Objections are due on February 11, 2011; this Response is timely filed.

I. Responses to Objections to Larry Glass's Direct Testimony

WETT filed an objection to one portion of Larry Glass's ("Glass") Direct Testimony on the grounds that a portion of Glass's testimony is based on speculation, and that Glass is not qualified as an expert to provide this item of his testimony.

Larry Glass has lived and ranched in Glascock County his entire life. As the owner and operator of the Glascock County operation, Glass is a cattleman, a sheep producer, a businessman, a range manager, a herd health manager, a mechanic, and an engineer, just to name

a few. The health of the livestock owned by Glass is just one of many critical areas that he must daily monitor in order for his operation to remain commercially viable.

Glass is very concerned about the impact the proposed transmission line will have on his commercial livestock operation. The portion of Glass' testimony that WETT objects to is found on page 3. Glass's testimony simply indicates that he opposes construction of the proposed line because of the impact the proposed transmission line will have on his cattle and sheep operations – including any impacts on the health of his animals due to more visitors and more vehicles on Glass's property. Monitoring animal health, recognizing high risk activities, and reducing or eliminating the introduction of new bacteria into his livestock operations is at the heart of Glass's job as a livestock producer. Glass has continued to run a viable operation all of these years, because of his awareness of biosecurity risks and his determination to implement controls to reduce or eliminate those risks. Glass aptly and correctly stated that an increase in people and automobiles – potential vectors for bacteria that cause an influx in animal diseases – is a real concern of his, when facing the possibility of the proposed transmission line being built on his Glasscock County ranch.

Therefore, because Larry Glass does have personal knowledge of the herd health of the cattle and sheep on his ranch, coupled with his personal knowledge of and past experience with external sources of disease that interfere with herd health, Glass's testimony is not speculative and was not offered as an expert opinion. Rather, Glass's testimony is based on personal knowledge and is offered as a permissible opinion of a lay witness, under Texas Rule of Evidence 701. Therefore WETT's objections to Glass's testimony as "speculative" and as an "unqualified expert opinion" should be overruled.

II. Prayer

WHEREFORE, PREMISES CONSIDERED, Larry Glass, requests that WETT's objections to his Direct Testimony be overruled and that Larry Glass be granted all other relief to which he may show himself entitled.

Respectfully submitted,

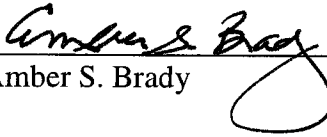
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LARRY GLASS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties of record, via facsimile, U.S. mail, or electronically on this 7th day of February, 2011.


Amber S. Brady

Public Utility Commission, Tx
Filing Submission

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