



Control Number: 40684



Item Number: 202

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APPLICATION OF LCRA §
TRANSMISSION SERVICES § BEFORE THE STATE OFFICE
CORPORATION TO AMEND ITS §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE PROPOSED § OF
EC MORNINWEG TO PARKWAY 138- §
KV TRANSMISSION LINE IN COMAL §
AND GUADALUPE COUNTIES § ADMINISTRATIVE HEARINGS

RESPONSE OF Albert D. KOEHLER (insert name)
TO LCRA TSC'S FIRST REQUEST FOR INFORMATION TO ALL INTERVENORS

COMES NOW, Belmont Park Homeowners Association, Inc. ("Belmont Park HOA") as the authorized representative for the above-referenced intervenor(s), to file initial responses to LCRA Transmission Services Corporation's ("LCRA TSC's") First Request for Information ("RFIs") to All Intervenors and shows as follows:

I. Written Responses

Attached hereto are written responses to LCRA TSC's First RFIs. All responses are made without waiver of Belmont Park HOA's right to contest the admissibility of any matters upon hearing. Belmont Park HOA has not yet determined the witnesses it will sponsor in this proceeding, so it cannot identify a witness who will sponsor any of the responses to the questions in the RFIs. The responding intervenor(s) is/are the person(s) who can "vouch for the truth of the answer." The responding intervenor(s) to LCRA TSC's First RFIs is/are:

-Insert Name- Albert D. Koehler
-Insert Address- 413 AMERICAN FLAG
Schertz, Texas 78108

Respectfully submitted,

Sign: Albert D. Koehler

Print name: ALBERT D. KOEHLER

**MEMBER OF THE BELMONT PARK
HOMEOWNERS ASSOCIATION, INC.
AND/OR THE RIATA HOMEOWNERS
ASSOCIATION.**

CERTIFICATE OF SERVICE

I hereby certify that on Dec. 15th, 2012, a copy of the foregoing response to LCRA TSC's First Request to All Intervenors was served via electronic mail, facsimile, or U.S. Mail on counsel for LCRA TSC in this proceeding.

Peter R. Maupin
Peter R. Maupin

Initial Responses to LCRA TSC's First Set of RFIs to All Intervenors

- 1-1: Please identify any parcel/parcels of land you own that you believe is/are directly affected by any LCRA TSC-proposed route segment in this case. "Directly affected" in this set of RFIs means land that is either crossed by an LCRA TSC-proposed route segment or is within 300 feet of the centerline of an LCRA TSC-proposed route segment.**

RESPONSE TO 1-1:

Begin here: My address listed above, the Riata Community Pool, the Riata Community Playground, and the Belmont Park park area.

- 1-2: Has LCRA TSC correctly shown on its maps in this case the parcel or parcels of land (including property boundaries) you believe are directly affected by any proposed route segment? If not, please explain any discrepancies and provide a corrected map showing your correct parcel(s) of land and the correct property boundaries.**

RESPONSE TO 1-2:

Begin here: Unknown as no detailed maps have been furnished to me.

- 1-3: Are you aware of any land transactions resulting in a change of ownership that is not currently reflected on LCRA TSC's maps? If so, please provide an explanation of that change in ownership, and please provide any documents that reflect your understanding of the change in ownership.**

RESPONSE TO 1-3:

Begin here: Unknown – see response to 1-2 above.

- 1-4: If you are representing any party other than yourself, please identify the particular piece of land involved and please explain in what capacity you are representing the other party in question (e.g., the party is my mother and the land is her homestead, I am helping a friend, I am assisting a business associate with whom I share a business interest, etc.) and the relationship of the party or parties to you.**

RESPONSE TO 1-4:

Begin here: N/A

- 1-5: Please identify all persons with an interest in property identified in your response to Questions 1-1 and 1-4.**

RESPONSE TO 1-5:

Begin here: All residents of the Belmont Park Subdivision and the Riata Subdivision.

SOAH DOCKET NO. 473-13-0821
PUC DOCKET NO. 40684
Initial Responses to LCRA TSC's First Set of RFIs to All Intervenors

- 1-6: Please provide a short summary and explanation of your position in this docket, and please describe your specific concerns about the proposed transmission line.**

RESPONSE TO 1-6:

Begin here: I oppose utilizing segment S as it is through densely populated subdivisions and a park. It also borders an elementary school, community playground, and community pool. I am also concerned that there might be an increased health risk from living in close proximity to a power line. Also I believe that this segment would negatively affect the value of many residences including mine.

- 1-7: Are you aware of any directly affected landowner who did not receive notice from LCRA TSC of the proposed transmission line involved in this docket? If so, please identify the landowner and describe the location of the property involved.**

RESPONSE TO 1-7:

Check one:

☒ No

☐ Yes (list)