



Control Number: 40684



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BELMONT PARK HOMEOWNERS ASSOCIATION, INC.  
JANUARY 14, 2013

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SOAH DOCKET NO. 473-13-0821  
PUC DOCKET NO. 40684

FILING CLERK

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

**BELMONT PARK HOMEOWNERS ASSOCIATION, INC.'S  
FIRST REQUESTS FOR ADMISSION TO  
LCRA TRANSMISSION SERVICES CORPORATION**

COMES NOW, Belmont Park Homeowners Association, Inc. ("Belmont Park HOA")<sup>1</sup> pursuant to P.U.C. PROC. R. 22.144(j) to submit the following First Requests for Admission ("RFA") to LCRA Transmission Services Corporation ("LCRA TSC") by and through its counsel of record:

Fernando Rodriguez  
Attorney for LCRA Transmission Services Corporation  
Post Office Box 220  
Austin, Texas 78767-0220  
FAX (512) 473-4010

For each RFA that LCRA TSC does not admit, state the legal and factual basis for LCRA TSC's contentions and denial. If any RFA appears ambiguous, please contact counsel for Belmont Park HOA as soon as possible to obtain clarification. Belmont Park HOA requests that Brazos answer these Requests under oath or stipulate in writing that its Request responses can be treated exactly as if the responses were filed under oath. Service on Belmont Park HOA should be made electronically or in person to:

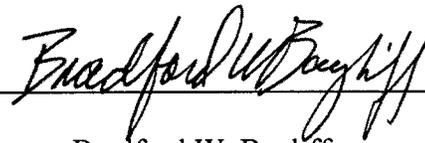
<sup>1</sup> Belmont Park HOA is the authorized representative for the following intervenors in this proceeding: Timothy M. and Gabrielle M. Beland; Brent A. Bolter; Filippo Cristiano Caratti and Lisa Bakewell; Joseph Gonzales; Douglas J. Jennings; Dominic G. and Karen A. Johnson; Jeffrey S. and Arlene R. Johnson; Peter R. Maupin; David J. and Nikko M. Peterson; John Ruddy; and Jeffrey R. Womak.

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Bradford W. Bayliff  
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Respectfully submitted,

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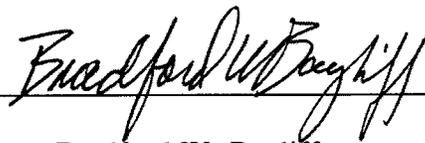


By: Bradford W. Bayliff  
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**ATTORNEY FOR BELMONT PARK  
HOMEOWNERS ASSOCIATION, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2013, a copy of Belmont Park HOA's First Requests for Admission to LCRA Transmission Services Corporation was served via electronic mail, facsimile, or U.S. Mail on LCRA TSC.



Bradford W. Bayliff

**Request No. 1-1**

Admit or deny that the proposed project is not required to meet NERC Reliability Standards.

**Request No. 1-2**

Admit or deny that the proposed project is not required to meet ERCOT Planning Criteria.

**Request No. 1-3**

The application states only that the proposed project has been reviewed by the ERCOT Regional Planning Group (ERCOT RPG). Admit or deny that the ERCOT RPG classified the proposed project as a Tier 4 'Neutral' project.

**Request No. 1-4**

Admit or deny that ERCOT staff performed no independent review of the proposed project beyond the ERCOT RPG project review and comment process.

**Request No. 1-5**

Admit or deny that ERCOT staff made no assessment of the need for the proposed project.

**Request No. 1-6**

Admit or deny that ERCOT staff made no assessment of whether the proposed project is the preferred solution to the identified system performance deficiency that the proposed project is intended to resolve.

**Request No. 1-7**

Admit or deny that ERCOT Board of Directors did not review the proposed project.

**Request No. 1-8**

Admit or deny that the ERCOT Board of Directors did not endorse the proposed project.

**Request No. 1-9**

Admit or deny that the ERCOT Five-Year Transmission Plan does not include the proposed project.

**Request No. 1-10**

Admit or deny that Dr. Gelmann has reviewed a study titled “Impact of high electromagnetic field levels on childhood leukemia incidence.” The study was published on August 15, 2012 in Vol. 131, Issue 4, pages 769-778 of the *International Journal of Cancer*, by J.C. Teepen and J.A. van Dijck of the Department of Epidemiology, Radboud University Nijmegen Medical Centre, The Netherlands.

**Request No. 1-11**

Admit or deny that the conclusion of the Teepen and van Dijck study states:

As the impact of exposure to electromagnetic radiation seems to be limited, we do not recommend more strict guidelines. However, reducing the exposure of highly exposed children, especially in regions with a large proportion of highly exposed children like Northern America and Brazil, is advised. Governments may consider precautionary measures such as reducing exposure from power lines near densely populated areas or take power lines into consideration in spatial planning of schools and living areas in order to minimize the number of highly exposed children.

**Request No. 1-12**

Admit or deny that Dr. Gelmann has reviewed “Pooled analysis of recent studies on magnetic fields and childhood leukemia.” The analysis was published on September 20, 2010 in the *British Journal of Cancer* 103, 1128-1135. The analysis credits L Kehifets, A Ahlbom, CM Crespi, G Draper, J Hagihara, RM Lowenthal, G Mexel, S Oksuzyan, J Schuz, J Swanson, A Tittarelli, M Vinceti, and V. Wunsch Filho.

**Request No. 1-13**

Admit or deny that the conclusion of the above-referenced analysis states at 1134: “In conclusion, our results are in line with previous pooled analyses showing an association between magnetic fields and childhood leukaemia, but the association is weaker in recent studies and imprecise because of small numbers of highly exposed individuals.”

**Request No. 1-14**

Admit or deny that the conclusion of the above-referenced analysis states at 1134: “Therefore, our results support conclusions of the WHO EHC (WHO EHC, 2007) and the European Union Scientific Committee on Emerging and Newly Identified Health Risks (Scientific Committee on Emerging and Newly Identified Health Risks, 2007) that recent studies on magnetic fields and childhood leukemia do not alter the previous assessment that magnetic fields are possibly carcinogenic to humans.”

**Request No. 1-15**

Admit or deny that Dr. Gelmann has reviewed a paper published in the *British Medical Journal* on June 2, 2005, titled “Childhood cancer in relation to distance from high voltage power lines in England and Wales: a case-control study.” BMJ2005;330:1290.

**Request No. 1-16**

Admit or deny that the conclusion in the abstract of the above-referenced paper states “There is an association between childhood leukaemia and proximity of home address at birth to high voltage power lines, and the apparent risk extends to a greater degree than would have been expected from previous studies.”

**Request No. 1-17**

Admit or deny that the conclusion of the above-referenced paper states “An association between childhood leukaemia and power lines has been reported in several studies, but it is nevertheless surprising to find the effect extending so far from the lines.”

**Request No. 1-18**

Admit or deny that Dr. Gelmann has reviewed “An Evaluation of the Possible Risks from Electric and Magnetic Fields (EMFs) from Power Lines, Internal Wiring, Electrical Occupations, and Appliances.” The report was prepared in June 2002 by R. R. Neutra, V. DelPizzo, and G. Lee who work for the California Department of Health Services, at the request of the California Public Utilities Commission.

**Request No. 1-19**

Admit or deny that Section 21.0 Conclusions of the above-referenced report, in Section 21.1, page 380 at line 10 states: “It should be noted that all of the review panels thought that the childhood leukemia epidemiology warranted the classification of EMF as a ‘possible’ carcinogen and thus did not agree with the biophysical arguments that EMF physiological effects (and therefore pathological effects) were ‘impossible’.”

**Request No. 1-20**

Admit or deny that Dr. Gelmann has reviewed NIH Publication No. 99-4493; “NIEHS Report on Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields” prepared in response to the 1992 Energy Policy Act (PL 102-486, Section 2118). (1999).

**Request No. 1-21**

Admit or deny that the May 4, 1999, letter from Kenneth Olden, Director, to Congress, states on page two: “The NIEHS concludes that ELF-EMF exposure cannot be recognized at this time as entirely safe because of weak scientific evidence that exposure may pose a leukemia hazard.”

