



Control Number: 40684



Item Number: 346

Addendum StartPage: 0

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

APPLICATION OF LCRA TRANSMISSION §
SERVICES CORPORATION TO AMEND ITS § PUBLIC UTILITY COMMISSION
CERTIFICATE OF CONVENIENCE AND §
NECESSITY FOR THE PROPOSED EC §
MORNHINWEG TO PARKWAY 138-KV § OF TEXAS
TRANSMISSION LINE IN COMAL AND §
GUADALUPE COUNTIES, TEXAS §

**RESPONSE OF SALOF REFRIGERATION, INC. AND SALOF
PROPERTIES II, LLC TO SECOND REQUEST FOR INFORMATION OF LCRA**

NOW COMES Salof Refrigeration, Inc. and Salof Properties II, LLC, as intervenors in this docket ("Salof") and timely provides the response attached hereto to the Second Request for Information to Intervenor Salof Refrigeration, Inc. et al. of Applicant Lower Colorado River Authority ("LCRA TSC"), notice of which was received by Salof on February 20, 2012. Salof stipulates that its responses may be treated by all parties as if the answers were filed under oath.

Respectfully submitted,



W. Roger Wilson
State Bar No. 21733500
Cox Smith Matthews Incorporated
Telephone: 210/554-5500
Facsimile: 210/226-8395

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing pleading on the Applicant and all other parties of record by filing in the Public Utility Commission of Texas interchange on this 12th day of March, 2013.



W. Roger Wilson

2-1: Understanding that no party in this case has volunteered to have the transmission line placed on his or her property, if the Public Utility Commission by Order places the transmission route on your property, please identify specifically the location where you would prefer the right-of-way to be located, particularly if that location differs from the proposed route(s) contained in LCRA TSC's CCN Application.

Response:

Subject to Salof's continued assertions regarding its position and the negative impacts, including safety considerations, of location of any portion of the LCRA TSC line on the Salof property, Salof responds as follows: If Salof acquires the tract immediately southwest of its existing property for expansion of its operations, as referred to in its testimony, Segment C2 of the LCRA TSC line could feasibly be located just inside the new southwest boundary, i.e. adjacent to Friesenhahn Lane. This location would still have the potential to adversely impact Salof's testing, storage, and fabrication operations at the property perimeter, but it would not obstruct activities across the full breadth of the tract as would the existing proposed location of Segment C2, for an expanded work area. The location of the southwest to northeast portion of Segment C2 extending along the northwest perimeter of the expanded Salof property again continues to have the adverse impacts noted in Mr. Luhrs' testimony and would restrict Salof's operating area by 10 to 15 percent. Ideally, the entire southwest to northeast portion of Segment C2 should be located north of the Union Pacific railroad track, as with the most northeastern portion of Segment C2 as presently drawn, rather than south of the railroad track. This configuration would eliminate safety and obstruction issues along the northwest boundary of the Salof property.

Witness: Bob Luhrs, Vice President, Salof Refrigeration, Inc.