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

**BABCOCK ROAD 165, LTD.'S OBJECTIONS AND RESPONSES TO
LCRA TRANSMISSION SERVICES CORPORATION'S SECOND REQUEST FOR INFORMATION
TO BABCOCK ROAD 165, LTD.**

TO: LCRA TRANSMISSION SERVICES CORPORATION

BY AND THROUGH ITS ATTORNEYS OF RECORD:

Fernando Rodriguez   *Via Overnight Delivery*
Associate General Counsel
Lower Colorado River Authority
P.O. Box 220
Austin, Texas 78767-4010

R. Michael Anderson   *Via Overnight Delivery*
BICKERSTAFF HEATH
DELGADO ACOSTA L.L.P.
3711 S. MoPac Expressway
Building One, Suite 300
Austin, Texas 78745

AND: Public Utility Commission of Texas   *Via Overnight Delivery*
        Central Records
        1701 N. Congress
        P.O. Box 13326
        Austin, Texas 78711-3326
        centralrecords@puc.texas.gov

All Parties   *Via PUC Interchange*

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COMES NOW Babcock Road 165, Ltd., a Texas limited partnership ("Babcock"), and

pursuant to SOAH Order No. 1 and the COMMISSION'S PROCEDURAL RULES makes its Objections

and Responses to LCRA Transmission Services Corporation's Second Request for Information to

Intervenor Babcock Road 165, Ltd.

Respectfully submitted,

Pulman, Cappuccio, Pullen & Benson, LLP
2161 NW Military Hwy., Suite 400
San Antonio, Texas 78213
(210) 222-9494 Telephone
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By: _____
Devin "Buck" Benson
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ATTORNEYS FOR BABCOCK ROAD 165, LTD.

CERTIFICATE OF SERVICE

I certify that on March 13, 2013, a true and correct copy of Objections and Responses to

LCRA Transmission Services Corporation's Second Request for Information to Intervenor Babcock

Road 165, Ltd. has been transmitted in accordance SOAH ORDER NO. 2 and/or the COMMISSION'S

PROCEDURAL RULES addressed as follows:

Fernando Rodriguez
Associate General Counsel
Lower Colorado River Authority
P.O. Box 220
Austin, Texas 78767-4010

R. Michael Anderson
BICKERSTAFF HEATH
DELGADO ACOSTA L.L.P.
3711 S. MoPac Expressway
Building One, Suite 300
Austin, Texas 78745

Public Utility Commission of Texas
Central Records
1701 N. Congress
P.O. Box 13326
Austin, Texas 78711-3326
centralrecords@puc.texas.gov

All Parties of Record

Grant M. Gaines

OBJECTIONS AND RESPONSES TO REQUEST FOR INFORMATION

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:

Babcock objects to the LCRA transmission line being placed on its property, including proposed line segments J and L. Babcock believes and continues to advocate that route 10 is the best and most efficient choice for the transmission line.

However, were Babcock ordered by the Public Utility Commission ("PUC") to have the transmission line placed on its property, the least inconvenient location would be segment J. In addition, Babcock would prefer that segment J abut and run parallel to the east side of the existing transmission line the entire length of its property, with any required crossover or offset occurring at Babcock's southernmost property boundary abutting the adjacent residential community.

Lastly, should the PUC order, over Babcock's strong objection, that the transmission line follow segment L; then Babcock would request that the portion of segment L that crosses Babcock's property be moved to the opposite side (northern side) of the existing transmission line easement it currently parallels.