

Control Number: 43599



Item Number: 261

Addendum StartPage: 0

DOCKET NO. 43599

RECEIVED

APPLICATION OF LCRA
TRANSMISSION SERVICES
CORPORATION TO AMEND CCN FOR
THE PROPOSED BLUMENTHAL
SUBSTATION AND 138-KV
TRANSMISSION LINE PROJECT IN
BLANCO, GILLESPIE, AND KENDALL
COUNTIES, TEXAS

§
§
§
§
§
§
§

PUBLIC UTILITY COMMISSION

2015 MAR 19 10:45 AM
PUBLIC UTILITY COMMISSION
FILING CLERK
TEXAS

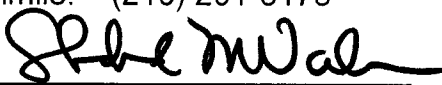
**FRANCIA RUPPEN'S RESPONSE TO LCRA TRANSMISSION SERVICES
CORPORATION'S FIRST REQUEST FOR INFORMATION TO INTERVENORS**

To: LCRA Transmission Services Corporation, by and through its counsel of record,
Mr. Fernando Rodriguez, 3700 Lake Austin Boulevard, Austin, Texas, 78703.

COMES NOW the above-named Intervenor ("Intervenor") and files this Response to LCRA Transmission Services Corporation's First Request for Information to All Intervenors. These Responses to Information are sponsored by the above-named Intervenor, have been prepared by the undersigned counsel of record, and are timely filed. Intervenor agrees and stipulates that all parties may treat these responses as if the responses were filed under oath.

Respectfully submitted,

SPIVEY VALENCIANO, PLLC
McAllister Plaza – Suite 130
9601 McAllister Freeway
San Antonio, Texas 78216
Telephone: (210) 787-4654
Facsimile: (210) 201-8178

By: 

James K. Spivey
jkspivey@svtxlaw.com
State Bar No. 00794680
Soledad M. Valenciano
State Bar No. 24056463
svalenciano@svtxlaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been served on the parties and/or counsel of record as identified in the applicable Service List in Docket No. 43599 in compliance with PUC Procedural Rule 22.74 as modified by the applicable Orders issued to date in the above-captioned proceedings.



Soledad M. Valenciano

RESPONSES

1. Please provide copies of all correspondence and documents (including photographs, presentations, and/or studies) reviewed by you, received by you, or sent by you to any other landowner, local/state/federal agency official, or intervenor/intervenor group pertaining to the Blumenthal Substation and 138 k-V Electric Transmission Line Project. Please note, this request does not seek to obtain materials protected by the attorney/client privilege.

RESPONSE: Intervenor has no documents responsive to this Request.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

2. Are you aware of any directly affected landowner that did not receive notice of the proposed transmission line project from LCRA TSC? If so, please identify the landowner and describe a best as you can the location of the property affected. [Note: a "directly affected" landowner is any landowner from whom LCRA TSC would need to obtain an easement or other property interest if it built the transmission line using one or more of the segments of the proposed transmission line or whose land contains a habitable structure that is within 300 feet of the centerline of one or more of the segments of the proposed transmission line].

RESPONSE: No.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

3. Do any existing transmission lines (i.e., a transmission line 69-k-V or greater) cross your property? If so, please describe how and where they cross your property.

RESPONSE: No.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

4. Are any existing transmission lines (i.e., a transmission line 69-k-V or greater) visible from your property? If so, please describe from where the lines are visible, approximately how far away the lines are located, and how the current lines affect your property, if at all.

RESPONSE: Please see my Direct Testimony which will be filed by April 6, 2015.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

5. What are your specific concerns about the proposed transmission line?

RESPONSE: Please see my Direct Testimony which will be filed by April 6, 2015.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

6. Are your property boundaries for the property you own in proximity (i.e. within 300 feet) to LCRA TSC's route segments accurately depicted on the maps provided by LCRA TSC in its Application and Attachment 7 (maps 1-12)? If not, please explain any discrepancies and provide a modified LCRA TSC map or drawing to indicate the discrepancies.

RESPONSE: It appears as though any of my property's boundary lines that would be within 300 feet of any noticed route segment are accurately depicted.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

7. What is the primary use for your property and, in your opinion, will this primary use be affected by the proposed transmission line? If so, please explain.

RESPONSE: Please see my Direct Testimony which will be filed by April 6, 2015.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

8. In your opinion, is there any particular feature about your land that you believe should be considered when routing a transmission line on your property? If so, please explain.

RESPONSE: Please see my Direct Testimony which will be filed by April 6, 2015.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

9. Please identify all persons with an ownership interest in the property identified in Questions 3 and 4, above.

RESPONSE: Please see my Direct Testimony which will be filed by April 6, 2015.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

10. Which substation location(s) tap point location(s), route(s) or route segment(s) do you oppose or recommend the PUC NOT approve, and why?

RESPONSE: I oppose Tap Point Alternative 3 and Primary Alternative Routes 4, 9, 13, 17 and 19. Please see my Direct Testimony which will be filed by April 6, 2015.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

11. Understanding that most, if not all, of the intervenors do not want the transmission line on their property, if the transmission line is nonetheless routed on your property by Order of the Commission, please identify the location for the right-of-way that would be least offensive to you. Please use a map to show the location.

RESPONSE: Any location on my property would be offensive to and unwanted by me, and as such, at this time I am unable to readily identify a less-offensive or otherwise desirable location.

SPONSORED BY: Intervenor

PREPARED BY: Counsel

12. 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: No.

SPONSORED BY: Intervenor

PREPARED BY: Counsel