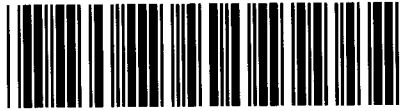




Control Number: 43599



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Addendum StartPage: 0

SOAH DOCKET NO. 473-15-1589
DOCKET NO. 43599

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

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BEFORE THE STATE OFFICE

2015 MAR 19 PM 2:52
PUBLIC UTILITY COMMISSION
FILING CLERK
OF

ADMINISTRATIVE HEARINGS

MARK AND ANN WITCHER'S RESPONSES
TO LCRA TRANSMISSION SERVICES CORPORATION'S FIRST SET OF
REQUESTS FOR INFORMATION

Mark and Ann Witcher file the following responses to the First Set of Requests for Information ("RFIs") to Intervenors filed by the LCRA Transmission Services Corporation (LCRA). The request was filed at the Commission and received on February 27, 2015. Accordingly, pursuant to the procedural schedule entered in this case, this response is timely filed. The Witchers' responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to P.U.C. Proc. R. 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

THOMPSON & KNIGHT LLP



James Cousar

State Bar No. 04898700

Katie Coleman

State Bar No. 24059596

Jill Carvalho

State Bar No. 24087266

98 San Jacinto Blvd., Suite 1900

Austin, Texas 78701

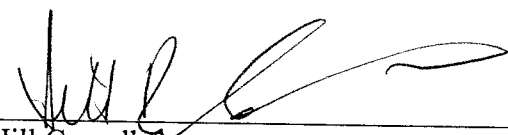
(512) 469.6100

(512) 469.6180 (fax)

**ATTORNEYS FOR THE JENSCHKE LANE
PRESERVATION ALLIANCE**

CERTIFICATE OF SERVICE

I, Jill Carvalho, Attorney for Jenschke Lane Preservation Alliance, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 19th day of March, 2015 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.



Jill Carvalho

SOAH DOCKET NO. 473-15-1589

DOCKET NO. 43599

APPLICATION OF LCRA	§	BEFORE THE STATE OFFICE
TRANSMISSION SERVICES	§	
CORPORATION TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	OF
AND NECESSITY FOR THE PROPOSED	§	
BLUMENTHAL SUBSTATION AND 138-	§	
KV TRANSMISSION LINE PROJECT IN	§	ADMINISTRATIVE HEARINGS
BLANCO, GILLESPIE, AND KENDALL	§	
COUNTIES	§	

MARK AND ANN WITCHER'S RESPONSES TO
LCRA TRANSMISSION SERVICES CORPORATION'S
FIRST SET OF REQUESTS FOR INFORMATION

LCRA TSC: 1-1 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-kV Electric Transmission Line Project. Please note, this request does not seek to obtain materials protected by the attorney/client privilege.

RESPONSE:

See Old Meadowgate Farm LTD's Response to LCRA Transmission Services Corporation's First Set of Requests for Information, Exhibit OMF 1-1.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-2

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 as 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.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-3 Do any existing transmission lines (i.e., a transmission line 69-kV or greater) cross your property? If so, please describe how and where they cross your property.

RESPONSE:

No.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-4 Are any existing transmission lines (i.e., a transmission line 69-kV 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:

There are electrical lines that run up Jenschke Lane, that traverse from Jenschke Lane to the West and that run along 290. I am unaware of the kV level.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-5 What are your specific concerns about the proposed transmission line?

RESPONSE:

Impact of substation and line on the character, utility, value and commercial use of our property.
Impact of the line on the homesite we selected for the home we planned to build and retire to.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-6 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 at 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:

Yes.

Prepared By: Mark and Ann Witcher

Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-7 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:

We bought 70 acres. In the last 6 to 9 months, we have dug two wells, rebuilt one pond, and built another pond. We have cleared the underbrush, mesquite and cedar to expose and safeguard the oaks and elm that have suffered during the drought as a result of the dense nature of the cover. We had electricity extended to the property and we have built a 40 x 40 barn. We have a pad laid out for a house where we will stay on the weekends we're in the area and that we will make available for rental when we are not. We have longer term plans for a structure that will support an events center/bed and breakfast/commercial eatery business. Our plan has been to build our retirement home in the southeast part of the place near the rebuilt tank.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-8 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:

Pastoral character of the place which would support the businesses described above and which was the reason we bought it. There are also quite a number of large trees which need to be protected.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-9 Please identify all persons with an ownership interest in the property identified in Questions 3 and 4, above.

RESPONSE:

Mark and Ann Witcher.

Prepared By: Mark and Ann Witcher

Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-10 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 the following substation and tap point locations:

- All Substations (6, 7 and 9) which border or abut Jenschke Lane

I oppose those substation and tap point locations because of adverse impact on, impact on character, utility, value and commercial use of property described above and other proposed substation locations are better suited.

I oppose the follow route segments: P, O1, T1, Q, S, R2, T, V

I oppose those segments because they use substations 6, 7, and 9.

I oppose the following routes:

2, 4, 8, 10, 12, 13, 14, 15, 16, 17, 18, and 20.

I oppose these routes because they include the segments and substations listed above.

Prepared By: Mark and Ann Witcher

Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-11 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:

As far to the east as possible so that no trees are required to be taken down.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher

LCRA TSC: 1-12 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.

Prepared By: Mark and Ann Witcher
Sponsored By: Mark and Ann Witcher