

Control Number: 43599



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SOAH DOCKET NO. 473-15-1589
PUC 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 §
KENDAL COUNTIES §

2015 MAR 19 PM 4:55
BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

BERTRAM FRANZ'S RESPONSE TO
LCRA TRANSMISSION SERVICES CORPORATION'S
FIRST REQUEST FOR INFORMATION

COMES NOW, Bertram Franz ("Franz") and files this, her Response to LCRA Transmission Services Corporation's (LCRA TSC) First Request for Information, which was filed with the PUC and served on Franz on February 27, 2015. This Response is timely filed. Franz agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,




William B. Steele, III
State Bar No. 19107400
Todd Lawrence Disher
State Bar No. 24081854

LOCKE LORD LLC
600 Congress Avenue, Suite 2200
Austin, Texas 78701
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**ATTORNEYS FOR
BERTRAM FRANZ**

CERTIFICATE OF SERVICE

I hereby certify that on the 19th of March, 2015, a copy of the foregoing was served on counsel for LCRA via email pursuant to SOAH Order No. 2 entered in this proceeding regarding the service of discovery.

A handwritten signature in black ink, appearing to read 'William B. Steele III', written over a horizontal line.

William B. Steele III

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BERTRAM FRANZ'S RESPONSE TO LCRA TSC FIRST RFIS TO INTERVENORS

Question No. 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 13 8-kV Electric Transmission Line Project. Please note, this request does not seek to obtain materials protected by the attorney/client privilege.

Response No. 1-1:

I reviewed parts of LCRA's Application and route maps, which are in LCRA's possession and, therefore, will not be produced. After diligent search, I do not possess any other non-privileged documents responsive to LCRA's request. Should I discover any responsive documents, I will supplement this response.

Prepared by: William B. Steele III
Sponsored by: Bertram Franz

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Question No. 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. 1-2:

No.

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Question No. 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. 1-3:

Please see my Direct Testimony when it is filed on April 6, 2015.

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Question No. 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 No. 1-4:

Please see my Direct Testimony when it is filed on April 6, 2015.

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Question No. 1-5:

What are your specific concerns about the proposed transmission line?

Response No. 1-5:

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Question No. 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 No. 1-6:

Please see my Direct Testimony when it is filed on April 6, 2015.

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Question No. 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 No. 1-7:

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Question No. 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 No. 1-8:

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Question No. 1-9:

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

Response No. 1-9:

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Question No. 1-10:

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

Response No. 1-10:

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Question No. 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 No. 1-11:

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Question No. 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. 12:

No.

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