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SOAH DOCKET NO. 473-16-2983  
DOCKET NO. 45601

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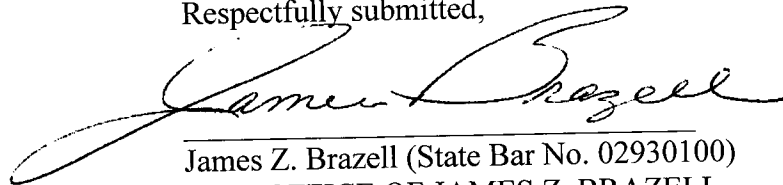
APPLICATION OF LCRA §  
TRANSMISSION SERVICES §  
CORPORATION TO AMEND ITS §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE ZORN- §  
MARION 345-KV TRANSMISSION §  
LINE PROJECT IN GUADALUPE §  
COUNTY §

OF  
ADMINISTRATIVE HEARINGS

**KRACKAU INTERVENORS' RESPONSES TO LCRA TSC'S 1<sup>ST</sup> REQUESTS FOR  
INFORMATION FROM THE KRACKAU INTERVENORS**

COME NOW the Krackau Intervenor and submit their written responses to LCRA-TSC's 1<sup>st</sup> Requests for Information from the Krackau Intervenor. Each response is provided in or attached to a separate sheet with the request identified and restated. The Krackau Intervenor do not waive any right to object to admissibility at hearing. These responses may be treated as if filed under oath. For any requests produced for inspection that are voluminous, please contact the undersigned to arrange for inspection and copying.

Respectfully submitted,



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LORI L. KRACKAU, JERRY W.  
KRACKAU, LYNNETTE K. CRANFORD,  
CLARENCE A. KRACKAU FAMILY**

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**Question LCRA-KRI 1.1:**

Refer to the Direct Testimony of Charles R. Krackau at page 6, lines 11-14. Identify each and every way in which the Krackau properties are or would be affected by LCRA TSC's use of the existing open position for this Project. Explain fully.

**Response LCRA-KRI 1.1:**

Please see the direct testimony of Charles R. Krackau in this proceeding. Please also see the Krackaus' response to LCRA-KRI 1-2.

Prepared by: James Z. Brazell  
Sponsored by: Charles R. Krackau

3. the second circuit could cause additional exposure to or damage/cost/danger from the second circuit's exposure to severe weather, storms, lightning, high winds, tornadoes, fire, or other natural phenomenon;

4. the second circuit could cause additional exposure to or damage/cost/danger from vandalism, collision with vehicles, implements, and equipment, aviation and air craft collision, electrocution, electrical damage, thermal damage, and overload;

5. the second circuit could cause additional exposure to or damage/cost/danger from additional noise from construction of, maintenance and repair of, and operation of the second circuit;

6. the second circuit could cause additional exposure to or damage/cost/danger from additional EMF from the second circuit;

7. the second circuit could cause additional visual and aesthetic impact;

8. the second circuit could cause additional impact on safety, environmental integrity, historical or archeological resources, vegetation, wildlife, birds, threatened and endangered species, community values, park and recreational areas, and the other impacts discussed by LCRA in the application, EA, testimony, and in TPWD's letter;

9. the second circuit could cause additional impact on property values;

10. the second circuit could cause additional proximity to habitable structures; and

11. the second circuit could cause additional impacts not now known or identified.

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**Question LCRA-KRI 1.4:**

Refer to the Direct Testimony of Charles R. Krackau at page 7, line 22 through page 8, line 3. Do you contend that LCRA TSC failed to comply with any Commission substantive or procedural rule? Explain fully.

**Response LCRA-KRI 1.4:**

While PUC Proc. R. 22.52(a)(3) requires notice to landowners whose land will be subject to an easement or other property interest obtained over all or any portion (the Krackaus and other landowners in the portion of the line in the open position of the line approved in Docket No. 33978 could be subject to new demands for additional easements to permit entry/construction/addition/installation of the second circuit) or contains a habitable structure that would be within 500 feet of the centerline (there may be landowners on portions of the route approved in Docket No. 33978 that have habitable structures within 500 feet of the centerline of the new circuit) and PUC Subst. R. 22.52(a)(4) appears to require notice to landowners affected by the entire *project*, not just the portion crossed by the "new" sections, including the portion LCRA proposes to build in the open second position of the transmission line approved in Docket No. 33978, the Krackaus do not assert at this time that LCRA violated any rule. The Krackaus could assert such a claim in briefing after the hearing if the evidence indicates there is a material issue, but the point of the Krackaus' discussion was to alert the Commission to the issue and to invite appropriate clarification by LCRA, if needed.

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**Question LCRA-KRI 1.6:**

Admit or deny that transmission line structures are presently located on one or more Krackau properties on which agricultural operations are conducted.

**Response LCRA-KRI 1.6:**

Admit. See the direct testimony of Charles R. Krackau.

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**Question LCRA-KRI 1.8:**

In light of potential impacts that transmission line structures pose to the Krackau properties, including agricultural operations conducted on the Krackau properties, do you have a preference as to structure type (e.g., poles or lattice towers)?

**Response LCRA-KRI 1.8:**

Poles are preferred.

Prepared by: James Z. Brazell  
Sponsored by: Charles R. Krackau