



Control Number: 45866



Item Number: 1126

Addendum StartPage: 0

SOAH DOCKET NO. 473-16-4342
PUC DOCKET NO. 45866

RECEIVED

2016 AUG 29 PM 4: 07

PUBLIC UTILITY COMMISSION
FILING CLERK

APPLICATION OF LCRA §
TRANSMISSION SERVICES §
CORPORATION TO AMEND ITS §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE PROPOSED §
LEANDER TO ROUND ROCK 138-KV §
TRANSMISSION LINE PROJECT IN §
WILLIAMSON COUNTY, TEXAS §

BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS

**BURLESON RANCHES AND LAGMANSON'S
FIRST SET OF REQUESTS FOR INFORMATION
TO LCRA TSC**

Pursuant to Sections 22.141-145 of the Procedural Rules of the Public Utility Commission of Texas ("Commission" or "PUC"), Mary Frances Burleson Roberts, Burleson Ranches, LTD, MFBRGP LLC, John W. Roberts, Frank B. Roberts, Mary Roberts Ortiz, Russell Austin Burleson, and Markus Lagmanson ("Burleson Ranches, *et al.*" or "Burleson Ranches and Lagmanson") request that the LCRA Transmission Service Corporation ("LCRA TSC"), by and through its attorney of record, provide the information requested in this document in accordance with the definitions, explanatory notes, and instructions below within twenty (20) days of receipt thereof, unless the Presiding Officer provides a different time limit. It is further requested that the answers to the requests for information be made under oath, and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing it (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can attest to its accuracy. These requests are continuing in nature, and should there be a change in circumstances that would modify or change an answer supplied, such changed answer should be submitted immediately as a supplement to the original answer.

Burleson Ranches and Lagmanson's
First RFI to LCRA TSC
SOAH Docket No. 473-16-4342
PUC Docket No. 45866
Page 1 of 7

1120

DEFINITIONS, EXPLANATORY NOTES, AND INSTRUCTIONS

1. The term “identify,” “identity” or “identification” when used in reference to an individual person, means to state that person’s full name and business address, including zip code, telephone number, and present or last-known business position and duties.
2. The term “identify,” “identity” or “identification” when used in reference to a business organization, means to state the corporate, partnership, or proprietorship name or names, and locations, full addresses and telephone numbers of its principal place of business, and all other business locations that should be denoted for a full and complete response to an inquiry, interrogatory, or request for information.
3. The term “identify,” “identity” or “identification” when used in reference to a document or study, means to state the type of document or the study format (e.g., book, magazine article, circular, ledger, letter, memorandum, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author, volume and page number or other means of general identification, its approximate size and number of pages, and the date on which it was made, prepared, or taken. If any such document was but is no longer in your possession or subject to your control, state what disposition was made of it.
4. The term “identify,” “identity” or “identification” when used in reference to anything other than a person, business organization, document, or study means to state the nature and present location of the item, a description of its form, the name or title by which the item is commonly known, and the person or business organization that has custody of or responsibility to maintain the item.
5. The term “study” or “studies” means any analysis, investigation, summary of data, listing, or report, the results of which were made known, formally or informally, where the author thereof reached an objective or subjective conclusion or presented information upon which others could or did reach an objective or subjective conclusion.
6. The terms “document” and “documents” are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms “document” and “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, e-mails, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants’ reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases,

notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made. The terms "document" and "documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.

7. If a copy of the information requested is available in machine-readable form (such as electronic, CD, DVD, memory stick, punch cards, paper or magnetic tapes, drums, disks, or core storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
8. When a request calls for the identification of a "document" or "documents," the identification should include the following:
 - (a) the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - (b) the date of the document;
 - (c) the title and/or "re:"/subject of the document;
 - (d) the subject matter of the document;
 - (e) the full name and address of the recipient and every person who received copies of the document;
 - (f) the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
 - (g) if the document has been lost, shredded, or destroyed (whether intentionally or unintentionally), an explanation of the reasons for and causes of such loss, shredding or destruction.
9. If any requested information or document cannot be provided in its entirety, it shall be provided to the greatest extent possible, with an indication of the portion of the information or document that cannot be provided and the reason it cannot be provided.

10. The respondent to requests for information must provide not only the information or documents in its physical possession, custody, or control, but all information and documents in the physical possession, custody, or control of any other person acting or purporting to act on behalf of the respondent, including, but not limited to, contractors, attorneys, consultants, and witnesses.
11. The term “communication” shall mean any transaction or transmission of information by oral, graphic, written, pictorial, or other means, including, but not limited to, telephone, conversations, letters, telegrams, e-mails, text messages, and personal conversations.
12. “To each” means to identify separately information, facts, data, and documents for each of the individual items or things designated as the subject of the specific inquiry or request.
13. Terms expressed in the masculine gender shall be regarded as including the feminine or neuter; terms expressed in the singular shall be regarded as being expressed in the plural, and vice versa; terms expressed in the past tense shall be regarded as being expressed in the present tense, and vice versa; and the term “and” shall be regarded as the term “or,” and vice versa, so as to not limit the scope of any request.
14. The name “Burleson Ranches” refers to Mary Frances Burleson Roberts, Burleson Ranches Ltd., MFBRGP LLC, John W. Roberts, Frank B. Roberts, Mary Roberts Ortiz, Russell Austin Burleson, collectively, as property owners and intervenors in this case.
15. The name “Markus Lagmanson” and “Lagmanson” refer to the property owner in Williamson County that is an intervenor in this case.
16. “Burleson Ranches, *et al.*” and “Burleson Ranches and Lagmanson” refer to all of the intervenors identified above as Burleson Ranches and Lagmanson, collectively.
17. LCRA Transmission Services Corporation, “LCRA TSC”, and “Applicant” refer to the applicant in in this case, its employees, agents, or any other natural person, corporation, partnership, joint venture, or any entity with authority to act on behalf of LCRA Transmission Services Corporation.
18. The terms “Commission” and “PUC” refer to the Public Utility Commission of Texas.
19. “Sam Bass Road” refers to the Sam Bass Road, County Road 175, and CR 175 in the LCRA TSC Study Area for this case.
20. In answering each request, please restate the request prior to providing the response. Each request and its response should begin on a separate page. Where there are subparts to a request, the answer to each subpart should be separately labeled.
21. If any of the information requested is claimed to be privileged or proprietary, then the response should identify such information, identify all persons who participated in the

preparation of the information or who received a copy, read, or examined the information or knows of its substance, state the present location of the information and all copies of it, and identify each person having custody or control of the information or any of the copies.

22. If any requested information is not available in the form requested, provide the information in the form that it currently exists, explain why the data cannot be provided in the form requested, and describe the work or process needed to provide the information in the form requested.

Respectfully submitted,



Shannon K. McClendon
Attorney & Counselor at Law
State Bar No. 13412500
shannonk@webmclaw.com
1302 Overland Stage Road, Suite 200
Dripping Springs, Texas 78620
(512) 264-3536 telephone
(512) 852-4633 facsimile

**ATTORNEYS FOR BURLESON RANCHES
AND LAGMANSON**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on counsel for LCRA TSC by facsimile and/or e-mail on this 29th day of August 2016.



**BURLESON RANCHES AND LAGMANSON'S
FIRST SET OF REQUESTS FOR INFORMATION
TO LCRA TRANSMISSION SERVICES CORPORATION**

- 1-1 Is it possible for LCRA TSC to build any portion of the proposed 138-kV transmission line in the median of Sam Bass Road, also referred to as County Road 175 or CR 175?
- a. If not, please explain why it cannot?
 - b. If so, please identify along which segments/links LCRA TSC can build the proposed transmission line within the median of Sam Bass Road?
 - c. If so, what are the endpoints of each portion within the median of Sam Bass Road LCRA TSC can build the proposed transmission line?
 - d. If so, how long is each portion within the median of Sam Bass Road LCRA TSC can build the proposed transmission line?
 - e. If so, what is the total distance of the proposed transmission line that LCRA TSC can build within the median of Sam Bass Road?
 - f. If so, does any portion of the proposed transmission line in the median of Sam Bass Road have to be built underground?
- 1-2 What would be the effect, if any, on the intervenors along Sam Bass Road if LCRA TSC was authorized to build a portion of the proposed 138-kV transmission line in in the median of Sam Bass Road, also referred to as County Road 175 or CR 175?
- 1-3 What would be the effect, if any, on the noticed landowners along Sam Bass Road if LCRA TSC was authorized to build a portion of the proposed 138-kV transmission line in in the median of Sam Bass Road, also referred to as County Road 175 or CR 175?
- 1-4 Does LCRA TSC agree that often times a proposed transmission line and accompanying facilities, such as a substation, do not support the local community or communities in which it traverses? Please explain your answer.
- 1-5 Do the proposed transmission line and accompanying substation facilities in this case support the local communities?
- a. If so, what community(ies) do the proposed transmission line and accompanying substation facilities support?
 - b. If so, in what ways do the proposed transmission line and accompanying substation facilities support the local community(ies)?
- 1-6 Does LCRA TSC believe that in this case Community Values, as a statutory factor to consider in an electric transmission certificate of convenience and necessity case, are reflected by positions of the intervening cities?
- a. Why or why not?

- b. How are those positions expressed?
- c. Please provide any documents in support of 1-6(b) or if previously provided, please provide a cite to such information.