

Control Number: 45866



Item Number: 1470

Addendum StartPage: 0

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

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

BEFORE THE STATE OFFICE OF PUBLIC UTILITY COMMISSION
PIERCING CLERK
OF
ADMINISTRATIVE HEARINGS

**CITY OF LEANDER'S RESPONSES TO
PUC COMMISSION STAFF'S
FIRST REQUESTS FOR INFORMATION**

COMES NOW, the City of Leander ("City" or "Leander") and files these responses to PUC Commission Staff's ("Staff") First Requests for Information ("RFIs") to the City.

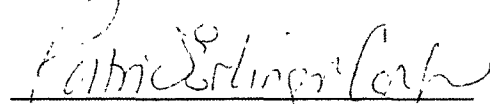
I. Written Responses

Attached hereto and incorporated herein by reference are the City's written responses to Staff's First Requests for RFIs to the City. The RFIs were received by the undersigned via fax on October 31, 2016 and filed in this docket on that same day. This response is timely filed on November 10, 2016, which is 10 days after the date of filing as required by SOAH Order No. 2 in this docket.

All responses are made without waiver of the City's right to contest the admissibility of any matters upon hearing. Each response (and objection, if any) is set forth on a separate page on which the request has been restated. The City stipulates that the responses may be treated by all parties as if they were filed under oath.

1470

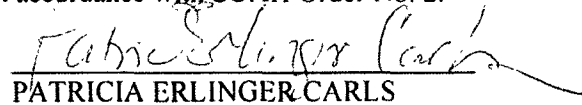
Respectfully submitted,
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PATRICIA ERLINGER CARLS
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ATTORNEYS FOR CITY OF LEANDER

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of November, 2016, a true and correct copy of the foregoing document has been filed in accordance with SOAH Order No. 2.



PATRICIA ERLINGER CARLS

**CITY OF LEANDER'S RESPONSES TO
STAFF'S FIRST REQUESTS FOR INFORMATION**

STAFF 1-1:

Please list the basis for Pat Wood's expertise in municipal planning.

RESPONSE:

Pat Wood, III does not claim to be an expert in municipal planning. Pat Wood, III is an expert on matters pertaining to electric transmission line certificate of convenience and necessity cases, particularly matters of policy.

**CITY OF LEANDER'S RESPONSES TO
STAFF'S FIRST REQUESTS FOR INFORMATION**

STAFF 1-2:

See Wood Cross Rebuttal at page 5, lines 8-16. As a point of clarification, please list the CCN proceedings in which Pat Wood has testified as an expert witness.

RESPONSE:

Pat Wood, III's cross-rebuttal testimony correctly reflects the proceedings in which he has provided expert testimony, which does not include CCN proceedings. Beginning on page 6, line 10 of Pat Wood, III's testimony he states: "Ordinarily, I would not testify in a CCN where my opinion would favor one landowner over another. As I know from personal experience, and as probably every Commissioner has ever said on the record when ruling on the routing of a CCN case, these cases are difficult — some of the most daunting decisions a Commission has to make".

**CITY OF LEANDER'S RESPONSES TO
STAFF'S FIRST REQUESTS FOR INFORMATION**

STAFF 1-3:

Please list the CCN proceedings reviewed by Pat Wood during the preparation of his testimony.

RESPONSE:

Pat Wood, III reviewed many CCN proceedings in preparation of his testimony. He does not maintain a list of those cases, nor is he able to recall all of those cases. Some of those cases are cited in his testimony.

**CITY OF LEANDER'S RESPONSES TO
STAFF'S FIRST REQUESTS FOR INFORMATION**

STAFF 1-4:

Please provide all correspondence between the City of Leander (and its representatives) and Pat Wood related to this matter.

RESPONSE:

- a) DIRECT TESTIMONY OF TOM YANTIS (Item 1174 in this Docket)
- b) CITY OF LEANDER'S RESPONSE TO COMMISSION STAFF'S OBJECTIONS AND MOTION TO STRIKE PORTIONS OF DIRECT TESTIMONY OF TOM YANTIS (Item 1333 in this Docket)