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SOAH CONSOLIDATED DOCKET NO. 473-19-1265
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STATE OFFICE
COMMISSION
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JOINT APPLICATION OF ONCOR §
ELECTRIC DELIVERY COMPANY §
LLC, AEP TEXAS INC., AND LCRA §
TRANSMISSION SERVICES §
CORPORATION TO AMEND THEIR §
CERTIFICATES OF CONVENIENCE §
AND NECESSITY FOR 345-KV §
TRANSMISSION LINES IN PECOS, §
REEVES, AND WARD COUNTIES, §
TEXAS (SAND LAKE TO SOLSTICE §
AND BAKERSFIELD TO SOLSTICE) §

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**ATMOS ENERGY CORPORATION'S FIRST REQUEST FOR INFORMATION
TO LCRA TRANSMISSION SERVICES CORPORATION**

Pursuant to § 22.144 of the Commission's Procedural Rules, Atmos Energy Corporation ("Atmos Energy") on behalf of Atmos Pipeline – Texas ("APT") requests that LCRA Transmission Services Corporation ("LCRA TSC") provide all of the information requested in this First Request for Information and serve a copy of its responses upon the undersigned attorney within ten (10) days.

It is further requested that the requests be answered in the order in which they are presented and in as much detail as needed to fully present all relevant facts. You are requested to copy the request immediately above the response to each request. For each response, please identify the preparer or person under whose direct supervision the response was prepared, and the testifying witness able to testify regarding the response. All responses must be filed under oath, unless the responding party stipulates in writing that responses to requests for information can be treated by all parties as if the answers were filed under oath.

In producing documents pursuant to this Request, please indicate the specific request(s) to which the document is being produced.

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These requests are continuing in nature. If you acquire information upon the basis of which you know or should know that the response was incorrect when made, or though correct or complete when made, is materially incorrect or incomplete, you are required to amend the prior response within five (5) working days of acquiring the information.

DEFINITIONS

As used herein, the following terms will have the following meanings:

“Document(s)” shall mean documents within the possession, custody or control of LCRA TSC, and includes, but is not limited to, all writings of every kind, source, and authorship, both originals and all non-identical copies thereof, in your possession, custody, or control, or known by you to exist, irrespective of whether the writing is one intended for, or transmitted internally by you or intended for, or transmitted to, any other person or entity, including without limitation any government agency, department, administrative, or private entity or person. The term shall include handwritten, typewritten, printed, photocopied, photographic, or recorded matter. It shall include communications in words, symbols, pictures, sound recordings, films, tapes, and information stored in, or accessible through, computer or other information storage or retrieval systems together with the codes and/or programming instructions and other materials necessary to understand and use such systems. The term shall also include electronically transmitted messages (e-mail) of any nature whatsoever. For purposes of illustration and not limitation, the term shall include: affidavits; agendas; agreements; analyses; announcements; bills, statements, and other records of obligations and expenditures; books; briefs; brochures; bulletins; calendars; cancelled checks, vouchers, receipts and other records of payments; charts, drawings; check registers; checkbooks; circulars; collateral files and contents; computer disks, programs or information; contracts; corporate by-laws; corporate charters; correspondence; credit files and contents; deeds of trust; deposit slips; diaries, drafts; files; guaranty agreements; indentures; instructions; invoices;

ledgers, journals, balance sheets, profit and loss statements, and other sources of financial data; legal research; letters; logs, notes, or memoranda of telephonic or face-to-face conversations; manuals; memoranda of all kinds, to and from any person, agency, or entity; minutes; minute books; notes; notices; opinions; orders; ordinances; papers; press releases; printed matter (including published books, articles, speeches, and newspaper clippings); purchase orders; records; records of administrative, technical, and financial actions taken or recommended; reports; resolutions; safety deposit boxes and contents and records of entry; schedules; security agreements; specifications; statement of bank accounts; statements, interviews; stock transfer ledgers; technical and engineering reports, evaluations, advice, recommendations, commentaries, conclusions, studies, test plans, manuals, procedures, data, reports, results, analyses and conclusions; summaries, notes, and other records and recordings of any conferences, meetings, visits, statements, interviews or telephone conversations; telegrams, teletypes, facsimiles and other communications sent or received; transcripts of testimony; UCC instruments; workpapers; drafts or copies of any of the foregoing; and all other writings, the contents of which relate to, discuss, consider, or otherwise refer to the subject matter of the particular request made. Inclusion in a request of specific kinds of documents, when in addition to the term “document,” does not limit the kinds of documents that are to be provided, and reference to this definition should be made to assist complete production.

“Relating to” or “relate” shall mean making or including a statement about, discussing, describing, reflecting, consisting of, constituting, comprising or any way concerning in whole or part, the subject or thing.

“Identify” or “Identification”:

- a. As to a person: When used in reference to a person or individual, the terms “identify” or “identification” mean to state his/her full name, address, and telephone number;

- b. As to an entity: The terms “identify” or “identification” when used in reference to an entity such as a corporation, partnership or association, mean to state the name of the entity, its business address, telephone number, and the name of its chief executive officer and the agent for service of process;
- c. As to a document: When used in reference to a document, the terms “identify” or “identification” shall include the following:
 - 1. The title, heading or caption of such document;
 - 2. The date appearing on such document; or if no name appears, the approximate date on which the document was prepared;
 - 3. A general description of the document;
 - 4. The name of the person who signed the document or statement;
 - 5. The name of the person or persons who prepared the document;
 - 6. The name of the person or persons to whom the documents was addressed and to whom the document was sent;
 - 7. The physical location of the document.

“**LCRA TSC**” shall mean LCRA Transmission Services Corporation and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including, but not limited to, attorneys, agents, advisors, investigators, representatives, employees or other persons.

“**AEP**” or “**AEP Texas**” shall mean AEP Texas Inc. and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including, but not limited to, attorneys, agents, advisors, investigators, representatives, employees or other persons.

“**APT**” shall mean Atmos Pipeline – Texas.

“**Commission**” shall mean the Public Utility Commission of Texas.

“**AC Interference**” shall mean alternating voltages and currents induced on a structure because of the AC power system.

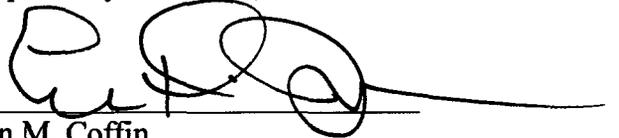
“**AC Mitigation**” shall mean measures taken to mitigate the effects of AC interference on a structure.

“Current Load” shall mean the amount of electrical current that is passed through a transmission line.

“Natural gas” shall mean a naturally occurring hydrocarbon gas mixture consisting primarily of methane, but commonly including varying amounts of other hydrocarbons and sometimes a small percentage of carbon dioxide, nitrogen, hydrogen sulfide, or helium.

“Communication” shall mean without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both communications and statements that are face-to-face and those that are transmitted by any writing or document or by media of any kind. These words also include any communications and statements that are transmitted electronically or wirelessly, through means such as, but not limited to, email or text messages.

Respectfully submitted,

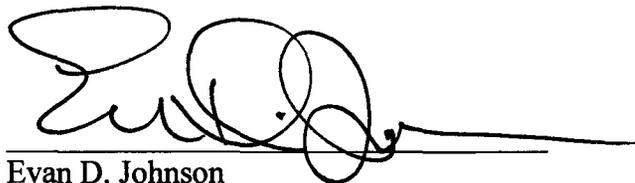


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**ATTORNEYS FOR ATMOS
ENERGY CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of January 2019, a true and correct copy of the foregoing document was served on all parties of record in accordance with 16 Tex. Admin. Code § 22.74 and SOAH Order No. 2.

A handwritten signature in black ink, appearing to read "Evan D. Johnson", written over a horizontal line. The signature is stylized with loops and a long horizontal tail.

Evan D. Johnson

**ATMOS PIPELINE – TEXAS’
FIRST REQUEST FOR INFORMATION TO LCRA TSC**

- RFI 1-1 Identify all segments of the proposed transmission line that are located within 500 feet of an APT metallic pipeline and provide the distance in feet between each segment and the pipeline or facility. Provide all available data to support your response.
- RFI 1-2 Indicate whether LCRA TSC or AEP Texas will own the proposed facilities that will be located on any of the routes within 500 feet of an APT metallic pipeline.
- RFI 1-3 Indicate when LCRA TSC and AEP Texas intend to begin operating their proposed line as a double-circuit line, if an approximate date is known at this time.
- RFI 1-4 Identify any anticipated operating parameters to be used to operate the proposed transmission line that are not already identified in the application in this proceeding, including but not limited to anticipated current load, anticipated maximum current load, and any anticipated fluctuations in maximum current load and the reasons for those fluctuations.
- RFI 1-5 Regarding page 2-5, Row 18 and Table 4-1, line 18 of the Environmental Assessment, define the phrase “parallel and adjacent” and explain the rationale behind the definition and how it was applied in performing the analyses supporting this chart.
- RFI 1-6 Regarding Footnote 5 on Page 2-6 and on Table 4-1 of the Environmental Assessment, explain the rationale for limiting the criteria to “Only pipelines six inches and greater carrying petrochemicals were quantified in the pipeline crossing and parallel calculations” and define the term “petrochemicals” as that term was used in performing the analyses supporting this chart and explain whether this definition includes natural gas. Provide all documents or analyses used to support this qualification to the criterion.
- RFI 1-7 Regarding Table 4-1, line 18 of the Environmental Assessment, confirm whether all lengths of segments or routes that are located within 500 feet of an APT metallic natural gas pipeline are included in the calculation of these criteria. Describe the analyses undertaken to confirm that all such pipelines were identified and explain why any specific pipelines or types of pipelines were excluded.
- RFI 1-8 Regarding Table 4-1, line 19 of the Environmental Assessment, confirm whether all lengths of segments or routes that are located within 500 feet of an APT metallic natural gas pipeline are included in the calculation of these criteria. Describe the analyses undertaken to confirm that all such pipelines were identified and explain why any specific pipelines or types of pipelines were excluded.
- RFI 1-9 Regarding page 11 of the direct testimony of Curtis Symank, is LCRA TSC or AEP Texas willing to make routing adjustments to avoid above-ground Atmos Energy facilities by a minimum of 150 feet?
- RFI 1-10 Refer to the direct testimony of Mr. Symank at page 5. What specific steel pole or H-frame based designs may be required because of adjacent pipeline crossings?

- RFI 1-11 Refer to the direct testimony of Mr. Symank on page 13, lines 4-7. If the Commission does not order any coordination between LCRA TSC, AEP Texas and pipeline companies, what coordination, if any, would LCRA TSC and AEP Texas attempt with pipeline companies before energizing the line?
- RFI 1-12 Does LCRA TSC dispute that electric transmission lines can cause induced current on natural gas steel pipelines absent sufficient mitigation measures?
- RFI 1-13 Indicate whether LCRA TSC's and AEP Texas's estimated costs for each proposed transmission line route in this project include costs associated with mitigating the impacts of the proposed line on existing natural gas pipelines. If LCRA TSC's and AEP Texas's proposed costs include any such costs, either specifically or as a component of any overage estimates, please provide the basis for such costs and any documents that support those cost estimates.
- RFI 1-14 Pursuant to Texas Health & Safety Code §§ 756.121-.126, does LCRA TSC or AEP Texas intend to pursue a written agreement with Atmos Energy to construct LCRA TSC's and AEP Texas's joint proposed transmission line project across Atmos Energy's easements? If not, please explain.
- RFI 1-15 Confirm whether LCRA TSC and AEP Texas support adopting in the final order in this proceeding the following final ordering language: "LCRA TSC and AEP Texas shall coordinate with pipeline owners or operators in the vicinity of the approved route regarding the pipeline owners or operators assessment of the need to install measures to mitigate the effects of AC interference on existing natural gas pipelines that are crossed or paralleled by the proposed electric transmission facilities." If not, please explain in detail the basis and indicate what ordering language LCRA TSC and AEP Texas will support with regards to metallic pipelines that could be affected by the transmission line.
- RFI 1-16 Confirm whether LCRA TSC and AEP Texas support adopting in the final order in this proceeding the following final ordering language: "LCRA TSC and AEP Texas shall conduct surveys to identify pipelines that could be affected by the proposed transmission line, if not already completed, and coordinate with pipeline owners in modeling and analyzing potential hazards because of AC interference affecting pipelines being crossed or paralleled." If not, please explain in detail the basis and indicate what ordering language LCRA TSC and AEP Texas will support with regards to metallic pipelines that could be affected by the transmission line.
- RFI 1-17 Confirm whether LCRA TSC and AEP Texas support adopting in the final order in this proceeding the following final ordering language: "LCRA TSC and AEP Texas must coordinate with Atmos Energy (1) regarding any facilities routed within 150 feet from Atmos Energy's above ground facilities to avoid the risk of an electric arc or spark igniting the vented gas and to avoid a risk of toppling; (2) before conducting any blasting within 300 feet of Atmos Energy's pipelines to avoid damaging them; and (3) before operating any heavy construction equipment across existing Atmos Energy pipeline ROW." If not, please explain in detail the basis and indicate what ordering language LCRA TSC and AEP Texas will support with regards to metallic pipelines that could be affected by the transmission line.