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COMMISSION STAFF'S PETITION §
FOR THE SELECTION OF ENTITIES §
RESPONSIBLE FOR TRANSMISSION §
IMPROVEMENTS NECESSARY TO §
DELIVER RENEWABLE ENERGY §
FROM COMPETITIVE RENEWABLE §
ENERGY ZONES §

BEFORE THE PUBLIC
UTILITY COMMISSION
OF TEXAS

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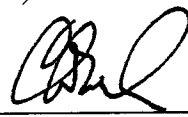
ISOLUX CORSÁN CONCESIONES S.A.'S FIRST REQUESTS FOR INFORMATION
TO CROSS TEXAS TRANSMISSION, LLC

Pursuant to PUC Proc. R. 22.144, Isolux Corsán Concesiones S.A. ("Isolux") requests that you fully respond to the First Requests for Information (RFIs) attached. Responses to the attached RFIs are due in 15 days and shall conform to the Commission's rules. Responses shall be answered in sufficient detail to present all the relevant facts. Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Respectfully submitted,

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1403 West Sixth Street
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(512) 476-8591
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By: _____


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Attorneys for Isolux Corsán Concesiones S.A.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing document has been sent via CREZ listserv to all counsel/parties of record in this matter on this the 3rd day of October, 2008.

A handwritten signature in cursive script, appearing to read 'C. Malish', is written over a horizontal line.

Christopher Malish

INSTRUCTIONS

Sworn, written answers to these discovery requests questions should, to the extent possible, be answered in the spaces provided. If additional space is needed, please use additional sheets of paper.

In answering the following requests, furnish all information available to you, including all non-privileged information in the possession of your attorneys, or their investigators, and all persons acting on your behalf, and not merely such information within the personal knowledge of the person who signs these answers. If you cannot answer a request in full after exercising due diligence to secure the information, so state in your answer, and, to the extent possible, answer by stating whatever information or knowledge you have.

The requests which follow are to be considered as continuing, and you are requested to provide, by way of supplemental answers, such additional information as you or any other person acting on your behalf may later obtain which will supplement or modify your answers given to the questions below. You may have a duty to supplement when:

- a. You know the answers were incorrect when made; or
- b. You know that the answers though correct when made are no longer the true and the circumstances are such that to fail to amend or supplement your answers would be in substance a knowing concealment.

Further, should you fail to so amend or supplement your answers, this party will ask the presiding officer to exclude evidence which you or your attorney might wish to offer relating to such matter. Such supplemental responses are to be filed and served upon the undersigned attorney immediately upon receipt of such information and in no event less than thirty (30) days before the date of trial or hearing.

As used, the following terms shall have the meanings indicated below:

DEFINITIONS

1. "IDENTIFY" or "IDENTITY" when used in reference to a natural person means his full name, present or last known address, his employer, and his present or last known job title or position. When used in reference to a corporation or legal entity other than a natural person, the term "identify" or "identity" means its name, and the address of its principal place of business. When used in reference to a document, "identify" means the name and date of the document and the identity of the person who prepared it and who signed it. When used for any other purpose, the common dictionary meaning of "identify" applies.

2. "DOCUMENT" means both the plural and the singular, and each term includes, but is not limited to, contracts and agreements, correspondence, advertising materials, memoranda, reports, handwritten notes, surveys, analysis, leases, manuals, questionnaires, computer printouts, tapes and records of any types, corporate records, minutes of meetings, studies, books, pamphlets, policy manuals, schedules, job descriptions, photographs, voice recordings, and every other device or media on which or through which information of any type is transmitted, recorded, or preserved in your possession, custody or control. The term "documents" also means an authentic copy where the original is not in your possession, custody, or control and every copy of a document where such copy is not an identical duplicate of the original.

"DOCUMENT" also includes any printed, typewritten, handwritten, mechanically or otherwise recorded matter of whatever character, including, but without limitation, letters, purchase orders, memoranda, telegrams, notes, catalogs, brochures, diaries, reports, calendars, interoffice communications, intraoffice communications, statements, investigative reports, announcements, depositions, answers to Interrogatories, pleadings, judgments, newspaper articles, data compilations, photographs, tape recordings, motion pictures and any carbon or photographic copies of any such material if you do not have custody or control of the original. As used, the term "documents" includes, but is not limited to, any note, correspondence, contracts or agreements, financial statements, computer printouts, balance sheets, income statements, real estate documents, records, notices, confirmations, appraisals, prospectuses, notations or memoranda of any sort of communications, invoices, diaries, analysis, offers, worksheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes and amendments of any of the foregoing), graphic or oral records or representations of any kind, other written, printed, typed or other graphic recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film or record, computer disk, laser disk, compact disk, film, tape, videotape, computer card or magnetic media of any form which are in your possession, custody or control. If any document requested to be identified was in your possession or control or is no longer in existence, please state whether it is:

- (1) missing or lost;
- (2) destroyed;
- (3) transferred voluntarily or involuntarily to others, and if so, to whom, or
- (4) otherwise disposed of; and in each instance explain the circumstances surrounding an authorization of the disposition and the approximate date of the disposition and describe its contents.

3. "YOU" and "YOUR" means: Cross Texas Transmission, LLC, and its divisions, departments, officers, directors, officers, agents, employees, predecessors-in-interest, representatives, assignees, assignors and affiliates; and its its subsidiaries and parent company(ies), and their divisions, departments, officers, directors, officers, agents, employees, predecessors-in-interest, representatives, assignees, assignors and affiliates.

NOTICE WITH REGARD TO OBJECTIONS

Please take notice that:

1. Discovery extends to documents or claims either in the your actual possession or constructive possession. Constructive possession exists so long as you have a superior right to compel the production of such information or claim from a third party, including an agent, attorney or representative, who has possession, custody or control of such information even though you do not have actual physical possession of such information or claim.

2. If you object to any request on the ground that the request is overly broad, burdensome or is not limited properly in time or scope, please state in your answer or objection the following:

- a. The items or categories of items, if any, that you do not object to providing and to provide such items or information in the answers to these requests; and
- b. The items or categories of items which are in existence to which you do object to providing and stating the specific reasons why discovery of such items should not be allowed.

3. Claim of Privilege. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

REQUESTS FOR INFORMATION

1. Please describe the number of miles of 345kV lines you have completed construction on in the past five years. Please indicate whether you served as the Engineering, Procurement, and Construction contractor or whether you hired another entity to perform these functions.
2. Please identify all the assumptions you made in calculating your estimates provided in the Engineering, Procurement, and Construction portions of your CTP proposal (e.g., your response to 16 TAC 25.216 (e)(1)(I)).
3. Please provide an estimate of your complete Engineering, Procurement, and Construction cost to build the longest CTP Facility transmission line in your proposal that involves a double circuit 345 kV, overhead line using 1590 ACSR conductor. If no CTP Facility transmission line in your proposal has these characteristics, please answer for the longest line you propose building, stating single or double circuit, line length and conductor type. In answering this question, please first
 - a. Identify your assumptions regarding:
 - i. Right of Way width
 - ii. Wind speed considered
 - iii. Temperature range considered
 - iv. Average Span between towers
 - v. Tower weight for tangent, 30°, and 90° structures
 - vi. Tower height for tangent, 30°, and 90° structures
 - vii. Tower distribution over the 150 mile line segment (% of tangent, 30°, and 90° structures)
 - viii. Electrical distance
 - ix. Foundations volumes per type of towers (tangent, 30°, and 90° structures)
 - b. Your estimate should include:
 - i. Total Engineering costs, taking into consideration:
 - (1) Route Definition
 - (2) Topography study
 - (3) Geotechnical Study
 - (4) Tower Testing
 - (5) Tower Design
 - (6) Tower siting
 - (7) Foundation Design
 - ii. Total Procurement costs, including those for:
 - (1) Towers-Tangent
 - (2) Towers - Angle 30°
 - (3) Towers - Dead End 90°

- (4) 1590 ACSR Conductor
- (5) Ground wire 7/8 AWG
- (6) OPGW/Fiber Optic Communication and Ground Wire
- (7) Tension Insulators
- (8) Suspension Insulators
- (9) V Suspension Fittings
- (10) Double Tension Fittings
- (11) Groundwire Suspension Fittings
- (12) Grounding
- (13) OPGW Suspension Fittings
- (14) OPGW Tension Fittings
- (15) Stockbridge-type vibration dampners
- (16) Tower Identification Plates

iii. Total Construction costs, including for:

- (1) Tower Erection
- (2) Conductor Stringing
- (3) Foundations for (tangent, 30°, and 90° structures);

iv. Total Transportation, including Logistics;

v. Total Indirect Costs, including:

- (1) Site Management
- (2) Project Management
- (3) Overhead
- (4) Bonds/performance guarantees
- (5) Insurance
- (6) Legal expenses
- (7) Measures to guard against risk of subcontractor non-performance
- (8) Profit margin/project profit
- (9) Taxes
- (10) Inflation for project duration

c. Please include a Tower loading tree for tangent tower (tower structure design figures indicating tower height, dimensions, angles, conductor configuration and clearances)

4. Please identify any and all transmission projects of greater than 138 kV built since year 2000 in the State of Texas by you and provide for each the pre-construction schedule and budgeted cost estimate, and final completed cost and in-service date.

5. Please provide letters of intent, contracts, agreements and/or of the name of any person or entity you have communicated with regarding studies for route analysis, site selection, engineering, material procurement and construction for each CTP Facility.

6. Identify all non-CREZ transmission projects of greater than 138kV currently under construction, scheduled to be built, or planned by you in the same time period as the CTP Facilities are planned to be constructed (e.g., through 2013), if awarded, by you. Explain for each project how it will be coordinated with development of CREZ CTP Facilities and indicate if the same construction, management and O&M personnel will be involved or if additional staff and facilities are required.
7. Please provide the following information for all "greenfield" (i.e., new) transmission projects you have developed, constructed or put into operation within the last eight years:
 - a. Project name;
 - b. Project location;
 - c. Project all-inclusive construction cost;
 - d. Dates that development began, construction began (or expected to begin) and operation began (or expected to begin);
 - e. Ownership level of the project currently;
 - f. As applicable, other shareholders involved in the project;
 - g. Name of individuals involved in the project that will be involved in these CREZ projects if awarded; and;
 - h. Role played in the development, construction and operation of the project.