



Control Number: 37448



Item Number: 285

Addendum StartPage: 0

**P. U. C. Docket No. 37448**

**SOAH Docket No. 473-10-1097**

**Application of LCRA  
Transmission Services  
Corporation to Amend its  
Certificate of Convenience  
And Necessity for the  
Gillespie-Newton 345-KV CREZ  
Transmission Line in Gillespie,  
Llano, San Saba, Burnet, and  
Lampasas Counties**

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**Public Utility Commission  
of Texas**

**Intervener Six Peaks LLC's Request for Information**

Six Peaks LLC, pursuant to Public Utility Commission Procedural Rules 22.114, file this request for information.

Respectfully submitted,

Six Peaks LLC



By: \_\_\_\_\_

Peter Malin, Managing Member

5925 Forest Lane  
Suite 505  
Dallas, Texas 75230  
(972) 960-1250  
(972) 960-1201

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Request for Information from LCRA TSC and PBSJ.

1. Provide a copy of and identify all treatises, studies, communications, emails, documents, examples of, notes about, or information in your files, that deals with the Atmos Gas Line which runs north from Fredericksburg to Llano and parallels the proposed transmission line segments C-4 and C-8, "the AGL." If you are aware of issues relating to the AGL, its depth, its age, past history of leaks, fires or explosions, forward that information under this request as well.
2. Provide a copy of and identify all treatises, studies, examples of, notes, communications, emails, documents about, or information in your files, whether relied on or not, that deals with the electric transmission line arcing, sparks or fires caused by arcing or sparking.
3. Provide copy of and identify all notes, discussions, memos, documents, communications, emails, whether relied on or not about the safety of electric transmission lines near metal structures.
4. Provide a copy of and identify all treatises, studies, examples of, notes, communications, emails, documents about, or information in your files, whether relied on or not, that deal with the electric transmission lines situated adjacent to gas pipelines.

Instructions regarding the answers for this RFI:

1. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records, and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

2. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of LCRA TSC.
3. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the documents, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or viewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of LCRA TSC or in the custody of its attorneys or the representatives or agents.
4. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
5. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
6. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
7. 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.

8. These requests shall be deemed continuing so as to require further and supplemental responses if LCRA TSC receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.