



Control Number: 37448



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SOAH DOCKET NO. 473-10-1097  
DOCKET NO. 37448

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APPLICATION OF LCRA §  
TRANSMISSION SERVICES §  
CORPORATION TO AMEND ITS §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE §  
GILLESPIE TO NEWTON 345-KV §  
CREZ TRANSMISSION LINE IN §  
GILLESPIE, LLANO, SAN SABA, §  
BURNET, AND LAMPASSAS §  
COUNTIES, TEXAS §

PUBLIC UTILITY COMMISSION  
FILING CLERK

OF TEXAS

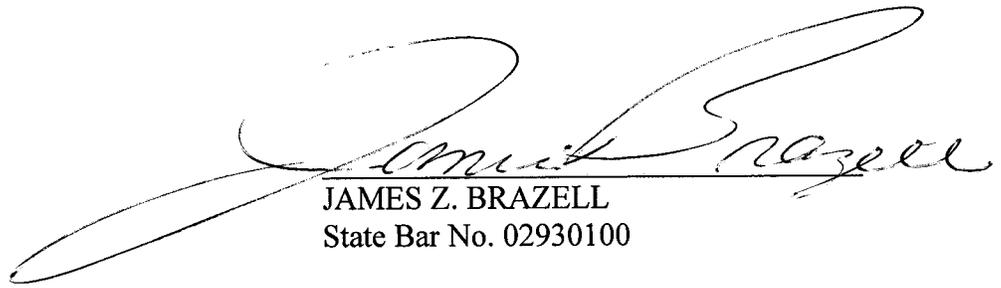
GILLESPIE SUBSTATION INTERVENORS'  
SECOND REQUEST FOR INFORMATION  
FROM LCRA TSC

TO: LCRA TSC, by and through its attorney of record, Fernando Rodriguez, Associate General Counsel, Lower Colorado River Authority, P.O. Box 220, Austin, Texas 78767-0220, (512) 473-3354, (512) 473-4010.

Karl and Mary Ransleben ("the Ranslebens"), Connie and Ruben Crenwelge ("the Crenwelges"), and Charles and Becky Anderson ("the Andersons"), referred to herein as the "Gillespie Substation Intervenors," hereby submit requests for information from LCRA TSC pursuant to Order No. 1, PUC Proc. R. 22.144, and all other applicable Commission rules. Please serve full written responses under oath to the question(s) included in Exhibit A (attached and incorporated by reference) on James Z. Brazell, Law Office of James Z. Brazell, at 100 Congress Avenue, Suite 2000, Austin, Texas 78701, within 10 calendar days or within any other specific time limit provided by the Presiding Officer.

Respectfully submitted,

LAW OFFICE OF JAMES Z. BRAZELL  
100 Congress Avenue, Suite 2000  
Austin, Texas 78701  
(512) 370-5222 Direct  
(512) 370-5223 FAX

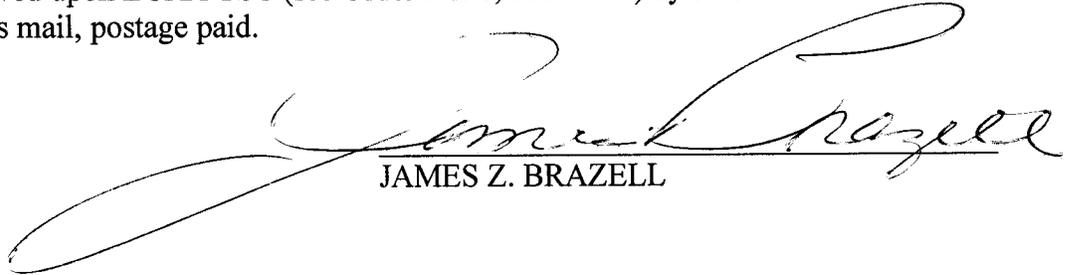


JAMES Z. BRAZELL  
State Bar No. 02930100

**ATTORNEY FOR KARL AND MARY  
RANSLEBEN, CONNIE AND RUBEN  
CRENWELGE, AND CHARLES AND  
BECKY ANDERSON**

**CERTIFICATE OF SERVICE**

I hereby certify that on 17<sup>th</sup> of December 2009 a true and correct copy of the foregoing document was served upon LCRA TSC (see Order No. 1, Sec. V.A.) by facsimile and/or First-class United States mail, postage paid.



JAMES Z. BRAZELL

## DEFINITIONS

As used in these Requests for Information, the terms listed below have the following meanings:

1. The terms “you,” “yours,” “Applicant”, “Utility,” “LCRA TSC” mean the LCRA Transmission Services Corporation including without limitation, its attorneys, agents, advisors, investigators, representatives, employees or other persons. The terms “you” and “yours” further refer to (but are not limited to) the person or persons to whom this request for information is directed; and, any other member of the group, entity, association, trust, etc. of which the person is a part.
2. The term “LCRA TSC” means the Applicant, Lower Colorado River Authority Transmission Service Corporation; the term “LCRA” means the Lower Colorado River Authority; the term “PBS&J” and “Consultants” means PBS&J; the term “EA” means the Environmental Assessment in the proceeding; the term “Application” means LCRA TSC’s Application filed in this proceeding; the term “Line” means the 345 kV transmission line that is the subject of the Application; the term “ROW” means right of way or rights of way; the term “lines” (lowercase) means transmission lines, generally.
3. The terms “Gillespie Substation Intervenors” shall mean Karl A. and Mary B. Ransleben, Connie and Ruben Crenwelge, and Charles and Becky Anderson.
4. The terms “person” and “persons” refer to and include, without limiting the generality of the meaning of the terms, natural persons, corporations, holding companies, partnerships, proprietorships, joint ventures, unincorporated associations, trusts, estates, governments (and agencies thereof), municipalities, cooperatives, unit operations, joint defense associations, industry associations, clubs, quasi-public entities, and all other forms of associations (whether formally organized or ad hoc) and specifically identifiable legal entities.
5. The terms “concern” or “concerning” include referring to, alluding to, responding to, relating to, connected with, commenting on, in respect of, about, regarding, discussing, showing, recording, describing, mentioning, reflecting, analyzing, constituting, evidencing, or pertaining to.
6. The terms “document” and “documents” are used in their broadest sense and include, among other things, all written, printed, typed, recorded, filmed, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto, as here further described:
  - a. Without limiting the foregoing, the terms “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, facsimiles, messages, memoranda, records, reports, books, summaries, tape recordings 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 records, 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,

analyses, studies, surveys, transcripts of hearings, transcripts of testimony affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilations from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated or made; and

- b. If any of the documents provided pursuant to these requests is in machine-readable form (such as punch cards, paper or magnetic tapes, drums, diskettes, or core storage), for each such document state the type of computer and software program(s) or other machinery or equipment required to read the information.
7. 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, e-mail, 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.
8. The term "identify" when used with a natural person means to provide his or her full name, business address, business telephone number, e-mail address, position, job title, name of employer, and current and prior connection or association with any party to this proceeding. If the above information is unavailable, "identify" means to provide some other means of identifying the person and his or her present address, telephone number, e-mail address, position, title, employer, and connection to any party to this proceeding.
9. The term "identify" when used with a person other than a natural person means to provide its name, business form, structure, or nature (e.g. corporation, partnership, etc.), street and mailing addresses, telephone number, e-mail contact address, and website address.
10. The term "identify" when used with a document means to provide 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 the document was prepared;
  - c. the title and "re" of the document;
  - d. the subject matter of the document;
  - e. 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
  - f. if the document has been lost, shredded, or destroyed (whether intentionally or unintentionally), a statement that the document has been lost, shredded, or destroyed, the estimated date of such loss, shredding, or destruction, and the reason(s) or cause of such loss, shredding, or destruction.
11. The term "identify" when used with any other thing or matter means to provide as detailed a description as is necessary to permit Intervenors to identify it and to determine its present location.

12. Miscellaneous definitions:
  - a. Words used in the plural shall also be taken to mean and include the singular.
  - b. Words used in the singular shall also be taken to mean and include the plural.
  - c. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
  - d. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."
  - e. The term "including" means "including but not limited to."

### **INSTRUCTIONS**

1. Please provide your responses to these requests as governed by the requirements of Order No. 1, PUC Proc. R. 22.144, the remainder of Subchapter H, and other applicable provisions of the Commission's rules.
2. Your responses shall be in sufficient detail to fully present all relevant facts.
3. If you do not understand and request or if any request appears confusing, please call the undersigned to request clarification.
4. If your responses become available at different times, please provide each individual response as it becomes available.
5. If LCRA TSC considers any request to be unduly burdensome or if any response would require the production of voluminous material, please call the undersigned to discuss arrangements to make the material available.
6. If LCRA TSC objects to any request on the grounds that the request seeks proprietary information or on any other ground, please call the undersigned as soon as possible to discuss the objection and/or arrangements to make the material available.
7. These requests are continuing. Please supplement your responses pursuant to Order No. 1, R. 22.144(i), the remainder of Subchapter H, and any other applicable Commission rules.
8. Please provide each response starting on a separate page and as otherwise required by PUC Proc. R. 22.144(c)(2). Please state the docket numbers, style, and request number to which you are responding on the first page of each response.
9. 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
10. Pursuant to P.U.C. PROC. R. 22.144(g)(4), if the response to any request is voluminous,

please provide a detailed index of the voluminous material.

11. If the information requested is included in previously furnished exhibits, work papers, response to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.
12. If you cannot admit or deny any request for admission, please explain.

## EXHIBIT A

PUC DOCKET NO. 37448  
SOAH DOCKET NO. 473-10-1097

### GILLESPIE SUBSTATION INTERVENORS' SECOND RFIs TO LCRA TSC

- 2.1. Please identify, disclose, and provide copies of all documents, as defined above, including, but not limited to, work papers, notes, e-mails, correspondence, orders, invoices, receipts, payment records, authorizations, bids, RFPs, studies, vendor data, sales data, construction data, surveying data, materials lists or pricing data, digitized and electronic and computerized data, and any and all other documents provided to, reviewed by, relied on, considered by, prepared by, or used by Curtis Symank in preparing Exhibit CDS-1 attached to his testimony.
- 2.2. The Commission concluded that construction with monopoles was nearly equivalent in cost or less costly than lattice construction in PUC Docket No. 33033, SOAH Docket No. 473-07-0736 (AEP); PUC Docket No. 21741, SOAH Docket No. 473-99-2915 (CP&L); and PUC Docket No. 21747, SOAH Docket No. 473-00-0112 (STEC). Please explain, state the basis of, and provide supporting detail for the difference between LCRA TSC's claim and analysis in this case that tubular steel pole or monopole construction is more costly than lattice construction and the Commission's rulings regarding the relative cost of tubular steel or monopole construction and lattice construction in those dockets. Please provide all documents, as defined above, concerning your answer and not already provided in response to 2.1 above.
- 2.3. Please identify each location, segment, link, span, or other instance where the Commission required LCRA TSC to use tubular steel poles or monopoles in Docket No. 33978, LCRA TSC's Clear Springs to Hutto 345 kV case. Please state and explain the basis for the Commission's order to use tubular steel or monopoles in each such instance. Please state whether LCRA TSC proposed, supported, objected to, excepted to, appealed, or otherwise contested the Commission's rulings in each such instance. Please provide all documents not already provided in response to 2.1 above that relate to the cost of using monopoles in each such instance compared to the cost of using lattice structures.
- 2.4. In a number of parts of his testimony, Mr. Garza refers to exposure to failures caused by among other things, equipment failure, lightning, tornadoes, fires, aircraft, vehicular accidents debris, vandalism, and/or terrorism, and he refers to specific lightning-related outages in the Hill Country. Please identify the dates, location, description, cause, conditions, results, duration, and effect of each such failure and of all such failures on LCRA TSC's system since 1999. Please indicate which of the instances identified occurred where the line was in a common ROW or adjacent ROW. Please disclose and provide documents (including records and maps, if any) of each such instance.
- 2.5. On Page 15 Line 30 to Page 16 Line 8 of his testimony, Mr. Symank says that LCRA owns 45 miles of tubular steel poles in the vicinity of this project in Burnet, Gillespie, Kerr Lampasas, Llano, San Saba, and Kendall Counties and 21 miles of 345 kV tubular steel poles in Kendall County. Please identify the systems and locations to which Mr. Symank is referring. Please include the description, name, kV, location, route, in service date, PUC approval docket number, and cost of each such segment. Please provide detail not provided

by Mr. Symank in his testimony to identify, explain, and quantify the unanticipated extra cost and construction challenges Mr. Symank describes related to the 21 miles in Kendall County. Please state whether LCRA TSC encountered any such unanticipated extra cost and construction challenges in the construction of the segments included in the 45 to which Mr. Symank refers. Please identify, explain, and quantify any such extra costs and challenges.

- 2.6. Please provide citations to all relevant sections of the National Electric Safety Code (“NESC”) provided to, reviewed by, relied on, considered by, or used by LCRA TSC that address: a) design of transmission systems to provide protection and reliability through route diversity from the failures mentioned by Mr. Garza (i.e., equipment failure, lightning, fires, aircraft, accidents, storms, tornadoes, vandalism, terrorism, etc.); b) circumstances where use of tubular steel poles or monopoles is prohibited, not recommended, unacceptable, acceptable, permissible, appropriate, preferred, recommended, or required. Please disclose and provide access to the responsive sections of the NESC inspection and copying.
- 2.7. Please provide a list of, and description of, all instances of which LCRA TSC is aware where any 345 kV transmission line exists, has been or is being constructed, is planned, or announced in Texas using tubular steel poles or monopoles. Please provide information known to LCRA TSC concerning the owner, system designation, name, description, location, function, operation, Commission docket or proceeding, date of construction, cost, and cost relative to lattice of such facilities.
- 2.8. On Page 13 Lines 6 to 14 of his testimony, Mr. Symank he explains some of the bases of his conclusions regarding the cost of using lattice towers compared to the cost of using tubular steel poles or monopoles. Please describe the conditions Mr. Symank refers to in greater detail than provided in the testimony, providing all documents concerning and that were part of the estimate of costs he refers to and detailed data regarding the size, radius, circumference, and depth of the foundations referred to, sizes of holes, quantities of concrete and other material, drilling and excavation processes and costs, specific volumes, weights, and measurements in the estimate, standards reviewed, considered, relied on, or applied. Please provide all documents not already provided in response to 2.1 above provided to, reviewed by, relied on, considered by, or used by Mr. Symank in preparing this portion of his testimony.