

Control Number: 37448



Item Number: 359

Addendum StartPage: 0

		•	<i>,</i> ~
APPLICATION OF LCRA TRANSMIS-	§	BEFORE THE	7
SION SERVICES CORPORATION TO	§		> .
AMEND ITS CERTIFICATE OF CON-	§		···
VENIENCE AND NECESSITY FOR THE	§	STATE OFFICE OF ADMINISTR	ATIVE
GILLESPIE TO NEWTON 345 KV CREZ	§	() and ()	
TRANSMISSION LINE IN GILLESPIE,	§	And the second second	5
LLANO, SAN SABA, BURNET, AND	§	HEARINGS 🐔 😫	-
LAMPASAS COUNTIES, TEXAS	§.	· · ·	

LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO SIX PEAKS LLC'S FIRST REQUEST FOR INFORMATION

COMES NOW LCRA Transmission Services Corporation (LCRA TSC) and files this, its Response to Six Peaks LLC's First Request for Information. This Response is timely filed. LCRA TSC agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,

BICKERSTAFF HEATH DELGADO
ACOSTA LLP
R. Michael Anderson
Texas State Bar No. 01210050
Joe N. Pratt
Texas State Bar No. 16240100
3711 S. MoPac Expressway
Building One, Suite 300
Austin, Texas 78746
(512) 472-8021
(512) 320-5638 (FAX)
Email: rmanderson@bickerstaff.com
jpratt@bickerstaff.com

William T. Medaille Associate General Counsel Texas State Bar No. 24054502 Fernando Rodriguez Associate General Counsel Texas State Bar No. 17145300 Lower Colorado River Authority P.O. Box 220 Austin, Texas 78767-0220

Telephone: (512) 473-3354
Facsimile: (512) 473-4010
Email: bill.medaille@lcra.org
ferdie.rodriguez@lcra.org

For Service: Docket37448CREZ@lcra.org

William T. Medaille

ATTORNEYS FOR LCRA TRANSMISSION SERVICES CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the propounding party (pursuant to Order No. 1) on this the 18th day of December 2009, by email, facsimile, First-Class U.S. mail, or by hand delivery.

William T. Medaille

APPLICATION OF LCRA TRANSMIS-	§	BEFORE THE
SION SERVICES CORPORATION TO	§	
AMEND ITS CERTIFICATE OF CON-	§	
VENIENCE AND NECESSITY FOR THE	§	STATE OFFICE OF ADMINISTRATIVE
GILLESPIE TO NEWTON 345 KV CREZ	§	
TRANSMISSION LINE IN GILLESPIE,	§	
LLANO, SAN SABA, BURNET, AND	§	HEARINGS
LAMPASAS COUNTIES, TEXAS	8	

LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO SIX PEAKS LLC'S FIRST REQUEST FOR INFORMATION

Question No. 1-1:

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 of 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.

Response No. 1-1:

PBS&J and LCRA TSC do not have any treatises, studies, communications, emails, documents, examples of, notes about, or information that deal with the Atmos Gas Line which runs north of Fredericksburg to Llano and parallels the proposed transmission line segments C-4 and C-8. PBS&J and LCRA TSC have no information regarding the depth, age, history of leaks, or fires or explosions related to this pipeline.

The pipeline that parallels links C4 and C8 is shown on the U.S. Geological Survey's (USGS) Llano and Pedernales River 1:100,000 topographic maps. These maps were used to produce PBS&J's base map for figures 3-1a, 3-1b, and 3-1c. PBS&J identified the pipeline as being operated by "Atmos Pipeline – Texas" by observation at road crossings in the field and from the Railroad Commission of Texas's website http://gis2.rrc.state.tx.us/public/.

Rob R. Reid	Title:	Principal Project Director, PBS&J
France Davis	Title:	Sr. Project Mgr, PBS&J
Rob R. Reid	Title:	Principal Project Director, PBS&J
Curtis Symank	Title:	Engineering Supervisor, LCRA
Dennis Palafox	Title:	Sr. Regulatory Case Mgr, LCRA
	Rob R. Reid France Davis Rob R. Reid Curtis Symank Dennis Palafox	France Davis Rob R. Reid Curtis Symank Title: Title:

APPLICATION OF LCRA TRANSMIS-	§	BEFORE THE
SION SERVICES CORPORATION TO	§	
AMEND ITS CERTIFICATE OF CON-	§	
VENIENCE AND NECESSITY FOR THE	§	STATE OFFICE OF ADMINISTRATIVE
GILLESPIE TO NEWTON 345 KV CREZ	§	
TRANSMISSION LINE IN GILLESPIE,	§	
LLANO, SAN SABA, BURNET, AND	§	HEARINGS
LAMPASAS COUNTIES, TEXAS	§	

LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO SIX PEAKS LLC'S FIRST REQUEST FOR INFORMATION

Question No. 1-2:

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.

Response No. 1-2:

Please refer to Six Peaks_1st_Q. 1-2_Attachment 1, which is a record of all outages for the last 10 years to LCRA TSC transmission lines that are responsive to the question.

LCRA TSC has a copy of the EPRI AC Transmission Line Reference Book-200kV and Above, Third Edition, which has many references to electric transmission line arcing, sparks and flash-over. This book is hardbound, copyrighted material that is voluminous and can be made available for viewing by appointment by contacting Gina Eddy or Janet McNutt at (512) 473-3287.

Preparer: Huntis Dittmar
Sponsor: Curtis Symank
Title: Engineering Supervisor, LCRA
Title: Engineering Supervisor, LCRA

A ANTA	John Buckner reported that a billionn tied to a ribbon bleew with the fire at structure BA2, and debris fell into the grass cousing a 1.9 acre for underneath the line. The ribbon was still on the tower; and was removed from the ower on 71/6/2008. No damage was reported to the line or tower; and was removed from the associated structures.	And the second s	SOCC received phone calls reporting a grass fire under the line and a tent canogy hanging off of one phase just outside of Sonneanselle on 1-307. Line was later taken out of service for safety resons (forms #8136).		AEP reported a crossarm on fire and needed to open up the line for repairs. Line was repaired and re-nergized.	The Buffer CO LIDITOR OF EAST COURT FOR Buffer to Big Late). Then Buffer CO LIDITOR I Indian Secretary Indian Company of the C	Besh exist of interpret for state to the last Act List (\$10506 & 100104 \$1 in the last were Besh exist of interpret for state for some fire to tab Pig List. At \$1650, AFF 50.004 stated these sevently specified, these to exist in the form one to include the second of the vently were not interface. The colories find the form one to include the Act and at Big report List lets do by Infly, fig. I need. Forth McGraw pair it \$1.004 and at Big Lists \$175 miles. Inspect Direct Act Act Act Act Act Act Act Act Act A		There was a sear from the Profile. C- Politice 150, 140 or 15.4 the threshed so do off at a tructure 15M. The attention is a three-sold and one pole was knowled completely of it agreed bent sold to the complete of the state of the control of the complete of the state of the control of the complete of the control of the			AEP found a 69kV pole of fire and a broken static wire on 2 frames. AEP found a 69kV pole on fire and a broken static wire on 2 frames.	donak.		A.B. Trooted a wing down between Philips to and blacky and a fit around the location of comment at a respect to the second the location of comment at a respect to the second burned per more present to the second burned per more perfectly and the second to the second burned per more perfectly and the second to	Correct operation for Flatonia bus. Waelder CB 19150 over-cripped. An owl caused arcing on the ighthing anesters next to the 68KV PT's at Flatonia per fory Kovar
Parmer CR. 1500 the pecies of 15,000. Notherns Dam CR. Stuting Speech & PAS. IT. Jun. PEC. Commerce and custom that Demonstration. The SP. Stuting and Extending the Pecies "Inflating the Stuting Section 2.3.2. This behave the subsect that the Commerce of the Speech Section 2.3.2. The Speech Section 2.	Lytton Springs CB LY1206 & CB LY1207 trip/freclased (T-352). Garfield CB 11400 trip/freclosed and CB 11390 trip/freclosed by RN(T-352). The recloses frod 13190 is normality off AEN Notifield and John Buckner was dispatiched to pastrol fre fine. Selvena indicated the fault was 3,07 miles from John Buckner was dispatiched to pastrol fre fine. Selvena indicated the fault was 3,07 miles from Lytton Springs.		Sharrist Pous CB 2560 tripfreciosed (T-307), Schumansville CB 3700 tripfrobead by EMS (T-307), OMEC indicated by Latt CB 3700 was and that the May are down a 1540-minsville, so SCC had no status of station information. At 1347 the RTU was brought back online and CB 3700 was closed via BMS. Subwan indicated the fault was 5.53 milles from Sheriff's Posse.	Luthur (2), 2000 [PD/Federal (T. AS) Weeding (C. AS) An Open design (Professor) (Formation (T. AS) (AP) (AP) (AP) (AP) (AP) (AP) (AP) (AP	North MicCamey Switchyard CB 11580 and CB 11500 opened by AEP EMS. Big Lake AEP CB 3570 and CB 3585 opened by AEP EMS.	Twin Buttes CB 10740 the EMS/close EMS (APP TWIN Buttes to Big Lake), Twin Buttes CB 10750) Twin Buttes CB 10740 the PMS/close EMS (APP, Twin Buttes to Big Lake)	North McCampy CB 11580 trip/close ENG (ARP - North McCampy to Big Lake), North McCampy CB 11500 trip/close ENS (ARP - North McCampy to Big Lake CB 5570 trip/close ENS (ARP - North McCampy to Big Lake), ARP Big Lake CB 5570 trip/close ENS (ARP - North McCampy to Big Lake), ARP Big Lake CB 5587 trip/close ENS (ARP - North McCampy to Big Lake)	Unique de la compression de la codiçue describations que l'autre de l'action de la compression del compression de la compression del compression de la compression de la compression de la compression del compression del compression de la compression del compression	Pateface CS 3400 manual open/close EMS (T-123), Millar Creek CS 10340 open/close EMS (T-124), PRC reported a pole on first stor 13/6 febrees Phillips LC. and Patefore DA.S servitos rescionalise T-1324 to restoral load at Phillips LC. auditatelion. Load was unavailable for 53 minutes (no load at limit of veerit).	Menand da 2010 (196/AE) haga podecoj fre a 450 Trey resort is a singe pode and difficult to the access protein imma redail from the first 50 mm to 1967.	Friend Ranch CB 6765 and CB 6770 trip/close AEP (T-438). Fort Lancarter CB 13180 and CB 13190 trip/close AEP (T-438), 1 hour and 19 minute outage to T-438.	COSTSTAIN Wood (1) Libra CS 8150 to (p/m8biss) AEP confirmed operation Montentary line bitrage.		Flatonia CB 920 trip/recione (1-5.13). CB 19150 at Waelder did not operante, the Waelder - Thompsonville GB VV line 1-145 is not a fervice for maintenance. This condition made Waelder radial from Flatonia. This caused a momentary outage or 1-1 at Waelder for the City of Waelder and OFIC. and OFIC.	TOTAL CONTRACTOR CONTR	Flatonia 68KV 82 Differential trip/reset SOCC EMS. Platonia CB 950 (17.13), CB 950 (17.13) & CB 960 (17.134) trip/debes SOCC EMS. Yosakum CB 2560 trip/reclose (17.134) Waelder CB 19150 trip/reclose (17.134) Waelder CB 19150 trip/reclose (17.134) Momentary outages at Moulton T-1 (City) and Shiner T-1 (City) loads.
Auti Josephine	Line		Line	aut 💆	Cross-arm - Wood	Gross arm - Wood	Cross-arm - Wood		Line	Une structure - Wood	Une	Cross arm - Wood ?	Consultation of the consul	Arrester - Line	Too	Bus
Automatic	Automatic	in day	Automatic	Automatic	Manual	Manual	Automatic	Adomatic	Manusi	Autometics		Automatic	Automate	Automatic	* Automatics	Automatic
0.11665667	0.033333333		0.28333333	0	4.05	2.61666667	9,28333333	6.21 455546 7	16.25	2,500	1.31666667	3 80	177	0	*215.5	1.05
'XI YOT	LCRA TSC	or one	LCRA TSC	LOATSC		ACP	AEP	SCAND!	LCRATSC	A.P.	LCRA TSC	, AER	100	LCRA TSC	9	LCRA TSC
Animal Gende Suite	Foreign Interference	and and	Foreign interference	Animal - Contact - Snaker	Weather	Une Equipment Failure	Line Equipment Failure	Cun Equipment Falure	Hre	Line Equipment Fallure	Fire	Line Equipment Failure	Une Equipment Falure	Animal - Contact - Snake	Line Equipment Fallure	Animal - Contact - Bird
IOM TX	LCRA TSC	LON TSC	LCRA TSC	LOWIN	AEP	, AB	AEP	ST AS	LCRA TSC	dy.	LORA TSC	LORATSC	LCPA TSC	LORA TSC	ΛΕΡ	LCRA TSC
8	a a	Ä	138	8	138	138		8.	138	81	138	. 69	2 / 3	9	8.	6
OIL Takk	73£1		T307	70.65	AEP - North McCamey to Big Lake (AEP)	7793 AEP, Iwin Buttes to Big Lake	AEP - North McCamey to Big Lake (AEP)	99 (Fig. 1)	1724	Tigg (Ag) was a way to page (Ag) (Ag)	1438	1543	TS43	T513	AEP, Gillapia to Mason	1134
7118	8156		8135	7	7960			97 6	7594	86	87.27	995//	7565	8 257	7312	7071
777.700013.31	7/15/2009 14:47	Pripadd's/	7/5/2009 13:33	# 0 cook / G	4/28/2009 23:30	12/18/2008 14:11:	12/18/2008 10:52	77,1200	6/30/2008 14:50	6.13,200,674	6/18/2008 16:02	6/6/2008 12:06 * "47566; **	6/6/2008 12:05	5/9/2008 11:16	10/19/2007/33.25	87:002/92/5

The state of the s	AEP reports Wind Farms tripped along with North Mcamery 5w when attempting to clear Big Lake to SW Mesa for a forced outage due to pole fire, no relay data to confirm this event.	The second secon	Switch 8D's part of the auto excitosalizing scheme, SOCC RNS indicated that switch 8D' was dosed and therefore that all load was restored the first time that C 850 was closed. The switch was actually gate and SOCC had in incorrect indication and only gat of the load was restored, was actually gate and SOCC had in incorrect indication and only gat Of the load was restored.		13.24 tripped correctly Broken pole and plank erm on structure 13.1/4 (± 3-pole structure on 1-3.24). Pole was on fer Pleinle company was not pumping at this time and no customer load fost. Transmission line to be forced out until 17-00 on 2-25-06.	WW.	Both exist of the tripped connexty. Temporary SEL date at Lockbut hlowes a 90 f shult at 13 miles from Lockbut. Canding operations from 18 pers in mean of their, possibly caused to spark from Inchalact flabourer. Frame SEA is where we believe the flate occurated. Their frames with steet arm notiling persons fire former SEL is a could be dead pleased as the seminant strate views in certain have a travel from their as a mail for as the arm of the as the flate counted. This for appears to have a travel from their counter and their section of their counter. This for appears to have a travel from their counter and their section and their counter of their have a countered the meals on the based and a same time time tripped and is in distance from the relay. had installed in a first travel.	Both and so they Epipad correctly. Landowner contacted distribution pole gay M/n, causing destribution for a proper contact contact with T-340 near trape 5/4. Small fire fractional mission with T-340 near trape 5/4. Small fire manner in land mission mission in Manner in Manne		Ronnic Hearn reported transmission pole 1/2 on fire Loss of radial feed to Marchidale Posibile broken insulator on Youwer 2019, caused fine, feet. No 1981, data
The first first about the control of	AEP reports North McCamey CBs 11580 and 11600 trip/reclose [T453].		Totalina CB 2018 (Nyklendyklozerkyke Handen (28) (1940) (1940) (1940) (1941) (1940) (1941) (1940) (1		Miller Creek CB 10330 (T124) trip/close/trip. Paleface CB 3400 trip. At 10:20 attempted to close CB 3400 and it tripped beck out. Possible lightening strike.	Twin Buttes 10740/10750 tripped to lockout. Aft inported Big Lake and also locked out, Aft reported bole file.	Corpora (1980 tripped/recloses, Lockhart 1380 tripped/reclosed, Case unknown, no weather in area. Momentary outset to Camp Gary and Markindale.	Cookin 4250 trippel/recional/tripped, Valentulla 24,70 tripped/frecional/tripped. One mitter and tripped of tr	Forced outsign on 1.160 to remove trees and although	Cargon Coll. 2009 in URGARDATE, the Integrated the Attenuated to clear 89 COST Supervisors viring out-of-size Bilds constraint CIA-SOCT and reported that they had several reports of transmission pole of the behind Cardon Soc. 251 Secender in whosted on IT 851.50 Conges is wherefinding carno Gary, Revealing 6000 Cianariose 512 to Benki Valede on Tested Soc. Conges in Martindale Carno Gary, Revealing 6000 Cianariose 512 to Benki Valede on Tested Soc. 2019 1004 598 Carno Gary, Revealing 6000 Cianariose 512 to Benki Valede on Tested Soc. 2019 1004 598 Carno Gary, Soc. 2019 1005 Concern seeked on Tested Soc. 2019 1004 500 Tages 837 07/35 Celeanous 83 Sisted Benki Carno on the Carnon Carno Gary Sock (1970 CIA) The Proposal on the Envision Carnot Carno Carno Gary Sock (1970 CIA) The Proposal on the Envision Carnot Carno
poor, une seco	Line Structure - Wood		Switch		Line Structure Wood	e i per line	ínsulator - Line	Tipe	Transion - Cine	Line Structure - Wood
Automotic	Automatic	A property of the second	Automatic	. Western	Automatic	Automatic	Automatic		Manual	Automatic
ű	2.21666667	3	1.15	A)Temperal(30.68333333	0.216666667	•	0.03333333	77	15
an	AEP	24-765)	LCRA TSC	e e e e e e e e e e e e e e e e e e e	LCRA TSC	AUD.	LEPA 75C		GVEC	LCRATSC TCRATSC
Live Equipment Failure	Line Equipment Failure	Enter Management Art.	Animal - Contact - Snake		Lightning	Une Equipment Fallure	Line Equipment Fallure	Foreign Interference,	Undeficient Incide BOW	Line Equipment Failure
Ą	AEP	50 4 07	LCRA TSC	ž.	LCRA TSC	Ą	LCRA TSC	LOPA TSC.	OVEC 1 Pa Ter	LCRA TSC
2	138	8	8		138	a	59	8	2 2	
The state of the s	AEP - North McCamey to Big Lake (AEP)	4	7134	į.	1124	AEP Twin Buttes to Big Lake	1720		7,61	1720
1130	5672	3	3086	8	2908	2469	2334	581	1798	373
7,56,7007,4,00	4/3/2004 14:12	911000000 91100000000000000000000000000	6/15/2006 0:55	ge osotrett	1/28/2006 10:19	4/21/2005/12/4	12/16/2004 13:07		5/15/2003 11:30	9/13/2000 3:58

APPLICATION OF LCRA TRANSMIS-	§	BEFORE THE
SION SERVICES CORPORATION TO	§	
AMEND ITS CERTIFICATE OF CON-	§	
VENIENCE AND NECESSITY FOR THE	§	STATE OFFICE OF ADMINISTRATIVE
GILLESPIE TO NEWTON 345 KV CREZ	§	
TRANSMISSION LINE IN GILLESPIE,	§	
LLANO, SAN SABA, BURNET, AND	§	HEARINGS
LAMPASAS COUNTIES, TEXAS	8	

LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO SIX PEAKS LLC'S FIRST REQUEST FOR INFORMATION

Question No. 1-3:

Provide a copy of and identify all notes, discussion, memos, documents, communications, emails, whether relied on or not about the safety of electric transmission lines near metal structures.

Response No. 1-3:

Please refer to Mr. Symank's Direct Testimony, which describes how this transmission line will meet the requirements of the National Electrical Safety Code (NESC) including effects on metal objects. The NESC is copyrighted and can be obtained from the Institute of Electrical and Electronic Engineers (IEEE). Please also refer to the Electric Power Research Institute (EPRI) "Red Book" which is copyrighted and can be obtained from EPRI. Both of these books are voluminous and can be made available for viewing by appointment by contacting Gina Eddy or Janet McNutt at (512) 473-3287.

Preparer: Curtis Symank

Title: Engineering Supervisor, LCRA

Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA

APPLICATION OF LCRA TRANSMIS-	§	BEFORE THE
SION SERVICES CORPORATION TO	§	
AMEND ITS CERTIFICATE OF CON-	§	
VENIENCE AND NECESSITY FOR THE	§	STATE OFFICE OF ADMINISTRATIVE
GILLESPIE TO NEWTON 345 KV CREZ	§	
TRANSMISSION LINE IN GILLESPIE,	§	
LLANO, SAN SABA, BURNET, AND	§	HEARINGS
LAMPASAS COUNTIES, TEXAS	8	

LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO SIX PEAKS LLC'S FIRST REQUEST FOR INFORMATION

Question No. 1-4:

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.

Response No. 1-4:

LCRA personnel have seen numerous documents during their careers that describe how electric transmission lines and gas pipelines can be placed safely adjacent to each other. LCRA TSC has not collected, catalogued, and/or maintained a library of such documents.

LCRA TSC is aware of numerous transmission lines constructed in and through the oil and gas fields of West Texas and believes this demonstrates that transmission lines can be constructed in, near, and adjacent to oil and gas pipelines.

Also, LCRA TSC is aware that other utilities, whose applications and testimonies are publicly available from the PUC, have proposed such placement of electric transmission line in proximity to gas pipelines. For one such example, please refer to the Rebuttal Testimony of Earl L. Kirkpatrick for TXU Electric Delivery Company in PUC Docket No. 30168, which is publicly available from the Public Utility Commission.

For other documents, please refer to the transcript, LCRA TSC's rebuttal testimonies, and the proposal for decision in the Hill Country Project, PUC Docket No. 29684, which is publicly available from the PUC.

LCRA TSC is aware that some pipelines were constructed by pipeline companies after electric transmission lines were already in place, and LCRA TSC believes this demonstrates that pipeline companies believe or have the opinion that such placement could and would be done safely. Easement documents thereto are publicly available from county courthouses.

Please also refer to the Electric Power Research Institute (EPRI) "Red Book" which is copyrighted and can be obtained from EPRI. This book is voluminous and can be made available for viewing by appointment by contacting Gina Eddy or Janet McNutt at (512) 473-3287.

Preparer: Curtis Symank Title: Engineering Supervisor, LCRA

Preparer: David Turner Title: Engineering Mgr, LCRA

Sponsor: Curtis Symank Title: Engineering Supervisor, LCRA