

Control Number: 37448



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

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

**BEFORE THE
STATE OFFICE OF ADMINISTRATIVE
HEARINGS**

JUL 11 10:04 AM '10
CLERK

**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,

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By: 

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

**SOAH DOCKET NO. 473-10-1097
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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 LAMPASAS COUNTIES, TEXAS	§ § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**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/>.

Co-Preparer: Rob R. Reid
Co-Preparer: France Davis
Co-Sponsor: Rob R. Reid
Co-Sponsor: Curtis Symank
Co-Sponsor: Dennis Palafox

Title: Principal Project Director, PBS&J
Title: Sr. Project Mgr, PBS&J
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Title: Engineering Supervisor, LCRA
Title: Sr. Regulatory Case Mgr, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO
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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

[illegible]

7/26/2007 16:40	6871	AFIP - North McCarney to Big Lake (AFIP)	69	AFIP	Line Equipment Failure	AFIP	2.21666667	Automatic	Line Structure - Wood	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
11/17/2006 11:54	6440	AFIP - North McCarney to Big Lake (AFIP)	69	LCRA TSC	Line Equipment Failure	LCRA TSC	2.21666667	Automatic	Line Structure - Wood	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
6/15/2006 05:55	3086	T134	69	LCRA TSC	Animal - Contact - Snake	LCRA TSC	1.15	Automatic	Switch	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
4/20/2006 0:3	3999	T131	138	LCRA TSC	Weather	LCRA TSC	3.21666667	Manual	Line	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
1/7/2006 10:19	2908	T124	138	LCRA TSC	Lightning	LCRA TSC	30.63333333	Automatic	Line Structure - Wood	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
4/21/2006 23:37	2469	AFIP - Twin Buttes to Big Lake	138	AFIP	Line Equipment Failure	AFIP	0.21666667	Automatic	Line	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
12/16/2004 13:07	2394	T220	69	LCRA TSC	Line Equipment Failure	LCRA TSC	0	Automatic	Insulator - Line	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
3/25/2003 12:06	1819	T140	138	LCRA TSC	Foreign Interference	LCRA TSC	0.03333333	Automatic	Line	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
5/17/2003 11:30	1798	T177	69	OVCE	Line Equipment Failure	OVCE	5	Automatic	Line	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
4/14/2003 16:50	1794	T180	69	LCRA TSC	Vegetation - Inside ROW	LCRA TSC	24	Manual	Line	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
9/13/2000 1:58	371	T220	69	LCRA TSC	Line Equipment Failure	LCRA TSC		Automatic	Line Structure - Wood	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).
9/20/1999 21:53	2	T145	69	LCRA TSC	Line Equipment Failure	LCRA TSC		Automatic	Insulator - Line	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).	AFIP reports North McCarney to Big Lake (AFIP) 11500 and 14000 (re/replace) (7433).

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO
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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
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA
Title: Engineering Supervisor, LCRA

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**LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO
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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, cataloged, 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
Preparer: David Turner
Sponsor: Curtis Symank

Title: Engineering Supervisor, LCRA
Title: Engineering Mgr, LCRA
Title: Engineering Supervisor, LCRA