



Control Number: 37778



Item Number: 181

Addendum StartPage: 0

**SOAH DOCKET NO. 473-10-2461  
PUC DOCKET NO. 37778**

<b>APPLICATION OF LCRA TRANSMISSION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED TWIN BUTTES TO McCAMEY D CREZ 345 kV TRANSMISSION LINE IN TOM GREEN, IRION, AND SCHLEICHER COUNTIES, TEXAS</b>	<b>§ § § § § § § § § § §</b>	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**COMMISSION STAFF'S THIRD SET OF REQUESTS FOR INFORMATION  
TO LCRA TRANSMISSION SERVICES CORPORATION**

Pursuant to §22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission ("Staff") requests LCRA Transmission Services Corporation (LCRA TSC) to provide responses to the following question(s) under oath. The response is requested within 10 days as specified in Order No. 1 of this docket.

Pursuant to P.U.C. PROC. R. §22.144(c), each response must identify the name of the witness who will sponsor the answer and guarantee the truth of the answer. In addition, each request must be answered separately and be preceded with the appropriate question.

Pursuant to P.U.C. PROC. R. §22.144(i), LCRA TSC is under a duty to supplement any response that, in light of newly discovered information, modifies or makes incomplete an answer already supplied to Staff within five days of the discovery of the new information.

The answers must have sufficient detail to fully present all the relevant facts. Staff requests that LCRA TSC provide the answers in the order in which they are listed in this request for information. If responses to all the requests cannot be provided quickly, Staff requests that each item of information be provided as it is available or completed.

Provide an original and four copies of your answers to the questions to the Filing Clerk,

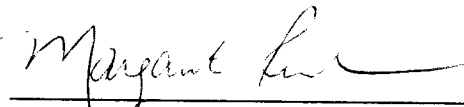
Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

**DATE: March 17, 2010**

Respectfully Submitted,

Thomas S. Hunter  
Division Director  
Legal Division

Keith Rogas  
Deputy Division Director  
Legal Division

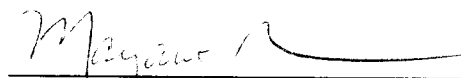


Margaret Uhlig Pemberton  
Attorney - Legal Division  
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P.O. Box 13326  
Austin, Texas 78711-3326

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on the party to whom the discovery is directed on March 17, 2010, in accordance with Order No. 1 in this docket.

  
Margaret Uhlig Pemberton

**SOAH DOCKET NO. 473-10-2461  
PUC DOCKET NO. 37778**

**COMMISSION STAFF'S SECOND SET OF REQUESTS FOR INFORMATION  
TO LCRA TRANSMISSION SERVICES CORPORATION**

**DEFINITIONS AND INSTRUCTIONS**

1. "Applicant" "you", "the utility" or "LCRA TSC" refers to LCRA Transmission Services Corporation and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
2. The term "document" or "documents" are used in their broadest sense to include, but not be limited to, all written or graphic matter of every kind and description whether printed, produced, or reproduced, by any process whether visually, magnetically, mechanically, electronically, or by hand, whether final or draft, original or reproduction, whether privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody or control. These shall also be construed to include every copy of a document where the copy contains any commentary or notation of any kinds that does not appear on the original or any other copy.
3. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
4. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
5. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."
6. The term "including" means "including but not limited to."
7. Words in the plural shall be construed to include the singular and words in the singular shall be construed to include the plural.
8. The past tense shall be construed to include the present and the present shall be construed to include the past.
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 Bate Stamp page citations and detailed cross-references.

**COMMISSION STAFF'S SECOND SET OF REQUESTS FOR INFORMATION  
TO LCRA TRANSMISSION SERVICES CORPORATION  
QUESTION NOS. STAFF-1-1 THROUGH STAFF-1-12**

Please refer to Bryant Family Trust's Supplemental Second Request for Information to LCRA TSC (2<sup>nd</sup> RFI) Attachment 1 (Link a13A) for RFI Questions Staff 3-1 through 3-\_\_\_\_\_

- Staff-3-1** Please provide costs and calculable data for Link a13A.
- Staff-3-2** Please provide costs and calculable data for the criteria in Table 6-1 of the Environmental Assessment (EA) and Alternative Route Analyses for Routes TM6 and TM8 replacing link a13 with Link a13A.
- Staff-3-3** Please describe the differences in the costs of equipment, angle structures, length of transmission line and ROW acquisition between link a13 and Link a13A.
- Staff-3-4** Please identify all habitable structures that would be within 500 feet of the centerline of Link a13A.
- Staff-3-5** In LCRA TSC's opinion, is the modification of routes TM6 and TM8 by using Link a13A instead of link a13 a viable and reliable route? If not, please explain why not.
- Staff-3-6** Using Link a13A in place of link a13 in Route TM6 (TM6'), please rank Route TM6' amongst LCRA TSC's proposed Routes TM1, TM2, TM3, TM4, TM5, TM6, TM7 and TM8.
- Staff-3-7** Does LCRA TSC consider the airstrip located on Mr. Jay Dickens's property (Tract a16-008) to be a constraint that would prevent link a14 or a16 from being used in any routes selected by the Commission?
- Staff-3-8** What could be done by LCRA TSC to accommodate Mr. Jay Dickens's airstrip, if anything? If an accommodation(s) could be used, what is the estimated cost of the accommodation(s)?

- Staff-3-9** When was the 2009 aerial photography of the study area in this docket taken and when was it available?
- Staff-3-10** RFI Staff 1-1 requested LCRA TSC to identify by name, type, owner, location, or other designation as appropriate, each existing transmission line that parallels LCRA TSC's preferred and alternative routes. Since LCRA TSC's March 2010 helicopter survey of the project area in this docket, is LCRA TSC aware of any additional transmission lines, whether private or not, located in the study area? If so, please describe approximately where they are located and whether or not they interfere with any of LCRA TSC's proposed links.
- Staff-3-11** The EA reflects that the Concho water snake has been recorded in the study area in Tom Green County. Please identify on which link(s) the Concho water snake has been recorded.
- Staff-3-12** Please provide any and all documents, including documents from Texas Parks and Wildlife (TPWD), which contains information relating to Concho water snake habitat in the study area.
- Staff-3-13** The EA reflects that the common black hawk has been reported in the study area. Please identify on which link(s) the common black hawk has been reported and/or documented.
- Staff-3-14** Please provide any and all documents, including documents from Texas Parks and Wildlife (TPWD), which contains information relating to common black hawk habitat in the study area.
- Staff-3-15** The EA reflects that the black-capped vireo is a summer resident in the study area. Please identify on which link(s) the black-capped vireo habitat is present.
- Staff-3-16** Please provide any and all documents, including documents from Texas Parks and Wildlife (TPWD), which contains information relating to black-capped vireo habitat in the study area.
- Staff-3-17** The EA reflects that the Texas horned lizard has been recorded in the study area. Please identify on which link(s) the Texas horned lizard has been recorded.
- Staff-3-18** Please provide any and all documents, including documents from Texas Parks and Wildlife (TPWD), which contains information relating to the Texas horned lizard in the study area.
- Staff-3-19** The EA reflects that the least tern (interior subspecies) has been recorded in the study area. Please identify on which link(s) the least tern has been recorded.

- Staff-3-20** Please provide any and all documents, including documents from Texas Parks and Wildlife (TPWD), which contains information relating to the least tern (interior subspecies) in the study area.
- Staff-3-21** Please explain why Table 6-1 reflects no known habitat of federally threatened/endangered species along any route when the EA reflects that the Concho water snake, the common black hawk, the Texas horned lizard, the least tern (interior subspecies) and the black-capped vireo have been recorded or reported in the study area.
- Staff-3-22** Please explain why you have included costs to mitigate endangered species along proposed routes of up to \$16.75 million when Table 6-1 reflects no known habitat of federally threatened/endangered species.
- Staff-3-23** Please provide any and all information LCRA TSC has relating to updated costs for mitigation of endangered species.