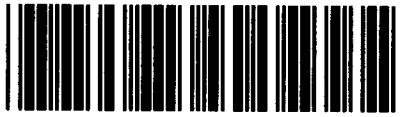
Control Number: 38283



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DOCKET NO. 38283

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR A PROPOSED TRANSMISSION LINE WITHIN HANSFORD, SHERMAN, AND MOORE COUNTIES	§ § § § § § §	PUBLIC UTILITY COMMISSION OF TEXAS

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS) QUESTION NOS. CR-1-1 THROUGH CR-1-15

The Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Public Service Company (SPS) provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the presiding officer or within 20 days, if the presiding officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three 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.

Dated: July 22, 2010

Respectfully Submitted,

Thomas S. Hunter
Division Director
Legal Division

Keith Rogas
Deputy Division Director
Legal Division

Jeffrey B. Stuart
Attorney-Legal Division
State Bar No.24066160
(512) 936-7442
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on July 22, 2010, in accordance with P.U.C. Procedural Rule 22.74.

Jeffrey B. Stuart

PUC DOCKET NO. 38283

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS) QUESTION NOS. CR-1-1 THROUGH CR-1-15

DEFINITIONS

A. "SPS," "the Company", or "you" refers to Southwestern Public Service Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

INSTRUCTIONS

1. Pursuant to P.U.C. Proc. R. 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.

2. Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

3. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.

4. 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.

5. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

6. 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.

7. 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.

PUC DOCKET NO. 38283

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS) QUESTION NOS. CR-1-1 THROUGH CR-1-15

CR-1-1 Please provide an estimated cost per mile comparison of wood vs. steel H-frame structures for this proposed project. Please include in the comparison such factors as material costs, transportation and installation costs, ROW costs, and maintenance costs. Also, please include an expected life comparison between the two structure types.

CR-1-2 The drawings for steel H-frame structures in Attachment 2 of the Application shows tangent structures have an overall width of approximately 40 feet and corner structures have an overall width of approximately 60 feet. Please explain if more than 90 feet of ROW (as proposed for this project) will be required in areas where corner structures are used. If so, please explain if the cost estimates in Attachment 3 include such additional ROW costs.

CR-1-3 Please admit or deny that the proposed transmission line is a single circuit line.

CR-1-4 Please explain why Link E was included in the preliminary alternative routes shown in Figure 2-3 of the EA and also included in the primary alternative routes in Figure 7-1 of the EA, but was not included in any of the eight proposed routes. Also, please explain if affected landowners along Link E received notice about the proposed project.

CR-1-5 Please provide the approximate distance of the oil/gas well located in Section 207 (Figure 7-1) to the closest centerline point of Link L. Please explain if this is an active well.

CR-1-6 Please explain if any communication with the Texas Railroad Commission has occurred to identify oil/gas wells in the study area. If so, please provide a copy of such communications.

CR-1-7 According to the route descriptions, the proposed transmission line routes double circuit with an existing 115 kV SPS transmission line along a portion of Links K, K1, and B and routes double circuit with an existing 345kV SPS transmission line along a portion of Link T. For each of the locations the proposed transmission line routes double circuit with an existing transmission line, please address the following:

- Explain if existing structures will be used for routing double circuit with the existing transmission lines. Include in your explanation what types of structures currently exist and whether they are capable of supporting a second circuit.

- Explain if the existing line is certificated to carry a second circuit and for what line voltage it was certificated.
- Please provide the width of the existing ROW for each of these locations.
- If existing structures cannot be used, please explain what type of structures will be used where the proposed line routes double circuit with an existing transmission line and explain if more than 90 feet of ROW will be required in these areas.

CR-1-8 Please provide justification for routing the proposed line double circuit with an existing transmission line along Links K, K1, B, and T rather than routing the proposed line parallel to the existing transmission line. Please provide the estimated cost per mile in each of the areas where the proposed line is routed double circuit with an existing transmission line.

CR-1-9 Please provide an updated list of directly affected landowners receiving notice and include each owners habitable structure number and/or section boundary number, as identified in Figure 7-1.

CR-1-10 According to Tables 4-1 through 4-8 of the EA, there appears to be either a barn (map #54) or an abandoned house & barn (map #44) located within the ROW of all proposed routes.

- Please explain what resources were used to identify these structures as a barn and/or abandoned.
- Other than the mailed landowner notice, please explain if any communication with the owners of these structures has occurred. If possible, please provide a copy of such communications.

CR-1-11 According to Figure 7-1 of the EA, the proposed transmission line appears to be in close proximity to wind turbines in Sections 30, 31, 36, 37, 38, and 143. Please provide SPS's minimum allowed distance (in feet) between the proposed route centerline and the wind turbine structures. Please explain if the owners of the wind farms are aware and agree to this minimum allowed distance and provide any communications that may exist with regard to this.

CR-1-12 According to Table 7-1 of the EA, SPS preferred Route 8 parallels or utilizes the least amount of existing transmission line ROW (13,909 feet) of all proposed routes, except Route 3 which parallels/utilizes the same. Also, Route 8 parallels the second least amount of existing corridors, including apparent property boundaries (280,373 feet). Please explain why Route 8 was selected as SPS's preferred route considering these facts.

CR-1-13 In the Application, page 30, a table shows specific contingencies and the potential problems of constructing the proposed 230 kV line from Hitchland Substation to Moore County Substation in a common corridor with existing 115kV or 345kV lines. On page 35 of the Application it states "SPS selected Alternative Route 8 as the preferred route based on a review of potential environmental impacts, land use, engineering constraints, maintenance and construction considerations, community values, estimated costs, system operations, and landowner input." Please explain if system reliability & operational concerns of constructing the proposed transmission line in a common corridor with existing 115kV and 345kV transmission lines was a consideration in selecting Route 8 as SPS's preferred route.

CR-1-14 Please explain if SPS considers all proposed routes to be viable, reliable routes. Also, please explain if SPS & SPP can maintain system reliability if the line was to be constructed on any one of the proposed routes. If applicable, please include any potential impacts to the transmission transfer capacities to operate any one of the proposed routes reliably.

CR-1-15 In the Application, page 22, Table 13.2 shows the forecasted modeled area loads to increase from 872.4MW (Summer 2010) to 948.6MW (Summer 2014). Considering these forecasted loads and referring to Table 13.5 on page 28 (and page 30) of the Application, please explain the decrease in base case loading % on the Hitchland 230/115 kV transformer for years 2010-2014 for a contingency on the Potter Co. 345/230 kV transformer or the Potter Co. to Hitchland Substation 345kV line.