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APPLICATION OF SHARYLAND § BEFORE THE STATE OFFICE
UTILITIES, L.P. TO AMEND ITS §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE §
PROPOSED HEREFORD TO WHITE § OF
DEER 345 KV CREZ TRANSMISSION §
LINE IN ARMSTRONG, CARSON, §
DEAF SMITH, OLDHAM, POTTER, §
AND RANDALL COUNTIES, TEXAS § ADMINISTRATIVE HEARINGS

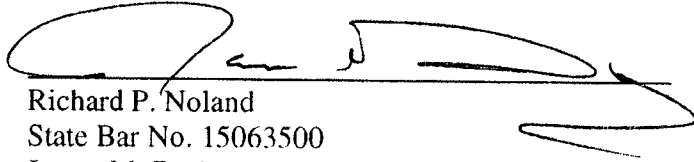
**SHARYLAND UTILITIES, L.P.'S SECOND REQUESTS
FOR INFORMATION TO CIELO WIND SERVICES, INC.**

Sharyland Utilities, L.P. ("Sharyland") requests that Cielo Wind Services, Inc. ("Cielo") fully respond to the second request for information ("RFI"), attached as Exhibit A to this pleading, within ten (10) days of receipt, pursuant to P.U.C. PROC. R. 22.144(c) and Order No. 1 in this proceeding.

Responses to the attached requests shall conform in all respects to the Commission's rules, including the requirement in P.U.C. PROC. R. 22.144(c)(2)(F) that they be made under oath. Responses shall identify the preparer or person under whose direct supervision each response was prepared, and the sponsoring witness, if any. Each request shall be answered separately; responses shall be preceded by the request to which the answer pertains.

Any information responsive to and any questions regarding these requests should be directed to the undersigned.

Respectfully submitted,



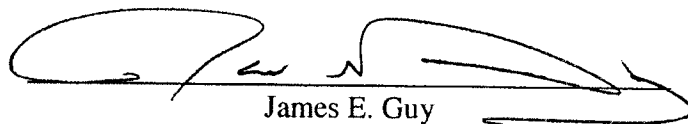
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Attorneys for Sharyland Utilities, L.P.

August 31, 2010

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on all parties of record on this 31st day of August 2010.



James E. Guy

**SHARYLAND UTILITIES, L.P.'S SECOND REQUEST
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General Instructions

1. In responding to each RFI, please provide information available from all corporate and individual files, as well as from all past and present employees, officers, and board members and all predecessors and affiliates, as defined below.
2. These RFIs are continuing in nature, and require supplemental responses in accordance with P.U.C. PROC. R. 22.144(i).
3. If any information is not available in the exact form requested, provide whatever information or documents that best respond to the information request.
4. If the requested information or data are available for only part of the period requested or are otherwise incomplete, please provide such data as are available.
5. If any RFI appears ambiguous, please contact counsel for Sharyland as soon as possible to obtain clarification.
6. Each document of more than one page should be stapled or otherwise bound, and the individual pages numbered consecutively.
7. If, in the case of any RFI seeking documents, there are no responsive documents, so state and provide a narrative answer to the request.
8. The terms "and" and "or" should be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of each RFI information or documents which might otherwise be considered to be beyond its scope.
9. The singular form of a word should be interpreted as plural, and the plural form of a word should be interpreted as singular, whenever appropriate, in order to bring within the scope of each data request information or documents which might otherwise be considered to be beyond its scope.
10. When the recipient of the information request is requested to provide a study, schedule, or analysis, it should also provide the workpapers, underlying facts, inferences, suppositions, estimates, and conclusions necessary to support each study, schedule, or analysis.
11. If the actual data are unavailable, but estimates or approximations are available, provide the estimates or approximations that are the best available information and explain the procedure for developing the information supplied.

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**SHARYLAND UTILITIES, L.P.'S SECOND REQUEST
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Definitions

1. "Cielo Wind Services, Inc." or "Cielo" refers to, for purposes of these RFIs, Cielo Wind Services, Inc., and any merged, consolidated, or acquired predecessors or predecessor in interest, its subsidiaries, past or present, and its employees, officers, directors, agents, consultants, and all persons acting under contractual arrangements with, or purporting to act on its behalf.
2. "Date" shall mean the exact day, month and year if ascertainable, or if not, the best approximation thereof in relation to other events.
3. To "describe," "detail," or "state" shall mean to relate as completely as possible each and every act, omission, incident, event, condition, circumstance, or thing relating directly or indirectly to the subject of the description, including all pertinent dates. These terms call for answers independent from any documents that are required in response to requests. Such answers should be in a form (*e.g.*, narrative, tabular, etc.) appropriate to a complete response to the request.
4. The terms "document" or "documents" are used in their broadest sense to include, by way of illustration and not limitation, 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 or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. "Document" or "documents" shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.
5. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."
6. To "explain" means to make known in detail, to make clear the cause or reason of and account for each act, omission, incident, event, condition, circumstance, decision, and/or thing relating directly or indirectly to the subject of the explanation including all pertinent dates. This term calls for answers independent from any documents that are required in

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response to requests. Such answers should be in a form (*e.g.*, narrative, tabular, etc.) appropriate to a complete response to the request.

7. To “identify” a person means to include his or her full name, including middle name or initial, his or her employer or other organizational affiliation at the date of the relevant transaction or event and at the present, his or her title and duties in the company or other organization with which he or she was then affiliated and is now affiliated, and his or her last known business address and telephone number or if not available last known residence address and telephone number.
8. “Identification” of, or to “identify,” a document means to provide facts sufficient to establish the identity of the document or other thing(s) at issue, such as (a) the type or nature of the document (*e.g.*, letter, memorandum, corporate minutes), (b) the data, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who wrote, dictated, or otherwise participated in the writing of the document, (h) the identity of each person who signed or initialed the document, (i) the identity of each person to whom the document was addressed, (j) the present location of the document; and (k) the identity of each person having custody of, or control over, the document. Identification of the document includes identifying all documents known or believed to exist, whether or not in the custody of its attorneys or other representatives. The final version and each draft of each document should be identified and produced separately. If a document is no longer in your possession or control, state what disposition was made of it. A document need not be identified if it is produced.
9. The term “including,” or one of its inflections, means and refers to “including but not limited to.”
10. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or *ad hoc*), joint venture, cooperative, municipality, commission, or governmental body or agency.
11. “Relating to” or “relates to” means comprising, embodying, addressing, presenting, discussing, concerning, referring to, pertaining to, regarding, containing, reflecting, evidencing, describing, showing, identifying, providing, disproving, consisting of, supporting, contradicting, commenting upon, analyzing, or mentioning in any way.

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Requests for Information

General

SU-Cielo 2-1

Please state the shortest distance between a turbine and any overhead transmission line greater than 69 kV for any wind farm that Cielo developed in the State of Texas.

SU-Cielo 2-2

With respect to the Wildorado Two Wind Project, does Cielo have any agreements with any landowner who is an intervenor in this case relating to the construction or placement of wind turbines or transmission lines on such landowner's property? If so, please identify each such landowner, and provide copies of all documents which describe the nature of the agreement(s).

SU-Cielo 2-3

Please identify each instance that Cielo is aware of where wind farm infrastructure or turbines were damaged by transmission line construction. For each such instance, please state the date, location, nature of the damage, and cause of the damage. Provide all documents or communications that discuss, address, or relate to the potential for damage to wind farm infrastructure or turbines by electric transmission line construction.

SU-Cielo 2-4

Please provide any documents or communications that discuss, address, or relate to the ability of Cielo to adjust the planned location of its turbines on the Wildorado Two Wind Project.

Direct Testimony of Melissa Miller

SU-Cielo 2-5

Please provide copies of all workpapers Ms. Miller utilized in preparing her Direct Testimony.

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SU-Cielo 2-6

Please provide copies of all documents on which Ms. Miller relied in connection with preparing her Direct Testimony or which formed the basis for her opinions and recommendations set forth in that Testimony.

SU-Cielo 2-7

(Page 6, lines 12-15) – Concerning Ms. Miller’s concern in the referenced testimony that construction of a transmission line on the Cielo 2 site would damage Cielo’s equipment or infrastructure:

- (a) Please identify each specific infrastructure item that Cielo believes could be damaged by construction of the proposed transmission line, explain the nature of the potential damage, and describe what precautions could be taken to prevent such damage.
- (b) Please identify each specific turbine location that Cielo believes could be damaged by construction of the proposed transmission line, describe the nature of the potential damage, and explain what precautions could be taken to prevent such damage.

SU-Cielo 2-8

(Page 6, line 18) – Concerning Ms. Miller’s statement in the referenced testimony that the proposed line would create a “no mans land:”

- (a) Please specifically identify what further development or support structures Cielo plans to construct that would be precluded by the proposed transmission line and explain specifically how the presence of the line would preclude such construction or development.
- (b) Utilizing Cielo’s 471 foot buffer zone, on the map provided as an attachment to Ms. Miller’s testimony, identify each specific turbine that Cielo would be prevented from constructing if the proposed transmission line is constructed.
- (c) For each turbine identified in response to (b), please identify any minor route deviation that would allow both the turbine and the transmission line to be constructed.

Relative to (a) construction activities and (b) operation and maintenance activities of wind turbines, what is Cielo’s minimum distance requirement between the edge of a transmission line right-of-way and a wind turbine? Please provide all documents or

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communications, and references to applicable codes and standards, both codified and internal, that support this distance.

SU-Cielo 2-9

Please state the shortest distance between any of the turbine locations shown on the map attached to Ms. Miller's testimony and the existing 69 kV and 230 kV transmission lines on the Wildorado Two Wind Project.