



Control Number: 38290



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SOAH DOCKET NO. 473-10-4790
PUC DOCKET NO. 38290

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

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

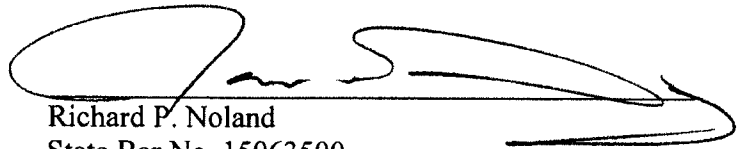
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**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

Sharyland Utilities, L.P. ("Sharyland") files this response to Kenneth Eugene Scivally's First Request for Information ("RFI") to Sharyland. Sharyland received Mr. Scivally's First RFIs on September 7, 2010. Pursuant to Order No. 1, Sharyland's response is due on September 17, 2010. This response is therefore timely filed. All parties may treat these answers as if they were filed under oath.

Sharyland reserves the right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,



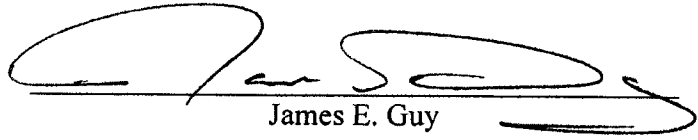
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Attorneys for Sharyland Utilities, L.P.

September 16, 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 16th day of September 2010.



James E. Guy

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-1

Please provide environmental data, equivalent to that appearing in Table 6-1 on Page 6-3 of the Environmental Assessment and Alternative Route Analysis in the Application, and cost estimates for a route that utilizes the following links: C, L, L', M, N, O, P, X, FF, II, HH, HH', HH'', HH''', QQ, VV.

RESPONSE:

For the purposes of this response, Sharyland refers to the alternative route comprising the links listed in this question as Route 14. The table below contains an estimate of the Total Project Cost (as that term is used in Attachment 3 of the Application) for Route 14.

Route 14	Transmission Facilities	Hereford Station Facilities	White Deer Station Facilities
Right-of-Way and Land Acquisition	\$ 4,373,951	\$ 272,500	\$ 272,500
Engineering and Design (Utility)	\$ 218,796	\$ 180,625	\$ 180,787
Engineering and Design (Contract)	\$ 5,253,839	\$ 3,766,222	\$ 4,461,528
Procurement of Material and Equipment (including stores)	\$ 47,739,302	\$ 8,316,335	\$ 17,393,729
Construction of Facilities (Utility)	\$ 481,484	\$ 373,969	\$369,861
Construction of Facilities (Contract)	\$ 51,025,543	\$ 12,660,638	\$18,589,869
Other (all costs not included in the above categories)	\$ 2,462,107	\$ 868,569	\$914,998
Estimated Total Cost	\$ 111,555,023	\$ 26,438,858	\$ 42,183,272
Total Project Cost			\$ 180,177,152

Please see attached Exhibit KES-SU 1-1 for environmental data for Route 14 equivalent to that appearing in Table 6-1 of the Environmental Assessment.

Preparer: Rob R. Reid
Mark D. Meyer

Sponsor: Rob R. Reid
Mark D. Meyer

*PUC Docket No. 38290
Sharyland Utilities, L.P.'s Response to Kenneth Eugene Scivally's
First Request for Information*

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-2

Please provide that length in feet and miles of links B + D.

RESPONSE:

The length in miles of Links B and D can be derived by summing the data provided for these two links in Supp. Exhibit Seewald-SU 1-1, provided by Sharyland in its supplemental response to Seewald-SU 1-1(RFI) on August 25, 2010.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-3

Please provide the length in feet and miles of links C+ L+ L'.

RESPONSE:

The length in miles of Links C, L, and L' can be derived by summing the data provided for these three links in Supp. Exhibit Seewald-SU 1-1, provided by Sharyland in its supplemental response to Seewald-SU 1-1(RFI) on August 25, 2010.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-4

Please provide the length in feet and miles of length of ROW parallel to other existing ROW for links B + D

RESPONSE:

The length in miles of ROW parallel to other existing ROW for Links B and D can be derived by summing the data provided for these two links in Supp. Exhibit Seewald-SU 1-1, provided by Sharyland in its supplemental response to Seewald-SU 1-1(RFI) on August 25, 2010.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-5

Please provide the length in feet and miles of length of ROW parallel to other existing ROW for links C + L + L'.

RESPONSE:

The length in miles of ROW parallel to other existing ROW for Links C, L, and L' can be derived by summing the data provided for these three links in Supp. Exhibit Seewald-SU 1-1, provided by Sharyland in its supplemental response to Seewald-SU 1-1(RFI) on August 25, 2010.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-6

Please provide the length in feet and miles of length of ROW paralleling apparent property lines (not following existing ROW) for links B + D.

RESPONSE:

The length in miles of ROW paralleling apparent property lines (not following existing ROW) for Links B and D can be derived by summing the data provided for these two links in Supp. Exhibit Seewald-SU 1-1, provided by Sharyland in its supplemental response to Seewald-SU 1-1(RFI) on August 25, 2010.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-7

Please provide the length in feet and miles of length of ROW paralleling apparent property lines (not following existing ROW) for links C + L + L'.

RESPONSE:

The length in miles of ROW paralleling apparent property lines (not following existing ROW) for Links C, L, and L' can be derived by summing the data provided for these three links in Supp. Exhibit Seewald-SU 1-1, provided by Sharyland in its supplemental response to Seewald-SU 1-1(RFI) on August 25, 2010.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-8

Please provide the length in feet and miles of length of ROW paralleling section lines for links B + D.

RESPONSE:

PBS&J calculated length of ROW paralleling apparent property lines (not following existing ROW), which may or may not coincide with section lines. PBS&J has not specifically calculated the length of ROW paralleling section lines.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-9

Please provide the length in feet and miles of length of ROW paralleling section lines for links C + L + L'.

RESPONSE:

PBS&J calculated length of ROW paralleling apparent property lines (not following existing ROW), which may or may not coincide with section lines. PBS&J has not specifically calculated the length of ROW paralleling section lines.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-10

Please provide the distance in feet and miles of the nearest proximity of links B +D to the nearest boundary of Buffalos Lake Wildlife Refuge.

RESPONSE:

According to Figure 2-6c of the Environmental Assessment, the distance of the nearest proximity of Links B and D to the nearest boundary of Buffalo Lake National Wildlife Refuge is approximately 6,500 feet (1.23 miles).

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-11

Please provide the distance in feet and miles of the nearest proximity of links C +L + L' to the nearest boundary of Buffalo Lake Wildlife Refuge.

RESPONSE:

According to Figure 2-6c of the Environmental Assessment, the distance of the nearest proximity of Links C, L, and L' to the nearest boundary of Buffalo Lake National Wildlife Refuge is 27,800 feet (5.3 miles).

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
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KES-SU 1-12

Please provide the distance in feet and miles of length of ROW that parallels neither existing ROW, apparent property lines, or section lines for links B + D.

RESPONSE:

PBS&J has not specifically calculated the length of ROW paralleling section lines. For Links B and D, the length of ROW that does not parallel existing transmission line ROW, other existing ROW, or apparent property lines can be calculated by subtracting the sum of lines 4, 5, and 6 from line 1 (length of alternative route) in Supp. Exhibit Seewald-SU 1-1, provided by Sharyland in its supplemental response to Seewald-SU 1-1(RFI) on August 25, 2010.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

**SHARYLAND UTILITIES, L.P.'S RESPONSE TO
KENNETH EUGENE SCIVALLY'S FIRST REQUEST FOR INFORMATION**

KES-SU 1-13

Please provide the distance in feet and miles of the length of ROW that parallels neither existing ROW, apparent property lines, or section lines for links C + L + L'.

RESPONSE:

PBS&J has not specifically calculated the length of ROW paralleling section lines. For Links C, L, and L', the length of ROW that does not parallel existing transmission line ROW, other existing ROW, or apparent property lines can be calculated by subtracting the sum of lines 4, 5, and 6 from line 1 (length of alternative route) in Supp. Exhibit Seewald-SU 1-1, provided by Sharyland in its supplemental response to Seewald-SU 1-1(RFI) on August 25, 2010.

Preparer: Rob R. Reid

Sponsor: Rob R. Reid

REVISED ENVIRONMENTAL DATA FOR ALTERNATIVE ROUTE EVALUATION
 HEREFORD (PANHANDLE AB) TO WHITE DEER (PANHANDLE BA) 345-KV TRANSMISSION LINE PROJECT

Scivally Route 14

Land Use	Miles	Feet
1 Length of alternative route	82.60	436,145
2 Number of habitable structures ¹ within 500 ft of ROW centerline	64	
3 Number of newly affected habitable structures within 500 ft of ROW centerline	58	
4 Length of ROW parallel to existing transmission line ROW	13.26	70,010
5 Length of ROW parallel to other existing ROW (highways, pipelines, railways, etc.)	21.68	114,455
6 Length of ROW paralleling apparent property lines (not following existing ROW)	29.23	154,310
7 Length of ROW crossing parks/recreational areas ²	0.00	0
8 Number of additional parks/recreational areas ² within 1,000 ft of ROW centerline	0	
9 Length of ROW crossing cropland	26.43	139,525
10 Length of ROW crossing pastureland/rangeland	55.21	291,505
11 Length of ROW crossing cropland or pastureland with mobile irrigation systems	0.49	2,570
12 Number of pipeline crossings	26	
13 Number of transmission line crossings	10	
14 Number of U.S. and state highway crossings	5	
15 Number of farm-to-market (FM) road crossings	11	
16 Number of FAA-registered airfields within 20,000 ft of ROW centerline	5	
17 Number of private airstrips within 10,000 ft of ROW centerline	2	
18 Number of heliports within 5,000 ft of ROW centerline	1	
19 Number of commercial AM radio transmitters within 10,000 ft of ROW centerline	2	
20 Number of FM radio transmitters, microwave towers, and other electronic installations within 2,000 ft of ROW centerline	3	
Aesthetics		
21 Estimated length of ROW within foreground visual zone ³ of U.S. and state highways	5.08	26,800
22 Estimated length of ROW within foreground visual zone ³ of parks/recreational areas	1.77	9,335
Ecology		
23 Length of ROW crossing upland woodland/brushland	0.00	
24 Length of ROW crossing bottomland/riparian woodland/brushland	0.00	
25 Length of ROW crossing potential wetlands (excluding playa lakes)	0.53	2,775
26 Length of ROW crossing known habitat of endangered or threatened species	0.00	0
27 Number of stream/river crossings	20	
28 Length of ROW paralleling (within 100 ft) streams	0.49	2,570
29 Length of ROW crossing open water (playa lakes, ponds, etc.)	2.48	13,080
30 Number of playa lake crossings	12	15
31 Length of ROW crossing 100-year floodplains ⁴	4.31	22,765
Cultural Resources		
32 Number of recorded cultural resources sites crossed by ROW	0	
33 Number of recorded cultural resources sites within 1,000 ft of ROW centerline	0	
34 Number of NRHP-listed or -eligible sites crossed by ROW	0	
35 Number of NRHP-listed or -eligible sites within 1,000 ft of ROW centerline	0	
36 Length of ROW crossing areas of high archaeological/historical site potential	23.63	124,765

Note: All length measurements in Miles

¹Residences, businesses, schools, churches, hospitals, nursing homes, etc.

²Defined as parks and recreational areas owned by a governmental body or an organized group, club, or church

³One-half mile, unobstructed

⁴The Federal Emergency Management Agency (FEMA) has not conducted floodplain analyses for Armstrong, Carson, Deaf Smith, or Oldham counties. Therefore, these estimates represent length of ROW crossing floodplains in Potter and Randall counties only