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Addendum StartPage: 0

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LAW OFFICE

APPLICATION OF WIND ENERGY § BEFORE THE STATE OFFICE
TRANSMISSION TEXAS, LLC FOR A §
CERTIFICATE OF CONVENIENCE AND §
NECESSITY FOR THE PROPOSED § OF
SCURRY COUNTY SOUTH – LONG §
DRAW – GRELTON – ODESSA 345-KV §
CREZ TRANSMISSION LINES IN § ADMINISTRATIVE HEARINGS
SCURRY, MITCHELL, BORDEN, §
HOWARD, DAWSON, MARTIN, §
MIDLAND, AND ECTOR COUNTIES §

**WIND ENERGY TRANSMISSION TEXAS, LLC'S RESPONSE TO
SOUTHWESTERN PUBLIC SERVICE COMPANY'S FIRST REQUEST FOR
INFORMATION**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

WIND ENERGY TRANSMISSION TEXAS, LLC (WETT) files this Response to the
aforementioned request for information.

**I.
WRITTEN RESPONSES**


Attached hereto and incorporated herein by reference are WETT's written responses to the
aforementioned request for information. Each such response is set forth on or attached to a separate
page upon which the request has been restated. Such responses are also made without waiver of
WETT's right to contest the admissibility of any such matters upon hearing. WETT hereby stipulates
that its responses may be treated by all parties exactly as if they were filed under oath.

**II.
INSPECTIONS**

In those instances where materials are to be made available for inspection by request or in
lieu of a written response, the attached response will so state. For those materials that a response
indicates may be inspected at Wind Energy Transmission Texas, LLC, 210 Barton Springs Road,
Suite 150, Austin, Texas 78704 or at the offices of Naman, Howell, Smith & Lee, PLLC, 8310
Capital of Texas Highway North, Suite 490, Austin, Texas 78731.

Respectfully submitted,

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**ATTORNEYS FOR WIND ENERGY
TRANSMISSION TEXAS, LLC**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on the requesting party on this 1st day of November, 2010.



Stephen F. Morris

QUESTION 1-1

During the construction phase of WETT's proposed transmission line, what protective measures will be used to protect existing transmission lines that will be crossed?

RESPONSE:

The following response was prepared by or under the direct supervision of Stan Tessmer, the sponsoring witness for this response.

WETT plans to take steps to prevent any physical contact to existing lines during the construction phase. Such possible steps include using truck-mounted booms or installing guard structures, such as poles with cross arms. In some instances, if appropriate measures cannot adequately prevent damage to facilities or safety of personnel at line crossings, brief outages on existing lines may be required.

QUESTION 1-2

Will WETT agree to coordinate with SPS to determine any impact of mutual coupling on SPS's existing lines, before WETT places its line in service?

RESPONSE:

The following response was prepared by or under the direct supervision of Stan Tessmer, the sponsoring witness for this response.

Yes. To the extent the PUC selects routes parallel to SPS lines, WETT will coordinate with SPS regarding the possible impact of mutual coupling on SPS's existing lines. This coordination would occur after route certification but before WETT places its lines in service.

QUESTION 1-3

Has WETT performed any analysis or reviewed any research performed by others related to the effects of mutual coupling and/or induced fields between transmission lines operated in proximity to each other, which are not electrically connected and operate in separate grid systems? If so, please provide the results of any such analysis and the reviewed research materials.

RESPONSE:

The following response was prepared by or under the direct supervision of Stan Tessmer, the sponsoring witness for this response.

No. However, to the extent necessary, WETT will coordinate with SPS to address such issues after the certification of routes and prior to final design.

QUESTION 1-4

If mutual coupling and/or induced fields between WETT's proposed transmission line and SPS's existing lines damage or otherwise impair the operation of SPS's facilities or service to SPS's transmission customers, will WETT agree to compensate SPS for the reasonable cost of repairs or upgrades to its system to remedy such damage or impairment?

RESPONSE:

The following response was prepared by or under the direct supervision of Stan Tessmer, the sponsoring witness for this response.

After route certification, if it is determined that the operation of existing SPS facilities or service to SPS customers will be impaired or damaged by the placement of WETT's facilities, then WETT will work in good faith with SPS to address these issues. To the extent necessary, WETT would either compensate SPS for the reasonable costs of repairs or otherwise remedy the damage or impairment to the operation of SPS facilities.

QUESTION 1-5

If it is determined that SPS's existing transmission or distribution facilities will need to be relocated due to the construction of WETT's proposed transmission line, will WETT agree to compensate SPS for the reasonable cost of relocating said facilities?

RESPONSE:

The following response was prepared by or under the direct supervision of Stan Tessmer, the sponsoring witness for this response.

After route certification, if it is determined that the SPS facilities need to be relocated due to the placement of WETT's facilities, then WETT will work in good faith with SPS to address the issue. To the extent necessary, if relocation is the best method of mitigating the damage or impairment, WETT would compensate SPS for the reasonable costs of relocating its facilities.