

Control Number: 38743



Item Number: 159

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## SOAH DOCKET NO. 473-11-0945 PUC DOCKET NO. 38743

APPLICATION OF ELECTRIC	§	PUBLIC UTILITY COMMISSION &
TRANSMISSION TEXAS, LLC TO	§	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR	§ 8	OF TEXAS
THE TESLA TO EDITH CLARKE TO	§	
CLEAR CROSSING TO WEST	§	
SHACKELFORD 345-KV CREZ	§	
TRANSMISSION LINE IN CHILDRESS,	§	
COTTLE, HARDEMAN, FOARD, KNOX,	§	
HASKELL, JONES, AND SHACKELFORD	§	
COUNTIES	§	

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO ELECTRIC TRANSMISSION TEXAS, LLC QUESTION NOS. BA-1-1 THROUGH BA-1-7

The Staff of the Public Utility Commission of Texas (Staff) requests that Electric Transmission Texas, LLC (ETT) 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 10 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.

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Dated: December 7, 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 December 7, 2010, in accordance

with Order No. 1 in this docket..

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## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO ELECTRIC TRANSMISSION TEXAS, LLC QUESTION NOS. BA-1-1 THROUGH BA-1-7

#### **DEFINITIONS**

A. "ETT," "the Company", or "you" refers to Electric Transmission Texas, LLC 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.

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#### COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO ELECTRIC TRANSMISSION TEXAS, LLC QUESTION NOS. BA-1-1 THROUGH BA-1-7

- BA-1-1 Please provide an estimated cost by link for each alternate route provided in Attachment 9 of the Application using the same categories of costs.
- BA-1-2 Using the same cost categories as presented in Attachment 9, please provide cost estimates for the use of lattice structures by route and link for each of the alternate routes.
- BA-1-3 Does ETT propose to directly embed the monopoles or use a concrete/steel foundation for the structures proposed in the Application?
- Please provide an estimated installed cost of typical structures that would be used if the selected routes were constructed using monopoles. Include in the estimate the height of the structure, type of soil, structure type (tangent, and appropriate angle structures), typical span in feet, number of tangent structures per mile, and required ROW width.
- BA-1-5 Please provide an estimated installed cost of typical structures that would be used if the selected routes were constructed using lattice towers. Include in the estimate the height of the structure, type of soil, structure type (tangent, and appropriate angle structures), typical span in feet, number of tangent structures per mile, and required ROW width.
- BA-1-6 Has ETT contracted with a company that will construct this CREZ project? If so, please state whether this company is capable of erecting both monopole and lattice towers.
- BA-1-7 Please provide a description of the delays that ETT or AEP has experienced in other transmission projects because of the use of lattice towers and delays caused by missing or wrong parts.