



Control Number: 38825



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PUC DOCKET NO. 38825  
SOAH DOCKET NO. 473-11-1266

APPLICATION OF WIND ENERGY §  
TRANSMISSION TEXAS LLC TO §  
AMEND ITS CERTIFICATE OF §  
CONVENIENCE AND NECESSITY FOR §  
THE LONG DRAW TO SAND BLUFF, §  
SAND BLUFF TO BEARKAT 345-KV §  
CREZ TRANSMISSION LINES IN §  
BORDEN, COKE, GLASSCOCK, §  
HOWARD, MITCHELL, AND §  
STERLING COUNTIES §

PUBLIC UTILITY COMMISSION

OF TEXAS

PUBLIC UTILITY COMMISSION  
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**GARRETT FAMILY PARTNERSHIP'S SECOND SET OF  
REQUESTS FOR INFORMATION TO WETT**

Pursuant to § 22.144 of the Commission's Procedural Rules and Order No. of this proceeding, Dorothy Garrett Family Partnership, LP, Sue Partee, Matthew Garrett Turner, Lindley Cole Turner, and Austin Trust Company, Matthew Garrett Turner and Lindley Cole Turner, co-trustees of the Matthew Garrett Turner Trust u/w/o Dorothy Ann Turner, deceased, and the Lindley Cole Turner Trust u/w/o Dorothy Ann Turner, deceased (collectively, "Garrett Family Partnership") request that Wind Energy Transmission Texas, LLC (WETT), by and through its attorneys of record, provide all of the information requested on the attached Exhibit "A" within ten (10) calendar days of receipt.

Pursuant to P.U.C. PROC. R. 22.144(c)(2), Garrett Family Partnership further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to P.U.C. PROC. R. 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. Garrett Family Partnership further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested.

All information responsive to the requests on the attached Exhibit "A" should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

Mr. Lino Mendiola  
Ms. Tammy Cooper  
Ms. Katherine Coleman  
Andrews Kurth LLP  
111 Congress Avenue, Suite 1700  
Austin, Texas 78701  
(512) 320-9200  
(512) 320-9292 (fax)  
[lmendiola@andrewskurth.com](mailto:lmendiola@andrewskurth.com)  
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### **DEFINITIONS AND INSTRUCTIONS**

A. "Wind Energy Transmission Texas, LLC," "WETT," "the Company," "you" or "your" refers to Wind Energy Transmission Texas, LLC and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons, including kp environmental, LLC.

B. 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.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Garrett Family Partnership specifically requests that any electronic or magnetic data (which is included in the definition of "document") that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests.

D. The terms "and" and "or" shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."

F. "Any" shall be construed to include "all" and "all" shall be construed to include "any."

G. The term "concerning," or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term "including," or one of its inflections, means and refers to "including but not limited to."

I. 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.

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

K. 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 of copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to P.U.C. Proc. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

Respectfully submitted,

ANDREWS KURTH LLP




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Lino Mendiola  
State Bar No. 00791248  
Tammy Cooper  
State Bar No. 00796401  
Katherin Coleman  
State Bar No. 24059596  
111 Congress Avenue, Suite 1700  
Austin, Texas 78701  
(512) 320-9200  
(512) 320-9292 (fax)

ATTORNEYS FOR GARRETT  
FAMILY PARTNERSHIP

**CERTIFICATE OF SERVICE**

I, Katherine Coleman, Attorney for Garrett Family Partnership, hereby certify that a copy of this document was served on Wind Energy Transmission Texas, LLC on this 12th day of January, 2011, in accordance with Order No. 1.

  
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Katherine Coleman

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- GFP 2-1.** Please provide a cost estimate for a Long Draw to Sand Bluff route that uses the following links: A5, B5, C5, AV5, AQ5, K5, N5, P5, S5, AY5, FO5, BF5, BL5, BS5, BW5, CF5, CQ5, CW5, CZ5, CT5, DF5, DN5, DO5, DU5, DX5, EI5, EL5, EP5, EY5.
- GFP 2-2.** For the route identified in GFP 2-1, please provide data for the factors in column 2 of Table 7-2 of the Environmental Assessment.
- GFP 2-3.** For the route identified in GFP 2-1, is this a viable route that WETT can reliably construct and operate? If your answer is no, please describe the engineering or other issues that impair the route's viability.
- GFP 2-4.** Please provide the estimated difference in cost per mile between lattice structures and monopoles.