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

**DRIVER FAMILY, ESTATE OF ALMA M. DRIVER, SKIPPER DRIVER,
EXECUTOR, ESTATE OF E. P. DRIVER, SKIPPER DRIVER, EXECUTOR,
AND WILLIAM DRIVER, AND JOHN B. PHILLIPS' SECOND SET OF REQUEST
FOR INFORMATION TO WIND ENERGY TRANSMISSION TEXAS, LLC**

Pursuant to Rule 22.144 of the Procedural Rules of the Public Utility Regulatory Commission of Texas, Intervenor, requests that WETT furnish all items of information and answer all requests attached hereto. General instructions and definitions to be used in responding to these requests are attached.

Responses shall conform in all respects to the Commission's rules. Responses shall identify the preparer or persons 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 questions regarding these requests should be directed to the undersigned.

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Respectfully submitted,

**STUBBEMAN, McRAE, SEALY,
LAUGHLIN & BROWDER, INC.**

Pat Long Weaver

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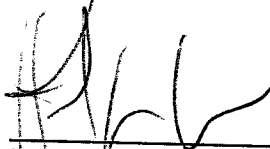
By: 

Pat Long Weaver

**ATTORNEY FOR DRIVER FAMILY, ESTATE
OF ALMA M. DRIVER, SKIPPER DRIVER,
EXECUTOR, ESTATE OF E. P. DRIVER,
SKIPPER DRIVER, EXECUTOR, AND
WILLIAM DRIVER, AND JOHN B. PHILLIPS**

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2011, a true and correct copy of the foregoing William Driver, The Estate of Alma M. Driver and John B. Phillips' First Set of Request for Information to Wind Energy Transmission Texas LLC was sent for filing with the Commission and a copy has been provided to all parties of record in this matter pursuant to Commission rules.


Pat Long Weaver

Definitions

1. "WETT" refers to the Wind Energy Transmission Texas, LLC.
2. "Applicant" refers to LCRA TSC.
3. "You," "yours," and "your" refer to WETT (as defined above), including its Directors, officers, employees, consultants, agents and attorneys.
4. "Identification" of, or to "identify," a document includes stating the type or nature of the document, (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 attorney or other representatives. The final version and each draft of each document should be identified and produced separately. If any document requested to be identified was but is no longer in your possession or control or is no longer in existence, state whether it is (i) missing or lost; (ii) destroyed; (iii) transferred voluntarily or involuntarily to others and, if so, to whom; or (iv) otherwise disposed of. In each such instance, explain the circumstances surrounding an authorization of such disposition thereof, state the approximate date thereof, and describe its contents.
5. "Identification: of, or to" identify," a person includes stating his or her full name, the corporate, partnership or proprietorship name or names, the most recent known business address and telephone number, the most recent known residence address and telephone number, his or her present position or title, and his or her prior connection or association with any party to this proceeding.
6. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate, partnership, association (whether formally organized or ad hoc), joint venture, cooperative, municipality, commission, or governmental body or agency.
7. "Relating to" or "relates to" means presenting, discussing, commenting upon, analyzing, or mentioning in any way.
8. "Document" should be interpreted broadly to include but not be limited to the original or any copy, of any kind, regardless of origin or location, or any book, pamphlet, periodical, publication, letter, exhibit, pleading, scrapbook, diary, calendar, cancelled check, photograph, form, memorandum, schedule, telegram, report, record, order of notice of the Commission or other governmental action of any kind, study, handwritten or typed notes, draft working paper, chart, map, minutes, logs, graph, index, tape, disc,

internal operating manual, data sheet or data processing card, or any other written or retrievable matter of date of any kind, however produced or reproduced, to which you have or have had access. Any document that is not exactly identical to another document for any reason, including marginal notations or deletions, should be considered to be a separate document. As to any document related to the matters addressed herein, that is not in your possession but that you know or believe to exist, you are requested to identify and indicate to the best of your ability is present or last known location or custodian.

9. "Correspondence" should be interpreted to include, but not be limited to, all letters, telecopies, notices, messages, memoranda, electronic mail, and other written communications. Correspondence includes internal communications of any kind.

10. "Communications" should be interpreted to include, but not be limited to, all forms of communication, whether written, printed, oral, pictorial or otherwise, including testimony or sworn statements, of any means or type whatsoever.

Instructions

1. If any request for information ("RFI") appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness of witnesses by sup-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If WETT considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if WETT objects to any of the RFI's on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

7. 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 above.
8. In the event there is no information on documents in response to a RFI, please so state.
9. This RFI is continuing in nature, and requires supplemental responses in accordance with Section 22.144 of the Commission's Procedural Rules.
10. If any information is not available in the exact form requested, please provide whatever information or documents that best respond to the data request.
11. If the requested information or data is available for only part of the period requested or is otherwise incomplete, please provide such data as is available.
12. If any RFI appears ambiguous, contact counsel as soon as possible to obtain clarification.
13. Each document of more than one page should be stapled or otherwise bound, and the individual pages numbered consecutively.
14. If, in the case of any RFI seeking documents, there are no responsive documents, please so state and provide a narrative answer to the request.
15. 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.
16. 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 beyond its scope.
17. When the recipient of the data request is requested to provide a study, schedule, or analysis, it should also provide the work papers, underlying facts, inferences, suppositions, estimates, and conclusions necessary to support each study, schedule or analysis.
18. If the actual data are unavailable, but estimates or approximations are available, please provide the estimates or approximations that are the best available information and explain the procedure for developing the information supplied.

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- D/P No.2-1. Please provide a cost estimate for a Long Draw to Sand Bluff route that uses the following links: A7, F7, J7, CV7, L7, M7, N7, CU7, X7, Z7, AM7, AQ7, BT7, CC7, CE7, CJ7.
- D/P No.2-2. For the route identified in D/P 2-1, please provide data for the factors in column 2 of Table 7-2 of the Environmental Assessment.
- D/P No.2-3. For the route identified in D/P 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.