



Control Number: 38829



Item Number: 259

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SOAH Docket No. 473-11-1267  
PUC Docket No. 38829

Application of Sharyland Utilities, L.P. to § Before the State Office  
Amend Its Certificate of Convenience and §  
Necessity for the Proposed White Deer to § Of  
Silverton 345-KV CREZ Transmission §  
Line in Armstrong, Briscoe, Carson, § Administrative Hearings  
Donley, Gray and Swisher Counties, Texas §

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**Red River Salt Fork Wind, LLC and Chermac Energy Corporation's  
First Request for Information  
to Sharyland Utilities, LP**

Pursuant to P.U.C. PROC. R. 22.144, Red River Salt Fork Wind, LLC and Chermac Energy Corporation (collectively, "Chermac Energy") request that Sharyland Utilities, L.P. ("Sharyland") fully respond to the attached requests for information ("RFIs") in accordance with the attached General Instructions and Definitions, to be construed consistent with the Commission's Procedural Rules and the Texas Rules of Civil Procedure.

Responses to the RFIs must conform in all respects to the Commission's rules. Each response must identify the sponsoring witness, if any, and the preparer or person under whose direct supervision the response was prepared. Each request must be answered separately, and responses must be preceded by the request to which the answer pertains. Any questions regarding these requests should be directed to the undersigned.

Respectfully submitted,



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*Attorney for Red River Salt Fork Wind, LLC  
& Chermac Energy Corporation*

January 7, 2011

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## **General Instructions**

1. In responding to each request for information ("RFI"), provide information available from all entity and individual files, as well as from all past and current employees, officers, and board members of the affected entities and all predecessors and affiliates, as defined below.
2. If there is no information or documents responsive to a RFI, so state.
3. This RFI is continuing in nature and requires supplemental responses in accordance with Section 22.144(I) of the Commission's Procedural Rules.
4. If any information is not available in the exact form requested, provide whatever information or documents that best respond to the data request.
5. If the requested information or data is available for only part of the period requested or is otherwise incomplete, provide such data as is available.
6. If any RFI appears ambiguous, contact requesting counsel as soon as possible to obtain clarification.
7. Each document of more than one page should be stapled or otherwise bound, and the individual pages numbered consecutively.
8. If, in the case of any RFI seeking documents, there are no responsive documents, so state and provide a narrative answer to the request.
9. The terms "and" and "or" should be construed either conjunctively or disjunctively as appropriate to bring within the scope of each RFI information or documents that might otherwise be considered to be beyond its scope.
10. The singular form of a word includes the plural and the plural includes the singular as appropriate to bring within the scope of RFI information or documents that might otherwise be beyond its scope.
11. When requested to provide a study, schedule, or analysis, the respondent shall also provide any work papers, underlying facts, inferences, suppositions, estimates, and conclusions necessary to support each study, schedule, or analysis.
12. If the data are unavailable, provide any estimates or approximations that are the best available information and explain the procedure for developing the information supplied.

## **Definitions**

1. "You" and references to the respondent by name mean, for purposes of these RFIs, the named respondent, any merged, consolidated, or acquired predecessors in interest, subsidiaries (past or present), and employees, officers, directors, agents, consultants, attorneys, members, and all persons acting under contractual arrangements with, or purporting to act on its behalf.
2. "Identification of" or to "identify" a document includes stating (a) the type or nature of the document (*e.g.*, letter, memorandum, corporate minutes), (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 current 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 they are in the custody of

attorneys or other agents. The final version and each draft of each document should be identified and produced separately. If a document is no longer in the possession or control of the recipient of a data request, the recipient shall state what disposition was made of it. A document need not be identified if it is produced.

3. "Identification of" or to "identify" a person includes stating the person's full name, corporate, partnership, proprietorship, or other business affiliation, current business address and telephone number, current job title, and current or prior association with any party to this proceeding.

4. "Person" means, without limitation, a natural person, corporate entity, partnership, association (whether formally organized or *ad hoc*), joint venture, cooperative, municipality, commission, or governmental body or agency.

5. "Relating to" or "relates to" means involving, referring to, having any relationship to, pertaining to, evidencing, or constituting evidence of.

6. "Document" is used broadly to include, without limitation, the original or any copy, of any kind, regardless of origin or location, of any book, pamphlet, periodical, publication, letter, exhibit, pleading, scrapbook, diary, calendar, canceled check, photograph, form, memorandum, schedule, telegram, telex, report, record, order or notice of the Commission or other governmental action of any kind, study, handwritten or typed notes, draft or other 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 or data of any kind, however produced or reproduced, to which the recipient of a request has or has had access. A 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 the recipient's possession but that the recipient knows or believes to exist, the recipient shall identify the document and state its current or last-known location and custodian.

7. "Correspondence" is used broadly to include, without limitation, letters, telecopies, telefaxes, notices, messages, memorandums, electronic mail, telexes, telegrams, and other written or electronic communications. Correspondence includes internal communications.

8. "Commission," "PUC," or "PUCT" means the Public Utility Commission of Texas; "Commission staff" refers to the employees of the Commission.

9. "Communications" is used broadly to include all forms of communication, whether written, printed, oral, pictorial or otherwise, including testimony or sworn statement, of any means or type whatsoever.

10. Computer readable data must be provided on CD-ROMs usable in Windows-compatible computers.

11. Acronyms, names, and terms defined in these General Instructions and Definitions or in any RFI carry the same meaning throughout the General Instructions and Definitions and the set of RFIs.

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RFIs CEC 1-1, 1-2 and 1-3 pertain to the selection of the alternative route in this case and the interconnection of the Red River Salt Fork Wind Project ("the Wind Project").

**CEC 1-1.** Does Sharyland contend that an interconnection at White Deer Station is less costly than an interconnection tap at a point along the proposed transmission line, assuming the transmission line traverses or is adjacent to the Wind Project?

- a. If so, what is the basis for that contention?
- b. Please provide all work papers and documents supporting the contention.

**CEC 1-2.** To interconnect the Wind Project, could the proposed lattice steel towers of the transmission line in this case accommodate the construction of an interconnection line on the towers in the future?

- a. If not, would it be technically feasible to modify the proposed lattice steel towers to accommodate the future construction of an interconnection line?
- b. Please describe any modifications to the proposed lattice steel towers that would be necessary to accommodate an interconnection line.
- c. Would it be reasonable to construct and operate an interconnection line on the lattice steel towers instead of constructing a stand-alone interconnection line to White Deer Station?

**CEC 1-3.** If it is not technically feasible and reasonable to add an interconnection line to the lattice steel towers in the future, please state whether it is technically feasible and reasonable to install Sharyland's interconnection line to the Wind Project on separate structures within the right-of-way of the proposed transmission line.

- a. If not, please explain the basis for contending that it is not feasible or not reasonable.

**CEC 1-4.** What would be the cost of moving Segments P and Z 675 feet east of the foundations of the western group of turbines within the Wind Project? [The precise location of the turbines can be provided to Sharyland at its request.]

- a. Has sufficient notice been given to affected landowners to permit Segments P and Z to be moved in such a manner?

**CEC 1-5.** What would be the cost of moving Segments Q and T 675 feet west of the foundations of the eastern group of turbines within the Wind Project? [The precise location of the turbines can be provided to Sharyland at its request.]

- a. Has sufficient notice been given to affected landowners to permit Segments Q and T to be moved in such a manner?

**CEC 1-6.** What would be the cost of moving Segments N and U 675 feet east of the foundations of the eastern group of turbines within the Wind Project? [The precise location of the turbines can be provided to Sharyland at its request.]

- a. Has sufficient notice been given to affected landowners to permit Segments N and U to be moved in such a manner?

**CEC 1-7.** This RFI pertains to the modification to Route 5 proposed by Kenneth Eugene Scivally (Item 200, Dec. 15, 2010) and Sharyland's response to Mr. Scivally's motion (Item 213, Dec. 17, 2011).

- a. By how much would the proposed modification increase the cost of Route 5?
- b. Please provide all information and documents provided to Mr. Scivally in the course of developing information to evaluate the proposed modification.
- c. Please provide all responses to Mr. Scivally's First RFI to Sharyland that are oversized, in color, or not downloadable from the PUC Interchange.

#### **Certificate of Service**

I certify that a copy of this document was served on the respondent on January 7, 2011, by e-mail delivery.

  
Robert A. Rima