



Control Number: 38877



Item Number: 331

Addendum StartPage: 0

SOAH DOCKET NO. 473-11-5978
PUC DOCKET NO. 38877

APPLICATION OF SOUTHWESTERN
PUBLIC SERVICE COMPANY TO
AMEND A CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR A PROPOSED TUCO TO
TEXAS/OKLAHOMA
INTERCONNECTION 345-KV
TRANSMISSION LINE WITHIN
HALE, FLOYD, MOTLEY, COTTLE,
BRISCOE, HALL, CHILDRESS,
DONLEY, COLLINGSWORTH, AND
WHEELER COUNTIES

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**SAMANN VEST WATKINS' FOURTH REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

Pursuant to PUC Procedural Rule 22.141 and 22.144, intervenor Samann Vest Watkins and her ranch, Vee Bar, Ltd. request that Southwestern Public Service Company provide the following information and answer the following question.

Please answer the attached question in accordance with the procedural schedule and orders issued in this case, the Commission's Procedural Rules, the Texas Rules of Civil Procedure, and other applicable law. Please copy the question immediately above the answer to each question. Please state the name of the witness or witnesses in this case who will sponsor the answer to the question at the hearing and can vouch for the truth of the answer. The answer should be filed under oath, or the response should stipulate in writing that the answer can be treated by all parties as if filed under oath.

The question should be answered in sufficient detail to fully present all of the relevant facts. In answering this request, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

331

If there is a relevant change in your answer after it is submitted such that it is no longer complete or accurate, please submit an amended answer, under oath, as a supplement to the original answer within five (5) working days of your discovery of the need for such amendment.

Please provide your response to the undersigned counsel at the address listed below and submit an original and the required number of copies of your answer to the question to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, Austin, Texas 78701.

Respectfully submitted,



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ATTORNEY FOR SAMANN VEST WATKINS
AND VEE BAR, LTD.

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on Southwestern Public Service Company on August 31, 2011 by facsimile.



Elizabeth Drews

DEFINITIONS

As used in the Requests for Information, the terms listed below have the following meanings:

The singular includes the plural and the plural includes the singular.

The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within each request all information responsive to the question.

“Application” refers to the application SPS filed with the Commission on March 31, 2011, in *Application of Southwestern Public Service Company to Amend a Certificate of Convenience and Necessity for a Proposed Tuco to Texas/Oklahoma Interconnection 345-kV Transmission Line within Hale, Floyd, Motley, Cottle, Briscoe, Hall, Childress, Donley, Collingsworth, and Wheeler Counties*, Docket No. 38877, including all attachments and revisions thereto.

“SPS” means Southwestern Public Service Company.

“You” or “your” refers to the party to which this Request is directed.

**SAMANN VEST WATKINS FOURTH REQUEST FOR INFORMATION
TO SOUTHWESTERN PUBLIC SERVICE COMPANY**

SVW 4-1 Please list each link proposed in the Application that crosses the Prairie Dog Town Fork of the Red River. For each of these links, please state the length of that link across the river bottom, and describe the link's relative accessibility for construction and for maintenance (including distance from existing roads that can handle the equipment SPS expects to use), any characteristics of the river bottom and adjacent terrain relevant to construction and maintenance of the line, and any other factors that for SPS make that link either a relatively desirable or relatively undesirable crossing point for the proposed transmission line compared to crossing points that use other proposed links.