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APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY TO §
AMEND A CERTIFICATE OF § BEFORE THE STATE OFFICE
CONVENIENCE AND NECESSITY FOR A §
PROPOSED TRANSMISSION LINE § OF
WITHIN HALE, FLOYD, MOTLEY, §
COTTLE, BRISCOE, HALL, CHILDRESS, § ADMINISTRATIVE HEARINGS
DONLEY, COLLINGSWORTH AND §
WHEELER COUNTIES, TEXAS §

SOUTHWESTERN PUBLIC SERVICE COMPANY'S FIRST SET OF REQUESTS FOR
INFORMATION TO AL ALLRED ON BEHALF OF MILL IRON NORTH, LTD., MILL
IRON SOUTH, LTD., MILL IRON SAND CREEK, LTD., L.A.D. FARMS, INC., CC
RIVER PARTNERS, AND THE ESTATE OF LOIS ALLRED
QUESTION NOS. 1-1 through 1-21

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RIVER PARTNERS, AND THE ESTATE OF LOIS ALLRED**

Pursuant to P.U.C. PROC. R. 22.144, Southwestern Public Service Company ("SPS") propounds this First Set of Requests for Information ("RFI") to Al Allred on behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, and the Estate of Lois Allred, herein referred to as the Mill Iron and Allred Parties. Responses to the RFIs should be served on Andrea Stover, Graves, Dougherty, Hearon & Moody, PC, 401 Congress Avenue, Suite 2200, Austin, Texas, 78701, within twenty (20) calendar days of service hereof in conformance with the requirements of P.U.C. PROC. R. 22.144(c)(1).

I. DEFINITIONS

The following definitions apply to each of the RFIs, instructions and definitions set forth in this document:

1. "Documents" shall mean all writings and records of every type, including electronic media, in the possession, control, or custody of the Mill Iron and Allred Parties. "Documents" shall also refer to copies of documents, even though the originals of those documents are not in the possession, custody, or control of the Mill Iron and Allred Parties, every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy, and all attachments to any documents.
2. "Habitable Structure" shall mean single-family and multi-family dwellings and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, schools, or other structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis within 500 feet of the centerline.
3. "Mill Iron and Allred Parties" shall mean Al Allred, Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, and the Estate of Lois Allred.
4. "RFI" shall mean Request for Information.
5. "RFI Response" shall mean Al Allred's Responses on Behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, and the Estate of Lois Allred to Commission Staff's First Set of Requests for Information.¹
6. "SPS" or "Company" shall mean Southwestern Public Service Company.
7. "Texas PUC" or "Commission" shall mean the Public Utility Commission of Texas.

¹ 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, Al Allred's Responses on Behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, and the Estate of Lois Allred to Commission Staff's First Set of Requests for Information (July 12, 2011).

8. "Tract" shall mean a specified parcel of land as designated in the county property records. Land divided or designated differently than through tracts listed in the county records shall be described in sufficient detail to plot on a map. For contiguous or nearly contiguous tracts under common ownership, a responsive answer may group such tracts provided that: 1) the tracts associated with the group are listed within the filing; 2) where an answer does not apply to all of the tracts in a group, the specific tracts to which the answer does apply are listed; and 3) if there is any variation in the common ownership, that variation is specifically noted so that the actual ownership of each tract is clear.

II. GENERAL INSTRUCTIONS

The following General Instructions apply to each of the RFIs by SPS:

1. Please provide all narrative responses in hard copy, on separate pages for each response, with the question restated at the top of the page. Where possible, please also provide responses via e-mail including all exhibits that are electronically available.
2. For each responsive answer, please identify the individual(s) responsible for its preparation, and the witness sponsoring the answer provided.
3. If a data request can be answered in whole or in part by reference to the response to a preceding or subsequent data request, including data requests of Commission Staff and other parties, so indicate. Specify the preceding or subsequent data request by participant or party and by number, and state whether it is claimed that the response to the preceding or subsequent data request is a full response to the instant data request. If not, furnish the balance of the response needed to complete a full reply.
4. For each document identified in a response that is computer generated, state separately (a) what types of data, files, diskettes or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (punch cards, tapes, diskettes, etc.), (c) a description of the recordation system employed (including program descriptions, flow charts, etc.), and (d) the identity of the person(s), during the designated period, in charge of the collection of input materials, the processing of input materials, the data bases utilized, and/or the programming to obtain such output.
5. In the event any document requested in this request is unavailable, describe in detail the reasons the document is unavailable.
6. When producing documents pursuant to these data requests, designate on the document or group of documents the data request(s) in response to which the document(s) are produced.
7. If, in answering any of these requests, there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact Andrea Stover or Tom Hudson at:

Graves Dougherty Hearon & Moody
401 Congress Avenue, Suite 2200
Austin, Texas 78701
office: (512) 480-5727
facsimile: (512) 536-9927
e-mail: astover@gdhm.com
thudson@gdhm.com

If that is not possible, please set forth the language deemed to be ambiguous and the interpretation chosen or used in responding to the request.

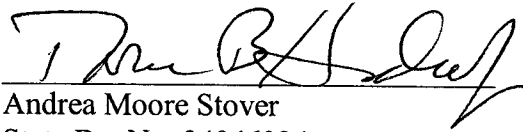
8. These data requests are continuing in nature and require supplemental responses when further or different information with respect to any of them is obtained.
9. Use of the singular or plural word form in a data request is not to be interpreted to exclude information or documents from the scope or intent of the specific request.
10. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these requests any information or documents which might otherwise be considered to be beyond their scope.
11. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:
 - (a) the reason for withholding;
 - (b) the date of the document;
 - (c) a brief description of the document;
 - (d) the name of each author or preparer;
 - (e) the name of each person who received the document; and
 - (f) a statement constituting the basis for withholding the document.
12. If the Mill Iron and Allred Parties decline to respond to any request for information or data on the basis of privilege, please state as to each such request an explanation for the refusal. Identify those documents and communications that are withheld from the response to each specific data request. The identification shall be served within the time specified by the presiding examiner for this proceeding and in accordance with the Rules of the Commission, and shall:
 - (a) specify the date of the document, its author(s) (with title and designation if an attorney), and recipients (with title and designation if an attorney);
 - (b) contain a brief summary of the subject matter of the document; and
 - (c) contain a brief statement of the reason that, in your opinion, the assertion of privilege is justified.
13. Please provide data responses as they become available.

Respectfully submitted,

XCEL ENERGY SERVICES INC.

Jerry F. Shackelford
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816 Congress Ave., Suite 1650
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(512) 658-5781

**GRAVES DOUGHERTY HEARON
& MOODY, P.C.**



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401 Congress Avenue, Suite 2200
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(512) 480-5727
(512) 536-9927 (facsimile)

ATTORNEYS FOR
SOUTHWESTERN PUBLIC SERVICE
COMPANY

III. REQUESTS FOR INFORMATION

- 1-1. Please identify and describe all tracts owned by the Mill Iron and Allred Parties which are the subject of the Mill Iron and Allred Parties' Requests to Intervene and Al Allred's Responses on Behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, and the Estate of Lois Allred to Commission Staff's First Set of Requests for Information ("RFI Response").² Please include the approximate distance from the proposed line. Please include the ownership of each tract.
- 1-2. Referring to the RFI Response Nos. 1-1 at 4, 1-5 at 8, and 1-8 at 11-13, please provide maps of the applicable tracts with the following separately identified: habitable structures, non-habitable structures, windmills, water wells, pumps, runways, archaeological sites, and protected species habitat. If maps are not available or specific items are not located on a map, please provide Global Positioning System (GPS) coordinates for such items.
- 1-3. Referring to the RFI Response to No. 1-1 at 4, please identify and describe the location of each of the structures listed below in relation to the proposed transmission line. Please include the approximate distance from the proposed line. For each structure close to more than one segment, please list the distance from each segment. Please use sufficient detail so that it may be accurately plotted on a map. If it is not possible to accurately describe the location of the structure in relation to the proposed line, please state the GPS coordinates of such structure's location.
 - a. The home of the Don Allred family.
 - b. The home of the Mill Iron Ranch Manager.
 - c. The "barn with an attached apartment."
 - d. The "house that could be used for ranch workers and hunters."
 - e. Any other structures not included in the list above.
- 1-4. Referring to the RFI Response to No. 1-2 at 5, please identify the tracts crossed by each of the segments listed. If segments of the proposed line have subsequently been discovered to cross your property, please identify those segments and the corresponding tract(s) which they would cross.

² *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, Al Allred's Responses on Behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, and the Estate of Lois Allred to Commission Staff's First Set of Requests for Information (July 12, 2011).

- 1-5. Referring to the RFI Response to No. 1-5 at 8, please identify and describe the location of each of the following windmills or pumps in relation to the proposed transmission line segments, including the approximate distance from the proposed line. For each windmill or pump close to more than one segment, please list the distance from each segment. Please use sufficient detail so that the windmills and pumps may be accurately plotted on a map. If it is not possible to accurately describe the location of the structure in relation to the proposed line segments, please state the GPS coordinates for each windmill and pump.
- a. Mill Iron North
 - 1. Each of the ten windmills.
 - 2. The submergible pump.
 - 3. Each of the two solar pumps.
 - b. Mill Iron South
 - 1. Each of the eighteen windmills.
 - 2. Each of the three submergible pumps.
 - c. Mill Iron Sand Creek
 - 1. Each of the three windmills.
 - 2. The submergible pump.
- 1-6. Referring to the RFI Response to No. 1-5 at 8, please identify the surface dimensions of each windmill referenced, *i.e.*, dimensions of the base and height.
- 1-7. Referring to the RFI Response to No. 1-5 at 8, please identify the surface dimensions of each pump referenced.
- 1-8. Referring to the RFI Response to No. 1-5 at 8, for each unique type of pump please explain the concerns of the Mill Iron and Allred Parties with regard to a transmission line being routed near the pumps listed. For each type of pump, please state the minimum distance that a transmission line would need to be from each pump to alleviate those concerns.
- 1-9. Referring to the RFI Response to No. 1-8 at 11:
- a. Please provide the GPS coordinates of the beginning and ending of each runway. Please state the length and width of each runway and the distance of each runway

from the proposed transmission line. For each runway potentially affected by multiple segments, please list the distance from each segment. Please provide any other detail necessary to accurately plot the runways on a map.

- b. Please provide the current status of the applications for the runways with the Federal Aviation Administration (FAA) and provide copies of all correspondence to and from the FAA regarding each runway. Please state whether each application has been approved, and if not, when such approval is expected.
- c. Please describe the current use of said runways, and the expected use of said runways.
- d. Provide the location of any structures associated with the runways, the location of any airplanes housed on the property permanently or temporarily, and the type of airplanes that use or are reasonably expected to use the runways.
- e. Please state whether there are heliports on any tract within 5,000 feet of the proposed line. If so, please identify and describe the location(s) or provide GPS coordinates. Please state the distance from the heliport(s) to the proposed line. For each heliport potentially affected by multiple segments, please list the distance from each segment. Please provide any other detail necessary to accurately plot the heliport(s) on a map.

1-10. Referring to the RFI Response to No. 1-8 at 11-12, for each archaeological site:

- a. Please identify and describe the location, including the distance from the proposed line. For each site potentially affected by multiple segments, please list the distance from each segment. If it is not possible to accurately describe the location of the site in relation to the proposed line, please state the GPS coordinates. Please use sufficient detail so that the site may be accurately plotted on a map.
- b. Please identify the known dimensions and state whether those dimensions are believed to be accurate. Please state any work needed to identify the accurate dimensions. Please use sufficient detail so that the site may be accurately plotted on a map.
- c. Provide a description stating:
 - 1. The reason(s) it is believed to be an archaeological site, including a description of the work done to identify the site as an archaeological site, and the expertise of the person(s) that performed work or identified the site.
 - 2. Whether the site is recorded as an archaeological site with the Texas Historical Commission, or another such entity.

3. Whether the site is eligible for the National Register of Historic Places (NRHP) or already registered. If the site is believed to be eligible, please state how the site meets the criteria for inclusion in the NRHP.

1-11. Referring to the RFI Response to No. 1-8 at 13:

- a. Please provide all documentation of the presence of any federal or state protected species on the tract(s). Please specify which tract(s) each piece of documentation corresponds to. If only part of a specified tract includes the presence of the species, please specifically describe the applicable part of the tract.
- b. If no documentation is available, please explain the reason(s) for the inclusion of any federal or state protected species listed in the response.
- c. Please provide all documentation of the presence of any sensitive or protected wildlife habitat on the tract(s). Please specify which tract each piece of documentation corresponds to. If only part of a specified tract includes the presence of the habitat, please specifically describe the applicable part of the tract.

1-12. Referring to the RFI Response to No. 1-11 at 16-17:

- a. Please explain the statement "[t]he Grassland Reserve Program prohibits any type of development or change of use." Please include in the explanation what the effect will be if transmission lines are placed on the affected tract(s) including references to statutes or regulations relied on for your conclusions.
- b. Please specify the tract(s) participating in the Grassland Reserve Program. If only part of a specified tract is included in the program, please specifically describe the part of the tract included.
- c. Please specify the tract(s) participating in the Prairie Chicken Conservation Program. If only part of a specified tract is included in the program, please specifically describe the part of the tract included.
- d. Please specify the tract(s) participating in the Prairie Dog Conservation Program. If only part of a specified tract is included in the program, please specifically describe the part of the tract included.
- e. Please specify the tract(s) participating in programs that support and use the property as a refuge for federal or state protected species and identify each applicable program. If only part of a specified tract is included in the program, please specifically describe the part of the tract included.

1-13. Referring to the RFI Response to No. 1-12 at 18, please specify which tracts are divided by the proposed routing.

- 1-14. Referring to the RFI Response to Nos. 1-1 at 4, 1-8 at 11-13, 1-11 at 16-17, 1-12 at 18, 1-14 at 20, please describe and provide a map indicating the transmission line right-of-way (ROW) location(s) on or around your property that would do one or more of the following:
- a. least divide your property;
 - b. have the least interference with the use of your property;
 - c. avoid state or federal protected species and their habitat; or
 - d. least interfere with use of the runways.
- 1-15. Please state whether water wells (other than those discussed in response to RFI 1-5 above) are present on any tract of the Mill Iron and Allred Parties' land crossed by a segment of the proposed transmission line. If water wells are present, please specifically describe the type of water well, their location and distance from the proposed line. If it is not possible to give a specific description, please state the GPS coordinates of such water wells.
- 1-16. Referring to the Route Adequacy Hearing held on August 23, 2011, and SOAH Order No. 7:³
- a. Please provide a map showing the "only other alternate route" referenced at the Route Adequacy Hearing and reflected in SOAH Order No. 7 at p. 2.
 - b. Please specifically describe the "only other alternate route" referenced at the Route Adequacy Hearing and reflected in SOAH Order No. 7 at p. 2. The description should include sufficient detail to plot the alternate route on a map from the beginning point to the endpoints of the alternative route. If the Mill Iron and Allred Parties did not have a specific alternate route determined, please describe with particularity the concept referenced.
- 1-17. Please provide the following information for the portion of the "only other alternate route" as referenced by Mill Iron and Allred Parties at the Route Adequacy Hearing that is not comprised of segments proposed by SPS ("Mill Iron Segments"):

³ *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, SOAH Order No. 7 Addressing Adequacy of Route Issues (August 24, 2011).

- a. Total length (miles) of the Mill Iron Segments;
- b. Length (miles) of Mill Iron Segments ROW parallel or adjacent to other existing ROW (highways, railroad, etc.);
- c. Length (miles) of Mill Iron Segments ROW parallel or adjacent to existing pipelines;
- d. Length (miles) of Mill Iron Segments ROW parallel or adjacent to apparent property lines;
- e. Length (miles) of Mill Iron Segments ROW parallel or adjacent to existing transmission line ROW;
- f. Length (miles) of existing transmission line ROW used by Mill Iron Segments;
- g. Number of commercial AM radio transmitters within 10,000 feet of the centerline of the Mill Iron Segments ROW;
- h. Number of FM radio transmitters within 2,000 feet of the centerline of the Mill Iron Segments ROW;
- i. Number of non-AM or -FM electronic installations (microwave, cellular, television towers, etc.) within 2,000 feet of the centerline of the Mill Iron Segments ROW;
- j. Number of habitable structures within 500 feet of the centerline of the Mill Iron Segments ROW;
- k. Number of cemeteries within 1,000 feet of centerline of the Mill Iron Segments ROW;
- l. Length (miles) of the Mill Iron Segments ROW across rangeland/pasture;
- m. Length (miles) of the Mill Iron Segments ROW across dryland cropland (non irrigated);
- n. Length (miles) crossing dryland cropland (non irrigated) at property line or field edge of the Mill Iron Segments;
- o. Length (miles) of the Mill Iron Segments ROW across pasture or cropland with mobile irrigation systems;

- p. Length (miles) of the Mill Iron Segments ROW across pasture or cropland with mobile irrigation systems that is along property line or field edge;
- q. Length (miles) of the Mill Iron Segments ROW across playa lakes;
- r. Number of FAA-listed airfields within 10,000 feet of the Mill Iron Segments ROW centerline with runways less than 3,200 feet;
- s. Number of FAA-listed airfields within 20,000 feet of the Mill Iron Segments ROW centerline with runway greater than 3,200 feet;
- t. Number of heliports within 5,000 feet of the Mill Iron Segments ROW centerline;
- u. Number of private airstrips within 10,000 feet of the Mill Iron Segments ROW centerline;
- v. Length of the Mill Iron Segments ROW across 100-year floodplains;
- w. Length (miles) of the Mill Iron Segments ROW through bottomland/riparian woodland;
- x. Length (miles) of the Mill Iron Segments ROW across potential (mapped or otherwise indicated) wetlands;
- y. Length (miles) of the Mill Iron Segments ROW through upland woodland/brushland;
- z. Number of farm to market road and ranch road crossings in the Mill Iron Segments;
- aa. Estimated length (miles) of the Mill Iron Segments ROW within foreground visual zone of U.S. and state highways;
- bb. Number of U.S. and state highway crossings (engineered constraint, limited to State and U.S. Highways) in the Mill Iron Segments;
- cc. Length (miles) of the Mill Iron Segments ROW through areas of high archaeological/historic site potential;
- dd. Length (miles) of the Mill Iron Segments ROW through areas of medium archaeological/historical site potential;

- ee. Number of recorded historic or prehistoric sites crossed by the Mill Iron Segments;
 - ff. Number of additional National Register listed or determined-eligible sites within 1,000 feet of the Mill Iron Segments ROW centerline;
 - gg. Length (miles) of the Mill Iron Segments ROW across parks/recreational areas;
 - hh. Number of additional parks and/or recreational areas within 1,000 feet of the Mill Iron Segments ROW centerline;
 - ii. Estimated length (miles) of ROW within foreground visual zone of recreational or park areas;
 - jj. Number of stream crossings in the Mill Iron Segments;
 - kk. Length (miles) of the Mill Iron Segments ROW parallel (within 100 feet) to streams;
 - ll. Number of river crossings in the Mill Iron Segments;
 - mm. Length (miles) of the Mill Iron Segments ROW across known habitat of federally endangered/threatened species; and
 - nn. Length (miles) of the Mill Iron Segments ROW across open water (lakes, ponds, etc.).
 - oo. If known, please state the ownership of all land crossed by the Mill Iron Segments ROW.
- 1-18. Please provide a map identifying the following information regarding the Mill Iron Segments. If it is not possible to plot the information on a map, please state all GPS coordinates.
- a. Habitable structures within 500 feet of the Mill Iron Segments ROW centerline;
 - b. Parks and/or recreational areas within 1000 feet of the Mill Iron Segments ROW centerline;
 - c. Mobile irrigation systems on pasture or cropland crossed by the Mill Iron Segments ROW;

- d. FAA-listed airfields within 10,000 feet of the Mill Iron Segments ROW centerline with runways less than 3,200 feet;
 - e. FAA-listed airfields within 20,000 feet of the Mill Iron Segments ROW centerline with runway greater than 3,200 feet;
 - f. Heliports within 5,000 feet of the Mill Iron Segments ROW centerline;
 - g. Private airstrips within 10,000 feet of the Mill Iron Segments ROW centerline;
 - h. Commercial AM radio transmitters within 10,000 feet of the centerline of the Mill Iron Segments ROW;
 - i. FM radio transmitters within 2,000 feet of the centerline of the Mill Iron Segments ROW;
 - j. Non-AM or -FM electronic installations (microwave, cellular, television towers, etc.) within 2,000 feet of the centerline of the Mill Iron Segments ROW;
 - k. Parks and/or recreational areas within 1,000 feet of the Mill Iron Segments ROW centerline;
 - l. Areas of high archaeological/historic site potential crossed by the Mill Iron Segments ROW;
 - m. Areas of medium archaeological/historical site potential crossed by the Mill Iron Segments ROW;
 - n. Number of recorded historic or prehistoric sites crossed by the Mill Iron Segments ROW;
 - o. Number of additional National Register listed or determined-eligible sites within 1000 feet of the Mill Iron Segments ROW centerline;
 - p. The windmills or water pumps that would be affected by the Mill Iron Segments ROW; and
 - q. Any other known constraints.
- 1-19. Please state whether the Mill Iron and Allred Parties have determined other acceptable alternate routing options. If yes, please specifically describe the other alternate options,

provide a map showing those options, and provide the information requested in Questions 1-17 and 1-18 for the other acceptable alternate routing options.

1-20. Referring to the Statement on Adequacy of Routes and Request for Hearing on Adequacy of Routes filed on behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, The Estate of Lois Allred, and J. Don Allred ("Statement")⁴ and the Reply to Statements on Adequacy of Routes and Request for Hearing on Adequacy of Routes filed on behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, The Estate of Lois Allred, and J. Don Allred ("Reply to Statements")⁵.

- a. Please specifically describe the area of Oklahoma referenced in the Statement at 3 and the Reply to Statements at 2.
- b. Please state whether the Mill Iron and Allred Parties contemplate that the line should stop progressing north or northeast in Texas and instead progress east to Oklahoma. If yes, please specifically state the point(s) in the proposed routing at which the Mill Iron and Allred Parties would propose that the routing stop progressing north or northeast in Texas.

1-21. Regarding the segments removed by SPS prior to the final application submittal, referenced in the Statement at 5-6 and the Reply to Statements at 2-3:

- a. Please state whether any of the segments would have been acceptable alternative segments to the Mill Iron and Allred Parties.
- b. Please state whether any of the segments would have been acceptable alternative segments to any individual landowner within the Mill Iron and Allred Parties. If

⁴ *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, Statement on Adequacy of Routes and Request for Hearing on Adequacy of Routes filed on behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, The Estate of Lois Allred, and J. Don Allred (Aug. 5, 2011).

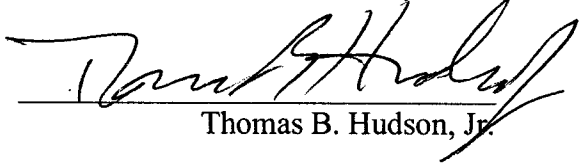
⁵ *Application of Southwestern Public Service Company to Amend a Certificate of Convenience and Necessity for a Proposed TUCO to Texas/Oklahoma Interconnection 345 kV Transmission Line Within Hale, Floyd, Motley, Cottle, Briscoe, Hall, Childress, Donley, Collingsworth, and Wheeler Counties*, Docket No. 38877, Reply to Statements on Adequacy of Routes and Request for Hearing on Adequacy of Routes filed on behalf of Mill Iron North, Ltd., Mill Iron South, Ltd., Mill Iron Sand Creek, Ltd., L.A.D. Farms, Inc., CC River Partners, The Estate of Lois Allred, and J. Don Allred (Aug. 16, 2011).

yes, please state which individual landowners would have found which segments acceptable alternative segments.

- c. Please state whether any of the segments would be preferred over any of the proposed segments. If yes, please specify the applicable segments and reasons they are preferable.

IV. CERTIFICATE OF SERVICE

I certify that on September 7, 2011, this document was served on the Mill Iron and Allred Parties by facsimile, electronic mail, hand delivery, United States mail, or overnight mail. Pursuant to SOAH Order No. 2, this document will not be served on other parties except by electronic filing in the docket.



Thomas B. Hudson, Jr.