



Control Number: 40606



Item Number: 76

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SOAH DOCKET NO. 473-13-0218
DOCKET NO. 40606

2012 NOV -1 PM 2:29
PUBLIC UTILITY
FILING CLERK

APPLICATION OF WIND ENERGY
TRANSMISSION TEXAS, LLC FOR
AUTHORITY TO ESTABLISH
INITIAL RATES AND TARIFFS

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO WIND ENERGY TRANSMISSION TEXAS, LLC (WETT)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Wind Energy Transmission Texas, LLC (WETT) by and through its attorney of record, provide responses to Staff's third request for information (RFI).

Pursuant to P.U.C. PROC. R. 22.144(c)(2), Staff requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing the 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 guarantee its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced.

Pursuant to P.U.C. PROC. R. 22.144(i), the respondent to these requests is under a duty to supplement any response that in light of newly discovered information modifies or makes incomplete an answer already supplied, within five days of the discovery of the new information.

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.

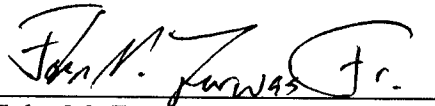
Provide an original and three copies of your answers to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326. Austin, Texas, 78711-3326.

DATE: November 1, 2012

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

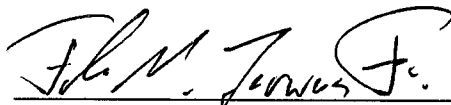
Keith Rogas
Deputy Division Director-Legal Division



John M. Zerwas, Jr.
State Bar No. 24066329
Joseph P. Younger
Attorney-Legal Division
State Bar No. 24037761
Davida Dwyer
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(512) 936-7256
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on November 1, 2012, in accordance with P.U.C. Procedural Rule 22.74.


John M. Zerwas, Jr.

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DEFINITIONS AND INSTRUCTIONS

“Applicant,” “you,” or “WETT” refers to Wind Energy Transmission Texas, LLC, its parent, subsidiaries and affiliates, past and present; its employees, officers, directors, agents, consultants, investigators, representatives, attorneys, and all persons acting under contractual obligations with or acting or purporting to act on behalf of WETT; any merged or consolidated predecessors in interest or predecessor in interest; and any merged or consolidated successors in interest.

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 including writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, electronic storage of any type, data on computer drives, e-mails, 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.

Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Staff 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 Office software and be produced with your response to these requests.

The terms “and” and “or” shall be construed as either disjunctive or conjunctive as necessary to make the request inclusive rather than exclusive.

“**Each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**.”

“**Any**” shall be construed to include “**all**” and “**all**” shall be construed to include “**any**.”

The term “**concerning**” includes the following meanings: relating 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.

The term “**including**” means and refers to “including but not limited to.”

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.

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

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.

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.

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.

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TO WIND ENERGY TRANSMISSION TEXAS, LLC (WETT)
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-6**

Staff 3-1 Please refer to the Direct Testimony of Bradley A. Ballard, pages 13-15. For each of WETT's six switching stations, please provide the following:

- a) The total amount of land purchased for the station (in acres).
- b) The amount of purchased land that will be used/developed by December 31, 2013 (in acres).
- c) The footprint of each station (in acres).
- d) The amount of any purchased land that will be fenced (in acres).
- e) The total cost of the land proposed for inclusion in rate base (in dollars).
- f) The number of fully-equipped 345 kV and 138 kV bays that will be "in service" (i.e., connecting lines, transformers, etc. to the station bus or busses) by December 31, 2013.
- g) The number of fully-equipped 345 kV and 138 kV bays that will not be "in service" by December 31, 2013.
- h) The number of "projected future" 345 kV and 138 kV bays (i.e., partially-equipped bays and designated but unequipped positions for additional bays) that could be placed "in service" in the station after December 31, 2013.
- i) The number of 345 kV and 138 kV bays not referenced above but which could be accommodated by expanding the station after December 31, 2013 without using/developing any additional portion of the purchased land.

Staff 3-2 Please refer to the Direct Testimony of Bradley A. Ballard, page 16, lines 8-10. Please explain how "...the project team determined that subdividing properties to purchase land sizes commensurate with the station layout would not result in cost savings." Please provide all documents including but not limited to cost studies, economic analyses, property price comparisons, etc. prepared by and/or used by the project team to reach this conclusion.

- Staff 3-3** Please refer to the direct testimony of Bradley A. Ballard at page 9, lines 2-6. Please quantify the impact of the Faraday Switching Station and monopole in lieu of lattice tower change orders, as well as provide all documents concerning these change orders.
- Staff 3-4** With regard to the monopole in lieu of lattice tower change order, please provide copies of all PUC final orders in WETT's CCN proceedings regarding monopoles. Please also provide any cost estimates made by WETT for monopoles related to those proceedings.
- Staff 3-5** Has WETT received any property tax assessments for taxes due in 2013? If yes, what is the total amount of the assessments received? Is this the amount of property taxes that WETT expects to pay during 2013? If not, why not?
- Staff 3-6** Has WETT received any property tax assessments for taxes due in 2012? If yes, what is the total amount of the assessments received, and please provide documentation to support the response.