



Control Number: 40728



Item Number: 208

Addendum StartPage: 0

SOAH DOCKET NO. 473-13-0846
PUC DOCKET NO. 40728

APPLICATION OF ELECTRIC
TRANSMISSION TEXAS, LLC TO
AMEND ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR THE PROPOSED LOBO TO RIO
BRAVO TO NORTH EDINBURG 345-
KV DOUBLE-CIRCUIT
TRANSMISSION LINE IN WEBB,
ZAPATA, JIM HOGG, BROOKS,
STARR, AND HIDALGO COUNTIES,
TEXAS

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BEFORE THE

STATE OFFICE OF

ADMINISTRATIVE HEARINGS

**ELECTRIC TRANSMISSION TEXAS, LLC'S FIRST SET OF
REQUESTS FOR INFORMATION TO EDWIN H. FRANK**

Pursuant to Commission Procedural Rules 22.141-.145, Electric Transmission Texas, LLC (ETT or Company) requests that Edwin H. Frank provide the following information and answer the following questions under oath within the time provided by Commission rules and/or applicable orders, or sooner if practicable. The answers should be provided in sufficient detail to present all relevant facts. These requests are deemed continuing in nature and require further and supplemental responses from a party if it receives or generates additional information within the scope of these data requests between the time of the original responses and the time of the hearing in this proceeding.

For any responses that require the use of or reference to information previously provided by the Company in this case that has been designated "Confidential" or "Highly Sensitive" material, please provide responses in accordance with the terms of the Protective Order and the Commission's Rules relating to "Confidential" and "Highly Sensitive" materials. See P.U.C. PROC. R. 22.142.

2013 JAN 11 PM 4:10
FILING CLERK

DEFINITIONS AND INSTRUCTIONS

1. A Reference to “you” or “your” means all members, division, departments, bureaus, agencies of the party served, and all witnesses whose testimony the respective party intends to present to the Public Utility Commission of Texas, and all persons acting or purporting to act for or on behalf of the respective party, including all staff, employees, agents, representatives, attorneys, consultants, economists, engineers, and accountants.

2. The terms “document” and “documents” are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description and all attachments and appendices thereto. Without limiting the foregoing, the terms “document” and “documents” shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries of records of personal conversations, minutes or summaries or other records of meetings and conferences, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants’ reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

3. “Person” means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver, syndicate, municipal corporation, government agency, any other form of legal entity, and other group or combination acting as a unit.

4. “Identify” means:

- a. as to a “person,” stating his, or her or its:
 - (i) legal, full and customarily used names;
 - (ii) present residential or business address;

- (iii) job title; and
- (iv) name of employer.

- b. as to a document, act, event, transaction or occurrence, stating:
 - (i) its date, authors or participants;
 - (ii) the place where it took place was created or occurred;
 - (iii) its purpose and subject matter, and
 - (iv) a concise description of what transpired.

5. Prior to each individual response, please restate the Request for Information and, following each individual response, identify the individual(s) responsible for preparing and sponsoring the response by name and title.

- 6. For each document produced that is generated by computer, please:
 - a. identify the nature and source of the data constituting the input;
 - b. identify the form of the input (*e.g.*, tapes, punch cards);
 - c. identify the recording system employed (*e.g.*, program, flow charts); and
 - d. provide an electronically manipulable version on disc (*i.e.*, CD or DVD), diskette, or other generally utilized electronic or magnetic medium.

Respectfully submitted,

Jerry N. Huerta
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By: 
George Hoyt

**ATTORNEYS FOR ELECTRIC TRANSMISSION
TEXAS, LLC**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on Edwin H. Frank via electronic mail, U.S. first-class mail, hand delivery, overnight delivery, or facsimile transmission on the 11th day of January, 2013.


George Hoyt

**SOAH DOCKET NO. 473-13-0846
PUC DOCKET NO. 40728**

**ELECTRIC TRANSMISSION TEXAS, LLC'S FIRST SET OF
REQUESTS FOR INFORMATION TO EDWIN H. FRANK**

ETT 1-1

Please provide all documented information and mapped locations (including the map showing these locations) of each state and/or federally-listed threatened or endangered species (plant, vertebrate species, or insect) known to occur on your property that is crossed by any of the links/routes filed in this docket.

ETT 1-2

Please provide a copy of any and all conservation easements executed with any entity pertaining to any of your property crossed by any of the links/routes filed in this docket and provide the location of these conservation easements on a map of your property.

ETT 1-3

Please provide a copy of any and all wildlife management plans, game management plans, ranch management plans, or any other similar plans prepared for any of your property crossed by any of the links/routes filed in this docket.

ETT 1-4

Where you have implemented any of the plans described in ETT RFI No. 1-3 above, please provide descriptions of the type and amount of vegetation that has been cleared to implement the plans, including width of clearing(s) as indicated by the aerial photography provided in Attachment 9 of the CCN Application.

ETT 1-5

How was the clearing performed and what procedures do you use to control re-growth in the areas cleared?

ETT 1-6

Please provide an up-to-date status regarding implementation of any and all of the items covered in any plans provided in response to ETT RFI No. 1-3 above.

ETT 1-7

If your property has pipelines or other petroleum facilities please explain how you allow access to these facilities and what rights the easement or lease holder has in expansion of these facilities.

ETT 1-8

Do you have current petroleum or other energy production (including renewable) activities occurring on your property?

- a. If so, please provide the location and number/length of such facilities on your property.
- b. How long have these petroleum or other energy production (including renewable) activities been occurring on your property (best estimate in years or months)?

ETT 1-9

Are you aware of an increase in petroleum production or other energy production (including renewable) activities planned to occur on your property?

- a. Did you agree to such increase in petroleum production or other energy production (including renewable) activities to occur on your property?

ETT 1-10

Do you have existing transmission or distribution electric lines on your property?

- a. If so, do you have deer feeders or deer blinds in or adjacent (within 15 feet) to the existing transmission or distribution line rights of way?

ETT 1-11

Do you use existing distribution/transmission line rights of way for road access across your property and if so for what purpose(s)?