



Control Number: 41606



Item Number: 1017

Addendum StartPage: 0

**JOINT APPLICATION OF
ELECTRIC TRANSMISSION TEXAS,
LLC AND SHARYLAND UTILITIES,
L.P. TO AMEND THEIR
CERTIFICATES OF CONVENIENCE
AND NECESSITY FOR THE
PROPOSED NORTH EDINBURG TO
LOMA ALTA DOUBLE-CIRCUIT 345
KV TRANSMISSION LINE IN
HIDALGO AND CAMERON
COUNTIES, TEXAS**

OF

JOINT LANDOWNERS' RESPONSES TO JOINT APPLICANTS' FIRST SET OF REQUESTS FOR INFORMATION

Pursuant to the orders in this docket, P.U.C. PROC. R. 22.144, and other applicable

Commission rules, the Joint Landowners¹ hereby serve their Responses to Joint Applicants' First Set of Requests for Information. The responses to these questions may be treated as though provided under oath.

20 OCT -7 PM 3:02

1017

Respectfully Submitted,

BRAUN & GRESHAM, PLLC

P.O. Box 1148 (Mailing)
Dripping Springs, Texas 78620
14101 Hwy. 290 W., Suite 1100B (Physical)
Austin, Texas 78737
512-894-5426 (telephone)
512-894-3405 (fax)

By: 

Patrick Reznik
State Bar No. 16806780
Cassie Gresham
State Bar No. 24045980

By: 

Edward D. "Ed" Burbach
State Bar No. 03355250
(512) 542-7070
(512) 542-7270 (Fax)
eburback@gardere.com

Andres Medrano
State Bar No. 24005451
(512) 542-7013
(512) 542-7223 (Fax)
amedrano@gardere.com

GARDERE WYNNE SEWELL LLP
600 Congress Avenue
Suite 3000
Austin, Texas 78701-2978

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing instrument has been served in accordance with Order Nos. 4-5 in this proceeding on October 7, 2013.



Patrick L. Reznik

SOAH DOCKET NO. 473-13-5207
PUC DOCKET NO. 41606

JOINT APPLICATION OF § **BEFORE THE STATE OFFICE**

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-1: Please provide GIS shape files/Geodatabase for all Environmental Data analyzed for the Canal Link and the Modified Link 169.

RESPONSE: Please see the files on the flashdrive included with this response. The GIS shape files/Geodatabase for the environmental data reviewed/analyzed for the Canal Link and the Modified Link 169 were provided in RFI Rhodes RFI Number 1-13 proffered upon the Joint Applicants.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. “Rudi” Reinecke

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-2. Please provide GIS shape files for all digitized data created as identified in Table 2-1 of the Environmental Assessment for the analysis of the Canal Link and the Modified Link 169.

RESPONSE: Please see the files on the flashdrive included with this response. The GIS shape files/Geodatabase for the environmental data reviewed/analyzed for the Canal Link and the Modified Link 169 were provided in RFI Rhodes RFI Number 1-13 proffered upon the Joint Applicants.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-3. Please provide GIS shape files for all shape files created to classify and quantify the length of proposed routes through each quantifiable metric in Table 4-1 of the Environmental Assessment for the Canal Link and the Modified Link 169.

RESPONSE: Please see the files on the flashdrive included with this response. The GIS shape files/Geodatabase for the environmental data reviewed/analyzed for the Canal Link and the Modified Link 169 were provided in RFI Rhodes RFI Number 1-13 proffered upon the Joint Applicants.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-4: For each witness individually (Mr. Almon, Mr. Reinecke, and Mr. Dauphinais), please (a) state what would have constituted an "adequate number of reasonably differentiated routes" that would "allow a reasoned choice of route considering all the facts and circumstances presented" for the project endorsed by ERCOT in this proceeding, (b) provide a detailed discussion of the basis for that opinion, and (c) provide a copy of any documents reviewed by that person after July 3, 2013 that are related to his opinion.

RESPONSE:

- (a) Mr. Almon concludes that there are not a specific number of routes that would be adequate for the project neither in this proceeding nor in any proposed transmission project.
- (b) Each project, including this project, must consider all the constraints that are applicable as defined by PURA §37.056(c) and Sub. R. 25.101(b)(3)(B). Each proposed route must make an effort to avoid or mitigate the defined constraints in a forward progressing manner from one end point to the other. As each alternative route moves from one end point to the other, alternative links will be available to avoid a given constraint. By using these alternative links, several alternative routes are developed. The

quality of each one of the alternative routes will be the basis for which the Administrative Law Judge and the Commission will decide the preferred route for the project.

- (c) Reviewed the Order on Appeal of Order No. 8 in Docket No. 32070.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE:

- (a) Mr. Reinecke has no opinion as to what would have specifically constituted an “adequate number of reasonably differentiated routes” that would “allow a reasoned choice of route considering all the facts and circumstances presented” for the project endorsed by ERCOT in this proceeding. Mr. Reinecke’s testimony concerns potential routing options that were not considered in the application.
- (b) Not applicable.
- (c) Not applicable.

Prepared by: Rudolph K. “Rudi” Reinecke

Sponsored by: Rudolph K. “Rudi” Reinecke

RESPONSE: Mr. Dauphinais has not developed an opinion on whether the Joint Applicants did or did not provide an “adequate number of reasonably differentiated routes” that would “allow a reason choice of route considering all the facts and circumstances presented” for the project endorsed by ERCOT in this proceeding. Based on Mr. Dauphinais’ review of the Joint Application of the Applicants, the direct testimony of the Joint Applicants, the Joint Applicants’ responses to RFIs and the Deposition of Mr. Billo of ERCOT, along with applying Mr. Dauphinais’ transmission planning knowledge and experience, Mr. Dauphinais concluded that ERCOT has not reasonably demonstrated a need to route the proposed 345 kV transmission line in this proceeding in proximity to South McAllen Substation. Based on this conclusion, his review of the aforementioned documents and consultation with Mr. Reinecke, along with applying his knowledge and experience with regard to transmission line routing, Mr. Dauphinais examined whether the Joint Applicants, based on their noticed route links, have offered an “adequate number of reasonably differentiated routes” that would “allow a reasoned choice of route considering all the factors and circumstances presented” for the proposed 345 kV transmission line without the constraint of routing the proposed transmission line in proximity to

South McAllen Substation. Mr. Dauphinais' conclusion from this review, as detailed on pages 24-28 of his direct route adequacy testimony, is that the Joint Applicants' application unreasonably denies the Administrative Law Judge ("ALJ") and the Commission the opportunity to examine route alternatives of potentially significantly lower cost and routing impact than those that can be assembled from the noticed route links in this proceeding. On this basis, he has concluded the Joint Applicants have not offered in their application an "adequate number of reasonably differentiated routes" that would "allow a reasoned choice of route considering all of the facts and circumstances presented."

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-5. Please identify any proceedings before the Public Utility Commission of Texas or any other regulatory body where the following persons testified as a transmission planning expert (and, if applicable, please provide copies of any such testimony):

RESPONSE: Mr. Almon testified in four transmission CCN cases before the Public Utility Commission of Texas (Dockets 37448, 38230, 38354, 38743) as an expert in applying PURA §37.056(c) and P.U.C. SUBST. R. 25.101. The application of PURA and Substantive Rules in these CCN cases does require an understanding of the planning process that was used by the respective transmission service providers and ERCOT to develop the CCN application. Therefore, Mr. Almon has testified as a regulatory expert and not a transmission planning expert in the identified proceedings.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke has not testified as a transmission planner expert before the Public Utility Commission of Texas or any other regulatory body.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: Please see Attachment Joint Applicants 1-5c for a list of Mr. Dauphinais' previous testimony that he has filed before the Public Utility Commission of Texas or any other regulatory body where he has testified as the transmission planning expert since 2007. All of these testimonies are publicly available on the internet from the website of regulatory body before which they were filed.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-6. Please identify any proceedings before the Public Utility Commission of Texas or any other regulatory body where the following persons delineated transmission line routes (and, if applicable, please provide copies of any supporting testimony).

RESPONSE: Mr. Almon did not delineate or draw the alternative routes proposed in the four transmission CCN cases (Dockets 37448, 38230, 38354, and 38743) in which he testified. However, as Mr. Almon analyzed the alternative routes in the applications, he obtained a thorough understanding of the many different criteria that must be considered before an alternative route is proposed.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke provided transmission line routing services for the Illinois Commerce Commission under Case Number 12-0598. His testimony can be found at:

<http://www.icc.illinois.gov/docket/files.aspx?no=12-0598&docId=195982>
<http://www.icc.illinois.gov/docket/files.aspx?no=12-0598&docId=195983>
<http://www.icc.illinois.gov/docket/files.aspx?no=12-0598&docId=195984>
<http://www.icc.illinois.gov/docket/files.aspx?no=12-0598&docId=196091>
<http://www.icc.illinois.gov/docket/files.aspx?no=12-0598&docId=196093>

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: It is not clear what the word "delineated" means. To the extent "delineated" means recommended or assembled a transmission line route from noticed route links, he has previously done so in testimony in PUCT Docket Nos. 37474, 37778, 38140, 38230, 38290, 38324, 38354, 38517, 38597 and 40728; Alberta Utilities Commission ("AUC") Proceeding IDs 979, 1069, 1363 and 2196; Illinois Commerce Commission ("ICC") Docket No. 12-0598; and Michigan Public Service Commission ("MPSC") Case No. U-17041. To the extent "delineated" means identified a new route made up fully or partially from previously unidentified route links, he has done so in AUC Proceeding IDs 979, 1069, 1363 and 2196 and, in conjunction with Mr. Reinecke, in ICC Docket No. 12-0598. Please see Attachment Joint Applicants 1-6c-1 for a list of the relevant testimonies filed by Mr. Dauphinais since 2007. All of these testimonies, but those before the Alberta Utilities Commission, are publicly available on the internet from the website of regulatory body before which they were filed. Attachments Joint Applicants 1-6-c-2 through 1-6-c-6 provide a copy of the testimonies listed in Attachment Joint Applicants 1-6-c-1 that were filed before the Alberta Utilities Commission.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

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REQUEST FOR INFORMATION NO. 1-7. For each witness individually (Mr. Almon, Mr. Reinecke, and Mr. Dauphinais), please (a) explain the witness's understanding of the phrase "an adequate number of reasonably differentiated routes have been proposed in the application to allow a reasoned choice of routing considering all the facts and circumstances presented," and (b) provide a copy of each document reviewed by the witness after July 3, 2013 in arriving at that understanding.

RESPONSE: Please see Mr. Dauphinais' response to Joint Applicants 1-4. It is Mr. Dauphinais' position that "an adequate number of reasonably differentiated routes have been proposed in the application to allow a reasoned choice of routing considering all the factors and circumstances presented" as a minimum means that the applicant(s) have not excluded any

alternative routes that both meet the required transmission line need and have significantly lower cost and/or routing impact than any of the alternative routes the applicant(s) have included in their application. This position is based on the knowledge and experience of Mr. Dauphinais' and his review of the Commission's Orders in Docket Nos. 32070 and 37448. However, Mr. Dauphinais is not an attorney and is not providing a legal opinion.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-8: For each witness individually (Mr. Almon, Mr. Reinecke, and Mr. Dauphinais), please (a) explain the witness's understanding of the term "forward-progressing" in the context of routing a transmission line, and (b) provide a copy of each document reviewed by the witness after July 3, 2013 in arriving at that understanding.

RESPONSE: Mr. Almon stated in his testimony that the Joint Applicants have not provided “forward-progressing” routes because of the constraint of routing through the South McAllen area. The proposed routes deviate more than 180 degrees from the general direction from North Edinburg to Loma Alta as presented on Attachment 10b of the Application. There are circumstances when an extreme deviation as we see in this Application might be necessary. For instance, when exiting or entering a substation and constraints at or near the substation may require a proposed transmission line to deviate from its original course by more than 180 degrees. However, this example does not apply to my recommendation.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke’s understanding of the term “forward-progressing” in the context of transmission line routing is associated with an alignment between the beginning and end points of the project. Forward-progressing involves each link in the route must make some positive length in the direction toward the end point of the project. For example of a forward-progressing

link is a link that is one mile long and through the routing is 0.75 mile closer to the project end point from where the link started. An example of a non-forward progressing link is one that is one mile in length and through the routing is one mile or more further away from the project end point.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: Mr. Dauphinais did not use the term "forward-progressing" anywhere in his direct route adequacy testimony. Notwithstanding, it is Mr. Dauphinais' knowledge and experience that, when the term "forward-progressing" is used in the context of routing a transmission line, "forward-progressing" typically means that the route as it is progressing from its point of origin to its point of destination follows a course that does not at any time move further away from its point of destination. For example, any route that involves backtracking or progressing in the opposite direction of the route's point of destination is not a "forward-progressing" route.

Mr. Dauphinais would note that "forward-progressing" routes typically have less total length than non-"forward-progressing" routes. This means that when the per unit of length routing factor characteristics of alternative routes are very similar, a "forward-progressing" route will typically have a lower cost and fewer adverse routing impacts than a non-"forward-progressing" route.

Mr. Dauphinais would also note that minor deviations from "forward-progressing" are not uncommon in transmission line routing in order to avoid a specific significant cost or adverse impact on the community and/or landowners. However, for the aforementioned reasons, it is desirable for a route to be as "forward-progressing" as possible except to the extent deviations from "forward-progressing" can yield significant reductions in the cost and/or adverse impacts of the proposed transmission line. Major deviations from "forward-progressing" that do not significantly reduce cost and/or other adverse routing factor impacts are generally only made in exceptional circumstances (such as those that existed in Docket No. 38597 with regard to the Greenbelt multi-use trail system as discussed on page 15 of Mr. Dauphinais' direct route adequacy testimony in this current proceeding).

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-9: Are the portions of the routes proposed between the North Edinburg substation and the vicinity of the South McAllen substation forward-progressing as between those two points as that idea is understood by the following persons (if not, please explain):

RESPONSE: If ERCOT stated in its recommendation that the Joint Applicants had to connect to South McAllen as part of the project, there are portions of the routes proposed between the North Edinburg substation and the South McAllen substation that are forward-progressing. However, the Application does not specify a point to connect the line from North Edinburg. The term “vicinity” does not define a point of destination.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke did not evaluate portions of routes proposed between the North Edinburg and South McAllen substations. Mr. Reinecke's testimony concerns potential routing options that were not considered in the application.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. “Rudi” Reinecke

RESPONSE: Mr. Dauphinais cannot answer this question specifically because the question does not clearly identify what is meant by the terms “vicinity of South McAllen Substation” and “portions of the routes.”

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-10: Are the portions of the routes proposed between the vicinity of the South McAllen substation and the Loma Alta substation forward-progressing as between those two points as that idea is understood by the following persons (if not, please explain):

RESPONSE: If ERCOT stated in its recommendation that the Joint Applicants had to connect to South McAllen as part of the project, there are portions of the routes proposed between South McAllen substation and Loma Alta substation that are forward-progressing. However, the Application does not specify a point to connect the line going to Loma Alta. The term “vicinity” does not define a point of origination.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE:

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. “Rudi” Reinecke

RESPONSE: See Mr. Dauphinais' response to RFI Joint Applicants 1-9c.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-11: For the following persons, please identify whether they (or anyone under their supervision) participated in the ERCOT RPG or TAC process for the transmission project endorsed by ERCOT in this proceeding? If so, did they oppose the project during the ERCOT review process or support any other option?

RESPONSE: Mr. Almon did not participate in any ERCOT RPG or TAC process for this transmission project. Mr. Almon does not recall if someone under his supervision attended an ERCOT RPG meeting when this project was discussed.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke has not participated in the ERCOT RPG or TAC process.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: No. Mr. Dauphinais was not engaged by anyone to participate in the ERCOT RPG or TAC process on their behalf. Furthermore, Mr. Dauphinais considers it unreasonable to expect landowners to participate in ERCOT RPG or ERCOT TAC process. Finally, it is Mr. Dauphinais' opinion that the ERCOT TAC is structured to allow reasonable representation of the

specific communities and landowners that would be adversely affected by a particular proposed transmission line.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-12: As applicable, please provide a copy of all documents related to this project which were created or received by Messrs. Almon, Reinecke, or Dauphinais as part of the ERCOT RPG or TAC process.

RESPONSE: Mr. Almon did not create or receive any documents related to this project as part of the ERCOT RPG or TAC process. Mr. Almon reviewed those ERCOT RPG and TAC process documents that were entered as exhibits at the deposition of ERCOT witness Jeff Billo.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke did not create or receive any documents related to this project as part of the ERCOT RPG or TAC process. Mr. Almon reviewed those ERCOT RPG and TAC process documents that were entered as exhibits at the deposition of ERCOT witness Jeff Billo.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. “Rudi” Reinecke

RESPONSE: Mr. Dauphinais only received copies of documents responsive to this request as part of the exhibits attached to Mr. Billo's deposition transcript in this proceeding. Please see Exhibit JRD-RA-11. Mr. Dauphinais has created no documents responsive to this request.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-13: In the opinion of the following persons, if the Commission decided to implement the ERCOT recommendation to route "in proximity to" the South McAllen substation, would the application include an adequate number of reasonably differentiated alternative routes for the Commission to consider? Please provide the basis for that opinion.

RESPONSE: If the Commission decided to implement the ERCOT recommendation to route “in proximity to” South McAllen, Mr. Almon has no opinion about whether the application would include an adequate number of reasonably differentiated alternative routes for the Commission to consider because the term “in proximity to” has not been defined as to where this point is located. One needs two points to determine a line.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke did not evaluate this issue. Mr. Reinecke's testimony concerns potential routing options that were not considered in the application.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: ERCOT did not make a recommendation to the Commission with respect to the route for the transmission line proposed in this proceeding. The ERCOT Staff made a recommendation to the ERCOT TAC and ERCOT Board for ERCOT to endorse the transmission line proposed in this proceeding with routing "in proximity to" South McAllen Substation. Notwithstanding, please see Mr. Dauphinais' response to RFI Joint Applicants 1-4.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
PUC DOCKET NO. 41606

JOINT APPLICATION OF § **BEFORE THE STATE OFFICE**
ELECTRIC TRANSMISSION TEXAS, §
LLC AND SHARYLAND UTILITIES, §
L.P. TO AMEND THEIR §
CERTIFICATES OF CONVENIENCE §
AND NECESSITY FOR THE § **OF**
PROPOSED NORTH EDINBURG TO §
LOMA ALTA DOUBLE-CIRCUIT 345 §
KV TRANSMISSION LINE IN §
HIDALGO AND CAMERON §
COUNTIES, TEXAS § **ADMINISTRATIVE HEARINGS**

RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-14: Are the following persons aware of any proceeding before the Public Utility Commission of Texas in which the ALJs have rejected during a route adequacy hearing ERCOT' s recommendation for a project? If so, please identify those proceedings.

RESPONSE: Mr. Almon is not aware of any proceeding before the Public Utility Commission of Texas in which the ALJs have rejected ERCOT's recommendation for a project during a route adequacy hearing. In this case, the Joint Landowners are not requesting that the ALJ reject ERCOT's recommendation in this project as part of the route adequacy hearing, only that the Joint Applicants be required to provide more forward progressing routes connecting North Edinburg to Loma Alta in the event that the ALJ and Commission ultimately decide that there is no need to route in the "vicinity" of the South McAllen substation.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke is not aware of any proceeding before the Public Utility Commission of Texas in which the ALJs have rejected ERCOT's recommendation for a project during a route adequacy hearing.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: ERCOT did not make a recommendation to the Commission with regard to the proposed transmission line. The ERCOT Staff made a recommendation to the ERCOT TAC and ERCOT Board of Directors for ERCOT to endorse the proposed transmission line. Notwithstanding, Mr. Dauphinais is not aware of a PUCT proceeding where an ALJ has rejected during a route adequacy hearing ERCOT's recommendation for a particular project. This said, the Commission has rejected a number of projects on the basis of route adequacy. For example, in the Newton to Gillespie CCN application, the Commission requested ERCOT to reexamine ERCOT's determination of the need for the proposed Gillespie to Newton 345 kV transmission line. This eventually led to the Commission determining that the proposed Gillespie to Newton 345 kV transmission line is unnecessary.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

JOINT APPLICATION OF § **BEFORE THE STATE OFFICE**
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REQUEST FOR INFORMATION NO. 1-15: For each witness individually (Mr. Almon, Mr. Reinecke, and Mr. Dauphinais), please explain whether the witness believes that the minimum number of routes that would constitute "an adequate number of reasonably differentiated alternative routes" is affected by the number and type of routing constraints in the study area. If yes, please explain how routing constraints affect the minimum number of routes. If no, please explain why not.

Sponsored by: Rudolph K. “Rudi” Reinecke

RESPONSE: Mr. Dauphinais has not developed an opinion with regard to this issue. However, Mr. Dauphinais believes that, generally, as the number and severity of imposed route constraints increases, the total number of potential route alternatives decreases as those increasing constraints eliminate otherwise viable alternative routes. This why is paramount that

unnecessary routing constraints, such as the constraint proposed in this proceeding to route proposed transmission line in proximity to South McAllen Substation, should be avoided. Please also see Mr. Dauphinais' response to Joint Applicants 1-4.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

JOINT APPLICATION OF § **BEFORE THE STATE OFFICE**
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REQUEST FOR INFORMATION NO. 1-16: In developing the opinion that the application does not include an adequate number of reasonably differentiated alternative routes, did any of the following persons evaluate the existence of the routing constraints identified by Joint Applicants or their consultant, POWER Engineers, Inc.? If so, please identify each such routing constraint considered by the witness and explain how that constraint impacted his opinion. If not, please provide the basis for his opinion.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: For this question, Mr. Dauphinais assumes the Joint Applicants are using the word "constraints" as that term is utilized on pages 10-11 of Mr. Reid's direct testimony on pages 2-6 and 2-7 of Attachment 1 of the Joint Applicants' application. Those "constraints" do not include the constraint of routing the proposed transmission line in proximity to South McAllen Substation. With that assumption, Mr. Dauphinais' answer is yes. The aforementioned constraints are captured in the routing factor data that has been provided for the Joint Applicants' 32 proposed routes in the Joint Applicants' application and for each notice route link in the Joint Applicants' response to RFI Rhodes 1-2. In addition, the Joint Applicants' responses to RFI Rhodes 4-1, 4-2 and 4-3 provide this routing factor data for Routes BAI-1, BAI-2 and BAI-3. Mr. Dauphinais evaluated all routing factors when comparing the Joint Applicants' 32 proposed routes and Routes BAI-1, BAI-2 and BAI-3 with regard to the question of route adequacy. The major differences he found between the routes are discussed on pages 19-23 of his direct route adequacy testimony. With regard to Routes BAI-4 and BAI-5, which utilize noticed route links except for Modified Link 169 or the Canal Link, only routing factor data with regard to total length and the factors the Commission has put significant emphasis on in the past (cost, number of habitable structures within 500 feet of centerline and paralleling of existing linear features) were compiled at the time of the drafting of Mr. Dauphinais' direct route adequacy testimony. However, as discussed in the response to 1-16b above, Mr. Reinecke, in laying out Modified Link 169 and the Canal Link, took the aforementioned "constraints" into consideration in the development of those links. Furthermore, to the extent on a per unit of total length basis the impact on the "constraints" is similar for all of the different routes examined by Mr. Dauphinais, a route that has a shorter total length would be expected to better address the "constraints" than a longer route.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
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JOINT APPLICATION OF § **BEFORE THE STATE OFFICE**
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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-17: Do the following persons believe that future transmission upgrades will be needed near the South McAllen substation sometime in the 2020s for N-1 conditions:

RESPONSE: No. ERCOT evaluated a modified Long-Term Assessment 2020 summer peak base case with a G-1 + N-1 contingency. A N-1 condition was not analyzed for 2020 and beyond, therefore there is no basis on which to form a belief that such condition will necessitate transmission upgrades near the South McAllen substation.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke has no opinion.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. “Rudi” Reinecke

RESPONSE: No, not based on the evidence that has been provided to date by the Joint Applicants and ERCOT. Page 25 of the December 19, 2011 ERCOT Report (page 29 of 32 of Attachment 6 of the Joint Applicants' Application) indicates "[t]his recommendation [Option 5] is further supported by the fact that the North Edinburg to South McAllen 345 kV line portion of this project will be needed by 2020 and the South McAllen to LRGV 345 kV portion will most likely be needed in the 2020 for N-1 contingency conditions." However, this conclusion is not

supported by the long-term considerations portion of the ERCOT Report (page 19 and 20 of the ERCOT Report (page 23 of 32 through 24 of 32 of Attachment 6 of the Joint Applicants' Application)), which only identifies that ERCOT's analysis shows the potential for post-2020 G-1 + N-1 contingency overloads, not post-2020 N-1 contingency overloads.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
PUC DOCKET NO. 41606

JOINT APPLICATION OF § BEFORE THE STATE OFFICE
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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-18: Please refer to T. Brian Almon's Route Adequacy Testimony at 12. Please define "electrical constraint" as he uses the term.

RESPONSE: Mr. Almon means there has been no reasonably identified and supported reason from a power system reliability or safety perspective that the substation could not be located outside of the circular area and eventually directly connected to South McAllen Substation.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

SOAH DOCKET NO. 473-13-5207
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JOINT APPLICATION OF § **BEFORE THE STATE OFFICE**
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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-19: Please refer to T. Brian Almon's Route Adequacy Testimony at 12. Do any of the following persons believe that increasing the distance between the South McAllen substation and a future substation "located outside the circular area" set forth in the application would decrease the effectiveness of the interconnection? If so, what does he consider an acceptable level of decreased effectiveness? If not, please provide the basis for that opinion.

RESPONSE: The Joint Applicants did not provide any evidence concerning the decrease in effectiveness for moving the new 138kV-345kV transformer from the South McAllen substation to a location in the “circular area.” Therefore, Mr. Almon concludes that there would not be a decrease in effectiveness if the 138kV-345kV transformer would be located outside of the “circular area” at some undetermined site.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke has no opinion.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: Mr. Dauphinais believes that increasing the distance between South McAllen Substation and a future substation "location outside the circular area" set forth in the application will not necessarily significantly decrease the effectiveness of an interconnection between the future substation and South McAllen Substation. ERCOT studied a direct connection between South McAllen 138 kV Substation and the 345 kV transmission line proposed in this proceeding between North Edinburg and Loma Alta Substation (with a 345/138 kV transformer added at South McAllen 138 kV Substation). ERCOT's study only identified certain potential post-2016 G-1+N-1 line overloads if such a direct connection is not made and certain 138 kV transmission upgrades are not pursued. Based on Mr. Dauphinais' knowledge and experience, provided a direct connection is eventually made between the future substation and South McAllen 138 kV Substation, either with a new 345 kV transmission circuit (with a 345/138 kV transformer at South McAllen 138 kV Substation) or one or more new 138 kV transmission circuits (with a 345/138 kV transformer at the future substation), there is a good likelihood that a sufficient level of relief of the identified potential post-2016 G-1+N-1 overloads would be provided regardless of whether the substation is located immediately adjacent to South McAllen 138 kV Substation. While increasing the distance between the future substation and South McAllen 138 kV substation will increase the electrical impedance of the connection between the two substations and potentially reduce the effectiveness of the relief provided, this does not mean any such increase in impedance and the resulting decrease in effectiveness will be significant enough to undermine the sufficiency of the relief provided to the potential post-2016 G-1 + N-1 overloads. Furthermore, to the extent necessary, the increase in impedance can be counteracted by either utilizing additional 138 kV circuits to interconnect the two substations or using a 345 kV transmission circuit to interconnected the two substations rather than one or more 138 kV transmission circuits. Regardless, any alternative designed to meet the constraint of routing the proposed 345 kV transmission line in this proceeding in proximity to South McAllen Substation that does not involve a direct connection of the proposed transmission line in this proceeding to South McAllen 138 kV Substation will need to be studied with additional powerflow analysis to verify its sufficiency regardless of whether such an alternative involves a future substation located as close as one-quarter mile away from South McAllen 138 kV Substation or a future substation.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
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JOINT APPLICATION OF § **BEFORE THE STATE OFFICE**
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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-20: Please refer to T. Brian Almon's Route Adequacy Testimony at 16. In the opinion of the following persons, would the method proposed by Joint Applicants for interconnecting with the transmission system in the vicinity of South McAllen materially change ERCOT's analysis of the benefits of a future connection? Please provide the basis for that opinion.

RESPONSE: Mr. Almon has no opinion. The Joint Applicants did not provide any description or analysis for their proposed method of interconnection. Mr. Caskey's testimony at pages 23-24 did not address any change to ERCOT's analysis.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke has no opinion.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. “Rudi” Reinecke

RESPONSE: Mr. Dauphinais believes the method may do so. ERCOT studied a direct connection between South McAllen 138 kV Substation and the 345 kV transmission line proposed in this proceeding between North Edinburg and Loma Alta Substations (with a 345/138 kV transformer added at South McAllen 138 kV Substation). As detailed in Mr. Caskey's direct

testimony on behalf of the Joint Applicants, the Joint Applicants have not proposed to route the proposed 345 kV transmission line to South McAllen 138 kV Substation. Instead, they have proposed to eventually construct a future substation somewhere along the proposed 345 kV transmission line and then somehow connect the future substation to the existing 138 kV facilities in the vicinity of the Joint Applicants' South McAllen proximity circle. As Mr. Dauphinais' response to RFI Joint Applicants 1-19c indicates, Mr. Dauphinais believes that, if the Joint Applicants ultimately directly connect the future substation to South McAllen 138 kV Substation (with a 345/138 kV transformer at either the future substation or South McAllen 138 kV Substation), there is a good likelihood that a sufficient level of relief of the identified potential post-2016 G-1+N-1 overloads would be provided. However, if the future substation were instead ultimately directly connected to other existing 138 kV facilities in the area, it could significantly change the amount of relief provided versus a direct connection of the proposed 345 kV transmission line to South McAllen 138 kV Substation (with a 345/138 kV transformer at South McAllen 138 kV Substation) as it could significantly change the electrical configuration of the 138 kV interconnection. However, any 138 kV interconnection approach, that is designed to meet the constraint that the proposed 345 kV line be routed in proximity to South McAllen Substation, will need to be studied with powerflow analysis to verify the sufficiency of that approach unless that approach involves directly connecting the proposed transmission line to South McAllen 138 kV Substation (with a 345/138 kV transformer at South McAllen 138 kV Substation) because the latter approach is the only approach that the ERCOT Staff actually studied.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
PUC DOCKET NO. 41606

JOINT APPLICATION OF

ELECTRIC TRANSMISSION TEXAS,

LLC AND SHARYLAND UTILITIES,

L.P. TO AMEND THEIR

CERTIFICATES OF CONVENIENCE

AND NECESSITY FOR THE

PROPOSED NORTH EDINBURG TO

LOMA ALTA DOUBLE-CIRCUIT 345

KV TRANSMISSION LINE IN

HIDALGO AND CAMERON

COUNTIES, TEXAS

§

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-21: In the opinion of the following persons, would the distance between the South McAllen substation and a new substation that connects with the North Edinburg to Loma Alta line affect the performance of that connection? If so, please explain the extent of that effect. If not, why not?

RESPONSE: Please see the response to Joint Applicants' RFI No. 1-20.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke has no opinion.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: Please see the response to Joint Applicants' RFI No. 1-19 and RFI No. 1-20.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
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COUNTIES, TEXAS § **ADMINISTRATIVE HEARINGS**

RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-22: In the opinion of each of the following witnesses, do they disagree with ERCOT's designation of this project as critical to reliability?

RESPONSE: Mr. Almon does not disagree with ERCOT's designation with the understanding that there is no definition for the term "critical to reliability." The term was used in the recommendation to the ERCOT Board as a result of the judgment of ERCOT staff that the North Edinburg to Loma Alta project should be completed by 2016 to avoid potential load shed to mitigate the N-1-1 contingency. In order to complete the project by 2016, a critical designation puts the PUC approval process for the CCN application on a 180-day timeline.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

RESPONSE: Mr. Reinecke has no opinion.

Prepared by: Rudolph K. "Rudi" Reinecke

Sponsored by: Rudolph K. "Rudi" Reinecke

RESPONSE: The term “critical to reliability” is imprecise. There is currently no established definition for “critical to reliability” nor an established criteria for determining whether a project

is "critical to reliability." For this reason, Mr. Dauphinais cannot offer an opinion at this time with regard to whether ERCOT's designation of the project as "critical to reliability" is reasonable. This said, Mr. Dauphinais agrees the ERCOT Report has reasonably demonstrated need new single-circuit 345 kV transmission line from North Edinburg Substation to Loma Alta Substation in 2016. However, Mr. Dauphinais does not agree that ERCOT has reasonably demonstrated the need to route this new single-circuit 345 kV transmission line in proximity to South McAllen 138 kV Substation either in 2016 or anytime after 2016.

Prepared by: James R. Dauphinais

Sponsored by: James R. Dauphinais

SOAH DOCKET NO. 473-13-5207
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RESPONSES TO REQUEST FOR INFORMATION

REQUEST FOR INFORMATION NO. 1-23: Regarding Mr. Almon's time as an employee of the Commission or as a member of ERCOT TAC,

- a. Has Mr. Almon ever testified opposing an ERCOT recommendation? If so, please identify the proceeding(s).
- b. Has Mr. Almon ever testified regarding the Commission's rule providing that ERCOT recommendations should be given great weight? If so, please identify the proceeding(s).
- c. Does Mr. Almon believe it would be desirable to delay a project designated critical by ERCOT by one or more years?
- d. In Mr. Almon's experience, how long would it take to prepare a new EA and CCN filing to route this project from North Edinburg to Loma Alta without going in proximity to South McAllen?
- e. In Mr. Almon's experience, if the Commission rejects ERCOT's recommendations to route the line in proximity to South McAllen, will this project have to go back through the RPG process? How long does it typically take for a project to go through the RPG process and be approved by the ERCOT board?
- f. In Mr. Almon's time on TAC, did he ever vote against an ERCOT staff recommendation for a transmission project? If so, please identify the recommendation(s).

RESPONSE:

- (a) No.
- (b) No.
- (c) No opinion. Mr. Almon does not have an opinion for this hypothetical question without knowing the specific definition used to designate the project as critical by recommendation of ERCOT staff.
- (d) Mr. Almon does not have the information that has been development by the Joint Applicants in the preparation of the Application including draft documents to make a determination of the time to prepare the necessary documents to file a modified EA and CCN filing.
- (e) Mr. Almon concludes that the Commission may elect to determine that routing in the vicinity of the South McAllen substation is not needed based on the evidence presented in this case and approve a CCN amendment for a project that routes in a forward progressing manner from the North Edinburg substation to the Loma Alta substation. In this case, there would be no need to refer to project back to the RPG process. Although ERCOT makes endorsements of the need of a project, or parts of a project, the ultimate determination of need is made by the Commission.
- (f) At TAC, Mr. Almon has not voted on any ERCOT Staff recommendations for a transmission project because none have been submitted to TAC since he became a TAC representative in January 2013.

Prepared by: T. Brian Almon

Sponsored by: T. Brian Almon

Brubaker & Associates, Inc.
Transmission Planning
Testimony Filed Since
January, 2007
by James R. Dauphinals

Attachment Joint Applicants 1-5-c

<u>Date Filed</u>	<u>State</u>	<u>Docket No.</u>	<u>Utility</u>	<u>Type</u>	<u>On Behalf Of</u>
7/15/2013	LA	UD-12-01	ENTERGY NEW ORLEANS, INC. / ENTERGY LOUISIANA, LLC	Surrebuttal	Air Products and Chemicals, Inc.
4/30/2013	TX	41223	ENTERGY TEXAS, INC.	Direct	Texas Industrial Energy Consumers
4/10/2013	LA	U-32538	ENTERGY LOUISIANA, LLC / ENTERGY GULF STATES LOUISIANA, LLC	Direct	Louisiana Energy Users Group
3/29/2013	IL	12-0598	AMEREN TRANSMISSION COMPANY OF ILLINOIS	Direct	Moultrie County Property Owners ("MCPO")
3/1/2013	LA	UD-12-01	ENTERGY NEW ORLEANS, INC. / ENTERGY LOUISIANA, LLC	Direct	Air Products and Chemicals, Inc.
11/14/2012	MI	U-17041	MICHIGAN ELECTRIC TRANSMISSION COMPANY, LLC	Direct	Landowners
7/31/2012	LA	UD-11-01	ENTERGY NEW ORLEANS, INC AND ENTERGY LOUISIANA, LLC	Cross-Answering	Air Products and Chemicals, Inc.
7/6/2012	TX	40346	ENTERGY TEXAS, INC.	Direct	Texas Industrial Energy Consumers
3/23/2012	LA	UD-11-01	ENTERGY NEW ORLEANS, INC AND ENTERGY LOUISIANA, LLC	Direct	Air Products and Chemicals, Inc.
10/29/2010	MI	U-16200	INTERNATIONAL TRANSMISSION COMPANY d/b/a ITC TRANSMISSION	Direct	Association of Business Advocating Tariff Equity
1/18/2010	CO	09A-324E & 09A-325E	TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC. AND PUBLIC SERVICE COMPANY OF COLORADO	Surrebuttal	Bianca Ranch Holdings, LLC and Trinchera Ranch Holdings, LLC
1/11/2010	TX	37464	ONCOR ELECTRIC DELIVERY COMPANY LLC	Supplemental	Preserve Our San Saba Environment, Inc.
12/11/2009	TX	37464	ONCOR ELECTRIC DELIVERY COMPANY LLC	Direct	Preserve Our San Saba Environment, Inc.
12/2/2009	CO	09A-324E & 09A-325E	TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC. AND PUBLIC SERVICE COMPANY OF COLORADO	Cross-Answer	Bianca Ranch Holdings, LLC and Trinchera Ranch Holdings, LLC
11/30/2009	CO	09A-324E & 09A-325E	TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC. AND PUBLIC SERVICE COMPANY OF COLORADO	Supplemental Answer	Bianca Ranch Holdings, LLC and Trinchera Ranch Holdings, LLC
10/28/2009	CO	09A-324E & 09A-325E	TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC. AND PUBLIC SERVICE COMPANY OF COLORADO	Direct	Bianca Ranch Holdings, LLC and Trinchera Ranch Holdings, LLC
1/14/2008	TX	34440	ONCOR ELECTRIC DELIVERY COMPANY	Direct	Salado Creek Protection Committee and UU Group
8/21/2007	TX	32707	RAYBURN COUNTRY ELECTRIC COOPERATIVE, INC.	Supplemental Direct	Explorer Pipeline Company
5/21/2007	TX	33672	TX - VARIOUS UTILITIES	Rebuttal	Airticity, Inc., Babcock & Brown Renewable Holdings Inc., Celanese, Ltd., Eurus Energy America Corporation, Horizon Wind Energy, LLC, RES America Developments, Inc. and Sharyland Utilities, L.P.
1/18/2007	TX	32707	RAYBURN COUNTRY ELECTRIC COOPERATIVE, INC.	Direct	Explorer Pipeline Company

Brubaker & Associates, Inc.
Transmission Line Routing
Testimony Filed Since
January, 2007
by James R. Dauphinals

Attachment Joint Applicants 1-6-c-1

<u>Date Filed</u>	<u>State</u>	<u>Docket No.</u>	<u>Utility</u>	<u>Type</u>	<u>On Behalf Of</u>
6/7/2013	AB	1609059 / 2196	ATCO ELECTRIC LTD.	Direct	Red Route Group
4/12/2013	IL	12-0598	AMEREN TRANSMISSION COMPANY OF ILLINOIS	Rebuttal	Moultrie County Property Owners ("MCPO")
3/29/2013	IL	12-0598	AMEREN TRANSMISSION COMPANY OF ILLINOIS	Direct	Moultrie County Property Owners ("MCPO")
1/23/2013	TX	40728	ELECTRIC TRANSMISSION TEXAS, LLC	Direct	The Alliance of South Texas Ranchers, LLC; Edwin H. Frank, III; Max A. Johnson; Tres Mujeres, Ltd.
11/14/2012	MI	U-17041	MICHIGAN ELECTRIC TRANSMISSION COMPANY, LLC	Direct	Landowners
5/11/2012	AB	Application: 1607153 / Proceeding ID: 1069	ATCO ELECTRIC	Direct	North Bruderheim Group
5/7/2012	AB	Application: 1607153 / Proceeding ID: 1069	ATCO ELECTRIC	Direct	POWERLESS
3/9/2012	AB	Application 1607597 / Proceeding ID 1363	ATCO ELECTRIC	Direct	Raymond and Victoria Dodd
10/3/2011	AB	Application 1606831; Proceeding ID 979	Altalink Management Ltd.	Direct	Hansman Lake Group
12/7/2010	TX	38597	ONCOR ELECTRIC DELIVERY COMPANY	Cross-Rebuttal	Walton Texas, LP, Walton Kimberlin Heights, LP, Walton Kimberlin Heights Development, LP, Walton Elm Creek Ranch, LP, Walton Elm Creek Ranch Development, LP, Walton TX Cottonwood, Limited Partnership, Walton USA Cottonwood, LP, Walton Southern U.S. Land, LP, Walton TX South Grayson Limited Partnership, Walton TX Garland Heights Limited Partnership, WECR Development Sub, LP and WKH Development Sub, LP
11/16/2010	TX	38597	ONCOR ELECTRIC DELIVERY COMPANY	Direct	Walton Texas, LP, Walton Kimberlin Heights, LP, Walton Kimberlin Heights Development, LP, Walton Elm Creek Ranch, LP, Walton Elm Creek Ranch Development, LP, Walton TX Cottonwood, Limited Partnership, Walton USA Cottonwood, LP, Walton Southern U.S. Land, LP, Walton TX South Grayson Limited Partnership, Walton TX Garland Heights Limited Partnership, WECR Development Sub, LP and WKH Development Sub, LP
10/15/2010	TX	38517	ONCOR ELECTRIC DELIVERY COMPANY LLC	Direct	Burkett Enterprises, Inc.
9/28/2010	TX	38354	LCRA TRANSMISSION SERVICES CORPORATION	Direct	Preston Interests, Ltd., Rafter Z Ranch, LP, Rockin OC, LLC, Saba Ranch Partners, W&W Legacy Wildlife Investments, LLC
9/27/2010	TX	38324	ONCOR ELECTRIC DELIVERY COMPANY LLC	Cross-Rebuttal	Barry K. and Robin E. Emerson
9/14/2010	TX	38290	SHARYLAND UTILITIES, L.P.	Cross-Rebuttal	Attebury Elevators LLC and Rockrose Development, LLC
9/3/2010	TX	38324	ONCOR ELECTRIC DELIVERY COMPANY LLC	Direct	Barry K. and Robin E. Emerson
8/26/2010	TX	38290	SHARYLAND UTILITIES, L.P.	Direct	Attebury Elevators LLC and Rockrose Development, LLC

Brubaker & Associates, Inc.
Transmission Line Routing
Testimony Filed Since
January, 2007
by James R. Dauphinals

Attachment Joint Applicants 1-6-c-1

Date Filed	State	Docket No.	Utility	Type	On Behalf Of
8/16/2010	TX	38230	LONE STAR TRANSMISSION, LLC	Direct	Lloyd W. Powell, Jr., Palo Verde Oil, L.P., Borden Exploration & Development, L.P., Rock Royalty, Inc.
7/30/2010	TX	38140	ONCOR ELECTRIC DELIVERY COMPANY LLC	Cross-Rebuttal	Henry Family
7/12/2010	TX	38140	ONCOR ELECTRIC DELIVERY COMPANY LLC	Direct	Henry Family
3/17/2010	TX	37778	LCRA TRANSMISSION SERVICES CORPORATION	Direct	M.D. Bryant Family Trust
1/11/2010	TX	37464	ONCOR ELECTRIC DELIVERY COMPANY LLC	Supplemental	Preserve Our San Saba Environment, Inc.
12/11/2009	TX	37464	ONCOR ELECTRIC DELIVERY COMPANY LLC	Direct	Preserve Our San Saba Environment, Inc.

**BEFORE THE
THE ALBERTA UTILITIES COMMISSION**

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Re: AltaLink Management)	
Ltd.'s Application: Proposed)	Application 1606831 /
Hanna Region Transmission)	Proceeding ID 979
Development – Hansman Lake)	
<hr/>)	

Evidence of
James R. Dauphinais

On behalf of
Hansman Lake Group

Project 9511
October 3, 2011

BAI
BRUBAKER & ASSOCIATES, INC.
CHESTERFIELD, MO 63017