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

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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**

# ELECTRIC TRANSMISSION TEXAS, LLC AND SHARYLAND UTILITIES, L.P.'S RESPONSE TO INTERVENORS RHODES, ET AL.'S SEVENTH REQUEST FOR INFORMATION

Electric Transmission Texas, LLC and Sharyland Utilities, L.P. (ETT/Sharyland) file this response to Intervenors RHODES ET AL.'s Second Request for Information (RFI) to ETT/Sharyland. ETT/Sharyland received Intervenors RHODES ET AL.'s Second RFI on September 27, 2013. Pursuant to SOAH Order No. 1, ETT/Sharyland's response to Intervenors RHODES ET AL.'s Second RFI is due on October 7, 2013. This response is therefore timely filed. All parties may treat these answers as if they were filed under oath.

ETT/Sharyland reserve the right to object at the time of the hearing to the admissibility of information produced herein.

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October 7, 2013

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#### Question No. Rhodes RFI No. 7-1:

Please consider a hypothetical alternate partial route constructed from Links 193a, 193b, 361, 351a, 193c, 195, 198, 199, 203, 212, 214, 219, 226, 233, 235, 256, 258, 265, 271, 270, 269,268,267,273,308,321,322,327,328,335, 340 and 341 ("Campbell Alliance Partial Route 1").

- a. Please confirm that notice has been properly given by the Joint Applicants for all of the links that would make up this hypothetical partial route.
- b. Please identify whether the Joint Applicants are willing to construct its proposed transmission line using these links if the Commission chooses to select this hypothetical partial route as part of the route for the proposed transmission line.
- c. If the Joint Applicants are <u>not</u> willing to construct its proposed transmission line using these links, please explain in detail why not.
- d. If the Joint Applicants are aware of any concerns it has with any specific combination of links in this hypothetical partial route, please identify each specific combination of links for which the Joint Applicants have a concern and explain in detail the specific concern the Joint Applicants have with regard to that specific combination of links.
- e. Please provide a cost estimate for this hypothetical partial route in a similar manner to the cost estimates provided in Attachment 5, Estimated Costs of Alternative Routes, of the CCN Application in Docket No. 41606.
- f. Please including Links 134, 135, 137a, 137b, 138, 141, 147, 152, 155, 162, 165 and 169 with the links of the hypothetical alternative partial route or Campbell Alliance Partial Route 1. Please provide a cost estimate for this hypothetical route ("Rhodes Alliance Route 1") in a similar manner to the cost estimates provided in Attachment 5, Estimated Costs of Alternative Routes, of the CCN Application in Docket No. 41606.

#### **Response No. Rhodes RFI No. 7-1:**

Joint Applicants have identified an error in the labels of Links 351a and 351b on the Landownership Map, Application Attachment 9 – Index Sheet 1 – Hidalgo. That map incorrectly labels the link north of Link 361 as Link 351a and the link south of Link 361 as Link 351b, and they should be reversed. This error is repeated on Landownership Map Application Attachment 9a – Hidalgo Sht 24. Links 351a and 351b are correctly labeled on Figure 3-2 Sheet 4 of 6 and Figure 5-1 Sheet 4 of 6 in the Environmental Assessment. For the purposes of these responses, Joint Applicants used Link 351b (instead of Link 351a) in order to connect Link 361 with Link 193c for this hypothetical partial route.

- a. Confirmed.
- b. Although the hypothetical partial route defined in Rhodes RFI 7-1 is constructed from a combination of existing proposed links, Joint Applicants do not believe it produces a route that is consistent with ERCOT's recommendation to route the project in proximity to the South McAllen Substation. However, if the Commission determines that (i) there is not a need to route the project in proximity to the South McAllen substation, or (ii) this alternative route is consistent with the ERCOT recommendation, then Joint Applicants are willing to construct this hypothetical partial route if it is part of the route for the proposed transmission line approved by the Commission.
- c. See Joint Applicants' response to Rhodes RFI No. 7-1b.
- d. Joint Applicants have not identified any concerns with any specific combination of links in this hypothetical partial route except to the extent that they produce a route that is not consistent with ERCOT's recommendation to route the project in proximity to the South McAllen Substation.
- e. Due to the time involved in creating cost estimates in the form provided in Attachment 5 to the CCN Application, Joint Applicants each are providing a total cost estimate for this hypothetical partial route based on their average cost per mile for the 32 routes proposed in the CCN Application. Although these are not final cost estimates, Joint Applicants believe these are the best available estimate at this time.

| Estimated    | Estimated      | Estimated Additional | Estimated     |
|--------------|----------------|----------------------|---------------|
| Cost ETT     | Cost Sharyland | Cost                 | Cost Total    |
| \$52,258,000 | \$139,586,000  | \$15,515,000         | \$207,359,000 |

f. Due to the time involved in creating cost estimates in the form provided in Attachment 5 to the CCN Application, Joint Applicants each are providing a total cost estimate for this alternate route based on their average cost per mile for the 32 routes proposed in the CCN Application. Although these are not final cost estimates, Joint Applicants believe these are the best available estimate at this time.

| Estimated     | Estimated      | Estimated Additional | Estimated  |
|---------------|----------------|----------------------|------------|
| Cost ETT      | Cost Sharyland | Cost                 | Cost Total |
| \$158,423,000 | \$139,586,000  | \$23,114,000         |            |

| Prepared By:  | Mark Caskey<br>Barrett A. Thomas | Title:<br>Title: | President, Sharyland Utilities, L.P.<br>Transmission Line Project Engineer,<br>AEPSC |
|---------------|----------------------------------|------------------|--|
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