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

2013 OCT 10 PM 2:51

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

**ELECTRIC TRANSMISSION TEXAS, LLC AND SHARYLAND UTILITIES, L.P.'S**  
**RESPONSE TO d'HEMECOURT PROPERTIES, INC.'S**  
**FIRST REQUEST FOR INFORMATION**

Electric Transmission Texas, LLC and Sharyland Utilities, L.P. (ETT/Sharyland) file this response to d'Hemecourt Properties, Inc.'s First Request for Information (RFI) to ETT/Sharyland. ETT/Sharyland received d'Hemecourt Properties, Inc.'s First RFI on September 27, 2013. Pursuant to SOAH Order No. 1, ETT/Sharyland's response to d'Hemecourt Properties, Inc.'s First RFI is due on October 10, 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.

1025

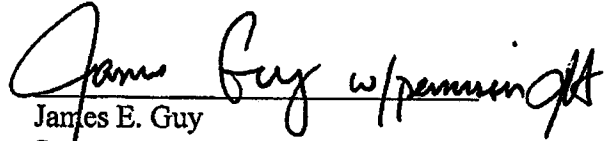


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October 10, 2013



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**SOAH DOCKET NO. 473-13-5207  
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<b>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</b>	§ § § § § § § § § §	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**ELECTRIC TRANSMISSION TEXAS, LLC AND SHARYLAND UTILITIES, L.P.'S  
RESPONSE TO D'HEMECOURT PROPERTIES, INC.'S  
FIRST REQUEST FOR INFORMATION**

**Question No. 1-1:**

Please provide ground elevation and height of proposed construction on links 196b, 193c, 194, 195, 198, 199, 201, 207, 208, 209, 351a, and 351b

**Response No. 1-1:**

Joint Applicants have not identified or calculated the ground elevation for the listed links. A detailed engineering design including pole placement and structure height that will be used to construct the project along each approved link will not be complete until after the PUC approves a route. Structure height will vary depending on the type of structure used, topography, structure location, and span length, with typical structure heights of approximately 140 feet to 155.

Prepared By: Mel Eckhoff

Title: Regulatory Consultant, AEPSC

Sponsored By: Barrett Thomas

Title: Transmission Line Project Engineer,  
AEPSC

Mark Caskey

President, Sharyland Utilities, L.P.

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**ELECTRIC TRANSMISSION TEXAS, LLC AND SHARYLAND UTILITIES, L.P.'S  
RESPONSE TO D'HEMECOURT PROPERTIES, INC.'S  
FIRST REQUEST FOR INFORMATION**

**Question No. 1-2:**

Please explain in detail why ETT/Sharyland included link 196b in its preferred route rather than link 193c, including all criteria and considerations evaluated. Please provide all supporting documentation.

**Response No. 1-2:**

In accordance with PUC Procedural Rule 22.52(a)(4), the Joint Applicants have not designated a preferred route, but as required by Question 17 of the PUC Application to Amend a Certificate of Convenience and Necessity, have identified Route 32 as the route that best addresses the requirements of the Public Utility Regulatory Act and the PUC's Substantive Rules.

In forming the 32 primary alternative routes, Joint Applicants created link combinations that were forward progressing as well as geographically diverse, and Route 32 includes Link 196b. Joint Applicants evaluated the primary alternative routes as a whole and made no evaluation of routing combinations that substituted links in any given route. There are other alternative routes that include Link 193c.

Prepared By: Mel Eckhoff

Title: Regulatory Consultant, AEPSC

Sponsored By: Mark Caskey  
Teresa B. Trotman

Title: President, Sharyland Utilities, L.P.  
Manager of Projects, AEPSC

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**ELECTRIC TRANSMISSION TEXAS, LLC AND SHARYLAND UTILITIES, L.P.'S  
RESPONSE TO D'HEMECOURT PROPERTIES, INC.'S  
FIRST REQUEST FOR INFORMATION**

**Question No. 1-3:**

Please explain in detail any and all reasons why the preferred route could not be modified by connecting 196a to 203 via links 351a, 351b, 193c, 195, 198, and 199 (instead of via links 196b and 200). Please provide all supporting documentation.

**Response No. 1-3:**

In accordance with PUC Procedural Rule 22.52(a)(4), Joint Applicants have not designated a preferred route, but as required by Question 17 of the PUC Application to Amend a Certificate of Convenience and Necessity, have identified Route 32 as the route that best addresses the requirements of the Public Utility Regulatory Act and the PUC's Substantive Rules. Route 32 includes Links 196a, 196b, 200, and 203.

Joint Applicants are not aware of any reasons other than adding additional length and its attendant impacts on cost and increased impact on land use as to why the link combination described in the question could not be substituted between Links 196a and 203 in any route that uses those links. As stated in the notices provided of the Joint Application, all routes and links are available for selection and approval by the PUC.

Prepared By: Mel Eckhoff

Title: Regulatory Consultant, AEPSC

Sponsored By: Mark Caskey  
Teresa B. Trotman

Title: President, Sharyland Utilities, L.P.  
Manager of Projects, AEPSC

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**ELECTRIC TRANSMISSION TEXAS, LLC AND SHARYLAND UTILITIES, L.P.'S  
RESPONSE TO D'HEMECOURT PROPERTIES, INC.'S  
FIRST REQUEST FOR INFORMATION**

**Question No. 1-4:**

If the preferred route were modified by connecting 196a to 203 via links 351a, 351b, 193c, 195, 198, and 199 (instead of via links 196b and 200), please describe the impact on estimated engineering and construction constraints, costs, grid reliability, security issues, public input, community values, design and constructability and delay. Specifically:

- a. Please provide ETT/Sharyland's best available estimate of route metrics for this modified Route 32 in the same format as Table 4-1 of Attachment 1, Environmental Assessment and Route Analysis, of the CCN Application.
- b. Please provide ETT/Sharyland's best available cost estimate of this modified Route 32 in the same format as the cost estimates provided in Attachment 5, Estimated Costs of Alternative Routes and Substations, of the CCN Application.

**Response No. 1-4:**

In accordance with PUC Procedural Rule 22.52(a)(4), Joint Applicants have not designated a preferred route, but as required by Question 17 of the PUC Application to Amend a Certificate of Convenience and Necessity, have identified Route 32 as the route that best addresses the requirements of the Public Utility Regulatory Act and the PUC's Substantive Rules. Route 32 includes Links 196a, 196b, 200, and 203.

Joint Applicants have not analyzed the potential impact on "estimated engineering and construction constraints, costs, grid reliability, security issues, public input, community values, design and constructability and delay" for the alternative link combination described in the question. Considering that Route 32 is approximately 117.5 miles in length and the alternative link combination described in the question is a relatively minor deviation geographically and in length, Joint Applicants expect that any potential impact on the factors listed in the question

would not be significant as compared to Route 32, but there would be an increase in cost and land use impacts from the additional length.

- a. Please see D'Hemecourt RFI No. 1-4 Attachment 1.
- b. Due to the time involved in creating cost estimates in the form provided in Attachment 5 to the CCN Application, Joint Applicants are not able to provide a cost estimate as requested. Estimating that the modified Route 32 described in the question is approximately 1.98 miles longer than Route 32, Joint Applicants estimate that the cost of the modified Route 32 would be approximately \$357,969,000. Although these are not final cost estimates, Joint Applicants believe this is the best estimate available at this time.

Prepared By: Anastacia Santos  
Mel Eckhoff

Title: Project Manager, POWER Engineers  
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Sponsored By: Rob Reid  
  
Mark Caskey  
Barrett A. Thomas

Title: Sr. Project Manager/Vice President,  
POWER Engineers  
Title: President, Sharyland Utilities, L.P.  
Transmission Line Project Engineer,  
AEPSC



Table 4-1 ENVIRONMENTAL DATA FOR ROUTE EVALUATION

SOAH Docket No. 473-13-5207

PUC Docket No. 41606

d'Hemecourt's 1st, Q. #1-4

Attachment 1

Evaluation Criteria	1-4	1-6
<b>Land Use</b>		
Length of alternative route	119.5	120.6
Number of habitable structures <sup>1</sup> within 500 feet of ROW centerline	487	417
Number of newly affected habitable structures within 500 feet of ROW centerline	320	293
Number of habitable structures <sup>1</sup> potentially to be relocated/removed <sup>2</sup>	1	1
Length of ROW using existing transmission line ROW	0.0	0.0
Length of ROW parallel to existing transmission line ROW	23.5	22.8
Length of ROW parallel to other existing ROW (highways, pipelines, railways, canals, etc.)	46.7	48.7
Length of ROW parallel to apparent property lines <sup>3</sup>	17.8	17.8
Length of ROW through parks/recreational areas <sup>4</sup>	0.0	0.0
Number of parks/recreational areas <sup>4</sup> crossed by ROW centerline	0	0
Number of additional parks/recreational areas <sup>4</sup> within 1,000 feet of ROW centerline	5	5
Length of ROW through USFWS National Wildlife Refuges	0.0	0.0
Length of ROW through IBWC managed ROW	6.9	7.9
Length of ROW through cropland <sup>5</sup>	72.1	73.0
Length of ROW through orchards	4.1	4.1
Length of ROW through pasture/rangeland	26.7	26.7
Length of ROW through land irrigated by traveling systems (rolling or pivot type)	0.0	0.0
Number of pipeline crossings	100	103
Number of transmission line crossings	28	30
Number of US and State highway crossings	7	7
Number of farm-to-market road crossings	19	18
Number of cemeteries within 1,000 feet of the ROW centerline	5	5
Number of FAA registered airports with at least one runway more than 3,200 feet in length located within 20,000 feet of ROW centerline	4	4
Number of FAA registered airports having no runway more than 3,200 feet in length located within 10,000 feet of ROW centerline	2	2
Number of private airstrips within 10,000 feet of the ROW centerline	1	1
Number of heliports within 5,000 feet of the ROW centerline	0	0
Number of commercial AM radio transmitters within 10,000 feet of the ROW centerline	0	0
Number of FM radio transmitters, microwave towers, and other electronic installations within 2,000 feet of ROW centerline	11	10
<b>Aesthetics</b>		
Estimated length of ROW within foreground visual zone <sup>6</sup> of US and State highways	14.8	13.2
Estimated length of ROW within foreground visual zone <sup>6</sup> of farm-to-market roads	32.5	32.2
Estimated length of ROW within foreground visual zone <sup>6</sup> of parks/recreational areas <sup>4</sup>	13.5	14.5
<b>Ecology</b>		
Length of ROW through upland woodlands	5.0	5.0
Length of ROW through bottomland/riparian woodlands	2.2	2.2
Length of ROW across mapped NWI wetlands	2.5	2.5
Length of ROW across known habitat of federally listed endangered or threatened species	14.8	14.8
Length of ROW across open water (lakes, ponds)	0.9	0.9
Number of stream crossings	4	6
Number of river crossings	0	0
Number of irrigation/drainage canal crossings	137	137
Length of ROW parallel (within 100 feet) to streams or rivers	0.0	0.0
Length of ROW across 100-year floodplains	27.1	27.7
Length of ROW within Coastal Management Program boundary	8.9	8.9
Length of ROW seaward of the Coastal Facilities Designation Line	8.9	8.9
<b>Cultural Resources</b>		
Number of recorded cultural resource sites crossed by ROW	5	5
Number of additional recorded cultural resource sites within 1,000 feet of ROW centerline	11	12
Number of National Register listed sites crossed by ROW centerline	1	1
Number of additional National Register listed sites within 1,000 feet of ROW centerline	1	1
Length of ROW across areas of high archeological site potential	80.0	81.5

<sup>1</sup>Single-family and multi-family dwellings, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, and 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 of a transmission project of 230 kV or more.

<sup>2</sup>ETT and Sharyland will potentially relocate/remove habitable structures within 750' of the centerline.

<sup>3</sup>Apparent property lines created by existing roads, highways, or railroad ROWs are not "double-counted" in the length of ROW parallel to property lines criteria.

<sup>4</sup>Defined as parks and recreational areas owned by a governmental body or an organized group, club, or church within 1,000 feet of the centerline of the project. This includes the Chihuahuas Woods Preserve.

<sup>5</sup>Cropland does not include orchards.

<sup>6</sup>One-half mile, unobstructed.

Note: All length measurements are shown in miles unless noted otherwise.

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RESPONSE TO D'HEMECOURT PROPERTIES, INC.'S  
FIRST REQUEST FOR INFORMATION**

**Question No. 1-5:**

Please explain in detail any and all reasons why the preferred route could not be modified by connecting 196a to 212 via links 351a, 351b, 193c, 194, 201, 207, 208, and 209 (instead of via links 196b, 200, and 203). Please provide all supporting documentation.

**Response No. 1-5:**

In accordance with PUC Procedural Rule 22.52(a)(4), Joint Applicants have not designated a preferred route, but as required by Question 17 of the PUC Application to Amend a Certificate of Convenience and Necessity, have identified Route 32 as the route that best addresses the requirements of the Public Utility Regulatory Act and the PUC's Substantive Rules. Route 32 includes Links 196a, 196b, 200, 203, and 212.

Joint Applicants are not aware of any reasons other than adding additional length and its attendant impacts on cost and increased impact on land use as to why the link combination described in the question could not be substituted between Links 196a and 212 in any route that uses those links. As stated in the notices provided of the Joint Application, all routes and links are available for selection and approval by the PUC.

Prepared By: Mel Eckhoff

Title: Regulatory Consultant, AEPSC

Sponsored By: Mark Caskey  
Teresa B. Trotman

Title: President, Sharyland Utilities, L.P.  
Manager of Projects, AEPSC

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**ELECTRIC TRANSMISSION TEXAS, LLC AND SHARYLAND UTILITIES, L.P.'S  
RESPONSE TO D'HEMECOURT PROPERTIES, INC.'S  
FIRST REQUEST FOR INFORMATION**

**Question No. 1-6:**

If the preferred route were modified by connecting 196a to 212 via links 351a, 351b, 193c, 194, 201, 207, 208, and 209 (instead of via links 196b, 200, and 203), please describe the impact on estimated engineering and construction constraints, costs, grid reliability, security issues, public input, community values, design and constructability and delay. Specifically:

- a. Please provide ETT/Sharyland's best available estimate of route metrics for this modified Route 32 in the same format as Table 4-1 of Attachment 1, Environmental Assessment and Route Analysis, of the CCN Application.
- b. Please provide ETT/Sharyland's best available cost estimate of this modified Route 32 in the same format as the cost estimates provided in Attachment 5, Estimated Costs of Alternative Routes and Substations, of the CCN Application.

**Response No. 1-6:**

In accordance with PUC Procedural Rule 22.52(a)(4), Joint Applicants have not designated a preferred route, but as required by Question 17 of the PUC Application to Amend a Certificate of Convenience and Necessity, have identified Route 32 as the route that best addresses the requirements of the Public Utility Regulatory Act and the PUC's Substantive Rules. Route 32 includes Links 196a, 196b, 200, and 203.

Joint Applicants have not analyzed the potential impact on "estimated engineering and construction constraints, costs, grid reliability, security issues, public input, community values, design and constructability and delay" for the alternative link combination described in the question. Considering that Route 32 is approximately 117.5 miles in length and the alternative link combination described in the question is a relatively minor deviation geographically and in length, Joint Applicants expect that any potential impact on the factors listed in the question

would not be significant as compared to Route 32, but there would be an increase in cost and land use impacts from the additional length.

- a. Please see D'Hemecourt RFI No. 1-4 Attachment 1.
- b. Due to the time involved in creating cost estimates in the form provided in Attachment 5 to the CCN Application, Joint Applicants are not able to provide a cost estimate as requested. Estimating that the modified Route 32 described in the question is approximately 3.67 miles longer than Route 32, Joint Applicants estimate that the cost of the modified Route 32 would be approximately \$362,855,000. Although these are not final cost estimates, Joint Applicants believe this is the best estimate available at this time.

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Mel Eckhoff

Title: Project Manager, POWER Engineers  
Title: Regulatory Consultant

Sponsored By: Rob Reid  
Mark Caskey  
Barrett A. Thomas

Title: Sr. Project Manager/Vice President,  
POWER Engineers  
Title: President, Sharyland Utilities, L.P.  
Title: Transmission Line Project Engineer,  
AEPSC