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Addendum StartPage: 0

SOAH DOCKET NO. 473-13-5207  
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PUBLIC UTILITY COMMISSION  
FILING CLERK

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

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BEFORE THE STATE OFFICE

OF

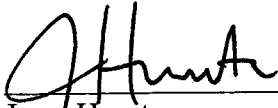
ADMINISTRATIVE HEARINGS

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

Electric Transmission Texas, LLC and Sharyland Utilities, L.P. ("ETT/Sharyland") file this response to Michael Rhodes, ML Rhodes, Ltd., and Rhodes Enterprises, Inc.'s ("Rhodes et al") Second Request for Information ("RFI") to ETT/Sharyland. ETT/Sharyland received Rhodes' et al Second RFI on August 16, 2013. Pursuant to SOAH Order No. 1, ETT/Sharyland's response to Rhodes' et al Second RFI is due on August 29, 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.

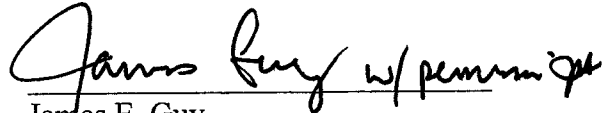
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August 29, 2013

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all parties of record on this 29<sup>th</sup> day of August 2013.



Jerry Huerta

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

<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 RHODES ET AL.'S SECOND REQUEST FOR INFORMATION**

**Question No. Rhodes RFI 2-1:**

Please refer RFI Rhodes 1-14 and ETT/Sharyland's response to that RFI.

- a. Please explain in detail why ETT/Sharyland did not consider using a configuration where the westbound and eastbound circuits are placed on separate structures in adjacent right-of-way along Links 118a and 118c.
- b. Please admit the loss of all transmission lines in adjacent or overlapping right-of-ways is a North American Electric Reliability Corporation ("NERC") Category D Extreme Contingency Event.
- c. Please explain in detail why ETT/Sharyland did investigate and propose the potential use of alternative route links located north of, in parallel of and no more than three miles in distance from Links 118a and 118c.
- d. Please explain in detail whether ETT/Sharyland believes additional notice would have to be given to landowners and other affected parties if a wider right-of-way, that could accommodate two adjacent transmission structure lines, were to be used for Links 118a and 118c. If so, please explain in detail why ETT/Sharyland believes this to be true.

**Response No. Rhodes RFI 2-1:**

- a. ETT/Sharyland considered possible link configurations in the area where Links 118a and 118c are currently proposed, including locating additional links and configurations within the right-of-way (ROW) subject to jurisdiction of the International Boundary and Water Commission (IBWC). Although ETT/Sharyland did not explicitly consider using a configuration where the westbound and eastbound circuits are placed on separate structures in adjacent ROW along Links 118a and 118c, Joint Applicants believe this configuration would not be an acceptable design across and within the IBWC ROW. Due in part to the need to obtain a license from the IBWC, original preliminary links in the vicinity of Links 118a and 118c were revised to conform with IBWC Staff's guidance to minimize new structures located within the IBWC floodways, which could potentially obstruct flows within those floodways. Links that would use adjacent ROWs across and through the floodway (with potentially twice the number of structures within the floodway) would be contrary to IBWC Staff's guidance.

Moreover, ETT/Sharyland do not believe the configuration proposed in this question is consistent with ERCOT's designation of the transmission project as critical to the reliability of the ERCOT grid. With respect to any links where the circuits into and out of the South McAllen 345 kV Substation area would be paralleled, ETT/Sharyland do not believe it is prudent to locate the circuits adjacent to each other due to the increased risk of a common failure creating an outage of both the North Edinburg to South McAllen circuit and the South McAllen to Loma Alta circuit. The closer these two circuits are to each other the higher the risk, and for the specific links referenced above, the distance that the two circuits would be paralleled is approximately 2.85 miles. Because of the critical designation of the transmission line by ERCOT, ETT/Sharyland determined that the risk to the ERCOT system from such a common event would be significantly reduced if the two circuits were separated as much as possible, taking into account other constraints in the area. See Joint Applicants' response to subsection (c) below.

- b. Admit, assuming the question refers to the configuration after the new South McAllen 345/138 kV Substation is constructed and interconnected to the project proposed in this proceeding. Please refer to Joint Applicants' response to subsection (a) above regarding the concern that ETT/Sharyland has with the increased risk of a common failure to this ERCOT critical transmission line by creating an outage to both the North Edinburg 345/138 kV Substation to the future South McAllen 345/138 kV Substation circuit and the South McAllen 345/138 kV Substation to the Loma Alta 345/138 kV substation circuit.
- c. POWER Engineers and the Joint Applicants initially investigated the possibility of links in the area north of Links 118a and 118c. However, due to existing constraints including the extent of existing development to the north, the east-west nature of the IBWC floodway in that area, and the McAllen Miller International Airport, the delineation of feasible links in that area was deemed not reasonable. Developing links to the north of Links 118a and 118c would cause those links to be close to the existing McAllen Miller International Airport, which would impose height restrictions on the structures needed for the project. See Joint Applicants' response to subsection (a) above regarding the paralleling of the circuits into and out of the future South McAllen 345/138 kV Substation area.
- d. Yes, ETT/Sharyland believe that those landowners impacted by the change of having one set of structures to now having two set of structures would need to be re-noticed along with any new potentially affected landowners due to the additional ROW and transmission line. See P.U.C. PROC. R. 22.52.

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Title: President, Sharyland Utilities, L.P.

**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 RHODES ET AL.'S SECOND REQUEST FOR INFORMATION**

**Question No. Rhodes RFI 2-2:**

Please refer to Rhodes RFI 1-13 and ETT/Sharyland's response to that RFI. Rhodes RFI 1-13 requested GIS shape files for all of the data created to classify and quantify the length of proposed routes through each quantifiable metric in Table 4-1 of the Environmental Assessment. ETT/Sharyland's response was that ETT/Sharyland did not create any GIS shape files and therefore they are not available. ETT/Sharyland's provided a GIS geodatabase that has all of the information that was requested, but, several of the files are corrupt rendering the entire geodatabase unusable. This is evident when one exports the zip file as there are numerous errors in this process.

- a. Please to resend the data, but please make sure that it will open on another computer.
- b. The shape files from the graphics ETT/Sharyland provided in your response to Rhodes RFI 1-19 was extractable. We believe it to be a simple process to export each of the layers as a shape file. Please explain in detail why ETT/Sharyland cannot get the geodatabase extracted from your servers.

**Response No. Rhodes RFI 2-2:**

- a. ETT/Sharyland have included all geodatabases previously sent (in a file that is not zipped) in response to Rhodes RFI 1-3, 1-11 and 1-13. The data requested is provided in electronic format, labeled Rhodes RFI 1-3.gdb, Rhodes RFI 1-11.gdb and Rhodes RFI 1-13.gdb, on the enclosed CD. Please note that the file folder names cannot be changed without corrupting the geodatabase.
- b. The files previously sent as part of Rhodes RFI 1-19 were saved as map packages for Arc GIS. The files can be viewed using ESRI's ArcMap application. In addition, all of the

data layers displayed on Figures 3-2 and 5-1 in the EA are included in the geodatabases provided for Rhodes RFI 1-3 and 1-11. It is a time-consuming process to extract the numerous data layers into shapefiles from the geodatabase. Geodatabase format is the project, and industry, standard.

Prepared By: Anastacia Santos

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Title: Sr. Project Manager/Vice President