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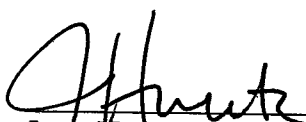
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JOINT APPLICATION OF ELECTRIC	§	
TRANSMISSION TEXAS, LLC AND	§	BEFORE THE STATE OFFICE
SHARYLAND UTILITIES, L.P. TO	§	
AMEND THEIR CERTIFICATES OF	§	
CONVENIENCE AND NECESSITY FOR	§	OF
THE PROPOSED NORTH EDINBURG	§	
TO LOMA ALTA DOUBLE-CIRCUIT	§	
345-KV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

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

Electric Transmission Texas, LLC and Sharyland Utilities, L.P. ("ETT/Sharyland") file this response to Rhodes et al's Third Request for Information ("RFI") to ETT/Sharyland. ETT/Sharyland received Rhodes, et al's Third RFI on August 26, 2013. Pursuant to SOAH Order No. 1, ETT/Sharyland's response to Rhodes, et al's Third RFI is due on September 5, 2013. This response is therefore timely filed. All parties may treat these answers as if they were filed under oath.

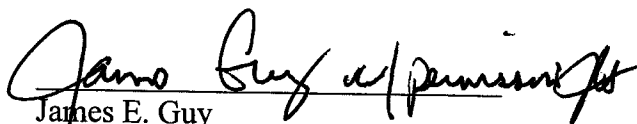
ETT/Sharyland reserve the right to object at the time of the hearing to the admissibility of information produced herein.



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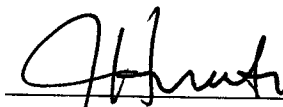
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September 5, 2013

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served on all parties of record on this 5<sup>th</sup> day of September 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 THE RHODES ET AL.'S THIRD REQUEST FOR INFORMATION**

**Question No. Rhodes RFI No. 3-1:**

Please refer RFI to Application attachment 1, the Environmental Assessment and Alternative Route Analysis

- a. The PUC definition of a habitable structure was used for this routing study. P.U.C. SUBST. R. 25.101(a)(3) defines habitable structures as "structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis. Habitable structures include, but are not limited to, single-family and multi-family dwellings, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, and schools." Please explain in detail the exact criteria, i.e. structure types, which ETT/Sharyland used to determine if a structure would fall into the habitable structure category. Aside from the structure types named in the definition, were any other structures types included in habitable structures. Were any structure types excluded?
- b. Does ETT/Sharyland have different weighting factors for the various structures types that comprise of habitable structures? For example, does ETT/Sharyland place greater weight on single- or multi-family dwellings than industrial structures?
- c. How does land parcel information affect the habitable structures count?

**Response No. Rhodes RFI No. 3-1:**

- a. Each structure within 500 feet of the centerline was evaluated based on the PUC's definition of habitable structures in P.U.C. SUBST. R. 25.101(a)(3). In addition to the types of habitable structures expressly listed in the PUC's definition, habitable structures within 500 feet of this project include recreational vehicles (RVs) (primarily located in RV parks), government buildings, and one large farm structure likely containing an

office. Structures that were determined to not be habitable structures include abandoned/delapidated dwellings, detached garages, sheds, outbuildings, and barns.

b. No.

c. Land parcel information does not affect the habitable structures count.

Prepared By: Anastacia Santos  
Sponsored By: Rob Reid

Title: Project Manager  
Title: Sr. Project Manager/Vice President

**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 THE RHODES ET AL.'S THIRD REQUEST FOR INFORMATION**

**Question No. Rhodes RFI No. 3-2:**

To the extent available, please provide in electronic format all digital files containing the land parcel data, i.e. boundary lines, in the study area that have been acquired, developed, or otherwise obtained by ETT, Sharyland, and POWER Engineers for the purpose of the development of possible routes for the transmission line proposed in this proceeding. These can include GIS shape files, geodatabase files, or any other files that contain the land parcel data.

**Response No. Rhodes RFI No. 3-2:**

Please see RHODES RFI 3-2 Attachment 1 on the enclosed flashdrive.

Prepared By: John Ramirez

Title: Project Manager, CDS Muery

Sponsored By: Mark Caskey  
Teresa Trotman

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

**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 THE RHODES ET AL.'S THIRD REQUEST FOR INFORMATION**

**Question No. Rhodes RFI No. 3-3:**

Please explain in detail if ETT/Sharyland developed any routes in addition to the 32 routes that have been filed as part of this application. If other routes or route links were developed, please provide the links contained within the routes and route metrics for both the routes and route links, similar to those contained Table 4-1 of the Environmental Assessment. If such other routes or route links were developed, please explain in detail why each of those routes or route links were ultimately left out of the application? If other route links were developed, please provide the GIS data in electronic format for those links.

**Response No. Rhodes RFI No. 3-3:**

Joint Applicants did not develop any end-to-end routes in addition to the 32 routes proposed in the Application. Additional links were developed during the routing process of the project and were either substantively changed or eliminated from consideration before the final 32 routes were defined. Route metrics for route evaluation were developed after the links were substantively changed or eliminated from consideration; therefore data similar to that contained in Table 4-1 of the Environmental Assessment are not available for links that were not used in one of the 32 routes proposed by Joint Applicants.

A list of all links that were substantively changed or eliminated from consideration (and therefore not included in the Primary Alternative Routes in the Application) is attached to this response as RHODES RFI 3-3 Attachment 1 on the enclosed flashdrive. Attachment 1 also contains an explanation of why each link was changed or eliminated. A GIS shapefile of these links is attached to this response as RHODES RFI 3-3 Attachment 2 on the enclosed flashdrive.

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Sponsored By: Rob Reid

Title: Project Manager  
Title: Sr. Project Manager/Vice President