

Control Number: 45624



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SOAH DOCKET NO. 473-16-2751
PUC DOCKET NO. 45624

2016 MAR -4 PM 1:15

APPLICATION OF THE CITY OF §
GARLAND TO AMEND A §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY FOR THE RUSK TO §
PANOLA DOUBLE-CIRCUIT 345-KV §
TRANSMISSION LINE IN RUSK AND §
PANOLA COUNTIES §

BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
OF
ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF GARLAND
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12

Pursuant to Tex. Admin Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the City of Garland by and through its attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.


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Dated: March 4, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division




Christina R. Switzer
Attorney-Legal Division
State Bar No. 24066171
Landon J. Lill
State Bar No. 24092700
(512) 936-7216
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on March 4, 2016, in accordance with 16 TAC § 22.74.


Christina R. Switzer

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF GARLAND
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

DEFINITIONS

- A. "Garland," or "You" refers to the City of Garland and any person acting or purporting to act on his behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.
- C. "Southern Cross" refers to Southern Cross Transmission LLC and any person acting or purporting to act on his behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- D. "Oncor" refers to Oncor Electric Delivery Company and any person acting or purporting to act on his behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- E. "ERCOT" refers to Electric Reliability Council of Texas and any person acting or purporting to act on his behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 1-1** Per link and route, how many miles of the proposed transmission line will use monopole towers?
- Staff 1-2** Per link and route, how many miles of the proposed transmission line will use lattice towers?
- Staff 1-3** What is the estimated cost to use monopole versus lattice towers?
- Staff 1-4** Why is it necessary to use monopole towers?
- Staff 1-5** Please explain how Garland decided where it will use monopole versus lattice towers.
- Staff 1-6** Please provide all correspondence between Garland & Southern Cross regarding the use of monopole towers.
- Staff 1-7** Who will fabricate the lattice and monopole towers?
- Staff 1-8** Please provide the vendor/fabricator's design drawings for both the lattice and monopole towers.
- Staff 1-9** Please provide all agreements between Garland and Southern Cross, including Southern Cross's affiliates and parent company.
- Staff 1-10** Please provide all correspondence between Garland and Oncor regarding any and all reliability and/or interconnection studies.
- Staff 1-11** Please provide all correspondence between Garland and ERCOT regarding any and all reliability and/or interconnection studies.
- Staff 1-12** Will Garland be required to pay for any construction of the proposed transmission project if Southern Cross is unable or unwilling to do so? Please provide all support for your response.