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PUBLIC UTILITY COMMISSION
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APPLICATION OF RAYBURN	§	BEFORE THE STATE OFFICE
COUNTRY ELECTRIC COOPERATIVE,	§	
INC. TO AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY FOR	§	OF
THE LOWER BOIS D'ARC WATER	§	
TREATMENT PLANT 138-KV	§	
TRANSMISSION LINE IN FANNIN AND	§	
HUNT COUNTIES, TEXAS	§	ADMINISTRATIVE HEARINGS


**RAYBURN'S RESPONSES
TO NORTHERN ALLIANCE'S
FIRST REQUEST FOR INFORMATION**

TO: Tyler Topper, Todd W. Boykin, C. Jared Knight, Burdett, Morgan, Williamson & Boykin, LLP, Attorneys for Intervenor Paul Gant, Billy R. Gant, Trustee, James Stone III, Robert Irish, Ron Wahlquist, T.W.M. Long III, and Robert Peace, 701 South Taylor, Suite 440, LB 103, Amarillo, TX 79101

Rayburn Country Electric Cooperative, Inc. ("Rayburn") timely submits these responses to Paul Gant, Billy R. Gant, Trustee, James Stone III, Robert Irish, Ron Wahlquist, T.W.M. Long III, and Robert Peace's (collectively "Northern Alliance") First Request for Information ("RFI"). Rayburn stipulates that all parties may treat these answers as if they were filed under oath. Rayburn reserves the right to object at the time of hearing to the admissibility of the information produced.

Responses to Northern Alliance's First RFIs contain voluminous, native file attachments. Accordingly, the voluminous, native file attachments are being produced on a USB flash drive labeled "RCEC-N. Alliance 1st", which will also be provided to any party who requests the same.

Respectfully submitted,



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**ATTORNEYS FOR RAYBURN COUNTRY
ELECTRIC COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the above and foregoing document was served on all parties of record in this proceeding as required by order or in accordance with P.U.C. PROC. R. § 22.74 on April 30, 2018.



Carl R. Galant

Northern Alliance RFI 1-1

Please provide a complete electronic copy of the Geographic Information System (GIS) Geodatabase and Shapefiles used in the development of the Environmental Assessment and Alternative Route Analysis (Attachment 1 of the Application).

RESPONSE:

Please see the “Northern Alliance RFI 1-1 (Geodatabase)” electronic file included within the attached USB flash drive labelled “RCEC-N. Alliance 1st”.

Preparer: Lara Zuzak
Sponsor: Lara Zuzak

Northern Alliance RFI 1-2

Please provide a copy of all aerial photography used in the development of the Application. If included within the Geodatabase, provide all aerial photography electronically as part of the Geodatabase.

RESPONSE:

Please see the “Northern Alliance RFI 1-2 (Aerial Imagery)” electronic file included within the attached USB flash drive labelled “RCEC-N. Alliance 1st”.

Preparer: Lara Zuzak
Sponsor: Lara Zuzak

Northern Alliance RFI 1-3

Please provide in electronic format, preferably in Microsoft Excel format, Table 6-1A and Table 6-1B, Environmental Data for Alternate Route Evaluation, which is contained in Attachment 1 of the Application.

RESPONSE:

Please see the “Northern Alliance RFI 1-3 (Excel Environmental Data)” electronic file included within the attached USB flash drive labelled “RCEC-N. Alliance 1st”.

Preparer: Lara Zuzak
Sponsor: Lara Zuzak

Northern Alliance RFI 1-4

Please provide an electronic copy, preferably in Microsoft Excel format, of the cost information contained in Attachment 4 of the Application.

RESPONSE:

Please see the “Northern Alliance RFI 1-4, 1-5, and 1-6 (Excel Cost Model)” electronic file included within the attached USB flash drive labelled “RCEC-N. Alliance 1st”. This electronic file contains an Excel file for Attachment 4 and for the entire cost model.

Preparer: Stephen Geiger
Sponsor: Stephen Geiger

Northern Alliance RFI 1-5

Please provide a complete electronic copy, preferably in Microsoft Excel format, of the cost model utilized to create the estimated costs shown in Attachment 4 of the Application. Please leave all formulae and links intact. In addition, please provide a detailed explanation of the methodology utilized to arrive at the costs shown in Attachment 4 of the Application.

RESPONSE:

Please see the “Northern Alliance RFI 1-4, 1-5, and 1-6 (Excel Cost Model)” electronic file included within the attached USB flash drive labelled “RCEC-N. Alliance 1st”.

Components of the cost estimate methodology include segment length, number and type of structures or equipment, estimated right of way acquisition, and right of way clearing.

Typical monopole structures as referenced in the CCN application were developed based on varying environmental and design considerations including height, angle of line deflection, necessary conductor/static splices, etc. The costs associated with these typical pole types were calculated based on the individual components that comprise the pole units.

The footage length for each segment was used to estimate the footage of conductors and static required. The cost per foot for the conductor was assumed at \$1.95 and the static at \$2.15.

Each segment was reviewed to estimate the number of acres of wooded area that would have to be cleared based on the location of the segment relative to the land it traversed. It was assumed that the cost to clear timber was \$2,000 per calculated acre.

To estimate right of way land costs, the average cost per acre of land according to the Fannin County Central Appraisal District was multiplied by the number of acres encumbered in easement by the segment. In addition to these costs, a flat fee for survey permission and associated documentation was estimated at \$2,000 for each tract of land the segment crossed. A similar estimated fee based on the number of tracts in a given segment was assumed at \$2,250 associated with negotiations and title documentation.

The estimated cost for each alternative route presented in the application was calculated by summing the costs associated with each of the segments comprising the route.

Preparer: Stephen Geiger
Sponsor: Stephen Geiger

Northern Alliance RFI 1-6

Please provide, in electronic format, the type (e.g., tangent, angle, dead-end, etc. for steel monopole, H-frame, lattice, etc. type construction) of structures used on each route and also the quantity of each structure type used on each route. Also, for each structure type provided, please provide a cost estimate of a single structure.

RESPONSE:

Please see the “Northern Alliance RFI 1-4, 1-5, and 1-6 (Excel Cost Model)” electronic file included within the attached USB flash drive labelled “RCEC-N. Alliance 1st”.

Preparer: Stephen Geiger
Sponsor: Stephen Geiger

Northern Alliance RFI 1-7

Please provide a copy of each Open House Questionnaire from all open house meetings, and subsequent mail-ins, received in the development of the Application.

RESPONSE:

Please see the “Northern Alliance RFI 1-7 (Open House Q)” electronic file included within the attached USB flash drive labelled “RCEC-N. Alliance 1st”.

Preparer: Lara Zuzak; Stephen Geiger
Sponsor: Lara Zuzak; Stephen Geiger

Northern Alliance RFI 1-8

Please provide any summaries, including tabular data, and all other documents related to the Open House Questionnaires from all open house meetings and subsequent mail-ins. If entered into an electronic format, please provide in an electronic format, preferably in Microsoft Excel.

RESPONSE:

Please see the “Northern Alliance RFI 1-8 (Excel Open House Q Tally)” electronic file included within the attached USB flash drive labelled “RCEC-N. Alliance 1st”.

Preparer: Lara Zuzak; Stephen Geiger
Sponsor: Lara Zuzak; Stephen Geiger