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DOCKET NO. 50584



**JOINT REPORT AND APPLICATION OF §
WIND ENERGY TRANSMISSION §
TEXAS, LLC; AXINFRA US LP; §
HOTSPUR HOLDCO 1 LLC; HOTSPUR §
HOLDCO 2 LLC; AND 730 HOTSPUR §
LLC, FOR REGULATORY APPROVALS §
PURSUANT TO PURA §§14.101, 39.262 §
AND 39.915 §**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

**WIND ENERGY TRANSMISSION TEXAS, LLC'S RESPONSE TO COMMISSION
STAFF'S SECOND SET OF REQUESTS FOR INFORMATION**

The Wind Energy Transmission Texas, LLC ("WETT") files this Response to Commission Staff's ("Staff") Second Requests for Information and would respectfully show as follows:

I. INTRODUCTION

On February 24, 2020, WETT AxInfra US LP ("AxInfra"), Hotspur HoldCo 1 LLC ("Hotspur 1"), Hotspur HoldCo 2 LLC ("Hotspur 2"), and 730 Hotspur, LLC ("730 Hotspur") (together, the "Joint Applicants") filed their Joint Report and Application for Regulatory Approvals Under PURA §§ 14.101, 39.262, and 39.915 (the "Application"). On April 27, 2020, the Staff issued its Second Request for Information to WETT. Pursuant to 16 Texas Administrative Code § 22.144(c)(1), WETT's responses are timely filed.

II. WRITTEN RESPONSES

Attached hereto and incorporated herein by reference are WETT's written responses to the aforementioned requests for information. Each such response is set forth separately beneath a restatement of the relevant request. Such responses are made without waiver of WETT's right to contest the admissibility of any such matters upon hearing. WETT hereby stipulates that its responses may be treated by all parties exactly as if they were filed under oath.

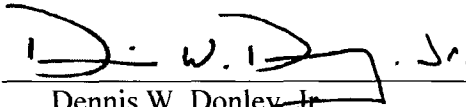
III. INSPECTIONS

In those instances where materials are to be made available for inspection by request or in lieu of a written response, the attached response will so state. For those materials that a response indicates may be inspected at WETT's voluminous room, please call at least 24 hours in advance for an appointment in order to assure that there is sufficient space and someone available to accommodate your inspection. To make an appointment at the WETT voluminous room located at 1901 Capital Pkwy, Suite 200, Austin, Texas 78746, please call Angela Montalvo at (512) 807-2495.

Respectfully submitted,

Naman, Howell, Smith & Lee, PLLC
8310 N. Capital of Texas Highway, Suite 490
Austin, Texas 78731
(512) 479-0300
(512) 474-1901 (Facsimile)

By




Dennis W. Donley, Jr.
State Bar No. 24004620
Stephanie S. Potter
State Bar No. 24065923

Attorneys for Wind Energy Transmission Texas, LLC

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served by electronic mail, facsimile, hand-delivery, overnight delivery, First Class U.S. Mail, and/or e-mail, if permitted, on all parties of record in this proceeding on May 7, 2020.


Dennis W. Donley, Jr.

PUC DOCKET NO. 50584
WIND ENERGY TRANSMISSION TEXAS, LLC's RESPONSE TO STAFF's 2nd RFIs

STAFF-WETT 2-1

Does WETT track SAIDI, SAIFI or other similar reliability metrics on its system? If so, please describe how and, generally from where, the data are collected. For example, if WETT considers delivery points at substations as customers for the purposes of metric calculation, please describe the process and calculation.

Response:

No. SAIFI and SAIDI are reliability metrics for use with distribution providers related to customer outages. WETT is a transmission-only utility, and as such these metrics do not apply to WETT, so it does not collect this data.

Prepared/Sponsored by: L. Wayne Morton, CEO, WETT

STAFF-WETT 2-2

If the answer to Question 2-1 is yes, please provide this data for the last five years.

Response:

Not applicable.

Prepared/Sponsored by: L. Wayne Morton, CEO, WETT

STAFF-WETT 2-3

Please provide a list of all outages to your system for the last five years. Please indicate whether the outages were forced, scheduled, resulted from outside causes, or were major events. Refer to the definitions in 16 TAC § 25.52 for the definitions of these outage classifications. Also indicate the cause and duration of each outage.

Response:

As noted in my testimony, WETT has a stellar operating history.¹ WETT has prepared a list of outages—the vast majority of them scheduled outages—responsive to this request. See Confidential Exhibit STAFF-WETT 2-3, filed under seal. In general, rare unscheduled outages fall into the following categories:

- In the early stages of the CREZ system completion, ERCOT had to manage some voltage issues prior to wind generation being connected by requesting lines be held out of service.
- In two cases in 2015, WETT experienced a static line becoming loose during a storm within a relatively short time after construction was completed. Detailed inspections were performed soon thereafter to the entire system and repairs made. No further such outages have since occurred.
- Line trips and circuit breaker lock-outs are the majority of the remainder. Lines were returned back to service in short order.

Prepared/Sponsored by: L. Wayne Morton, CEO, WETT

¹ WETT has never been censured or been held in violation in any Commission proceeding.

STAFF-WETT 2-4

Please identify the base location(s) of your crews that currently maintain and respond to outages on the WETT system. How many employees work at each location?

Response:

WETT currently has four field maintenance technicians, with plans for adding a fifth technician in approximately June of 2020 due to the increased number of assets being added to the WETT system.

WETT's field maintenance technicians are based at WETT's field office in Big Spring, Texas because this location is relatively central to the WETT system.

Prepared/Sponsored by: L. Wayne Morton, CEO, WETT

STAFF-WETT 2-5

Please identify the base location(s) of your crews that will maintain and respond to outages on the WETT system after completion of the proposed transaction. How many employees will work at each location?

Response:

Please see the response to STAFF-WETT 2-4. There are no plans for any changes to WETT's field base location or the number of employees based there; adding the fifth technician mentioned the response to STAFF-WETT 2-4 is planned for June independent of the proposed transaction.

Prepared/Sponsored by: L. Wayne Morton, CEO, WETT

STAFF-WETT 2-6

Please identify supply yards responsible for outage restoration that WETT currently operates, including location. Is WETT aware of any discussions regarding plans to change or close any of these locations if the proposed transaction is completed? If yes, please provide any documents pertaining to those discussions.

Response:

WETT maintains a supply yard at its field office in Big Spring described in the response to STAFF-WETT 2-4; this 10-acre site houses WETT's field office and storage facilities for maintenance equipment and spare parts and materials. There are no plans or discussions regarding changes to this facility.

Prepared/Sponsored by: L. Wayne Morton, CEO, WETT