



Control Number: 23429



Item Number: 513

Addendum StartPage: 0

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PUBLIC UTILITY COMMISSION
FILING CLERK

April 2, 2004

Paul Hudson
Chairman
Public Utilities Commission
1701 Congress Avenue
PO BOX 13326
Austin, TX 78711

RE: Docket #23429

Dear Mr. Hudson:

I am a resident of the Harper's Landing subdivision in The Woodlands, TX. I am also an electrical engineer. I have reviewed the initial and revised application as well as much of the supporting material and have found many omissions that should have been considered in several key areas that I point out below. Based on these omissions and the impact those omissions would have had during the review of this application, I plead with you to immediately revoke the Certificate of Convenience and Necessity and re-open the review of the docket. Also, since construction of Line 820 is currently underway, stopping the construction now will minimize the cost impact to all Entergy customers if it is later decided to permanently stop construction of Line 820. I realize that you may be equally concerned about minimizing the cost impact to customers if the construction is stopped and then restarted. However, the benefit of re-examining the application with all currently available data and the possibility of finding other solutions that benefit far more customers outweighs the slight cost impact of stopping and restarting construction.

Habitable Structures

In the application, Entergy states that there are only nine habitable structures within 200 feet of the centerline of the preferred route. While this was probably true at the time of the application, it is not true now. Today there are more than 50 habitable structures within 200 feet of the centerline of that preferred route. The majority of these additional habitable structures are homes in Harper's Landing. The development of this area was known at the time of the application. Whether willful or neglectful, the omission makes the application deficient and is cause for the application to be re-examined.

Change in Load Estimates

There were many significant changes in load estimates between the initial and revised applications. The initial analysis was that upon the failure of Line 569 45MW would have to be shed to relieve the overloads. The revised analysis determined that 163MW would have to be shed. The small changes

to the distribution load estimates between the initial and revised applications do not seem support a 262% increase in the amount of power that would need to be shed. These changes were not explained in any manner in the revised application. The omission of this explanation makes the application deficient and is cause for the application to be re-examined.

Necessity of Transmission Line

Based on the information in the application I agree that to insure reliable power to the area a change to the transmission system is necessary. However, I do not agree that the proposed transmission line (Line 820) does anything in and of itself to ensure reliable power. Exhibit KV-4 of the direct testimony of Khamsune Vongkhamchanh depicts how some transmission lines will overload upon the failure of Line 569. Exhibit KV-5 shows no overloading of transmission lines upon the failure of Line 569 with proposed Line 820 in place. This exhibit is misleading because it omits the fact that along with the installation of Line 820, five other transmission lines will be upgraded to alleviate the overloading.

Item 14 in the application explains that the southern part of Montgomery County is served from only two transmission lines, Line 569 and Line 582. The fact that Line 571 through the Tamina substation also can supply power to the area is omitted. Nevertheless, Item 14 of the application further explains that upon the loss of Line 569, three other lines will overload: Line 169, Line 582, and Line 587. The overloading of line 571 as depicted on Exhibit KV-4 is omitted. Item 14 concludes that the only alternative to shedding load in this situation is to install an additional transmission source into the area. I agree with that conclusion. However, Line 820 is NOT an additional transmission source into the area. It is only another route for the existing sources, namely Line 587 and Line 571 in the event of the failure of Line 569. The addition of Line 820 may alleviate the overloading of Line 169 and Line 582, but it will still only be able to pull power from Line 587 and Line 571. Therefore the addition of Line 820 in and of itself can not alleviate the overloading of Line 587 and Line 571 in the event of the failure of Line 569.

The omissions in Item 14 of the application and the direct testimony of Khamsune Vongkhamchanh makes the application deficient and is cause for the application to be re-examined.

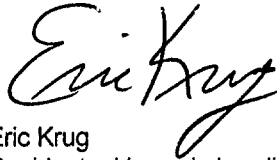
Alternative Solutions

One alternative solution that was not considered was simply to upgrade all the lines that would be overloaded in the event of the failure of Line 569. This would not only increase the reliability of electrical service to the 7 substations referenced in the application (i.e. Conair, Conroe Bulk, Plantation, Alden, Goslin, Metro, and Oak Ridge), but would also benefit other substations in other areas (e.g. Lake Forest, Tamina and Jacinto). The proposed Line 820 can only benefit 4 substations: Alden, Goslin, Metro, and Oak Ridge

April 2, 2004

Another alternative solution that would actually bring an additional transmission source into the area was the original plan as described in Option 1 of Item 15 of the application and Docket #21915. This option would have brought a new transmission source directly to where the power is needed: Alden, Goslin and Metro substations. One of the reasons stated in the application for rejecting this plan was the number of customers that would be affected by new construction. Since there are now more than 50 customers that would be affected by the construction of Line 820, the number of customers affected by the original plan should not be used as a reason to reject it in favor of Line 820. The original plan also provides more power to the area for the long term than the proposed Line 820. Since there have been numerous changes since the original plan was rejected and Line 820 was proposed, the original plan should be re-examined.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Krug". The signature is fluid and cursive, with the first name "Eric" and last name "Krug" clearly distinguishable.

Eric Krug
Resident – Harper's Landing