



Control Number: 32182



Item Number: 47

Addendum StartPage: 0

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May 22, 2006

David Featherston
Director, Infrastructure Reliability Division
Public Utility Commission of Texas
1701 North Congress Avenue
Austin, Texas 78701

Re: PUC Project No. 32182, *Investigation of Methods to Improve Electric and
Telecom Infrastructure that will Minimize Long Term Outages and Restoration
Costs.*

Dear Mr. Featherston:

Please accept this letter as the TXU Steering Committee of Cities' ("Cities") comments on Staff's Draft Executive Summary and Recommendations filed May 10, 2006, in the above-styled project. Cities is comprised of 110 cities served by TXU. As ratepayers and customers of electric service, Cities is concerned about the reliability of electric infrastructure as well as the minimization of long term outage and restoration costs. Thus, Cities commend Staff on their efforts to establish policies and recommendations to aid in this goal.

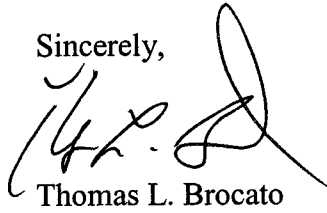
However, Cities is also very interested in minimizing costs. Any costs incurred by electric and telecom utilities to implement and accomplish the goals set forth in Staff's draft report will ultimately be passed on to consumers. Based upon comments at the workshop, it is evident to the utilities and Cities alike that the costs associated with implementing the Staff's recommendations will be substantial. Further, it is unclear whether the goals advanced by Staff are realistically attainable. As a result, Cities is concerned over the prospect of utilities and ratepayers being burdened with the costs of attempting to accomplish these goals without any demonstration that sufficient benefit would be attained.

Cities urge the Staff to take into consideration the realities and costs associated with any goals and recommendations it advances. Cities request that Staff particularly give due consideration to comments submitted by the utilities that may more specifically indicate the difficulty and great expense foreseeable in attempting to implement Staff's draft recommendations. It is Cities' position that without clear and convincing demonstration that appropriate benefits will be achieved, the costs of implementing these goals are unjustified.

Page 2
May 22, 2006

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Brocato', with a large, stylized loop at the end.

Thomas L. Brocato

TLB/jbp
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