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**TXU**  
Electric Delivery

TXU Electric Delivery  
500 N. Akard St., Ste. 10085  
Dallas, TX 75201  
Tel: 214-486-2084  
Fax: 214-486-3221  
ssouthers@txu.com

Stanley R. Southerns, P.E.  
Project Manager  
Regulatory Affairs

June 8, 2006

Mr. David Featherston  
Director, Infrastructure Reliability Division  
Public Utility Commission of Texas  
1701 N. Congress  
Austin, TX 78711

Subject: **Project No. 32182:** PUC Investigation of Methods to Improve Electric and Telecom Infrastructure that will Minimize Long Term Outages and Restoration Costs associated with Gulf Coast Hurricanes

Dear Mr. Featherston:


TXU Electric Delivery appreciates the opportunity to provide further comments on Staff's new draft Executive Summary in Project No. 32182, *Investigation of Methods to Improve Electric and Telecom Infrastructure that Will Minimize Long Term Outages and Restoration Costs associated with Gulf Coast Hurricanes* that is scheduled to be filed on June 9, 2006. TXU Electric Delivery recognizes the importance of addressing this issue to the PUCT Staff as well as to the citizens of the State of Texas, and particularly to those along the coastal region.

The proposed schedule in the filing submitted by Staff on June 2, 2006 indicates Staff will file its draft Report for comments from the Industry on July 3, 2006 and require said comments by July 10, 2006. July 4 is a national holiday and a peak time for summer vacation travel. Requiring the industry to gather sufficient information and formulate comments as it relates to the comprehensive draft Report within the proposed timeframe is not reasonable. To date, the industry has only been provided with a draft Executive Summary which does not provide the bases or justification for the eighteen recommendations in Staff's draft Executive Summary.

Given the magnitude of the effort expended by both Staff and the participating Utilities, and the potential financial ramifications associated with some of the recommendations, TXU Electric Delivery believes that it would be appropriate for Staff to extend the time of review for the draft Report to at least 30 days in order that a comprehensive review of the bases and justification for the recommendations may be conducted.

TXU Electric Delivery would be delighted to discuss this matter with Staff upon request.

Sincerely,

A handwritten signature in black ink, appearing to read "Stanley R. Southers". The signature is fluid and cursive, with the first name "Stanley" being more legible than the last name "Southers".

Stanley R. Southers, P.E.  
Regulatory Project Manager

cc: Ken Keller