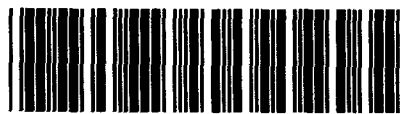




Control Number: 32707



Item Number: 225

Addendum StartPage: 0

SOAH DOCKET NO. 473- 07-0218
PUC DOCKET NO. 32707

APPLICATION OF RAYBURN
COUNTRY ELECTRIC
COOPERATIVE, INC. FOR A
CERTIFICATE OF CONVENIENCE
AND NECESSITY (CCN) FOR A
PROPOSED TRANSMISSION LINE IN
HENDERSON AND VAN ZANDT
COUNTIES, TEXAS

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2012-11-14 10:13:43
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

JOHN BECK'S BRIEF
ON THRESHOLD LEGAL POLICY ISSUES

I am an Intervenor in the above referenced proceeding and, accordingly, hereby submit a "Brief" on item 1. *'Should the alternative of transferring load from one power region to another power region be considered as an appropriate and viable alternative to constructing transmission in the original power region in a CCN proceeding?'* relating to Rayburn Electric Cooperative, Inc.'s ("Rayburn") application for a Certificate of Convenience and Necessity ("Application").

Issue No. 1

In its Order requesting Briefing on threshold Legal or Policy Issues, I will address the issue No. 1, which asks:

Should the Commission consider whether it is appropriate for Brazos to own generation resources (either inside or outside of ERCOT) as opposed to purchasing its requirements in the market in evaluating this application?

The Commission should consider whether it is in the Public's interest to explore all possibilities for a solution to Rayburn Country Electric Cooperative's stated problem (item #2) of low voltage in the Jacksonville – Coffee area.

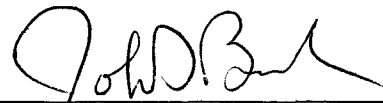
The System Impact Study, prepared by GDS Associates, Inc. (item #4) indicates that this is not a fix to the problem past 2010 and recommends that additional power is needed in this area.

It would appear (item #3) that Rayburn Country Electric Cooperative has plans to connect in the future with the SPP's Transmission Expansion Plan, but has made no mention of it in the CNN application.

Rayburn Country Electric Cooperative has only filed for a CNN (item #2) to address the reliability concerns on the loop and additional transfer capability to serve the growing load.

Rayburn Country Electric Cooperative has stated reasons (item #1) as to why they can not pursue **"Load Transfers to ERCOT"**.

I respectfully submit this "Brief".

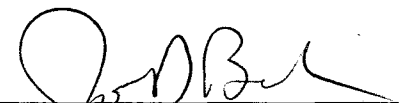


John Beck

January 29, 2007

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the above and foregoing "Brief" has been hand-delivered, mailed by first-class mail, postage prepaid, or faxed to all parties on the service list, on this 12th day of January, 2007



John Beck

Item # (1) Load Transfers to ERCOT page 22, Rayburn Country Electric Cooperative CNN

“Load Transfers to ERCOT: The RCEC Loop operates as part of the Southwest Power Pool (“SPP”). One or more of the substations served from the RCEC Loop could be disconnected from the RCEC Loop and reconnected to the ERCOT transmission system. However, new transmission facilities would still be required in ERCOT to accommodate the transferred load. Furthermore, RCEC has separate power supply agreements for its load in ERCOT and SPP, and neither agreement permits the service changes that would be required. The cost of RCEC’s purchases for its SPP load is considerably lower than for its ERCOT load, so a transfer of load from SPP to ERCOT would also result in a significant increase in RCEC’s purchased power costs. For all of the foregoing reasons, the transfer of load from the RCEC Loop to ERCOT is not a viable alternative.”

Item # (2) Conditions page 14, Rayburn Country Electric Cooperative CNN

“Conditions Addressed by this Application: The proposed transmission line is needed to address reliability problems on the RCEC Loop and provide additional transfer capability to serve the growing load. Reliability and transfer capability are concerns due to the possibility of outages, particularly one occurring on the Jacksonville to Coffee segment of the RCEC Loop. In that event, RCEC would lose the two sources of power that supply the RCEC Loop through the Jacksonville Switching Station, the Jacksonville source (through the ETEC line) and the Overton source (from SWEPCO). The only remaining source is the RCEC/SWEPCO interconnection at Grand Saline, which is fed from a relatively weak portion of the SWEPCO system. In peak load conditions, a fault on the Jacksonville to Coffee line results in unacceptably low voltages at a number of substations, and may result in a cascading outage of the entire RCEC Loop.”

**“RESPONSE OF
RAYBURN COUNTRY ELECTRIC COOPERATIVE, INC.
TO EXPLORER PIPELINE COMPANY’S
SIXTH SET OF REQUESTS FOR INFORMATION**

- 6- 1 Referring to Mr. Moore’s direct testimony at page 9, lines 20-23, please provide the following information:
- a. A complete, detailed description of RCEC’s understanding regarding the new 345 kV facilities that will be in the vicinity of the area served by RCEC that SWEPCO is currently evaluating including, but not limited to, the potential timing, nature and location of such facilities.
 - b. A complete detailed description of whether RCEC has explored accelerating the development of the 345 kV facilities SWEPCO is currently evaluating such that the construction of the transmission line proposed in this proceeding could either be voided or delayed.
 - c. Copies of all documents, studies, analyses, correspondence and communications that related to the new 345 kV facilities that SWEPCO is evaluating.
 - d. A complete detailed explanation of why RCEC believes the new 345 kV facilities in question should provide an effective long-term solution to the voltage problems in the area.

RESPONSE:

- a. SPP’s Transmission Expansion Plan for 2006 includes an 80-mile long 345 kV transmission line connecting SWEPCO’s Diana Substation and a new 345/138 kV substation near the Barton Chapel Substation, both having a planned in-service date of 2013. SPP estimates the cost of the line to be \$96 million, and the cost of the substation to be \$6 million.
- b. RCEC has not explored accelerating the development of the planned 345 kV transmission line.
- c. Responsive documents:
 - SPP Expansion Plan 2006 - Reliability Study and Results; undated (dated 8/16/06 on SPP website)
 - SPP Transmission Expansion Plan - 2006-2016; dated December 11,2006The response to this question is voluminous.
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Prepared by: Michael Moore”

Item #(4) *The following recommendations were made in the System Impact Study, prepared by GDS Associates, Inc. and were included with Rayburn County Electric Cooperative's CNN. (page 8)*

“RECOMMENDATIONS

- Jointly pursue additional coordinated transmission expansion in this region (e.g. new 345-kV source) between the impacted parties of ETEC, WCEC, RCEC, AEP and SPP as the addition of the project does not appear to resolve regional voltage issues past 2010, even under a conservative load growth scenario.
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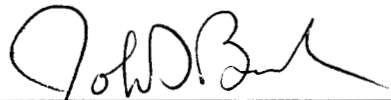
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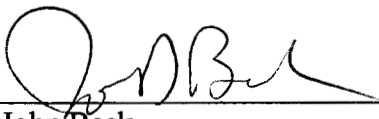


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Item #(3) (RFI From Rayburn Country

Electric Cooperative, Inc. to Explorer Pipeline Company RFI No. 6-1 item 171)

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