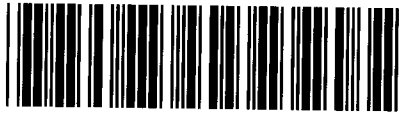




Control Number: 45624



Item Number: 115

Addendum StartPage: 0

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

**APPLICATION OF THE CITY OF  
GARLAND TO AMEND A  
CERTIFICATE OF CONVENIENCE  
AND NECESSITY FOR THE RUSK TO  
PANOLA DOUBLE-CIRCUIT 345-KV  
TRANSMISSION LINE IN RUSK AND  
PANOLA COUNTIES**

§  
§  
§  
§  
§  
§  
§

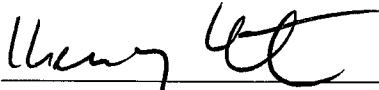
**BEFORE THE** 2016 MAR 20 PM 1:19  
**STATE OFFICE OF**  
**COMMISSION**  
**FILING CLERK**  
**ADMINISTRATIVE HEARINGS**

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

The City of Garland (Garland) files this response to Texas Industrial Energy Consumers' First Set of Requests for Information (RFI) to Garland. Garland received TIEC's First RFI on March 16, 2016. Pursuant to SOAH Order No. 2, this response is timely filed. All parties may treat these answers as if they were filed under oath.

Garland reserves the right to object at the time of the hearing to the admissibility of the information provided herein.

Respectfully submitted,



Kerry McGrath  
State Bar No. 13652200  
James A. Nortey, II  
State Bar No. 24079063  
**DUGGINS WREN MANN & ROMERO, LLP**  
P.O. Box 1149  
Austin, Texas 78767  
Telephone: (512) 744-9300  
Facsimile: (512) 744-9399

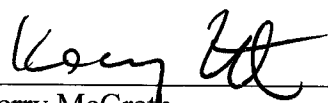
Brad Neighbor  
State Bar No. 14869300  
City Attorney  
Michael J. Betz  
State Bar No. 00783655  
Deputy City Attorney  
**CITY OF GARLAND**  
200 North 5th Street, Suite 416  
Garland, Texas 75040  
Telephone: (972) 205-2380  
Facsimile: (972) 205-2389

**ATTORNEYS FOR THE CITY OF GARLAND**

115

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served on Texas Industrial Energy Consumers on March 28, 2016 by electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. Mail.

  
Kerry McGrath

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	§ § § § § § §	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	---------------------------------	---

**CITY OF GARLAND’S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS’ FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-1**

Please identify all facilities associated with this project (the “Garland Line”) and identify the portion of those facilities’ costs, if any, that will be placed into transmission cost of service (TCOS). Specifically:

- a. Will the new Rusk Switching Station in Rusk County and/or its associated costs be placed into TCOS?
- b. Will the new Panola Switching Station in Panola County and/or its associated costs be placed into TCOS?
- c. Will any operation and maintenance expenses for the Garland Line be placed into TCOS? If so, what portion?
- d. Will future improvements to lower congestion costs or prevent reliability issues on the Garland Line be placed into TCOS?
- e. Will any other facilities not specifically listed above be included in TCOS?

**Response No. TIEC 1-1**

Garland interprets the phrase “facilities associated with this project (the ‘Garland Line’)” used in this RFI to include the double-circuit 345-kV transmission line itself and the switching stations at each end, i.e., the Rusk Switching Station and related facilities and the Panola Switching Station.

- a. The Rusk Switching Station and related facilities will be owned and operated by Oncor Electric Delivery Company. See also the response of Southern Cross Transmission, LLC to Staff RFI 1-13.
- b. As discussed in Mr. Cline's direct testimony, Garland has committed that it will not seek to recover the costs of developing, constructing, interconnecting, or financing the Panola Switching Station through TCOS. Garland also will not include in TCOS the costs of operating and maintaining the Panola Switching Station that are reimbursed by Rusk Interconnection, LLC pursuant to the Facilities Agreement attached to the Transmission Line Agreement provided as Exhibit DWC-2 to Mr. Cline's direct testimony.
- c. Garland will not include in TCOS the costs of operating and maintaining the Garland Line that are reimbursed by Rusk Interconnection, LLC pursuant to the Facilities Agreement attached to the Transmission Line Agreement provided as Exhibit DWC-2 to Mr. Cline's direct testimony.
- d. To the extent that future improvements are required by Commission rule or determined by ERCOT to be necessary to lower congestion costs or prevent reliability issues on the Garland Line, the cost of such improvements incurred by Garland will be included in TCOS. Costs of upgrades requested by Rusk Interconnection, LLC will be paid for by Rusk.
- e. As discussed at the outset of this response, Garland has not identified any other facilities besides those specifically listed above.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF</b>	§	
<b>GARLAND TO AMEND A</b>	§	<b>BEFORE THE</b>
<b>CERTIFICATE OF CONVENIENCE</b>	§	
<b>AND NECESSITY FOR THE RUSK TO</b>	§	<b>STATE OFFICE OF</b>
<b>PANOLA DOUBLE-CIRCUIT 345-KV</b>	§	
<b>TRANSMISSION LINE IN RUSK AND</b>	§	<b>ADMINISTRATIVE HEARINGS</b>
<b>PANOLA COUNTIES</b>	§	

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-2**

Please identify and provide all documents supporting the costs associated with building or upgrading facilities to allow delivery of power across the Garland Line to the high-voltage direct current (HVDC) converter station (the "DC Tie") to be owned by Southern Cross Transmission, LLC (SCT). In particular:

- a. Please identify the costs associated with constructing and/or upgrading the Rusk Switching Station to allow delivery of power across the Garland Line to the DC Tie and provide any supporting documents.
- b. Please identify the costs associated with constructing and/or upgrading any other facility in ERCOT to allow delivery of power across the DC Tie. Please list each facility and its associated costs individually and provide any supporting documents.

**Response No. TIEC 1-2**

Estimates of the costs associated with building or upgrading facilities to allow delivery of power across the Garland Line to the high-voltage direct current (HVDC) converter station (the "DC Tie") to be owned by Southern Cross Transmission, LLC (SCT) are contained in the direct testimony of Chris McCall for the City of Garland and in the Oncor Facilities Study Report provided in Exhibit DP-2 to the direct testimony of David Parquet for Southern Cross Transmission, LLC.

- a. See the Oncor Facilities Study Report provided in Exhibit DP-2 to the direct testimony of David Parquet for Southern Cross Transmission, LLC.

b. In addition to the Rusk Switching Station, the other facilities to allow delivery of power across the DC Tie are the Garland double-circuit 345-kV transmission line, the Panola Switching Station, and certain facilities ancillary to the Rusk Switching Station. In Exhibit CM-1 to his direct testimony, Garland witness Chris McCall estimates that the cost of the Garland double-circuit 345-kV transmission line will range from approximately \$104 million to \$110 million, depending on the route selected by the Commission, and that the cost of the Panola Switching Station will be approximately \$12 million. TIEC 1-2, Attachment 1 is provided with this response. See also the Oncor Facilities Study Report provided in Exhibit DP-2 to the direct testimony of David Parquet for Southern Cross Transmission, LLC.

Prepared by: Darrell W. Cline  
Chris McCall

Title: Chief Financial Officer, Garland Power & Light  
Project Manager, Burns & McDonnell  
Engineering, Inc.

Sponsored by: Darrell W. Cline  
Chris McCall

Title: Chief Financial Officer, Garland Power & Light  
Project Manager, Burns & McDonnell  
Engineering, Inc.

RUSK-PANOLA ROUTE SUMMARY													
	RP4	RP5	RP8	RP10	RP16	RP28	RP41	RP46	RP50	RP53	RP62	RP63	
Distance (Miles)	37.4	37.1	38	37.7	37.4	37.6	39.8	39.7	38.1	39.2	39.3	36.9	
Right-of-Way and Land Acquisition	\$ 4,079,592	\$ 4,046,868	\$ 4,145,040	\$ 4,112,316	\$ 4,079,592	\$ 4,101,408	\$ 4,341,384	\$ 4,330,476	\$ 4,155,948	\$ 4,275,936	\$ 4,286,844	\$ 4,025,052	
Engineering and Design (Utility)	-	-	-	-	-	-	-	-	-	-	-	-	
Engineering and Design (Contract)	\$ 2,888,743	\$ 2,820,950	\$ 2,930,499	\$ 2,901,560	\$ 2,852,429	\$ 2,827,384	\$ 2,991,380	\$ 2,989,016	\$ 2,841,129	\$ 2,861,310	\$ 2,919,860	\$ 2,894,097	
Structure Procurement (Steel, Hardware)	\$ 29,766,840	\$ 28,997,725	\$ 30,202,186	\$ 29,508,417	\$ 29,660,543	\$ 28,641,841	\$ 30,867,453	\$ 30,826,066	\$ 29,692,131	\$ 29,835,095	\$ 30,570,720	\$ 30,239,690	
Conductor and Shield Wire Procurement	\$ 16,817,698	\$ 16,683,166	\$ 17,089,638	\$ 16,952,230	\$ 16,817,698	\$ 16,907,386	\$ 17,898,832	\$ 17,851,988	\$ 17,134,482	\$ 17,627,787	\$ 17,672,611	\$ 16,593,477	
Procurement of Material and Equipment (Including stores)	\$ 46,584,538	\$ 45,680,890	\$ 47,291,824	\$ 46,460,647	\$ 46,378,241	\$ 45,549,228	\$ 48,764,284	\$ 48,678,053	\$ 46,826,613	\$ 47,462,862	\$ 48,243,331	\$ 46,833,168	
Construction of Facilities (Utility)	-	-	-	-	-	-	-	-	-	-	-	-	
Structure Construction (Inc. Foundations)	\$ 30,819,440	\$ 29,594,975	\$ 31,228,386	\$ 30,006,119	\$ 30,427,304	\$ 28,491,755	\$ 30,989,287	\$ 31,023,465	\$ 30,154,216	\$ 29,693,466	\$ 30,817,892	\$ 31,848,848	
Conductor and Shield Wire Installation	\$ 10,362,061	\$ 10,279,410	\$ 10,531,001	\$ 10,444,713	\$ 10,362,061	\$ 10,417,182	\$ 11,026,909	\$ 10,998,359	\$ 10,558,582	\$ 10,861,607	\$ 10,889,157	\$ 10,224,309	
Access (Includes Clearing)	\$ 8,525,407	\$ 8,476,385	\$ 8,632,105	\$ 9,807,199	\$ 7,913,349	\$ 9,787,973	\$ 8,952,199	\$ 8,932,973	\$ 7,164,905	\$ 7,359,075	\$ 7,378,301	\$ 7,563,566	
Construction Management	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	\$ 2,880,000	
Construction of Facilities	\$ 52,586,908	\$ 51,230,770	\$ 53,271,492	\$ 53,138,030	\$ 51,582,715	\$ 51,576,890	\$ 53,828,395	\$ 53,835,797	\$ 50,757,673	\$ 50,794,147	\$ 51,965,350	\$ 52,516,724	
Other (all costs not included in the above categories)	-	-	-	-	-	-	-	-	-	-	-	-	
Total Cost	\$ 106,139,781	\$ 103,779,478	\$ 107,638,855	\$ 106,612,554	\$ 104,892,976	\$ 104,054,910	\$ 109,925,443	\$ 109,833,342	\$ 104,581,362	\$ 105,394,256	\$ 107,415,385	\$ 106,289,040	
Cost per mile	\$ 2,837,962	\$ 2,797,291	\$ 2,832,601	\$ 2,827,919	\$ 2,804,825	\$ 2,767,418	\$ 2,761,946	\$ 2,766,583	\$ 2,744,918	\$ 2,688,629	\$ 2,733,216	\$ 2,879,920	

Notes:

1. Costs are in 2016 dollars and do not include escalation.
2. An adder for design allowances is not included. Typically 10-20% is added for design allowances for projects of this size
3. Contingency costs are not included. Typically 20-30% is included for contingency for projects of this size
4. A 15% contractor markup is used for all materials.
5. The average span length for all routes was assumed to be 800ft
6. All structures are assumed to be tubular steel



**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	--	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-3**

Refer to page 7, lines 15-17 of Mr. Cline's testimony. Please explain how the Garland line specifically benefits the City of Garland and its ratepayers. Please describe and provide any documents related to the annual revenues and costs to the City of Garland and/or its ratepayers associated with the Garland Line and provide any supporting documentation.

**Response No. TIEC 1-3**

Garland will receive revenues in connection with the Garland Line as set out in the Transmission Line Agreement and in the Facilities Agreement attached to the Transmission Line Agreement provided as Exhibit DWC-2 to Mr. Cline's direct testimony.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	§ § § § § § §	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	---------------------------------	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-4**

Refer to page 10, lines 6-11 of Mr. Cline's testimony. Will any of the payments in lieu of taxes referenced in that testimony be placed in TCOS?

**Response No. TIEC 1-4**

No. Pursuant to the Facilities Agreement attached to the Transmission Line Agreement provided as Exhibit DWC-2 to Mr. Cline's direct testimony, Rusk Interconnection, LLC will reimburse Garland for the payments in lieu of taxes.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	--	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-5**

Refer to page 11, lines 2-9 of Mr. Cline's testimony.

- a. What liabilities will Garland assume from Rusk Interconnection, LLC (Rusk)?
- b. Will those liabilities be placed in TCOS?
- c. Will costs associated with operating the Garland line or the Panola Switching Station be placed in TCOS?

**Response No. TIEC 1-5**

- a. The assumed liabilities are defined in Section 1.1 and on Schedule 1.1(a) of the Transmission Line Agreement provided as Exhibit DWC-2 to the direct testimony of Darrell Cline.
- b. No. The liabilities Garland will assume from Rusk will not be placed in TCOS.
- c. See Garland's response to TIEC 1-1.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	--	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-6**

Refer to page 11, lines 10-18 of Mr. Cline's testimony. Are there any operation and maintenance (O&M) expenses, payments in lieu of taxes, or other expenditures associated with the Garland Line that will *not* be reimbursed by Rusk? If so, please identify and describe those costs.

**Response No. TIEC 1-6**

The Facilities Agreement attached to the Transmission Line Agreement provided as Exhibit DWC-2 to Mr. Cline's direct testimony is designed for Rusk to reimburse Garland for the reasonable costs of operating and maintaining the Garland double-circuit 345-kV transmission line, including payments in lieu of taxes. The specific terms governing reimbursement from Rusk are set out in the Facilities Agreement, including Section 2.8 (payments in lieu of taxes) and 3.2 (operations and maintenance expenses).

See also Garland's response to TIEC 1-1.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	--	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-7**

Please describe how Rusk will recover the cost of building and operating the Garland Line.

**Response No. TIEC 1-7**

As set out in the March 7, 2016 letter from Garland to the Commissioners, Southern Cross Transmission, LLC has received an order from the Federal Energy Regulatory Commission authorizing it to charge negotiated rates for capacity on the Southern Cross project. *Southern Cross Transmission, LLC*, 137 FERC ¶ 61,207, Order Authorizing Proposal (Dec. 15, 2011). Under that order, Southern Cross will follow established FERC procedures for either an anchor tenant/open season process or an open solicitation process. Southern Cross will assume all market risk associated with the project and will have no captive customers or ability to pass on any costs to captive customers. As a result, Southern Cross will have the right to recover the costs of developing, constructing and financing the transmission project only from entities that voluntarily subscribe to Southern Cross transmission capacity.

Prepared by: Counsel  
Sponsored by: Counsel

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	--	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-8**

Please explain why Garland and/or SCT chose to have Garland own the line instead of just operating it. Please identify any and all benefits to Garland or SCT related to Garland's ownership of the line. Please produce all documents or communications related to this issue.

**Response No. TIEC 1-8**

In order to interconnect an interstate transmission line like the SCT project to the ERCOT grid, it is necessary to obtain an order from the FERC directing the interconnection and confirming that it will not affect the jurisdictional status of entities operating in ERCOT. It is Garland's understanding that only a limited number of utilities that sell power in ERCOT can be subject to such an interconnection order, and that under the current ERCOT market structure, entities that both provide transmission service and sell power include municipally-owned utilities, like GP&L, and cooperatives. SCT approached Garland about whether it would be willing to provide the interconnection between the SCT facility and the ERCOT grid under an appropriate FERC order. Garland agreed to do so. See Mr. Cline's direct testimony at page 6.

The benefits to Garland related to its ownership of the Garland double-circuit 345-kV transmission line are set out in the Transmission Line Agreement and in the Facilities Agreement attached to the Transmission Line Agreement provided as Exhibit DWC-2 to Mr. Cline's testimony.

Questions related to the benefits to SCT related to Garland's ownership of the Garland line would be better answered by SCT. However, it is Garland's understanding that Garland's agreement to provide an interconnection pursuant to an appropriate FERC order, as discussed above, enables SCT to interconnect with ERCOT and to preserve the jurisdictional status quo of entities operating in ERCOT.

**CONFIDENTIAL** TIEC 1-8, Attachment 1 will be provided pursuant to the terms of the Protective Order in this proceeding. Garland objects that this request could be construed to call for the production of documents protected by the attorney-client or attorney work product privilege, although no such documents have been identified at this time.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	--	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-9**

Refer to page 12, lines 16-20 of Mr. Cline's testimony. In Garland's view, why is it necessary or desirable for SCT to be an ERCOT market participant?

**Response No. TIEC 1-9**

Please see Southern Cross' response to TIEC 1-8. As Garland understands it, SCT will bind itself to applicable ERCOT protocols and other requirements by executing a Market Participant Agreement with ERCOT.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light



**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF</b>	§	
<b>GARLAND TO AMEND A</b>	§	<b>BEFORE THE</b>
<b>CERTIFICATE OF CONVENIENCE</b>	§	
<b>AND NECESSITY FOR THE RUSK TO</b>	§	<b>STATE OFFICE OF</b>
<b>PANOLA DOUBLE-CIRCUIT 345-KV</b>	§	
<b>TRANSMISSION LINE IN RUSK AND</b>	§	<b>ADMINISTRATIVE HEARINGS</b>
<b>PANOLA COUNTIES</b>	§	

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-10**

Please describe how the Panola Switching Station will be connected to the DC Tie in Louisiana. What voltage will the connection use? What is the length of the line that will run from the Panola Switching Station to the DC Tie?

**Response No. TIEC 1-10**

The Panola Switching Station will be connected to the DC Tie in Louisiana by a 345-kV bus extension as depicted in the diagram attached to SCT's confidential response to TIEC 1-2.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	<b>§ § § § § § §</b>	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	--	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-11**

Please describe the benefits that market participants or customers in ERCOT will gain from the line between the Panola Switching Station and the DC Tie in Louisiana being an "open access" line. Would these same benefits also be present if the line were a private use line? Why or why not?

**Response No. TIEC 1-11**

As discussed in response to TIEC 1-10, the connection between the Panola Switching Station and the DC Tie in Louisiana will be a bus extension, not a line. In response to TIEC's comments in FERC Docket No. TX11-1-001, the Panola Switching Station and the DC Tie will be configured so that an interconnection between those facilities will not be feasible. See SCT's response to TIEC 1-2 and 1-3.

Prepared by: Darrell W. Cline  
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light  
Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751  
PUC DOCKET NO. 45624**

<b>APPLICATION OF THE CITY OF GARLAND TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RUSK TO PANOLA DOUBLE-CIRCUIT 345-KV TRANSMISSION LINE IN RUSK AND PANOLA COUNTIES</b>	§ § § § § § §	<b>BEFORE THE  STATE OFFICE OF  ADMINISTRATIVE HEARINGS</b>
--	---------------------------------	---

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY  
CONSUMERS' FIRST SET OF REQUESTS FOR INFORMATION TO THE  
CITY OF GARLAND QUESTION NOS. TIEC 1-1 THROUGH TIEC 1-12**

**Question No. TIEC 1-12**

Will Garland have a "to, from, and over" tariff? Why or why not?

**Response No. TIEC 1-12**

Pursuant to the FERC's order directing Garland to interconnect with Southern Cross under Section 210 of the Federal Power Act, Garland will not become a transmitting utility under the FPA. As a result, Garland does not plan to have a FERC "to, from, and over tariff."

Prepared by: Counsel  
Sponsored by: Counsel