



Control Number: 45624



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

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

2/16/16 2:51
PUBLIC UTILITY COMMISSION
FILING CLERK

SOUTHWESTERN ELECTRIC POWER COMPANY'S MOTION TO INTERVENE

NOW COMES, Southwestern Electric Power Company (SWEPCO) and files this Motion to Intervene in the above-styled and docketed proceeding pursuant to 16 Texas Administrative Code (TAC) §§ 22.101, 22.103 and 22.104 of the Public Utility Commission of Texas (the Commission) and would respectfully show as follows:

1. On February 25, 2016, the City of Garland (Garland) filed an application with the Commission to amend its certificate of convenience and necessity (CCN) for a proposed double-circuit 345 kV transmission line in Rusk and Panola counties.

2. SWEPCO is an electric utility as defined in PURA §§ 11.004 and 31.002(6)¹, headquartered in Shreveport, Louisiana that provides bundled electric utility services in 24 counties in Texas, including Rusk and Panola counties, Texas.

3. SWEPCO received notice of Garland's CCN filing as a neighboring utility entitled to notice under 16 TAC § 22.52(a)(2). SWEPCO is a utility that is directly affected by Garland's proposed transmission line, as Garland's line may cross and/or parallel one or more existing SWEPCO transmission and distribution lines as depicted in Garland's application. Accordingly, SWEPCO has a justiciable interest that may be adversely affected by the outcome of this proceeding and desires to intervene to protect that interest.

¹ Public Utility Regulatory Act, Tex. Util. Code Ann. §§ 11.001-64.158 (West 2007 & Supp. 2015).

4. The name, address and telephone number of the SWEPCO's authorized business representative with respect to this matter is:

Brandon C. Bradford
Regulatory Consultant
Southwestern Electric Power Company
400 W. 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (318) 673-3607
Fax: (512) 481-4591
E-mail: bcbradford@aep.com

The name, address, telephone number and e-mail of the SWEPCO's authorized legal representative with respect to this matter is:

Jerry N. Huerta
Senior Counsel
American Electric Power Service Corporation
400 W. 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3323
Fax: (512) 481-4591
E-mail: jnhuerta@aep.com

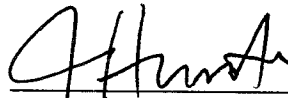
5. SWEPCO requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this proceeding be served upon SWEPCO's representatives.

WHEREFORE, PREMISES CONSIDERED, SWEPCO respectfully requests that its Motion to Intervene be granted, including party status to fully participate in this proceeding, and that it be granted any other relief to which it may be justly entitled.

Dated: March 28, 2016

Respectfully Submitted,

American Electric Power Service Corporation
400 West 15th Street, Suite 1520
Austin, Texas 78701
Jerry N. Huerta
State Bar No. 24004709
Telephone: (512) 481-3323
Telecopier: (512) 481-4587
e-mail: jnhuerta@aep.com



Jerry N. Huerta
Senior Counsel

ATTORNEY FOR SOUTHWESTERN ELECTRIC
POWER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding by hand-delivery, overnight delivery, facsimile transmission, or U.S. first-class mail on the 28th day of March, 2016.



Jerry N. Huerta