

Control Number: 45624



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**SOAH DOCKET NO. 473-16-2751  
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  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS**

2015 MAR 23 P.1 3:29  
PUBLIC UTILITY COMMISSION  
FILING CLERK

**TEXAS COMPETITIVE POWER ADVOCATES MOTION TO INTERVENE**

Texas Competitive Power Advocates (TCPA), pursuant to 16 TEX. ADMIN. CODE §§ 22.103(b) and 22.104, files this Motion to Intervene in the above-referenced proceeding.

**I. Authorized Representative**

The name, address and telephone number of TCPA's authorized representative is as follows:

Lindsey Hughes  
Executive Director, Texas Competitive Power Advocates  
1001 Congress Avenue, Suite 450  
Austin, Texas 78701  
(512) 771-8622  
LHughes@competitivepower.org

All pleadings or other documents filed in this proceeding shall be served upon TCPA's authorized representative.

**II. Standing to Intervene**

TCPA is a trade association representing power generation companies, wholesale power marketers and retail electric providers with investments in Texas and ERCOT's wholesale electric market. TCPA members and their affiliates provide a wide range of important market functions and services in ERCOT, including the development, operation, and management of

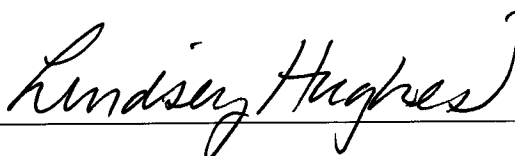
power generation assets, the scheduling and marketing of power, the provision of energy management services, and sales of competitive electric service to consumers. TCPA members provide more than 50 percent of the total net operable electric generating capacity in ERCOT, represent billions of dollars of investment in the state and employ thousands of Texans.

On February 25, 2016, pursuant to PURA § 37.051(c-1), (c-2), (g) and (i) as enacted during last legislative session by the Texas Legislature, the City of Garland, Texas filed an application to amend a certificate of convenience and necessity for the Rusk to Panola double-circuit 345-kV transmission line in Rusk and Panola Counties. These proposed transmission facilities are part of the Southern Cross direct-current (DC) tie transmission project that is being developed by Pattern Energy Group LP (Pattern Development). The Southern Cross DC tie transmission project would add a new high voltage direct current (HVDC) tie between ERCOT and SERC to enable the import and export of up to 2,000 MW of wholesale electric power generation to and from ERCOT. The Southern Cross DC tie transmission project, therefore, could have a significant impact on the ERCOT electric wholesale market and TCPA's members that participate in ERCOT's electric wholesale market. Consequently, TCPA has a justiciable interest that may be adversely affected by the outcome of this proceeding and has standing to intervene in this proceeding.

### III. Conclusion

For the above-stated reasons, TCPA respectfully requests that the Administrative Law Judge grant this Motion to Intervene and admit TCPA as an intervenor in this proceeding for all purposes, and for any other relief to which it may be entitled.

Respectfully submitted,

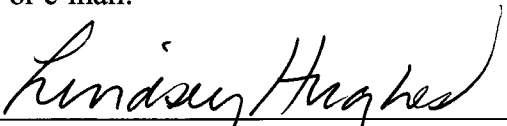
By: 

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record on March 28, 2016 by hand delivery, first-class U.S. mail, facsimile, or e-mail.

  
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Lindsey Hughes, Executive Director, TCPA