

Control Number: 45624



Item Number: 13

Addendum StartPage: 0

PUC DOCKET NO. 45624

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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 2016 HAR -2 AM 11: 40

PUBLIC UTILITY COMMISSION
FILING CLERK

PUBLIC UTILITY COMMISSION
OF TEXAS

CENTERPOINT ENERGY HOUSTON ELECTRIC LLC'S MOTION TO INTERVENE

COMES NOW CenterPoint Energy Houston Electric LLC ("CEHE") and files this Motion to Intervene in the above-referenced docket, and in support thereof respectfully shows as follows:

CEHE is a transmission and distribution utility ("TDU") operating in ERCOT. Further, CEHE was party to Federal Energy Regulation Commission ("FERC") Docket No. TX11-01-001 that approved the request of Southern Cross Transmission LLC ("SCT") to interconnect with ERCOT and was a signatory to the settlement agreement with SCT that formed the basis for FERC approval of SCT's interconnection request. The City of Garland and SCT seek to give effect to this FERC order in this docket through obtaining a certificate of convenience and necessity. CEHE's interests as a TDU in ERCOT are affected by this case of first impression. Further, CEHE has a specific interest in ensuring the terms of its settlement agreement with SCT in FERC Docket No. TX11-01-001 are satisfied. Accordingly, CEHE is an affected party.

CEHE requests that all documents in this proceeding by served upon its authorized representatives:

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WHEREFORE, PREMISES CONSIDERED, CEHE respectfully requests that the Commission grant this intervention, and for such further relief to which it may be entitled.

Respectfully submitted,

GREENBERG TRAURIG, LLP

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ATTORNEYS FOR CENTERPOINT ENERGY

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of March, 2016, a true and correct copy of the above and foregoing was served on all parties of record by Registered E-mail.

Dane McKaughan