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PUBLIC UTILITY COMMISSION
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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

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PUBLIC UTILITY COMMISSION
OF TEXAS

CENTERPOINT ENERGY HOUSTON ELECTRIC LLC'S LIST OF ISSUES

Pursuant to the Order of Referral, CenterPoint Energy Houston Electric, LLC ("CenterPoint") submits the following list of issues to be addressed in this case:

I. ISSUES TO BE ADDRESSED

The following issues should be considered concerning the City of Garland's ("Garland's") request for an amendment to its Certificate of Convenience and Necessity ("CCN") to build and operate a 345 kV transmission line in Rusk and Panola Counties.

1. Is the Application sufficient?
 - A. Must Garland prove need for the proposed new transmission line?
 - B. Does the Application meet the requirements of Section 37.056 of PURA¹ and Commission SUBST. R. 25.101(b)?
 - C. Can Garland use the Competitive Renewable Energy Zone ("CREZ") CCN process in the Commission's review of a proposed transmission line that is not within a CREZ?
 - D. Has Garland met its burden of making a *prima facie* case when it relies on intervenor testimony?

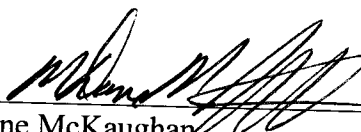
¹ Public Utility Regulatory Act, Tex. Util. Code Ann. §§ 11.001-66.016 (West 2007 & Supp. 2014) (PURA).

- E. Must Southern Cross Transmission LLC (“Southern Cross”) be a co-Applicant in this Docket?
2. What, if any, constraints does FERC’s acceptance of a settlement in FERC Docket No. TX11-01-001 place on the Commission’s ability to conduct a public interest review of the proposed line?
 3. Must Southern Cross and Garland give effect to the representations that they made in the FERC docket?
 4. Can a transmission provider acquire a CCN amendment from the Commission for a transmission project that is not entirely subject to postage stamp rates consistent with PURA §35.004?
 5. Can Garland charge Southern Cross or any other entity a rate for transmission service that has not been approved by the Commission?
 6. Can Garland reserve capacity on the proposed transmission line for Southern Cross or any other entity?
 7. How should Garland ensure non-discriminatory access to the proposed transmission line?
 8. Is the proposed transmission line subject to the ERCOT interconnection requirements for new generation?
 9. What guidance should the Commission give ERCOT regarding the market segment in which Southern Cross should be included?

II. CONCLUSION

CenterPoint respectfully requests that the Commission adopt the above list of issues to be addressed, incorporate them into its preliminary order issued to govern this docket, and that CenterPoint be granted such other relief to which it may show itself entitled.

Respectfully submitted,



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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