



Control Number: 45624



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

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

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION AND REQUEST
FOR ADMISSION TO THE CITY OF GARLAND
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

Pursuant to Tex. Admin Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the City of Garland by and through its attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

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Dated: April 13, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division



Christina R. Switzer
Attorney-Legal Division
State Bar No. 24066171
Landon J. Lill
State Bar No. 24092700
(512) 936-7216
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on April 13, 2016, in accordance with 16 TAC § 22.74.



Christina R. Switzer

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DEFINITIONS

- A. "Garland," "GP&L" or "You" refers to the City of Garland and any person acting or purporting to act on his behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 2-1** Please describe in detail any known engineering constraints associated with the proposed Rusk to Panola double circuit project and the proposed HVDC converter station to be owned by Southern Cross Transmission, LLC ("Southern Cross"), that are not included in the Environmental Assessment.
- Staff 2-2** Please indicate whether GP&L's estimated cost for each proposed route in this project includes pipeline mitigation costs. If GP&L's proposed costs include any pipeline mitigation cost, please describe, by line segment, the pipeline mitigation measures and related costs that have been included, along with any documents that support those cost estimates.
- Staff 2-3** Please identify any reliability concerns related to the paralleling or crossing of other utilities' transmission facilities on Garlands proposed alternative routes.
- Staff 2-4** Please refer to page 3 of the CCN Application Form, Question 4. GP&L states that the Rusk Switching Station will be owned by Oncor Electric Delivery Company, the Panola Switching Station will be constructed by Rusk and owned by GP&L, and that GP&L will be the sole owner of the proposed project when it is placed in service. Please identify which of the parties will operate and maintain the proposed transmission line.
- Staff 2-5** Please refer to page 4 of the CCN Application Form, Question 5. Describe which site conditions, routes, or engineering constraints might dictate the use of lattice structures over monopoles in this project.
- Staff 2-6** Please refer to Application Attachment 4, Final Order Directing Interconnection and Transmission Service, page 4 of 10. Has the land at the Texas/Louisiana border (proposed location of the HVDC converter station and Garland switching station) been purchased by GP&L or Southern Cross?
- Staff 2-7** Please refer to page 16 of the Direct Testimony of Kristi Wise, lines 14 – 16. What is the voltage of the existing transmission line referred to in this portion of Ms. Wise's testimony regarding presently impacted habitable structures?
- Staff 2-8** Please refer to page 23 of the Direct Testimony of Kristi Wise, lines 11 – 14. What is the status of the approval from Federal Energy Regulatory Commission ("FERC") and Sabine River Authority ("SRA"), needed to cross the SRA FERC project boundary for the Toledo Bend Reservoir? Does GP&L anticipate any problems with obtaining this approval? If so, please explain in detail.
- Staff 2-9** Please refer to the Direct Testimony of Kristi Wise, page 30, lines 12-16. Identify which of the proposed alternative routes are located in a FEMA-designated 100-year floodplain.