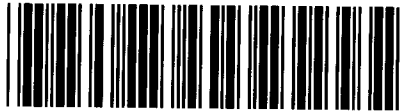


Control Number: 45624



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

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2016 APR 14 PM 1:44

APPLICATION OF CITY OF GARLAND,
TEXAS, TO AMEND A CERTIFICATE
OF CONVENIENCE AND NECESSITY
FOR THE PROPOSED RUSK TO
PANOLA DOUBLE-CIRCUIT 345-KV
TRANSMISSION LINE IN RUSK AND
PANOLA COUNTIES, TEXAS

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PUBLIC UTILITY COMMISSION
FILING CLERK

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**LUMINANT'S SECOND SET OF REQUESTS FOR INFORMATION TO
SOUTHERN CROSS TRANSMISSION, LLC**

COMES NOW Luminant Energy Company LLC and Luminant Generation Company LLC (collectively "Luminant"), by and through its attorneys of record, and requests that you provide the information and answer the attached questions under oath. It is further requested that the questions be answered in the order in which they are asked with as much detail so as to fully present all of the relevant facts.

Instructions

Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the witness or witnesses who will sponsor each of your answers at the hearing in this PUC Docket No. 45624. These questions are continuing in nature and, should there be a change in circumstances which would modify or change any of your answers, then, in such case, please change or modify such answer and submit such changed answer as a supplement to the original answer within five (5) working days of your discovery that such change or modification is appropriate.

In answering these requests for information, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

If you are unable to answer any request fully and completely after exercising due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such

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request. In addition to specifying those portions, you are to state with regard to each portion:

1. The fact on which you base the contention that you are unable to answer that portion;
2. The knowledge, information, and belief you have concerning that portion; and
3. The acts done and inquiries made by you in attempting to answer such request.

The singular includes the plural and the plural includes the singular.

Masculine, feminine, or neuter pronouns do not exclude the other genders.

The words “document” and “documents” have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. Among other things, the words “document” and “documents” mean the final form and **all drafts and revisions of any kind** of written or graphic matter, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies there from which are different in any way from the original regardless of whether designated “confidential,” “privileged,” or otherwise restricted. Without limiting the generality of the foregoing, the words “document” and “documents” also include information stored or maintained on, or which could be reproduced from, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape, compact disk, DVD, or similar means.

The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope.

The words “communication” and “communications” include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, and symposia. These words include, without limitation of their generality, both communications and statements which are face-to-face and those which are transmitted by any writing or document or by media such as intercoms, telephones, television or radio.

The words “identify” and “identification”, when used with respect to a natural person or persons, mean to state the name, address(es), and telephone number(s) of each such person. If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “identification”, when used in reference to a person other than a natural person, mean to set forth its:

- (1) full name or title;
- (2) nature or organization, including the state under which the same was organized or incorporated;
- (3) address and telephone number (with area code prefix); and
- (4) principal line of business.

If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “describe,” when used in reference to a fact, mean to state not only the fact itself, but also:

- (1) its date, time, and place;
- (2) the name, address, and telephone number of each person with knowledge of the fact;
- (3) whether the act is supported by an oral communication, a document, or other event; and
- (4) any other evidence which supports such fact.

The words “identify” and “identification,” when used in reference to a document, mean to state:

- (1) its date;
- (2) its author;
- (3) its addressee;
- (4) the type of document (e.g., letter, memorandum, receipt, invoice, schedule, report, telegram, chart, photograph, etc.); and
- (5) its present location and identity of its custodian. If any document was, but is no longer, in your possession, custody, or control, or is no longer in existence, explain why.

If any of the foregoing information is not available, state any other available means of identifying such document. If a document is one of a series of pages contained in a book, pamphlet, binder, folder, microfilm (or other storage device), include in your identification of such document(s) any available numerical reference (or other aid) to the pages and line or other portion thereof at which the information referred to can be found. A true and correct copy of any document may be produced and filed with your Answers hereto in lieu of the above information.

The words “identify” and “describe”, when used with respect to an oral communication,

mean:

- (1) to state the substance of each such oral communication;
- (2) to state the exact words used by each person participating in the oral communication;
- (3) to identify each speaker;
- (4) to identify each person present at the making or reception of such oral communication;
- (5) to specify the date, time and place of each oral communication;
- (6) to identify each person repeating such oral communication;
- (7) to identify every document which records, memorializes, or relates to all or part of such communication; and
- (8) to identify the mode of such communication (e.g., telephone, face-to-face, etc.).

The words "person" and "persons" as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint ventures, corporations, and any other entities.

The words "relate," "related," "relates," and "relating," as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

All computer readable data should be provided on CD ROMs or DVDs for use on PC-compatible machines. Luminant will provide a sufficient amount of CDs or DVDs if requested by you before time for your response.

If you have any question concerning the attached Questions or any of these instructions, please contact Kirk Rasmussen at (512) 615-1203.

Unless the specific question permits a longer time period, answers to this Request for Information should be served on Luminant and filed with the Public Utility Commission of Texas **within 10 days** of your receipt of said request. Service on Luminant should be made as follows:

Kirk D. Rasmussen
Enoch Kever PLLC
600 Congress Ave., Suite 2800
Austin, Texas 78701

Such Answers should be served upon Mr. Rasmussen by Federal Express or facsimile to (512) 615-1198.

Respectfully submitted,

ENOCH KEVER PLLC
600 Congress Avenue, Suite 2800
Austin, Texas 78701
512-615-1200 (phone)
512-615-1198 (fax)

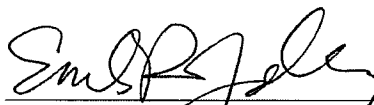
By: 

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**ATTORNEYS FOR LUMINANT
GENERATION COMPANY LLC AND
LUMINANT ENERGY COMPANY LLC**

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been faxed to Southern Cross Transmission, LLC, and served on all parties of record on this 14th day of April, 2016, in accordance with SOAH Order No. 3 issued in this docket.


Emily R. Jolly

QUESTIONS

Refer to the Supplemental Testimony of Mark Bruce at pages 13-14.

- 2.1 Explain fully and in detail what Mr. Bruce means by “using proxy offer curves in a SCED workaround to approximate economic dispatch.”
- 2.2 Explain fully and in detail the methodology, as envisioned by Mr. Bruce, that would be used to determine the price and quantity pairs constituting the “proxy offer curves.”
 - a. Describe what limitations, if any, would apply to the price and quantity pairs.
 - b. Would a price floor or price cap apply?
 - c. Would there be any rules regarding the slope of the “proxy offer curves”?
- 2.3 Explain fully and in detail the proposed process and timing for the submission of “proxy offer curves” to ERCOT, as envisioned by Mr. Bruce.
- 2.4 Describe the methodology, as envisioned by Mr. Bruce, by which ERCOT would “approximate economic dispatch.”
 - a. Explain fully and in detail how ERCOT would evaluate the “proxy offer curves” as compared to energy offer curves submitted via SCED.
 - b. Would ERCOT issue a dispatch instruction to the DC Tie owner? If so, under what circumstances?
 - c. Would the dispatch instruction displace the schedule for the DC Tie? If not, what would be the relationship between the dispatch instruction and the schedule?
- 2.5 Would an “approximate economic dispatch,” as envisioned by Mr. Bruce, require ERCOT to coordinate with other Independent System Operators? If not, why not? If so, how would that be accomplished?