



Control Number: 45624



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

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PUBLIC UTILITY COMMISSION
FILING CLERK

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

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE ELECTRIC RELIABILITY COUNCIL OF TEXAS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11

Pursuant to Tex. Admin Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the Electric Reliability Council of Texas 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.

199

Dated: April 19, 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 19, 2016, in accordance with 16 TAC § 22.74.



Christina R. Switzer

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE ELECTRIC RELIABILITY COUNCIL OF TEXAS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11**

DEFINITIONS

- A. "ERCOT," or "You" refers to the Electric Reliability Council of Texas 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.

- C. "Southern Cross Project" refers to the approximately 400-mile long, high voltage direct current, bi-directional transmission line that Southern Cross plans to build and connect to the ERCOT transmission system at the Texas-Louisiana border by interconnecting with the proposed Panola Switching Station and 345-kV transmission line.

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TO THE ELECTRIC RELIABILITY COUNCIL OF TEXAS
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-11**

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 1-1** Has ERCOT undertaken or reviewed any reliability or interconnection studies related to the proposed Southern Cross Project? If so, does ERCOT believe that these studies are sufficient or are additional studies necessary?
- Staff 1-2** If interconnected with the ERCOT transmission system, will the proposed Southern Cross Project qualify as the most severe single contingency on the ERCOT transmission system? If so, will additional Ancillary Services be necessary?
- Staff 1-3** Has ERCOT identified any transmission upgrades that are necessary within ERCOT to facilitate imports and/or exports over the Southern Cross Project? If so, please provide a description of each transmission upgrade.
- Staff 1-4** Please explain ramping limitation within the ERCOT transmission system and how interconnection of the proposed Southern Cross Project will interact with those ramp restrictions. What process exists for managing the ramping of flow through the Proposed Southern Cross Project?
- Staff 1-5** Please refer to the Direct Testimony of David Parquet at page 10, lines 3-12.
- a) Does ERCOT agree that it will develop and execute a coordination agreement with the relevant Independent System Operator (ISO)/Regional Transmission Organization (RTO)/Balancing Authorities (BAs)?
 - b) If so, what issues need to be address in a coordination agreement?
 - c) What is the time frame for executing a coordination agreement?
- Staff 1-6** In regards to existing coordination agreements between ERCOT and other RTOs/ISOs/BAs, what is the process for operation of a DC tie line during an emergency situation?
- Staff 1-7** In the event of an emergency, what ability and authority would ERCOT have to manage power flows over the proposed Southern Cross Project to ensure reliability and quality of service?
- Staff 1-8** Would ERCOT have the ability and authority to manage power flows across the proposed Southern Cross Project if any of the related equipment is located outside of Texas?

- Staff 1-9** If it were necessary to shut-off the proposed Southern Cross Project:
- a) Would ERCOT have the authority ability to do so?
 - b) Would ERCOT need a physical/direct connection to accomplish this?
 - c) Would shutting off the proposed Southern Cross Project require Southern Cross to act? If so, is there a way to give control to ERCOT, the City of Garland, or Oncor Electric Delivery Company?
- Staff 1-10** If the proposed Southern Cross Project is built and interconnected to ERCOT, in what ways would it be more difficult to coordinate outages?
- Staff 1-11** In what ways would the addition of the proposed Southern Cross Project affect contingency models for the ERCOT transmission system?