



Control Number: 45624



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

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2016 APR 19 PM 2: 28

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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BEFORE THE

PUBLIC UTILITY COMMISSION
FILING CLERK

STATE OFFICE OF

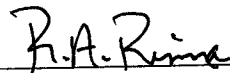
ADMINISTRATIVE HEARINGS

**SOUTHERN CROSS TRANSMISSION LLC'S SUPPLEMENTAL RESPONSE TO
TEXAS INDUSTRIAL ENERGY CONSUMERS' FIRST SET OF
REQUESTS FOR INFORMATION TO SOUTHERN CROSS TRANSMISSION LLC
QUESTION NO. TIEC 2-12**

Southern Cross Transmission LLC files this supplemental response to Texas Industrial Energy Consumers' Second Set of Requests for Information (RFI) Question No. 2-12 to Southern Cross Transmission LLC.

Southern Cross Transmission LLC reserves the right to object at the time of the hearing to the admissibility of the information provided herein.

Respectfully submitted,



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State Bar No. 16932500
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Attorney for Southern Cross Transmission LLC

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. Mail on TIEC on April 19, 2016.

R. A. Rima
Robert A. Rima *ln w/permission*

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**SOUTHERN CROSS'S SUPPLEMENTAL RESPONSE TO COMMISSION TEXAS
INDUSTRIAL ENERGY CONSUMERS' SECOND SET
OF REQUESTS FOR INFORMATION TO
COMMISSION STAFF QUESTION NOS. TIEC 2-12**

Question No. TIEC 2-12

Please provide all documents and communications exchanged between or among Pattern, Resero Consulting (Resero), and LCG Consulting (LCG) regarding this project, including interim reports.

By agreement of the parties, TIEC 2-12 is modified as follows:

1. The request is limited to the 2015 study which was the subject of Ms. Wolfe's testimony and exhibit.
2. TIEC requests any communications between or among Pattern, Resero, and LCG regarding:
 - changes or modifications that were made to the model at any point during the modeling process;
 - initial or preliminary results of partial or full model runs, and any changes made to the model in response to those results;
 - assumptions for the model, including both those assumptions that made it into the model and those that did not (if any),
 - any questions, guidance, guidelines, or clarifications about the scope of the project, the purpose of the model, or the type of results that the model was seeking.

Response No. TIEC 2-12

By agreement with TIEC, this response will be provided on April 19, 2016.

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

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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**SOUTHERN CROSS'S SUPPLEMENTAL RESPONSE TO COMMISSION TEXAS
INDUSTRIAL ENERGY CONSUMERS' SECOND SET
OF REQUESTS FOR INFORMATION TO
COMMISSION STAFF QUESTION NOS. TIEC 2-12**

Supplemental Response No. TIEC 2-12

Responsive information is being provided under the protective order. Material outside the scope of the request has been redacted.

Prepared by: Ellen Wolfe
Sponsored by: Ellen Wolfe

Title: President – Resero Consulting
Title: President – Resero Consulting