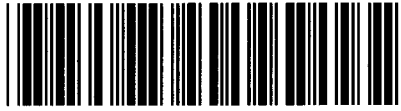




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APPLICATION OF THE CITY OF
GARLAND TO AMEND A
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AND NECESSITY FOR THE RUSK TO
PANOLA DOUBLE-CIRCUIT 345-KV
TRANSMISSION LINE IN RUSK AND
PANOLA COUNTIES

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ADMINISTRATIVE HEARINGS

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**SOUTHERN CROSS TRANSMISSION LLC'S RESPONSE TO LUMINANT ENERGY
COMPANY LLC AND LUMINANT GENERATION COMPANY LLC'S
FIRST SET OF REQUESTS FOR INFORMATION
TO SOUTHERN CROSS TRANSMISSION LLC
QUESTION NOS. LUMINANT 1.1 THROUGH LUMINANT 1.5**

Southern Cross Transmission LLC files this response to Luminant Energy Company LLC and Luminant Generation Company's (collectively "Luminant") First Set of Requests for Information (RFI) to Southern Cross Transmission LLC. Southern Cross Transmission LLC received Luminant's First RFI on April 12, 2016. Pursuant to SOAH Order No. 2, Southern Cross Transmission's response is due on April 22, 2016; therefore, this response is timely filed. All parties may treat these answers as if they were filed under oath.

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,

R.A. Rima


Robert A. Rima
State Bar No. 16932500
Law Offices of Robert A. Rima
7200 N. MoPac Expy, Suite 160
Austin, TX 78732-2560
512-349-3449
512-349-9339 Fax
bob.rima@rimalaw.com

In ut permission

Attorney for Southern Cross Transmission LLC

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 Luminant Energy Company LLC and Luminant Generation Company LLC on April 22, 2016.


Robert A. Rima *in v/permission*

APPLICATION OF THE CITY OF	§	
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AND NECESSITY FOR THE RUSK TO	§	STATE OFFICE OF
PANOLA DOUBLE-CIRCUIT 345-KV	§	
TRANSMISSION LINE IN RUSK AND	§	ADMINISTRATIVE HEARINGS
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**SOUTHERN CROSS TRANSMISSION LLC RESPONSE TO LUMINANT'S FIRST SET
OF REQUESTS FOR INFORMATION
TO SOUTHERN CROSS TRANSMISSION LLC
QUESTION NOS. LUMINANT 1.1 THROUGH LUMINANT 1.5**

Question No. Luminant 1.1

For imports into ERCOT from the Eastern Interconnect, please provide the following charges associated with power flows over the proposed DC tie using the assumptions in the economic analysis that is the subject of Ellen Wolfe's testimony:

- On-peak transmission charges that will apply in ERCOT;
- Off-peak transmission charges that will apply in ERCOT;
- On-peak transmission charges that will apply in the Eastern Interconnect; and
- Off-peak transmission charges that will apply in the Eastern Interconnect.

Response No. Luminant 1.1

	ERCOT CHARGES APPLIED TO ERCOT IMPORTS	ERCOT CHARGES APPLIED TO ERCOT EXPORTS	E/I CHARGES APPLIED TO E/I IMPORTS	E/I CHARGES APPLIED TO E/I EXPORTS
WOLFE TESTIMONY & STUDY				
On-Peak Months (June- September)	0	\$10.87/MWh	0	\$5.237/MWh
Off-Peak Months (October – May)	0	\$9.28/MWh	0	\$5.237/MWh

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**SOUTHERN CROSS TRANSMISSION LLC RESPONSE TO LUMINANT'S FIRST SET
OF REQUESTS FOR INFORMATION
TO SOUTHERN CROSS TRANSMISSION LLC
QUESTION NOS. LUMINANT 1.1 THROUGH LUMINANT 1.5**

	ERCOT CHARGES APPLIED TO ERCOT IMPORTS	ERCOT CHARGES APPLIED TO ERCOT EXPORTS	E/I CHARGES APPLIED TO E/I IMPORTS	E/I CHARGES APPLIED TO E/I EXPORTS
HIGH-TARIFF SENSITIVITY RUN				
On-Peak Months (June- September)	0	\$21.18/MWh	0	\$5.237/MWh
Off-Peak Months (October – May)	0	\$9.70/MWh	0	\$5.237/MWh

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

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QUESTION NOS. LUMINANT 1.1 THROUGH LUMINANT 1.5**

A table showing the derivation of the resultant ERCOT wheeling rates from the Mark Bruce response provided in response to TIEC 1-36 is shown below.

	June - Sept Months (\$/MWh)	Oct - May Months (\$/MWh)
Estimated Tariff Rate Transmission Charges - 2015	17.24	5.76
Expected increase in Transmission charges to 2020	0.75	0.75
Expected 2020 Transmission Charges	17.99	6.51
ERCOT Admin Charges - May 2015 Estimate	3.49	3.49
Adjustment down for lower current AS charges	-0.3	-0.3
Expected AS increase to 2020	-	-
Total Expected Wheeling Out Charges	21.18	9.7

Prepared by: Ellen Wolfe/Mark Bruce
Sponsored by: Ellen Wolfe/Mark Bruce

Title: Consultants
Title: Consultants

**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 TRANSMISSION LLC RESPONSE TO LUMINANT’S FIRST SET
OF REQUESTS FOR INFORMATION
TO SOUTHERN CROSS TRANSMISSION LLC
QUESTION NOS. LUMINANT 1.1 THROUGH LUMINANT 1.5**

Question No. Luminant 1.2

For imports into ERCOT from the Eastern Interconnect, please provide the following charges associated with power flows over the proposed DC tie using the maximum-case transmission charges associated with exports from ERCOT as specified in Southern Cross’ response to TIEC 1-36:

- a. On-peak transmission charges that will apply in ERCOT;
- b. Off-peak transmission charges that will apply in ERCOT;
- c. On-peak transmission charges that will apply in the Eastern Interconnect; and
- d. Off-peak transmission charges that will apply in the Eastern Interconnect.

Response No. Luminant 1.2

Please see SCT’s Response to Luminant 1.1.

Prepared by: Ellen Wolfe/Mark Bruce
Sponsored by: Ellen Wolfe/Mark Bruce

Title: Consultants
Title: Consultants

**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 TRANSMISSION LLC RESPONSE TO LUMINANT’S FIRST SET
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TO SOUTHERN CROSS TRANSMISSION LLC
QUESTION NOS. LUMINANT 1.1 THROUGH LUMINANT 1.5**

Question No. Luminant 1.3

For exports from ERCOT into the Eastern Interconnect, please provide the following charges associated with power flows over the proposed DC tie using the assumptions in the economic analysis that is the subject of Ellen Wolfe’s testimony:

- a. On-peak transmission charges that will apply in ERCOT;
- b. Off-peak transmission charges that will apply in ERCOT;
- c. On-peak transmission charges that will apply in the Eastern Interconnect; and
- d. Off-peak transmission charges that will apply in the Eastern Interconnect.

Response No. Luminant 1.3

Please see SCT’s Response to Luminant 1.1.

Prepared by: Ellen Wolfe/Mark Bruce
Sponsored by: Ellen Wolfe/Mark Bruce

Title: Consultants
Title: Consultants

**SOAH DOCKET NO. 473-16-2751
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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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**SOUTHERN CROSS TRANSMISSION LLC RESPONSE TO LUMINANT’S FIRST SET
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QUESTION NOS. LUMINANT 1.1 THROUGH LUMINANT 1.5**

Question No. Luminant 1.4

For exports from ERCOT into the Eastern Interconnect, please provide the following charges associated with power flows over the proposed DC tie using the maximum-case transmission charges associated with exports from ERCOT as specified in Southern Cross’ response to TIEC 1-36:

- a. On-peak transmission charges that will apply in ERCOT;
- b. Off-peak transmission charges that will apply in ERCOT;
- c. On-peak transmission charges that will apply in the Eastern Interconnect; and
- d. Off-peak transmission charges that will apply in the Eastern Interconnect.

Response No. Luminant 1.4

Please see SCT’s Response to Luminant 1.1.

Prepared by: Ellen Wolfe
Sponsored by: Ellen Wolfe

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

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**SOUTHERN CROSS TRANSMISSION LLC RESPONSE TO LUMINANT’S FIRST SET
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QUESTION NOS. LUMINANT 1.1 THROUGH LUMINANT 1.5**

Question No. Luminant 1.5

Refer to the testimony of Ellen Wolfe. In order for the economic analysis model to assume that flows across the DC tie will occur, must the power cost differential exceed the applicable DC tie transmission charges specified in the response to Question 1.1 above for imports and Question 1.3 for exports? Explain fully.

Response No. Luminant 1.5

Yes. Given that the UPLAN model seeks a least-cost solution energy will only flow across the SCT project to the extent that there is a price difference in the respective markets that exceeds the transmission charges.

Prepared by: Ellen Wolfe
Sponsored by: Ellen Wolfe

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