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

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PUBLIC UTILITY COMMISSION
BEFORE THE

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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STATE OFFICE OF

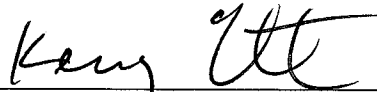
ADMINISTRATIVE HEARINGS

**CITY OF GARLAND'S RESPONSE TO 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**

The City of Garland (Garland) files this response to Commission Staff's Second Request for Information (RFI) and Request for Admission to Garland. Garland received Staff's Second on April 13, 2016. Pursuant to SOAH Order No. 2, this response is timely filed. All parties may treat these answers as if they were filed under oath.

Garland reserves the right to object at the time of the hearing to the admissibility of the information provided herein.

Respectfully submitted,



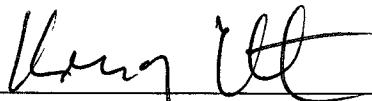
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ATTORNEYS FOR THE CITY OF GARLAND

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served on Commission Staff on April 25, 2016 by electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. Mail.


Kerry McGrath

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Question No. 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.

Response No. STAFF 2-1

No specific engineering constraints are known at this time. Detailed engineering design will be performed after a route has been selected and access to property has been obtained.

Prepared by: Chris McCall

Title: Project Manager, Burns & McDonnell
Engineering, Inc.

Sponsored by: Chris McCall

Title: Project Manager, Burns & McDonnell
Engineering, Inc.

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Question No. 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.

Response No. STAFF 2-2

Cost for pipeline mitigation has not been estimated at this time. Currently access to the existing facilities has not been granted. Pipeline mitigation requirements, if any, will be evaluated after a route is selected.

Prepared by: Chris McCall

Title: Project Manager, Burns & McDonnell
Engineering, Inc.

Sponsored by: Chris McCall

Title: Project Manager, Burns & McDonnell
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Question No. STAFF 2-3

Please identify any reliability concerns related to the paralleling or crossing of other utilities' transmission facilities on Garland's proposed alternative routes.

Response No. STAFF 2-3

Details of the potential paralleling or crossing arrangements are not known at this time. However, any necessary mitigation measures will be taken to ensure reliability and safety requirements are met in accordance with the national electric safety code and in conjunction with the existing facility owners.

Prepared by: Chris McCall

Title: Project Manager, Burns & McDonnell
Engineering, Inc.

Sponsored by: Chris McCall

Title: Project Manager, Burns & McDonnell
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Question No. 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.

Response No. STAFF 2-4

GP&L will operate and maintain the proposed transmission line.

Prepared by: Darrell W. Cline
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light
Title: Chief Financial Officer, Garland Power & Light

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Question No. 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.

Response No. STAFF 2-5

Generally speaking, lattice steel structures may be required if the necessary loading capacity exceeds the reasonable capability of an economically viable tubular steel pole. Typical loading increases due to structure height, structure line angle, and conductor tension.

Prepared by: Chris McCall

Title: Project Manager, Burns & McDonnell
Engineering, Inc.

Sponsored by: Chris McCall

Title: Project Manager, Burns & McDonnell
Engineering, Inc.

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Question No. 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?

Response No. STAFF 2-6

Garland understands that Rusk Interconnection, LLC has purchased the parcel of land for the Panola Switching Station and that Southern Cross Transmission, LLC has purchased the parcel of land for the HVDC converter station.

Prepared by: Kristi Wise

Title: Senior Project Manager, Burns & McDonnell
Engineering, Inc.

Sponsored by: Kristi Wise

Title: Senior Project Manager, Burns & McDonnell
Engineering, Inc.

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Question No. 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?

Response No. STAFF 2-7

The habitable structures that are referred to on page 16 of the Direct Testimony of Kristi Wise, lines 14-16, are located in proximity to an existing 115-kV transmission line.

Prepared by: Kristi Wise

Title: Senior Project Manager, Burns & McDonnell
Engineering, Inc.

Sponsored by: Kristi Wise

Title: Senior Project Manager, Burns & McDonnell
Engineering, Inc.

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Question No. 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.

Response No. STAFF 2-8

At this time, a permit application has not been submitted to the FERC and SRA as a final route has not been determined. Only Segments 31, 36, and 39 would require such approval. Segments 27B and 52 do not cross the FERC/SRA boundary. Based on conversations with SRA, GP&L does not anticipate any problems with obtaining this approval, although the approval process could be time-consuming. The permit process is outlined in a letter from SRA that is included in Appendix A to the EA (Pages A-131 & A-132).

Prepared by: Kristi Wise	Title: Senior Project Manager, Burns & McDonnell Engineering, Inc.
Sponsored by: Kristi Wise	Title: Senior Project Manager, Burns & McDonnell Engineering, Inc.

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Question No. 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.

Response No. STAFF 2-9

All routes proposed in the GP&L application would cross FEMA-designated 100-year floodplains. Segments 1, 2, 3, and 4 all would cross FEMA-designated 100-year floodplains in Rusk County. It is unknown whether the proposed routes would cross FEMA-designated floodplains in Panola County, as FEMA data is not available for most of the county.

Prepared by: Kristi Wise

Title: Senior Project Manager, Burns & McDonnell
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Sponsored by: Kristi Wise

Title: Senior Project Manager, Burns & McDonnell
Engineering, Inc.