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

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2016 MAR -7 AM 11:27
BEFORE THE STATE OFFICE
FILING CLERK
OF
ADMINISTRATIVE HEARINGS

TEXAS INDUSTRIAL ENERGY CONSUMERS' MOTION TO INTERVENE

Texas Industrial Energy Consumers (TIEC), pursuant to the Public Utility Regulatory Act (PURA), TEX. UTIL. CODE ANN. §§ 11.001 et seq., and §§ 22.102, 22.103(b), and 22.104 of the Commission's Rules of Practice and Procedures, files this Motion to Intervene in the above-referenced proceeding, respectfully showing as follows:

1. The names, address, and telephone number of TIEC's authorized representatives are:

Mr. Phillip G. Oldham
Ms. Katie Coleman
Mr. Michael McMillin
Thompson & Knight LLP
98 San Jacinto Blvd., Suite 1900
Austin, Texas 78701
(512) 469-6100
(512) 469-6180 (fax)
phillip.oldham@tklaw.com
katie.coleman@tklaw.com
michael.mcmillin@tklaw.com

All pleadings and other documents should be served upon TIEC's authorized representatives.

2. On February 25, 2016, the City of Garland, Texas filed an application to amend a certificate of convenience and necessity for the Rusk to Panola double-circuit 345 kV transmission line in Rusk and Panola Counties.

3. TIEC is an association of industrial consumers of electricity, and TIEC's principal purpose is to address electricity matters in proceedings before the Commission.

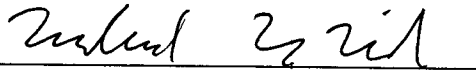
4. TIEC's member companies own and operate industrial facilities in ERCOT. TIEC's members will be directly affected by the outcome of this proceeding, including the impact large DC Ties and associated transmission facilities will have on the cost and reliability of electric service in ERCOT. Further, while the applicants assert that this project will not have any impact on transmission costs, TIEC has a right to participate in this proceeding to obtain discovery and to verify that no other costs will be imposed on the system.

5. TIEC was also a party to Federal Energy Regulatory Commission (FERC) Docket No. TX11-1-001, which addressed the Southern Cross Project that this application is intended to interconnect. TIEC has a continued interest in this project to address any cost or jurisdictional issues.

For the above-stated reasons, TIEC respectfully requests that the Commission grant this Motion to Intervene and admit TIEC as an intervenor in this proceeding for all purposes, and for any other relief to which it TIEC may be entitled.

Respectfully submitted,

THOMPSON & KNIGHT LLP




Phillip G. Oldham
State Bar No. 00794392
Katherine L. Coleman
State Bar No. 24059596
Michael McMillin
State Bar No. 24088034
98 San Jacinto Blvd., Suite 1900
Austin, Texas 78701
(512) 469.6100
(512) 469.6180 (fax)

ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, Michael McMillin, Attorney for TIEC, hereby certify that a copy of TIEC's Motion to Intervene was served on all parties of record in this proceeding on this 7 day of March, 2016 by facsimile, electronic mail and/or First Class, U.S. Mail, Postage Prepaid.

A handwritten signature in cursive script, appearing to read "Michael McMillin", written over a horizontal line.

Michael McMillin