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PUBLIC UTILITY COMMISSION

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

**DEEP EAST TEXAS ELECTRIC COOPERATIVE, INC.'S**  
**STATEMENT OF POSITION**

**TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:**

**NOW COMES** Deep East Texas Electric Cooperative, Inc. ("DETEC") and files this Statement of Position and would respectfully show the following:

On February 25, 2016, the City of Garland ("Garland") filed an Application to Amend a Certificate of Convenience and Necessary for the Rusk to Panola Double-Circuit 345 kV Transmission Line in Rusk and Panola Counties (the "CCN"). DETEC is a transmission and distribution electric cooperative headquartered in San Augustine, Texas and serves eight counties: San Augustine, Sabine, Panola, Shelby, Newton, Nacogdoches, Jasper and Rusk. DETEC is directly affected by the proposed project and received notice of City of Garland's filing as a neighboring utility under PUC PROC. R. 22.52(a)(2).

The proposed transmission line would only be in the public interest, in DETEC's opinion, if it is on a route that is safe and built in a way not to be unreasonably detrimental to the existing transmission/distribution lines and facilities of other utilities in the area, including DETEC and its members.

DETEC also has an interest in ensuring that Garland continues to keep DETEC and its members updated on information related to this project as the case moves forward, including

consulting with DETEC when any DETEC facilities may be crossed or paralleled – to help insure DETEC members are not unreasonably impacted (including from operational, safety, maintenance and reliability standpoints). To the extent this Garland CCN should have any sort of detrimental impact on DETEC, then Garland should be required to cooperate with DETEC, make reasonable accommodations for DETEC, and/or reimburse DETEC for costs related to facilities relocation, operational interruptions, necessary safety precautions and similar negative impacts to DETEC. To the extent a transmission line route might be agreed upon or approved that parallels any DETEC lines, Garland should be required to maintain any joint-use ROWs or joint-use facilities in which Garland and DETEC may agree to share an interest.

While, at this time, DETEC does not have a strong routing preference and is able to appreciate that many intervenors have individual routing preferences, for the sake of flexibility and in the spirit of accommodation and cooperation, DETEC would find any of the RP4, 5, 8, or 93 routings least objectionable, as DETEC believes those routes might come closest to meeting the statutory routing criteria, as well as being less intrusive to DETEC and its membership.

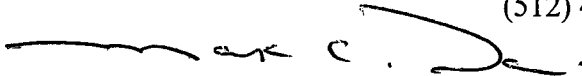
Respectfully submitted,

**HOLLAND & KNIGHT LLP**

Patrick Burchette  
Email: [Patrick.Burchette@hklaw.com](mailto:Patrick.Burchette@hklaw.com)  
800 17<sup>th</sup> Street N.W.  
Suite 1100  
Washington, D.C. 20006  
(202) 955-3000  
(202) 955-5564 FAX

**HOLLAND & KNIGHT LLP**

Mark C. Davis  
State Bar No. 05525050  
Email: [Mark.Davis@hklaw.com](mailto:Mark.Davis@hklaw.com)  
Russell G. Parish  
State Bar No. 24051155  
Email: [Russell.Parish@hklaw.com](mailto:Russell.Parish@hklaw.com)  
1005 Congress Avenue, Suite 950  
Austin, TX 78701  
(512) 472-1081  
(512) 472-7473 FAX  
(512) 472-1081  
(512) 472-7473 Facsimile

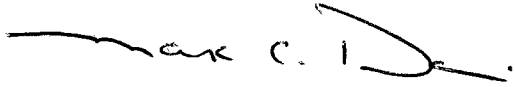


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**ATTORNEYS FOR DEEP EAST TEXAS ELECTRIC COOPERATIVE, INC.**

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was hand delivered and/or mailed this 27<sup>th</sup> day of April, 2016 by First Class, U.S. Mail, postage pre-paid to all parties of record.

A handwritten signature in black ink, appearing to read "Mark C. Davis", is written over a horizontal line.

Mark C. Davis