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SOAH DOCKET NO. 473-16-2751  
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2016 APR 27 PM 2:53

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	§	

**RUSK COUNTY ELECTRIC COOPERATIVE, INC.'S**  
**STATEMENT OF POSITION**

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

NOW COMES Rusk County Electric Cooperative, Inc. ("Rusk EC") 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"). Rusk EC is a transmission and distribution electric cooperative headquartered in Henderson, Texas and serves five counties Rusk: Gregg, Panola, Shelby and Nacogdoches. Rusk EC 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).

Rusk EC believes the proposed transmission line would only be in the public interest 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 Rusk EC and its members.

As this project moves forward, Rusk EC has an interest in ensuring that Garland continues to keep Rusk EC and its members updated on information related to this project, including consulting with Rusk EC when its facilities may be crossed or paralleled – to help insure Rusk EC 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 Rusk EC, then Garland should be required to cooperate with Rusk EC, make reasonable accommodations for Rusk EC, and/or reimburse Rusk EC for costs related to facilities relocation, operational interruptions, necessary safety precautions and similar negative impacts to Rusk EC. To the extent a transmission line route is settled upon that parallels Rusk EC, Garland should be required to maintain any joint-use ROWs or joint-use facilities in which Garland and Rusk EC may agree to share an interest.

As far as specific routes, Rusk EC can certainly appreciate that many intervenors have strong routing preferences and that choosing or settling upon a route is often a complex and controversial task at the Commission; so for the sake of flexibility and in the spirit of accommodation and cooperation, Rusk EC would be receptive to any of the RP4, 5, 8, or 93 routings. Each of those four route options would place the line parallel to Rusk EC's existing transmission (along segments 7 and 8 of the routes), and as such, those routes would all meet a key element of the statutory routing criteria, as well as being less intrusive to Rusk EC and its membership. Rusk EC would prefer not to see routes containing segments 3 or 4 chosen.

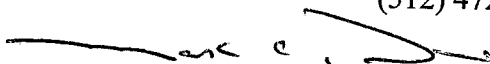
Respectfully submitted,

**HOLLAND & KNIGHT LLP**

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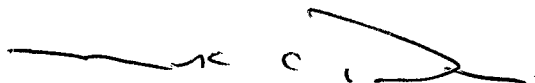


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**ATTORNEYS FOR RUSK COUNTY ELECTRIC COOPERATIVE, INC.**

**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.



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Mark C. Davis