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

# PANOLA-HARRISON ELECTRIC COOPERATIVE, INC.'S STATEMENT OF POSITION

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

**NOW COMES** Panola-Harrison Electric Cooperative, Inc. ("Panola") 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"). Panola is a distribution electric cooperative headquartered in Marshall, Texas and serves two counties: Harrison and Panola in Texas; and Panola also serves two parishes in Louisiana: Caddo and DeSoto. Panola 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).

Panola 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 Panola and its members.

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

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

### Respectfully submitted,

#### **HOLLAND & KNIGHT LLP**

Patrick Burchette

Email: Patrick.Burchette@hklaw.com

800 17th 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

Russell G. Parish

State Bar No. 24051155

Email: 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



ATTORNEYS FOR PANOLA-HARRISON 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 26<sup>th</sup> day of April, 2016 by First Class, U.S. Mail, postage pre-paid to all parties of record.

Mark C. Davis