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

SOUTHWESTERN ELECTRIC POWER COMPANY'S STATEMENT OF POSITION

NOW COMES, Southwestern Electric Power Company (SWEPCO) and timely files its Statement of Position pursuant to SOAH Order No. 2 in the above-styled and docketed proceeding requiring intervenors to file direct testimony or statements of position by April 27, 2016. SWEPCO respectfully shows as follows in its Statement of Position:

In its Application to amend its certificate of convenience and necessity (CCN) for a proposed double-circuit 345 kV transmission line in Rusk and Panola counties, the City of Garland (Garland) proposes twelve primary routes for the Public Utility Commission of Texas (Commission) to consider. Many of the proposed routes are composed of routing segments that cross and/or parallel three existing SWEPCO transmission lines that are within the Garland CCN project study area that encompasses parts of SWEPCO's service territory. The SWEPCO transmission lines are as follows and are affected by the identified segments¹:

- Lebrock to Tenaska Switching Station 345 kV line (Segments 1, 3 and 4).
- Carthage 'T' to Logansport 138 kV line (Segments 34, 37, 38, 39 and 44, 45 and 52)
- Carthage 'T' to Tenaha 138 kV line (Segments 7, 8, 14, 17, 24, 25, 26, 29 and 30)

All of the SWEPCO lines listed above, which are connected to the Southwest Power Pool, will operate asynchronously from Garland's proposed transmission line that will be connected to the Electric Reliability Council of Texas (ERCOT).

¹ See Garland's Application, Attachment 1, Environmental Assessment (Figure 3-4 and Table 3-1).

Garland identifies Route RP5 in its Application as the route that best meets the routing criteria in Chapter 37 of the Public Utility Regulatory Act (PURA) and 16 Tex. Admin. Code § 25.101(b)(3)(B).² Garland's Route RP5 is composed in part by routing segments 1, 7, 8, 26 and 34. If Garland's Route RP5 is selected by the Commission using these segments, its transmission line will operate in very near proximity paralleling and/or crossing SWEPCO's existing 345 kV, 138 kV and 69 kV lines at various locations. In particular, Garland's Segment 1 proposes to both parallel and cross a segment of SWEPCO's major bulk power delivery 345 kV transmission line (Lebrock to Tenaska Switching Station). This is a segment of the only 345 kV transmission line in East Texas that traverses north to south across a large area of Texas that connects two major utilities outside of ERCOT - SWEPCO in the Southwest Power Pool and Entergy Texas, Inc. (ETI) located in the Midcontinent Independent System Operator power region. Route RP5 is also composed in part by Segments 7, 8, 26 and 34. Segment 26 proposes to cross SWEPCO's 138 kV transmission line segment of the Carthage 'T' - Tenaha transmission line and is paralleled in part by segments 7 and 8. Segment 34 proposes to cross SWEPCO's Carthage 'T' - Logansport 138 kV transmission line. The City of Carthage and areas in certain surrounding areas that are in SWEPCO's service territory take retail electric service from SWEPCO in part through transmission electric delivery from these 138 and 69 kV lines that would be impacted by segments 7, 8, 26 and 34 used in Garland's Route RP5.

Routing segments 3 and 4, used in other routes Garland proposes, would also cross SWEPCO's 345 kV line as routes composed in part by these segments approach the western termination point at the new Rusk Switching Station. Additionally, a number of routes composed of the segments identified above would cross and/or parallel along the lengths north to south of SWEPCO's 138 kV and 69 kV transmission lines that provide service feeds to the City of Carthage and surrounding areas.

The paralleling and/or crossing of Garland's line with SWEPCO's 345 kV, 138 kV and 69 kV lines will create, for instance, an electromagnetic mutual coupling effect, which could cause relay mis-operations on the existing SWEPCO lines when faults occur on SWEPCO's or Garland's transmission lines. Mis-operations that lead to outages could negatively impact both bulk power delivery between SWEPCO and ETI systems over the SWEPCO 345 kV

² Direct Testimony of Darrell W. Cline at 10 (lines 1-4)

transmission line and SWEPCO's electric delivery service to the City of Carthage and surrounding areas that are reliant upon the SWEPCO 138/69 kV system. SWEPCO understands from the Application that Garland will be responsible for the operation and maintenance of the proposed transmission line.³ In light of Garland's service territory being considerably geographically removed from the location of its proposed transmission line in Panola County, SWEPCO has concerns with respect to the speed of Garland's service restoration that could impact SWEPCO's transmission service and retail service to its customers in the area.

Given the foregoing concerns, SWEPCO requests that Garland engage in the following coordinating efforts with and assurances to SWEPCO regarding Garland's proposed transmission line: (1) Garland shall coordinate with SWEPCO with respect to each crossing and the paralleling of SWEPCO's transmission and/or distribution facilities by the transmission line approved in this docket by the Commission in order to take measures to minimize service reliability impacts on SWEPCO lines including but not limited to establishing appropriate right-of-way distances from the impacted SWEPCO lines and ensuring Garland facilities at crossings are equipped to minimize damage that may be caused to crossed SWEPCO lines during outages or other events, including storms; (2) Garland will coordinate with SWEPCO to determine the impact of mutual coupling or any other impacts on SWEPCO's transmission lines before Garland's transmission line approved in this docket is placed in service; (3) if it is determined that SWEPCO's existing transmission and/or distribution facilities will require modification or enhancements, or will otherwise be impacted as a result of the construction or operation of Garland's transmission line approved in this docket, Garland agrees to take all necessary action to remedy such issues, including compensating SWEPCO for such modification or enhancements and/or impacts; and, (4) Garland shall provide assurances to SWEPCO that if any line approved in this docket parallels and/or crosses SWEPCO's transmission and/or distribution lines, SWEPCO will suffer no adverse effects due to fault or mutual coupling of such lines or other adverse impacts, and to the extent adverse effects are suffered by SWEPCO due to any fault or mutual coupling of Garland's line or other adverse impacts, Garland shall indemnify SWEPCO for resultant damage.

With Garland providing the foregoing coordinating efforts and assurances to SWEPCO,


³ *Id.* at 11 (lines 11-13).

SWEPCO will not oppose any proposed route in the Application, including Route RP5 identified by Garland as the route that best addresses the routing criteria in PURA and the Commission's substantive rules. SWEPCO reserves the right to participate in the hearing on the merits in this docket on all issues it believes necessary to address its interests and ensure the safe and reliable service to its customers through its electric delivery system. SWEPCO reserves the right to take positions on any other issues raised by any other party and participate in this proceeding, to conduct discovery on another parties and to participate in the hearing through cross-examination and briefing.

Dated: April 27, 2016

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding by hand-delivery, overnight delivery, facsimile transmission, or U.S. first-class mail on the 27th day of April, 2016.



Jerry N. Huerta