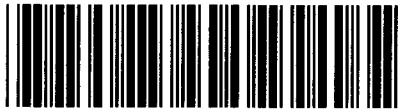




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SOAH DOCKET NO. 473-16-2751 RECEIVED
PUC DOCKET NO. 45624

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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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PUBLIC UTILITY COMMISSION
BEFORE THE

STATE OFFICE OF

ADMINISTRATIVE HEARINGS

**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY
CONSUMERS' THIRD SET OF REQUESTS FOR INFORMATION TO THE
CITY OF GARLAND QUESTION NOS. TIEC 3-1 THROUGH TIEC 3-3**

The City of Garland (Garland) files this response to Texas Industrial Energy Consumers' Third Set of Requests for Information (RFI) to Garland. Garland received TIEC's Third RFI on April 19, 2016. Pursuant to SOAH Order No. 2, this response is timely filed. All parties may treat these answers as if they were filed under oath.

Garland reserves the right to object at the time of the hearing to the admissibility of the information provided herein.

Respectfully submitted,



Kerry McGrath

State Bar No. 13652200

James A. Nortey, II

State Bar No. 24079063

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CITY OF GARLAND

200 North 5th Street, Suite 416

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Telephone: (972) 205-2380

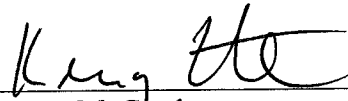
Facsimile: (972) 205-2389

ATTORNEYS FOR THE CITY OF GARLAND

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served on Texas Industrial Energy Consumers on April 29, 2016 by electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. Mail.



Kerry McGrath

**SOAH DOCKET NO. 473-16-2751
PUC 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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY
CONSUMERS' THIRD SET OF REQUESTS FOR INFORMATION TO THE
CITY OF GARLAND QUESTION NOS. TIEC 3-1 THROUGH TIEC 3-3**

Question No. TIEC 3-1

After receipt of a CCN for the construction of this project, how long will Rusk Interconnection, LLC ("Rusk") have to provide security for the following aspects of the project:

- a. Route surveying;
- b. Right of way acquisition;
- c. Engineering;
- d. Construction.

Response No. TIEC 3-1

Section 9.19.4 of the Transmission Line Agreement, provided as Exhibit DWC-2 to the Direct Testimony of Darrell W. Cline, requires that Rusk provide security to cover all costs and expenses of removing the Facilities on and restoring Eminent Domain Acquired Real Property. In addition, Section 9.16 of the Transmission Line Agreement provides for execution of the Decommissioning Escrow Agreement to provide funds for decommissioning the Facilities as defined in the Agreement. The Transmission Line Agreement does not otherwise require Rusk to provide security for the project.

Prepared by: Darrell W. Cline	Title: Chief Financial Officer, Garland Power & Light
Sponsored by: Darrell W. Cline	Title: Chief Financial Officer, Garland Power & Light

**SOAH DOCKET NO. 473-16-2751
PUC 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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY
CONSUMERS' THIRD SET OF REQUESTS FOR INFORMATION TO THE
CITY OF GARLAND QUESTION NOS. TIEC 3-1 THROUGH TIEC 3-3**

Question No. TIEC 3-2

If Rusk fails to timely provide security for the route surveying, right of way acquisition, engineering, and/or construction of this project, how long would Garland give Rusk to cure that failure?

Response No. TIEC 3-2

Not applicable. See Garland's response to TIEC 3-1.

Prepared by: Darrell W. Cline
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light
Title: Chief Financial Officer, Garland Power & Light

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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	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**CITY OF GARLAND'S RESPONSE TO TEXAS INDUSTRIAL ENERGY
CONSUMERS' THIRD SET OF REQUESTS FOR INFORMATION TO THE
CITY OF GARLAND QUESTION NOS. TIEC 3-1 THROUGH TIEC 3-3**

Question No. TIEC 3-3

If Southern Cross Transmission, LLC ("Southern Cross") elects to delay the commercial operation date of the DC tie, will Garland allow Southern Cross and/or Rusk to delay posting security for the route surveying, right of way acquisition, engineering, and/or construction of this project?

Response No. TIEC 3-3

Not applicable. See Garland's response to TIEC 3-1.

Prepared by: Darrell W. Cline
Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light
Title: Chief Financial Officer, Garland Power & Light