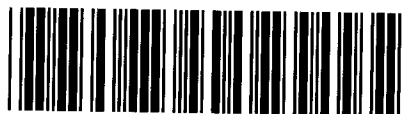




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Addendum StartPage: 0

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

RECEIVED

2016 MAY -2 AM 11:02

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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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

PUBLIC UTILITY COMMISSION
FILING CLERK

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE ELECTRIC RELIABILITY COUNCIL OF TEXAS
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9

Pursuant to Tex. Admin Code § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the Electric Reliability Council of Texas by and through its attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

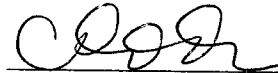
284

Dated: May 2, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division

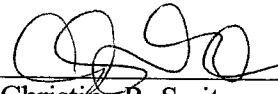


Christina R. Switzer
Attorney-Legal Division
State Bar No. 24066171
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(512) 936-7216
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78712-3326

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

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 2, 2016, in accordance with 16 TAC § 22.74.



Christina R. Switzer

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

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE ELECTRIC RELIABILITY COUNCIL OF TEXAS
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

DEFINITIONS

- A. "ERCOT," or "You" refers to the Electric Reliability Council of Texas and any person acting or purporting to act on his behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.
- C. "Southern Cross DC Tie" refers to the approximately 400-mile long, high voltage direct current, bi-directional transmission line.

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

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE ELECTRIC RELIABILITY COUNCIL OF TEXAS
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE ELECTRIC RELIABILITY COUNCIL OF TEXAS
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-9**

- Staff 2-1** Please refer to the Direct Testimony of Ted Hailu at page 9, lines 4-13. If the ERCOT protocols were amended to create a new type of market participant, who would bear the costs of amending the protocols and subsequent changes to ERCOT's system?
- Staff 2-2** Please refer to the Direct Testimony of Dan Woodfin at page 9, lines 11-19. Please provide an estimate of how much it would cost to modify ERCOT's Security Constrained Economic Dispatch system to add the functionality to dispatch the proposed Southern Cross DC Tie? Who would bear these costs?
- Staff 2-3** Please refer to the Direct Testimony of Dan Woodfin at pages 9-10. Please provide an estimate of how much it would cost to create a congestion management plan for the proposed Southern Cross DC Tie. Who would bear these costs?
- Staff 2-4** Please refer to the Direct Testimony of Dan Woodfin at pages 9-10. Please provide examples of the situations in which a congestion management plan would be unable to manage congestion. Please indicate the anticipated frequency of the situations as well as significance.
- Staff 2-5** Please refer to the Direct Testimony of Dan Woodfin at page 12, lines 11-16.
- a) Please describe the additional tools and processes necessary to evaluate whether a request by the proposed Southern Cross DC Tie to import or export power can be accommodated.
 - b) Please provide an estimate of how much it would cost to implement additional tools and processes to evaluate whether a request by the proposed Southern Cross DC Tie to import or export power can be accommodated.
 - c) Who would bear these costs?
- Staff 2-6** Please refer to the Direct Testimony of Dan Woodfin at page 14, lines 1-18. Please provide an estimate of how much it would cost to expand ERCOT's analytical capabilities to incorporate the proposed Southern Cross DC Tie into outage coordination. Who would bear these costs?
- Staff 2-7** Please refer to the Direct Testimony of Dan Woodfin at pages 15-16. Please provide an estimate of how much it would cost ERCOT to negotiate one or more agreements with the independent system operator/regional transmission organization and/or reliability coordinator on the eastern end of the proposed Southern Cross DC tie. Who would bear these costs?

- Staff 2-8** Please refer to the Direct Testimony of Dan Woodfin at page 17, lines 23-24. Please provide an estimate of how much it would cost ERCOT to procure additional ancillary service to ensure reliability margins are maintained if the proposed Southern Cross DC Tie is interconnected to ERCOT. Who would bear these costs?
- Staff 2-9** Please refer to the Direct Testimony of Dan Woodfin at page 12, lines 9-11. What would be the consequences of ERCOT denying a scheduled transaction over the proposed Southern Cross DC Tie?