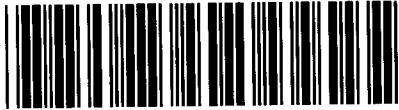


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PUC DOCKET NO. 45624
SOAH DOCKET NO. 473-16-2751

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APPLICATION OF CITY OF GARLAND, §
TEXAS, TO AMEND A CERTIFICATE §
OF CONVENIENCE AND NECESSITY §
FOR THE PROPOSED RUSK TO §
PANOLA DOUBLE-CIRCUIT 345-KV §
TRANSMISSION LINE IN RUSK AND §
PANOLA COUNTIES, TEXAS §

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**LUMINANT'S FIRST SET OF REQUESTS FOR INFORMATION TO THE
ELECTRIC RELIABILITY COUNCIL OF TEXAS**

COMES NOW Luminant Energy Company LLC and Luminant Generation Company LLC (collectively "Luminant"), by and through its attorneys of record, and requests that you provide the information and answer the attached questions under oath. It is further requested that the questions be answered in the order in which they are asked with as much detail so as to fully present all of the relevant facts.

Instructions

Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the witness or witnesses who will sponsor each of your answers at the hearing in this PUC Docket No. 45624. These questions are continuing in nature and, should there be a change in circumstances that would modify or change any of your answers, then, in such case, please change or modify such answer and submit such changed answer as a supplement to the original answer within five (5) working days of your discovery that such change or modification is appropriate.

In answering these requests for information, you are requested to furnish such information as is available to you, including information that you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

If you are unable to answer any request fully and completely after exercising due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such

request. In addition to specifying those portions, you are to state with regard to each portion:

1. The fact on which you base the contention that you are unable to answer that portion;
2. The knowledge, information, and belief you have concerning that portion; and
3. The acts done and inquiries made by you in attempting to answer such request.

The singular includes the plural and the plural includes the singular.

Masculine, feminine, or neuter pronouns do not exclude the other genders.

The words “document” and “documents” have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. Among other things, the words “document” and “documents” mean the final form and **all drafts and revisions of any kind** of written or graphic matter, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies there from which are different in any way from the original regardless of whether designated “confidential,” “privileged,” or otherwise restricted. Without limiting the generality of the foregoing, the words “document” and “documents” also include information stored or maintained on, or which could be reproduced from, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape, compact disk, DVD, or similar means.

The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope.

The words “communication” and “communications” include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both communications and statements which are face-to-face and those which are transmitted by any writing or document or by media such as intercoms, telephones, television or radio.

The words “identify” and “identification”, when used with respect to a natural person or persons, mean to state the name, address(es) and telephone number(s) of each such person. If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “identification,” when used in reference to a person other than a natural person, mean to set forth its:

- (1) full name or title;
- (2) nature or organization, including the state under which the same was organized or incorporated;
- (3) address and telephone number (with area code prefix); and
- (4) principal line of business.

If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “describe,” when used in reference to a fact, mean to state not only the fact itself, but also:

- (1) its date, time and place;
- (2) the name, address and telephone number of each person with knowledge of the fact;
- (3) whether the act is supported by an oral communication, a document, or other event; and
- (4) any other evidence which supports such fact.

The words “identify” and “identification,” when used in reference to a document, mean to state:

- (1) its date;
- (2) its author;
- (3) its addressee;
- (4) the type of document (e.g., letter, memorandum, receipt, invoice, schedule, report, telegram, chart, photograph, etc.); and
- (5) its present location and identity of its custodian. If any document was, but is no longer, in your possession, custody, or control, or is no longer in existence, explain why.

If any of the foregoing information is not available, state any other available means of identifying such document. If a document is one of a series of pages contained in a book, pamphlet, binder, folder, microfilm (or other storage device), include in your identification of such document(s) any available numerical reference (or other aid) to the pages and line or other portion thereof at which the information referred to can be found. A true and correct copy of any document may be produced and filed with your Answers hereto in lieu of the above information.

The words "identify" and "describe", when used with respect to an oral communication, mean:

- (1) to state the substance of each such oral communication;
- (2) to state the exact words used by each person participating in the oral communication;
- (3) to identify each speaker;
- (4) to identify each person present at the making or reception of such oral communication;
- (5) to specify the date, time and place of each oral communication;
- (6) to identify each person repeating such oral communication;
- (7) to identify every document which records, memorializes, or relates to all or part of such communication; and
- (8) to identify the mode of such communication (e.g., telephone, face-to-face, etc.).

The words "person" and "persons" as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint ventures, corporations, and any other entities.

The words "relate," "related," "relates," and "relating," as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

All computer readable data should be provided on CD ROMs or DVDs for use on PC-compatible machines. Luminant will provide a sufficient amount of CDs or DVDs if requested by you before time for your response.

If you have any question concerning the attached Questions or any of these instructions, please contact Kirk Rasmussen at (512) 615-1203.


Unless the specific question permits a longer time period, answers to this Request for Information should be served on Luminant and filed with the Public Utility Commission of Texas **within 10 days** of your receipt of said request. Service on Luminant should be made as follows:

Kirk D. Rasmussen
Enoch Kever PLLC
600 Congress Ave., Suite 2800
Austin, Texas 78701

Such Answers should be served upon Mr. Rasmussen by Federal Express or facsimile to (512) 615-1198.

Respectfully submitted,

ENOCH KEVER PLLC
600 Congress Avenue, Suite 2800
Austin, Texas 78701
512-615-1200 (phone)
512-615-1198 (fax)

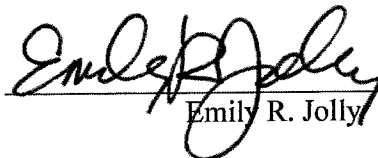
By: 

Kirk D. Rasmussen
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Emily R. Jolly
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**ATTORNEYS FOR LUMINANT
GENERATION COMPANY LLC AND
LUMINANT ENERGY COMPANY LLC**

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been faxed to counsel for ERCOT and served on all parties of record in accordance with SOAH Order No. 3 issued in this docket.


Emily R. Jolly

ADDITIONAL DEFINITIONS

1. “CMP” means a Constraint Management Plan or a Congestion Management Plan, as discussed in the Direct Testimony of Dan Woodfin.
2. “Special Protection System” or “SPS” has the meaning set forth in Section 2 of the ERCOT Nodal Protocols and Section 11 of the ERCOT Nodal Operating Guides.

QUESTIONS

- 1.1 Refer to the Direct Testimony of Dan Woodfin at page 6, lines 3-10.
 - a. Is the failure of Security Constrained Economic Dispatch (SCED) to resolve potential post-contingency overloads a mandatory prerequisite to ERCOT implementing a CMP? Explain fully why or why not.
 - b. Would the same be true with respect to implementing a Special Protection System? Explain fully why or why not.
- 1.2 Has ERCOT ever approved a CMP in a circumstance other than the situation described in the Direct Testimony of Dan Woodfin at page 6, lines 5-10? If so, identify and describe fully each and every such CMP.
- 1.3 Has ERCOT ever approved a Special Protection System in a circumstance other than the situation described in the Direct Testimony of Dan Woodfin at page 6, lines 5-10? If so, identify and describe fully each and every such SPS.
- 1.4 Refer to the Direct Testimony of Dan Woodfin at page 6, lines 11-13. Does Mr. Woodfin agree or disagree that a Special Protection System is a plan to implement certain actions in order to alleviate an overload and prevent a broader system problem? Explain fully.
- 1.5 Refer to ERCOT's Responses to Commission Staff's Second Requests for Information, Question Staff 2-3. Describe fully the coordination that would be required with the Reliability Coordinator (RC) and/or Balancing Authority (BA) on the other side of the Southern Cross DC Tie in order to develop a CMP.
- 1.6 Refer to ERCOT's Responses to Commission Staff's Second Requests for Information, Question Staff 2-3. Describe fully the coordination that would be required with the Reliability Coordinator (RC) and/or Balancing Authority (BA) on the other side of the Southern Cross DC Tie in order to initiate a CMP.
- 1.7 Refer to ERCOT's Responses to Commission Staff's Second Requests for Information, Question Staff 2-3.
 - a. Has ERCOT previously coordinated with another Reliability Coordinator (RC) and/or Balancing Authority (BA) on the other side of a DC Tie to develop and initiate a CMP?
 - b. If the answer to part a above is "yes," identify each and every instance when ERCOT has previously coordinated with another RC and/or BA to develop and initiate a CMP.
 - c. If the answer to part a above is "yes," would the coordination between ERCOT and the RC and/or BA that would be required to develop and initiate a CMP for the Southern Cross DC Tie be different than the coordination required to develop any other CMP related to a DC Tie? Explain fully.

- 1.8 Refer to ERCOT's Responses to Commission Staff's Second Requests for Information, Question Staff 2-3.
- a. Has ERCOT previously coordinated with another Reliability Coordinator (RC) and/or Balancing Authority (BA) on the other side of a DC Tie to develop and initiate a Special Protection System?
 - b. If the answer to part a above is "yes," identify each and every instance when ERCOT has previously coordinated with another RC and/or BA to develop and initiate a Special Protection System.
 - c. If the answer to part a above is "yes," would the coordination between ERCOT and the RC and/or BA that would be required to develop and initiate a Special Protection System for the Southern Cross DC Tie be different than the coordination required to develop any other Special Protection System related to a DC Tie? Explain fully.
- 1.9 Refer to the Direct Testimony of Dan Woodfin at page 9, line 4 through page 10, line 1. Is the use of a Special Protection System an alternative approach that might be used to adjust transfers across a DC tie?
- 1.10 Refer to the following statement in ERCOT's Responses to Commission Staff's Second Requests for Information, Question Staff 2-4: "CMPs are only used in situations where the SCED system is unable to solve any base case or post-contingency overloads."
- a. Identify any and all ERCOT binding documents and provide any other authorities that support this statement.
 - b. Is the same true with respect to a Special Protection System? Explain fully why or why not.
- 1.11 Admit or deny: A Special Protection System may be used to adjust transfers across a DC tie in order to allow Generation Resources that would otherwise be subject to restrictions to operate at their full Rating? Explain fully.
- 1.12 Refer to the following statement in ERCOT's Responses to Commission Staff's Second Requests for Information, Question Staff 2-4: "A CMP would only be used if SCED could not, or was not anticipated to be able to, alleviate the overloads in the importing or exporting case."
- a. Identify any and all ERCOT binding documents and provide any other authorities that support this statement.
 - b. Is the same true with respect to a Special Protection System? Explain fully why or why not.