

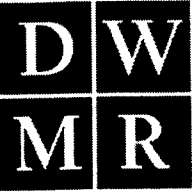


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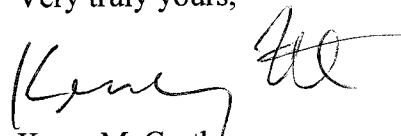
Lisa Clark, Filing Clerk
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Public Utility Commission of Texas
1701 N. Congress Ave.
Austin, Texas 78711-3326

RE: PUC Docket No. 45624; SOAH Docket No. 473-16-2751; *Application of the City of Garland to Amend a Certificate of Convenience and Necessity for the Rusk to Panola Double Circuit 345 k-V Transmission Line in Rusk and Panola Counties*; **Briefing Outline**

Dear Ms. Clark:

Attached for filing in this proceeding is a briefing outline prepared by the City of Garland and circulated to other parties for consideration. The attached outline generally follows the issues set out in the Commission's Preliminary Order in this proceeding. Several parties have indicated that they may follow a somewhat different outline or may not address all of the issues, but that they may cross-reference their briefs to this outline or to the Preliminary Order issues. Per Judge Rodriguez' request, we are providing SOAH with an electronic version of this outline in Microsoft Word.

Very truly yours,


Kerry McGrath

cc: All Parties
SOAH

343

I. INTRODUCTION

II. PROCEDURAL BACKGROUND

III. JURISDICTION

IV. NOTICE

V. DISCUSSION

A. Application (Preliminary Order Issue No. 1)

B. Reasonable Conditions to Protect the Public Interest (Preliminary Order Issue No. 2)

C. Routing Issues (Preliminary Order Issue No. 2a)

- 1. Appropriateness of a Route as a Reasonable Condition**
- 2. The Effect of Granting the Certificate on Any Electric Utility Serving the Area**
- 3. Community Values**
- 4. Recreational and Park Areas**
- 5. Historical and Aesthetic Values**
- 6. Environmental Integrity**
- 7. Engineering Constraints**
- 8. Costs**
- 9. Moderation of Impact on the Affected Community Landowners**
- 10. Existing Compatible Rights-of-Way, Property Lines or Other Features**
- 11. Prudent Avoidance**

D. Representations Made in *Southern Cross* (Preliminary Order Issue No. 2b)

E. Application of PURA § 37.051(c-2) to Southern Cross (Preliminary Order Issue No. 3)

- 1. Market Participant Agreement (Preliminary Order Issue No. 3a)**
- 2. Coordination Agreement (Preliminary Order Issue No. 3b)**

- F. ERCOT Issues (Preliminary Order Issue No. 4)**
- 1. Inclusion of DC Tie Project in Planning Models (Preliminary Order Issue No. 4a)**
 - 2. Treatment of DC Ties in Transmission Planning (Preliminary Order Issue No. 4b)**
 - 3. Transmission Upgrades to Facilitate Exports Over DC Ties (Preliminary Order Issue No. 4c)**
 - 4. Economic Dispatch and Congestion Management (Preliminary Order Issue No. 4d)**
 - 5. Ramp Restrictions (Preliminary Order Issue No. 4e)**
 - 6. Outage Coordination (Preliminary Order Issue No. 4f)**
 - 7. Coordination with other Balancing Authorities (Preliminary Order Issue No. 4g)**
 - 8. Reactive Power and Primary Frequency Response (Preliminary Order Issue No. 4h)**
 - 9. Costs of Ancillary Services (Preliminary Order Issue No. 4i)**
- G. Texas Parks & Wildlife Issues**
- 1. Texas Parks & Wildlife Department Recommendations (Preliminary Order Issue No. 5)**
 - a. Modifications to the proposed project as a result of TPWD recommendations/comments (Preliminary Order Issue No. 5a)**
 - b. Conditions or limitations to include in final order as a result of TPWD recommendations/comments (Preliminary Order Issue No. 5b)**
 - c. Other Disposition of TPWD recommendations/comments (Preliminary Order Issue No. 5c)**
 - d. TPWD Recommendations or Comments that should not be Incorporated (Preliminary Order Issue No. 5d)**
 - 2. Texas Parks & Wildlife Code Chapter 26**
 - a. Whether Chapter 26 Notice and Hearing is Required (Preliminary Order Issue No. 6)**

- b. **Whether Notice of Hearing was Provided (Preliminary Order Issue No. 7)**
- c. **Feasible and Prudent Alternative to the Use of Public Recreation Area (Preliminary Order Issue No. 8)**
- d. **Reasonable Planning to Minimize Harm to Recreation Area (Preliminary Order Issue No. 9)**

VI. CONCLUSION