



Control Number: 45624



Item Number: 40

Addendum StartPage: 0

**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**

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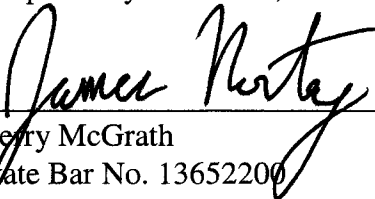
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PUBLIC UTILITY COMMISSION
STATE OFFICE OF
FILING CLERK
ADMINISTRATIVE HEARINGS

**CITY OF GARLAND'S RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF GARLAND QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

The City of Garland (Garland) files this response to Commission Staff's (Staff) First Request for Information (RFI) to Garland. Garland downloaded Staff's First RFI from the Commission Interchange on March 4, 2016. Pursuant the procedural schedule approved at the March 9, 2016 prehearing conference, 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 information produced herein.

Respectfully submitted,


Kerry McGrath
State Bar No. 13652200

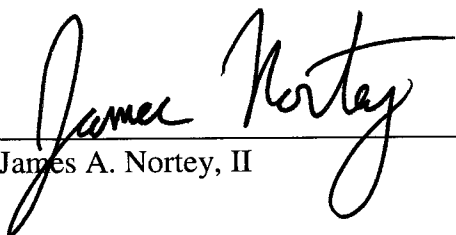
James A. Nortey, II
State Bar No. 24079063
DUGGINS WREN MANN & ROMERO, LLP
P.O. Box 1149
Austin, Texas 78767
Telephone: (512) 744-9300
Facsimile: (512) 744-9399

Brad Neighbor
State Bar No. 14869300
City Attorney
Michael J. Betz
State Bar No. 00783655
Deputy City Attorney
CITY OF GARLAND
200 North 5th Street, Suite 416
Garland, Texas 75040
Telephone: (972) 205-2380
Facsimile: (972) 205-2389

ATTORNEYS FOR THE CITY OF GARLAND

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. Mail on all parties of record in this proceeding on March 14, 2016.


James A. Nortey, II

**SOAH DOCKET NO. 473-16-2751
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Question No. Staff 1-1:

Per link and route, how many miles of the proposed transmission line will use monopole towers?

Response No. Staff 1-1:

It is impossible to know precisely how many miles of the proposed transmission line will use monopole towers until the Public Utility Commission of Texas selects a final route. Assuming that Garland builds the transmission line using the links and routes as proposed, the entire transmission line would likely be comprised of monopole towers. Lattice towers will only be used as necessary due to structure height and strength requirements. Garland's estimates for the length of each route in miles are listed at Attachment 3 of the Application.

Prepared by: Chris McCall
Sponsored by: Chris McCall

Title: Project Manager
Title: Project Manager

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Question No. Staff 1-2:

Per link and route, how many miles of the proposed transmission line will use lattice towers?

Response No. Staff 1-2:

Please see Garland's response to Question No. Staff 1-1.

Prepared by: Chris McCall
Sponsored by: Chris McCall

Title: Project Manager
Title: Project Manager

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Question No. Staff 1-3:

What is the estimated cost to use monopole versus lattice towers?

Response No. Staff 1-3:

The City of Garland is in the preliminary period of analyzing costs regarding construction of the transmission line. Garland provided an estimated cost of using monopole towers at Attachment 3 of the CCN Application. Garland has not created comparable estimates for lattice towers.

Prepared by: Chris McCall
Sponsored by: Chris McCall

Title: Project Manager
Title: Project Manager

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Question No. Staff 1-4:

Why is it necessary to use monopole towers?

Response No. Staff 1-4:

It is not technically necessary to use monopole towers. Garland chose monopole steel structures over lattice structures because monopole structures offer a limited footprint and significantly reduced construction requirements as related to similar lattice tower options. Additionally, nearly 73% of the respondents who attended the public involvement meetings hosted by Burns & McDonnell and completed the written questionnaire requested monopole towers.

Prepared by: Chris McCall
Sponsored by: Chris McCall

Title: Project Manager
Title: Project Manager

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Question No. Staff 1-5:

Please explain how Garland decided where it will use monopole versus lattice towers.

Response No. Staff 1-5:

Please see Garland's response to Question No. Staff 1-4. Given the desire from the public that Garland's transmission line utilize monopole towers, these towers will be used as much as feasible. Lattice towers will only be used as necessary due to structure height and strength requirements.

Prepared by: Chris McCall
Sponsored by: Chris McCall

Title: Project Manager
Title: Project Manager

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Question No. Staff 1-6:

Please provide all correspondence between Garland & Southern Cross regarding the use of monopole towers.

Response No. Staff 1-6:

Please refer to Staff 1-6, Attachment 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

From: David Parquet
To: Kerry McGrath
Cc: Wise, Kristi; Randle-Biehler, Kasey; Werth, Dusty; Adam Renz; Natalie McCue; George Armistead1@outlook.com; Beth O'Brien; Adam Cernea Clark; Mike Betz (betzm@garlandtx.gov); Blake Rasmussen; James Dermody; James A. Nortey, II; bob.nma@nmalaw.com; Ortiz, Joab; Deffenbaugh, Chris; McCall, Christopher
Subject: RE: SCT Garland Open House Routing Boards
Date: Friday, November 20, 2015 9:26:35 AM

I guess so. As long as the context is that we are creating the impression of honestly soliciting public input as to tower design.

Sent from my iPhone


On Nov 19, 2015, at 9:48 PM, Kerry McGrath <kmcgrath@dvmrlaw.com> wrote

That works for me

From: Wise, Kristi <kristi.wise@burnsmcd.com>
Sent: Thursday, November 19, 2015 6:44 PM
To: David Parquet; Kerry McGrath
Cc: Randle-Biehler, Kasey; Werth, Dusty; Adam Renz; Natalie McCue; George Armistead1@outlook.com; Beth O'Brien; Adam Cernea Clark; Mike Betz (betzm@garlandtx.gov); Blake Rasmussen; James Dermody; James A. Nortey, II; bob.nma@nmalaw.com; Ortiz, Joab; Deffenbaugh, Chris; McCall, Christopher
Subject: RE: SCT Garland Open House Routing Boards

So we're going to keep the drawings of both and leave the question in the questionnaire, correct?

Kristi Wise, PMP \ Burns & McDonnell
 Project Manager - Environmental Studies and Permitting
 o 816-822-3598 \ m 816-806-1746 \ f 816-822-4299
 kwise@burnsmcd.com \ burnsmcd.com
 9400 Ward Parkway \ Kansas City, MO 64114

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From: David Parquet [mailto:david.parquet@patternenergy.com]
Sent: Thursday, November 19, 2015 6:29 PM
To: Kerry McGrath
Cc: Wise, Kristi; Randle-Biehler, Kasey; Werth, Dusty; Adam Renz; Natalie McCue; George Armistead1@outlook.com; Beth O'Brien; Adam Cernea Clark; Mike Betz (betzm@garlandtx.gov); Blake Rasmussen; James Dermody; James A. Nortey, II; bob.nma@nmalaw.com; Ortiz, Joab; Deffenbaugh, Chris; McCall, Christopher
Subject: RE: SCT Garland Open House Routing Boards

Ok. We have decided on monopole for reasons Kerry notes. But, I guess it can't hurt to get the public to confirm that.

Sent from my iPhone

On Nov 19, 2015, at 1:53 PM, Kerry McGrath <kmcgrath@dvmrlaw.com> wrote

One of the questions on the questionnaire is whether they prefer monopole or lattice (they always pick monopole), so the visual of the lattice structure would help them understand the difference.

From: Wise, Kristi [mailto:kwise@burnsmcd.com]
Sent: Thursday, November 19, 2015 3:49 PM
To: David Parquet; Kerry McGrath; Randle-Biehler, Kasey; Werth, Dusty
Cc: Adam Renz; Natalie McCue; George Armistead1@outlook.com; Beth O'Brien; Adam Cernea Clark; Mike Betz (betzm@garlandtx.gov); Blake Rasmussen; James Dermody; James A. Nortey, II; bob.nma@nmalaw.com; Ortiz, Joab; Deffenbaugh, Chris; McCall, Christopher
Subject: RE: SCT Garland Open House Routing Boards

David,

Chris McCall had indicated that back in 2010, they were studying both options - a monopole and a lattice structure, so we were under the impression both were still possible. If the decision has been made to stick to a monopole design, then we can remove the lattice as an option from the open house boards. However, if it's still possible the design could be a lattice structure, then I think we need to keep that as an option to show the public.

Kristi Wise, PMP \ Burns & McDonnell
 Project Manager - Environmental Studies and Permitting
 o 816-822-3598 \ m 816-806-1746 \ f 816-822-4299
 kwise@burnsmcd.com \ burnsmcd.com
 9400 Ward Parkway \ Kansas City, MO 64114

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From: David Parquet [mailto:david.parquet@patternenergy.com]
Sent: Thursday, November 19, 2015 3:34 PM
To: Kerry McGrath; Randle-Biehler, Kasey; Werth, Dusty
Cc: Adam Renz; Natalie McCue; George Armistead1@outlook.com; Beth O'Brien; Adam Cernea Clark; Mike Betz (betzm@garlandtx.gov); Blake Rasmussen; James Dermody; James A. Nortey, II; bob.nma@nmalaw.com; Wise, Kristi; Ortiz, Joab; Deffenbaugh, Chris
Subject: RE: SCT Garland Open House Routing Boards

Here are my comments on the Routing Boards

1. First Bullet " under section 210 of the Federal Power Act " (That is, delete ref to section 211)
2. Second Bullet The City of Garland is one of only a few utilities in Texas that meets the requirements of the FERC's FPA interconnection order and that has the capability of owning and operating transmission and interconnection facilities " (That is, I changed the words to make them more accurate)
3. Third Bullet no comment
4. Fourth Bullet " has partnered with Rusk Interconnection LLC " (That is, delete "to finance the project "
5. Fifth Bullet no comment

I talked to Dusty and Kristi I will not be able to get from Siemens a good rep of the Panola switchyard with the Louisiana converter station in the background What I will have, and will bring with me to the Open House, are two 8 1/2 x 11's the first will show the overhead schematic of the TX/LA site layout The second will be a photo of a 3000 MW HVDC project in China I am advised that even an expert cannot tell the difference between a 2000 MW and a 3000 MW converter station with adjacent switchyard Therefore, this photo will be a good representation that we can show people who are interested The photo can be shown by whoever mans the Rusk Switchyard board

I see on the boards that the single circuit, monopole tower will be replaced with double circuit monopole However, below, I see that we are thinking of adding lattice towers structures If I understand correctly what I read below, we need to stick with double circuit, monopoles We are not using lattice structure towers Or, did I miss a memo?

Senior Vice President – Special Projects

Pattern Energy Group
Pier 1 Bay 3 San Francisco CA 94111
T 415 283 4000 D 415 283 4018 M 415 531 6683 F 415 362 7900
gary.parquet@patternenergy.com

<image018.jpg>

From: Kerry McGrath [mailto:kmcgrath@dwmrlaw.com]
Sent: Thursday, November 19, 2015 12:59 PM
To: Randle-Biehler, Kasey; David Parquet; Werth, Dusty
Cc: Adam Renz; Natalie McCue; George.Armistead1@outlook.com; Beth O'Brien; Adam Cernea Clark; Mike Betz (betzm@garlandtx.gov) (betzm@garlandtx.gov); Blake Rasmussen; James Dermody; James A. Nortey, II; bob.nma@rimalaw.com; Wise, Kristi; Ortiz, Joab; Deffenbaugh, Chris
Subject: RE: SCT Garland Open House Routing Boards

Kasey

Is it possible to take the windmills off the graphic on the "need" board? They are not explained and could be distracting/confusing to people at the open house

Also, can you change the first sentence of the OH Handout under the Project Overview caption to read

"The Rusk to Panola Transmission Project is a double circuit 345-kilovolt (kV) transmission line sponsored by Garland Power & Light and Rusk Interconnection LLC, and is being built as part of a plan to interconnect the Electric Reliability Council of Texas (ERCOT) and the southeastern United States with the Southern Cross Transmission Project"

This will correspond to the change made to the boards

Thanks,
Kerry

From: Randle-Biehler, Kasey [mailto:kbiehler@burnsmcd.com]
Sent: Thursday, November 19, 2015 2:26 PM
To: David Parquet; Werth, Dusty
Cc: Adam Renz; Natalie McCue; George.Armistead1@outlook.com; Beth O'Brien; Adam Cernea Clark; Mike Betz (betzm@garlandtx.gov) (betzm@garlandtx.gov); Blake Rasmussen; James Dermody; Kerry McGrath; James A. Nortey, II; bob.nma@rimalaw.com; Wise, Kristi; Ortiz, Joab; Deffenbaugh, Chris
Subject: RE: SCT Garland Open House Routing Boards

A Rusk Switching Station board has been added to the open house station board pdf on SharePoint and is ready for review We are in the process of adding a lattice structure graphic to the handout and construction board The only other new board that we anticipate adding is the Panola Switchyard board if David is able to get the graphic from Siemens today

Also, we have also only received comments from Kerry and Elizabeth on the open house station boards and handout Their comments are incorporated in the versions on SharePoint titled

- RTP Boards Draft_11_19_15
- OH Handout_Draft_11_18_15

As Dusty said, we need to receive everyone's comments on these items by **COB today** in order to make the necessary edits and send to the printers tomorrow

Thank you,
Kasey

Kasey Randle-Biehler, IAP2, ENV SP \ Burns & McDonnell
Public Involvement Specialist
o 816-823-6059 \ m 913-271-2664
kbiehler@burnsmcd.com \ burnsmcd.com
9400 Ward Parkway \ Kansas City, MO 64114

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other electronic or printed copies. Thank you for your cooperation.

From: David Parquet [mailto:David.Parquet@patternenergy.com]

Sent: Thursday, November 19, 2015 11:47 AM

To: Werth, Dusty <dw@burnsmcd.com>

Cc: Adam Renz <adam.renz@patternenergy.com>; Natalie McCue <natalie.mccue@patternenergy.com>; George Armistead <george.armistead1@outlook.com>; Beth O'Brien <beth.o.brien@patternenergy.com>; Adam Cernea Clark <adam.cernea.clark@patternenergy.com>; Mike Betz (betzm@garlandx.gov) (betzm@garlandx.gov); Blake Rasmussen <blake.rasmussen@patternenergy.com>; James Dermody <jdermody@patternenergy.com>; Kerry McGrath <kerry.mcgrath@patternenergy.com>; jnortey@dwmlaw.com, bob.rima@rimalaw.com; Wise, Kristi <Wise.Kristi@patternenergy.com>; Randle-Biehler, Kasey <kasey.randlebiehler@patternenergy.com>; Ortiz, Joab <joab.ortiz@patternenergy.com>; Deffenbaugh, Chris <chris.deffenbaugh@burnsmcd.com>

Subject: Re: SCT Garland Open House Routing Boards

I will be looking at them in a couple of hours. Also, I am annoying Siemens about getting a 3D view of the panola switchyard in Texas, with the converter behind it in Louisiana. I am trying for today, but I am not confident I will succeed.

Sent from my iPad

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On Nov 19, 2015, at 9:35 AM, Werth, Dusty <dw@burnsmcd.com> wrote:

There currently are no comments on the map boards on the sharepoint site. I don't know if this is because there are no comments or if they have not yet been reviewed but we do need to receive everyone's comments on these boards by COB Today so that we can make any necessary changes and send these to the printers tomorrow.

If you have not yet reviewed the boards please do so today and either provide comments directly on the PDFs or send them to me. The link to the boards is located in the email below.

Thank you,

Dusty E. Werth
Senior Environmental Scientist, Environmental Studies and Permitting Group
Burns & McDonnell
9400 Ward Parkway
Kansas City, MO 64114
Direct: 816-822-3446
Main: 816-333-9400
Mobile: 816-547-1689
Fax: 816-822-4299
dw@burnsmcd.com
www.burnsmcd.com

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From: Werth, Dusty

Sent: Tuesday, November 17, 2015 10:27 AM

To: 'Adam Renz'; 'natalie.mccue@patternenergy.com'; George.Armistead1@outlook.com; Beth O'Brien; David Parquet; 'Adam Cernea Clark'; Mike Betz (betzm@garlandx.gov) (betzm@garlandx.gov); Blake Rasmussen; 'james.dermody@patternenergy.com'; 'Kerry McGrath'; jnortey@dwmlaw.com, bob.rima@rimalaw.com

Cc: Wise, Kristi; Randle-Biehler, Kasey; Ortiz, Joab; Deffenbaugh, Chris

Subject: SCT Garland Open House Routing Boards

Ali,

The routing map boards (5 boards in two files) have been uploaded to the sharepoint site (link below). These need to be sent to the printers on this Friday so please get your comments back to me by COB on Thursday (Nov 19th) so that we can make any necessary changes and get this to the printers.

<https://patternenergy.sharepoint.com/:Forms/Forms.aspx?ID=52&Source=/patternenergy.com/Forms/Forms.aspx?ID=52>
The routing map boards (5 boards in two files) have been uploaded to the sharepoint site (link below). These need to be sent to the printers on this Friday so please get your comments back to me by COB on Thursday (Nov 19th) so that we can make any necessary changes and get this to the printers.

Thank you,

Dusty E. Werth
Senior Environmental Scientist, Environmental Studies and Permitting Group
Burns & McDonnell
9400 Ward Parkway
Kansas City, MO 64114
Direct: 816-822-3446
Main: 816-333-9400
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Question No. Staff 1-7:

Who will fabricate the lattice and monopole towers?

Response No. Staff 1-7:

Structure fabricators have not been selected at this time.

Prepared by: Chris McCall
Sponsored by: Chris McCall

Title: Project Manager
Title: Project Manager

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Question No. Staff 1-8:

Please provide the vendor/fabricator's design drawings for both the lattice and monopole towers.

Response No. Staff 1-8:

Vendor/Fabricator designs do not exist at this stage of the project.

Prepared by: Chris McCall
Sponsored by: Chris McCall

Title: Project Manager
Title: Project Manager

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Question No. Staff 1-9:

Please provide all agreements between Garland and Southern Cross, including Southern Cross's affiliates and parent company.

Response No. Staff 1-9:

Please refer to Staff 1-9, Attachments 1-5 for information responsive to this request. All five attachments contain CONFIDENTIAL information and will be provided pursuant to the terms of the Protective Order in this proceeding. The Transmission Line Agreement between Garland and Rusk Interconnection LLC, an affiliate of Southern Cross, is included as confidential Exhibit DWC-2 to the Direct Testimony of Darrell W. Cline in this proceeding.

Prepared by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light

Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light

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Question No. Staff 1-10:

Please provide all correspondence between Garland and Oncor regarding any and all reliability and/or interconnection studies.

Response No. Staff 1-10:

Please refer to Staff 1-10, Attachment 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

Kerry McGrath

From: Kerry McGrath
Sent: Thursday, January 21, 2016 3:02 PM
To: 'jarentaylor@velaw.com'
Cc: bob.rima@rimalaw.com
Subject: Oncor studies
Attachments: Final Steady State and Stability Study Report for HVDC Tie 06-14-2013.pdf; Final Steady State and Stability Study Report for HVDC Tie (Appendices) 06-14-2013.docx; Final Short Circuit Study Report for HVDC Tie 10-1-13.pdf; Final Facilities Study Report for HVDC Tie 11-1-2013.zip

Jaren,

Please convey my thanks to Oncor for agreeing to provide a business records affidavit for the studies they performed relating to the Southern Cross project interconnection. Per our discussion, I've attached the three studies to be sure we are on the same page.

Thanks,
Kerry

Kerry McGrath

From: Skinner, Winston <wskinner@velaw.com>
Sent: Monday, February 22, 2016 4:19 PM
To: Kerry McGrath
Cc: Taylor, Jaren
Subject: Southern Cross CCN - Oncor affidavit
Attachments: Affidavit - Jennifer Lee-Sethi.pdf; Final Steady State and Stability Study Report for HVDC Tie 06-14-2013.pdf; Final Steady State and Stability Study Report for HVDC Tie (Appendices)docx; Final Short Circuit Study Report for HVDC Tie 10-1-13.pdf; Final Facilities Study Report for HVDC Tie 11-1-2013.zip

Kerry,

I've attached Oncor's business records affidavit and the relevant records for the Southern Cross CCN. Jaren asked me to send this over to you on his behalf. Please let us know if you have any questions.

Best regards,
Winston

Winston P. Skinner
Associate



E wskinner@velaw.com
W +1 214 220 7870

Vinson & Elkins LLP
2001 Ross Avenue
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Dallas, TX 75201-2975



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Thank You.

**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
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF GARLAND QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

Question No. Staff 1-11:

Please provide all correspondence between Garland and ERCOT regarding any and all reliability and/or interconnection studies.

Response No. Staff 1-11:

Garland has not identified any documents responsive to this request.

Prepared by: Darrell W. Cline

Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light

Title: Chief Financial Officer, Garland Power & Light

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

**CITY OF GARLAND'S RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF GARLAND QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-12**

Question No. Staff 1-12:

Will Garland be required to pay for any construction of the proposed transmission project if Southern Cross is unable or unwilling to do so? Please provide all support for your response.

Response No. Staff 1-12:

No. Under the Transmission Line Agreement provided as Exhibit DWC-2 to the Direct Testimony of Darrell W. Cline, Garland has designated Rusk Interconnection LLC, an affiliate of Southern Cross, to design and construct the project in compliance with and along the route identified in the Commission's order in this case. After the facilities are complete and ready to be placed in service, Rusk will convey them to Garland for \$1 and the assumption of certain liabilities associated with the project. Garland will not be required to pay for any construction of the project if Southern Cross or Rusk is unable or unwilling to do so.

Prepared by: Darrell W. Cline

Sponsored by: Darrell W. Cline

Title: Chief Financial Officer, Garland Power & Light

Title: Chief Financial Officer, Garland Power & Light