



Filing Receipt

Received - 2021-12-03 11:19:13 AM
Control Number - 46304
ItemNumber - 18

PUC PROJECT NO. 46304

OVERSIGHT PROCEEDING	§	BEFORE THE
REGARDING ERCOT MATTERS	§	
ARISING OUT OF DOCKET NO. 45624	§	
(APPLICATION OF THE CITY OF	§	
GARLAND TO AMEND A	§	PUBLIC UTILITY COMMISSION
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE RUSK TO	§	
PANOLA DOUBLE-CIRCUIT 345-KV	§	
TRANSMISSION LINE IN RUSK AND	§	OF TEXAS
PANOLA COUNTIES)	§	

**ONCOR ELECTRIC DELIVERY COMPANY’S COMMENTS
REGARDING ACTIONS NECESSARY TO COMPLETE THIS PROCEEDING**

Oncor Electric Delivery Company LLC (“Oncor”) files these comments in response to the November 4, 2021 order (“Order”) issued by the Public Utility Commission of Texas (“Commission”) requiring interested parties to supply information regarding all remaining actions that are necessary to complete this proceeding. The Order appears focused on regulatory activities, but to the extent that the Commission’s intent is more broadly to identify and remove any and all hurdles to the energization of the project, Oncor’s comments below address technical matters that also need to be considered. The Order required that responsive comments be submitted within 30 days after the Order was issued; therefore, these comments are timely filed.

I. INTRODUCTION

On May 23, 2017, the Commission issued its Order on Rehearing in Docket No. 45624, approving the application of the City of Garland to amend its certificate of convenience and necessity for a double-circuit transmission line in Rusk and Panola counties (the “Rusk – Panola Transmission Line”). The Rusk – Panola Transmission Line will interconnect the Electric Reliability Council of Texas, Inc. (“ERCOT”) grid with the Eastern Interconnect—specifically, the SERC Reliability Corporation region—through a high-voltage direct-current tie owned by Southern Cross Transmission LLC (the “Southern Cross DC Tie”). Upon completion, the Southern Cross DC Tie is expected to have a capacity of 2,100 megawatts (“MW”), which will be available for import or export to and from the ERCOT grid.

The Order on Rehearing imposed certain conditions on the construction, operation, management, and regulatory treatment of the Rusk – Panola Transmission Line. Among them was a requirement that ERCOT complete certain tasks before the line may be energized. Those tasks were delineated as 14 discrete directives in the Commission’s Revised Order Creating and Scoping Project in this proceeding. Directive No. 6 requires ERCOT to “study and determine what transmission upgrades, if any, are necessary to manage congestion resulting from power flows over the Southern Cross DC [T]ie”

As an endpoint owner on the Rusk – Panola Transmission Line whose facilities will be directly impacted by the line’s energization and the operation of the Southern Cross DC Tie, Oncor respectfully provides the following comments regarding technical issues that must be addressed to complete this proceeding and allow for the safe, reliable integration of the Southern Cross DC Tie into the ERCOT grid.

II. ONCOR’S COMMENTS

In addition to the regulatory hurdles that must be addressed, there remain technical issues to be studied with respect to integrating the Southern Cross DC Tie. While ERCOT is actively moving forward to address a number of these issues, some will require finalized project details from Southern Cross for completion, as well as substantial coordination and planning by the impacted utilities. For example, to the extent the final capacity of the Southern Cross DC Tie varies from the 2,100 MW proposed at the time the City of Garland filed its application in Docket No. 45624, that variance will need to be addressed. The Federal Energy Regulatory Commission approved the transmission and interconnection of up to 3,000 MW of capacity for the Southern Cross DC Tie project. Until the capacity of the project is confirmed, its impacts to the system cannot be accurately modeled and understood; nor can ERCOT and impacted utilities determine the upgrades that will be required.

Further although certain studies were conducted regarding the Southern Cross DC Tie project, including a steady state analysis, stability analysis, short circuit analysis, and facilities study, those studies were concluded in 2013. Given that eight years have passed, and given the system changes that have occurred during that time, the results of these studies should be revalidated. These studies will provide important guidance regarding specific upgrades required

to accommodate the Southern Cross DC Tie's significant power injection at a single point on the ERCOT system.

III. CONCLUSION

While a number of regulatory requirements must be addressed before the Southern Cross DC Tie project may proceed, a number of technical and system studies will also be required to determine the transmission upgrades necessary to safely and reliably integrate the Southern Cross DC Tie into ERCOT.

Respectfully submitted,

By: /s/ Jared M. Jones

Jaren A. Taylor
State Bar No. 24059069
Winston P. Skinner
State Bar No. 24079348
Jared M. Jones
State Bar No. 24117474
VINSON & ELKINS LLP
Trammell Crow Center
2001 Ross Avenue, Suite 3900
Dallas, Texas 75201-2975
Telephone: (214) 220-7754
Facsimile: (214) 999-7754
jarentaylor@velaw.com
wskinner@velaw.com
jjones@velaw.com

**ATTORNEYS FOR ONCOR ELECTRIC
DELIVERY COMPANY LLC**