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PUBLIC UTILITY COMMISSION
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APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE § PUBLIC UTILITY COMMISSION
AND NECESSITY AUTHORIZATION §
AND RELATED RELIEF FOR THE § OF TEXAS
ACQUISITION OF WIND §
GENERATION FACILITIES §

GOLDEN SPREAD ELECTRIC COOPERATIVE INC.'S MOTION TO INTERVENE

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW, Golden Spread Electric Cooperative, Inc. ("Golden Spread"), and files this Motion to Intervene in the above-captioned proceeding, pursuant to Sections 22.103(b) and 22.104 of the Rules of Practice and Procedure of the Public Utility Commission of Texas ("Commission"). In support thereof, Golden Spread shows the following:

Golden Spread designates the following individuals as its authorized representatives for this proceeding and requests that all pleadings, notices, correspondence, or other documents be served upon the following:

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I.

GOLDEN SPREAD

Golden Spread is a non-profit electric generation and transmission cooperative organized under Texas law with its principal place of business in Amarillo, Texas. Its main corporate

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purpose is to supply cost effective and reliable wholesale electric power to its sixteen (16) member non-profit distribution cooperatives (“Members”).¹ Golden Spread’s Members serve about 230,000 retail electric meters serving their Member-Consumers located over an expansive area, including the Panhandle, South Plains and Edwards Plateau regions of Texas (covering twenty-four percent (24%) of the state, the Panhandle of Oklahoma, and small portions of Southwestern Kansas and Southeastern Colorado.

II.

NATURE OF THE CASE

On July 15, 2019, Southwestern Electric Power Company (“SWEPCO”) filed its Application for Certificate of Convenience and Necessity Authorization and Related Relief for the Acquisition of Wind Generating Facilities.

III.

JUSTICIABLE INTEREST

Golden Spread and its Members may be adversely affected by this project. Moreover, any effects on Locational Marginal Prices within the Southwest Power Pool (“SPP”) may affect Golden Spread and its Members. Similarly, the changes in dispatch of local generation that this project is expected to cause may adversely affect Golden Spread and its Members. Additionally, Golden Spread and some of its Members are transmission customers in SPP.² Golden Spread and its Members may be adversely affected by the allocation of costs associated with the any new transmission investment this project necessitates as well as by congestion effects caused by the project.

¹ Fifteen (15) of Golden Spread’s sixteen (16) distribution cooperative members operate in Texas. They are Bailey County Electric Cooperative Association (Muleshoe, Texas); Big Country Electric Cooperative, Inc. (Roby, Texas); Coleman County Electric Cooperative, Inc. (Coleman, Texas); Concho Valley Electric Cooperative, Inc. (San Angelo, Texas); Deaf Smith Electric Cooperative, Inc. (Hereford, Texas); Greenbelt Electric Cooperative, Inc. (Wellington, Texas); Lamb County Electric Cooperative, Inc. (Littlefield, Texas); Lighthouse Electric Cooperative, Inc. (Floydada, Texas); Lyntegar Electric Cooperative, Inc. (Tahoka, Texas); North Plains Electric Cooperative, Inc. (Perryton, Texas); Rita Blanca Electric Cooperative, Inc. (Dalhart, Texas); South Plains Electric Cooperative, Inc. (Lubbock, Texas); Southwest Texas Electric Cooperative, Inc. (Eldorado, Texas); Swisher Electric Cooperative, Inc. (Tulia, Texas); and Taylor Electric Cooperative, Inc. (Merkel, Texas). Golden Spread also serves Tri-County Electric Cooperative, Inc. (Hooker, Oklahoma).

² In addition to receiving transmission service from SPP generally, Golden Spread and two of its Members, Greenbelt Electric Cooperative, Inc. and Lighthouse Electric Cooperative, Inc., take transmission level service from SWEPCO in SPP.

Accordingly, Golden Spread and its Members have a justiciable interest that may be adversely affected by the outcome of this proceeding, and Golden Spread is entitled to party status.

Golden Spread is an active participant in the SPP. The SPP power supply market and transmission planning and operations, as well as SWEPCO's rates for transmission service it provides in the SPP will be directly affected by the Commission's determinations in this proceeding. Consequently, Golden Spread has a justiciable interest in this proceeding. No other entity can adequately represent Golden Spread's interests.

WHEREFORE, for the foregoing reasons, Golden Spread respectfully requests that it be granted intervenor status and be granted permission to participate fully as a party to this proceeding.

Respectfully submitted,



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ATTORNEYS FOR GOLDEN SPREAD
ELECTRIC COOPERATIVE INC.

Certificate of Service

I hereby certify that the foregoing Motion to Intervene has been mailed or hand delivered to all parties of record on this 22nd day of August, 2019.

A handwritten signature in black ink, appearing to be "M. J. [unclear]", is written above a horizontal line.