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APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY TO	§	
AMEND ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY FOR	§	
THE SWEPCO MORTON CUT-IN TO	§	OF
THE WOOD COUNTY ELECTRIC	§	
COOPERATIVE E BURGESS CUT-IN	§	
138-kV TRANSMISSION LINE IN VAN	§	
ZANDT COUNTY	§	ADMINISTRATIVE HEARINGS

**INITIAL BRIEF OF
EAST TEXAS ELECTRIC COOPERATIVE, INC. AND
WOOD COUNTY ELECTRIC COOPERATIVE, INC.**

NOW COMES East Texas Electric Cooperative, Inc. ("ETEC") and Wood County Electric Cooperative, Inc. ("WCEC") and file their Initial Brief and would respectfully show as follows:

I. Introduction

ETEC and WCEC support this transmission project because of the improved transmission service it is designed to bring.¹ The need for this transmission project is uncontroverted—no party has offered any evidence challenging the justification for this project. Southwestern Electric Power Company's ("SWEPCO") application explains the need for this transmission project, stating that recent changes in the local transmission network have removed the redundant, looped transmission service that previously served the area.² This has resulted in certain loads now being

¹ East Texas Electric Cooperative, Inc. and Wood County Electric Cooperative, Inc.'s Statement of Position (Sep. 8, 2020).

² SWEPCO Ex. 1 at 8 (Bates 9) (Application).

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served by radial transmission facilities, instead of the more reliable looped transmission facilities.³ This transmission project is designed to restore looped transmission service and improve the reliability for the load served by these facilities.⁴

This case began on March 31, 2020, with SWEPCO filing an application to amend its certificate of convenience and necessity (“CCN”) for a proposed 138-kV transmission line in Van Zandt County, Texas. This transmission line will begin at one of two points of connection that start near the existing SWEPCO Morton Substation located southeast of the City of Grand Saline, east of State Highway 110, and terminates at one of the three potential points of connection end options along the existing WCEC 138-kV transmission line located east to southeast of Grand Saline, south of US Highway 80, and north of the existing WCEC E Burges Substation.⁵

V. Discussion ⁶

B. Need (Preliminary Order Issue Nos. 2 and 3)

SWEPCO’s application and direct testimony support the need for this transmission project. As stated in the direct testimony of SWEPCO witness Marcus Alex Henry, “[t]he new transmission line will restore the looped transmission service to SWEPCO’s customer load and improve the transmission service for WCEC [member-]customers in this area.”⁷ Commission Staff witness Ramya Ramaswamy testified similarly, stating “In my opinion, based on the data provided by

³ *Id.* (“customer electrical load in the Grand Saline area [is now] being served by a radial transmission line, which will adversely impact the current transmission service reliability and expose customer load to potential extended loss of transmission service for the possible outage of the radial transmission line. . . .”).

⁴ *Id.*; *see also* SWEPCO Ex. 4 at 5 (Direct Testimony of Marcus Alex Henry).

⁵ SWEPCO Ex. 1 at 4 (Bates 5) (Application).

⁶ Please note heading names and numbers follow the approved briefing outline. Thus, numbering is non-sequential because not every issue is covered in this brief.

⁷ SWEPCO Ex. 4 at 5 (Direct Testimony of Marcus Alex Henry).

SWEPCO, it is evident that this project is necessary and is the best way to address the reliability issues resulting from [the] transfer . . . and the resulting radial transmission line configuration serving customers in the Grand Saline area.”⁸ Moreover, no witness offered evidence to challenge the need for this transmission project. Thus, ETEC and WCEC support a finding that this transmission project is needed for the service, accommodation, convenience, or safety of the public within the meaning of PURA § 37.056(a).⁹

VI. Conclusion

For the reasons discussed above, ETEC and WCEC recommend the Administrative Law Judge(s) and Commission find this transmission project is needed. As the preponderance of the evidence shows, this transmission project is designed to restore looped transmission service and improve transmission service reliability for, among others, WCEC members in the area.

⁸ Commission Staff Ex. 1 at 15 (Direct Testimony of Ramya Ramaswamy).

⁹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016 (“PURA”).

Respectfully submitted,

/s/ Jacob Lawler

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served this 7th day of December, 2020 on all parties of record.

/s/ Jacob Lawler

Jacob J. Lawler