

APR 21 2016

UNITED STATES DEPARTMENT OF ENERGY **Electricity Delivery and Energy Reliability**  
OFFICE OF ELECTRIC DELIVERY AND ENERGY RELIABILITY

Tenaska Energia de Mexico, S. de R.L. de C.V. ) Docket No. EA-417

**MOTION TO INTERVENE AND COMMENTS OF  
ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.**

Pursuant to the Notice of Application published by the Department of Energy (DOE) Office of Electric Delivery and Energy Reliability in the Federal Register on March 22, 2016, Electric Reliability Council of Texas, Inc. (ERCOT) moves to intervene in the above-captioned proceeding and provides the following comments regarding the application.

**I. IDENTIFICATION OF FILING PARTY**

ERCOT is the independent system operator (ISO) for the region covering the majority of Texas, which includes approximately 90% of the state's electric load. ERCOT's core functions include system operations, system planning, and administration of the wholesale electric markets. In performing these functions, ERCOT is subject to oversight by the Public Utility Commission of Texas (PUCT) and the Texas Legislature.

**II. COMMUNICATIONS**

Correspondence and communications regarding this filing should be addressed to the following persons:

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### **III. BACKGROUND AND MOTION TO INTERVENE**

On March 10, 2016, Tenaska Energia de Mexico, S. de R.L. de C.V. (TEM) filed an application with the Department of Energy (DOE) Office of Electric Delivery and Energy Reliability requesting authorization to transmit electric energy between the United States and Mexico. These activities have the potential to impact ERCOT. In particular, purchases and sales of energy occurring over transmission facilities interconnecting the ERCOT transmission system with the Mexican transmission system may have an impact on the quantity and price of energy available in the ERCOT system. These interests are unique to ERCOT and cannot be represented by any other party. Accordingly, ERCOT moves to intervene in this proceeding.

### **IV. COMMENTS**

ERCOT takes no position on whether the requested export authorization should be granted; ERCOT offers these comments only to inform the DOE's evaluation of the impacts of the application on the supply of electricity within the United States pursuant to section 202(e) of the Federal Power Act. The application does not seek to increase the transfer capacity over the existing ties between the ERCOT system and the Mexican transmission system, but simply proposes to use the existing ties to transfer energy between the two systems. Under normal operations, additional imports to, or exports from, the ERCOT system should not have a material impact on reliability, although they could have an impact on prices paid by consumers and received by generators in the ERCOT system. In cases in which exports over these ties would contribute to generation shortages in the ERCOT system, ERCOT is permitted by ERCOT Protocols and NERC Reliability standards to address this concern by reducing or curtailing exports over the ties as necessary.

**V. CONCLUSION**

ERCOT respectfully requests that the DOE grant its motion to intervene and give consideration to the comments submitted herein.

Respectfully submitted,

/s/ Chad V. Seely

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/s/ Nathan Bigbee

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ATTORNEYS FOR ELECTRIC RELIABILITY  
COUNCIL OF TEXAS, INC.

Date: April 21, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was electronically served upon all parties in this proceeding.

Dated at Austin, Texas this 21<sup>st</sup> day of April, 2016.

/s/ Nathan Bigbee \_\_\_\_\_

Nathan Bigbee