

TENNESSEE REGULATORY AUTHORITY



502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

July 24, 2014

Mr. Cary Kottler
General Counsel
Clean Line Energy Partners, LLC
1001 McKinney Street, Suite 700
Houston, TX 77002

In Re: Docket No. 14-00036, *Petition of Plains and Eastern Clean Line, LLC, for a Certificate of Convenience and Necessity, Approving a Plan to Construct a Transmission Line and to Operate an Electric Transmission Public Utility.*

Dear Mr. Kottler:

In order to assist the Authority in its evaluation of the above referenced docket, it is requested that you provide answers and/or information in response to the following:

1. The Petition of Plains and Eastern Clean Line LLC ("Plains and Eastern" or "Company") states that power will be delivered via an interconnection at the Tennessee Valley Authority's ("TVA") Shelby Substation¹. Does the Company currently have an interconnection agreement/contract with TVA for the interconnection of facilities between the two entities? If so, provide a copy. If not, provide a status update for negotiations related to such interconnection of facilities. Also, discuss whether the TVA has approved Plains and Eastern's proposed design and technical specifications for interconnection at the Shelby Substation (include any written correspondence).
2. Provide an update on the studies performed by TVA, SPP and MISO regarding the interconnection of the Company's new transmission facilities with their respective systems. If known, provide an estimated completion date.
3. Provide a copy of MLGW's Affected Impact Study.
4. The Petition states that the Company will provide wind power to TVA and other potential customers². Please identify all other potential customers that Plains and Eastern has had discussions with regarding the purchase of power and provide copies of any agreements reached with these customers.

¹ Petition, P. 3, (April 7, 2014)

² Petition, P. 4, (April 7, 2014)

5. On page 6 of David Berry's testimony, he provides a list of wind power purchase agreements involving the TVA (purchaser). To your knowledge, discuss the TVA's process for choosing to enter into such projects, including whether the projects go through the RFP process.
6. Is TVA or other potential wholesale purchasers under any obligations (including any state or federal requirements) to purchase additional wind power to meet its renewable energy objectives? Provide supporting documentation. To your knowledge, is TVA currently meeting its renewable energy objectives? Will TVA be able to meet its renewable energy objectives absent approval of Plains and Eastern's petition?
7. Provide a copy of all Memorandums of Understanding with TVA.
8. Please explain and describe in detail any guarantees or assurances that Plains and Eastern can provide lower cost renewable energy to TVA than TVA currently purchases.
9. Please list all available state and federal tax credits that Plains and Eastern currently receives related to projects in other states and federal credits that the Company anticipates receiving upon completion of the project proposed in this docket. Are these federal credits figured into the pricing model used by Plains and Eastern? If so, please explain in detail the impact on rates, as well as the Company's overall operations, that would result if these federal credits were discontinued by the federal government.
10. On page 9 of Michael Skelly's direct testimony, he states, "The TVA and other load serving entities have a strong and growing demand for cost-effective electricity from renewable resources." Provide the source from TVA and other potential entities stating they have a growing demand for renewable resources.
11. On page 11 of Michael Skelly's direct testimony, he states, "The Project will allow TVA and other utilities in the South to reliably and consistently access the country's most cost-effective wind energy resources." Please provide all underlying support and rationale relied upon for the assertion that this project will allow access to "the country's most cost-effective wind energy resources."
12. For clarification, please provide the estimated number of construction jobs that would be created in Tennessee if the petition is approved. Also provide the estimated duration of these temporary construction jobs.
13. For clarification, please provide the estimated number of permanent full-time jobs that would be created in Tennessee upon completion of the project.
14. Please describe any assurances and/or guarantees that Plains and Eastern will hire Tennesseans for the temporary construction and permanent jobs detailed above.

15. As set forth on page 14 of Michael Skelly's direct testimony, discuss the process by which Plains and Eastern has already acquired rights-of-way (please include all written supporting documentation).
16. Provide a copy of the TVA interconnection Feasibility Study and System Impact Study referred to on page 5 of Mario Hurtado's Direct Testimony.
17. Provide all written studies, white papers, etc. prepared by the Tennessee Department of Transportation, the Tennessee Division of Environment and Conservation, the Tennessee Wildlife Resources Agency, the U.S. Army Corp of Engineers, the U.S. Fish and Wildlife Service or the Natural Resources Conservation Service of the U.S. Department of Agriculture regarding the proposed project. If studies have not been performed, have these agencies indicated to you that they will conduct studies at a later date? If so, provide estimated dates for completion of these studies?
18. Provide the latest update on the environmental impact statement being prepared by the DOE under NEPA. Also provide the latest update on all federal reviews/environmental studies being performed by the DOE.
19. On page 20 of Mario Hurtado's Direct Testimony, he states that "Plains and Eastern has obtained the exclusive rights to purchase approximately 208 acres on two parcels adjacent to the north and east of the TVA Shelby Substation. Provide all written documentation supporting this claim.
20. Provide an update regarding Plains and Eastern's CCN application in Arkansas.

It is requested that you provide responses no later than August 8, 2014, and that the response reference Docket No. 14-00036. Should you have any questions or need clarification of any requested item, please contact me at (615) 770-6884.

Sincerely,



David Foster, Chief
Utilities Division

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Docket File