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

Calpine Energy Services, L.P.

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Docket No. EA-430

**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 Electricity Delivery and Energy Reliability in the Federal Register on October 13, 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 September 27, 2016, Calpine Energy Services, L.P. filed an application with the Department of Energy (DOE) Office of Electricity 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, imports and exports of energy over transmission facilities interconnecting the ERCOT electric system with the Mexican electric 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

As a threshold matter, ERCOT notes that it has been unable to obtain a copy of the application using either of the means identified in the published Notice of Application.<sup>1</sup> Consequently, ERCOT must reserve its right to provide further comment once the application has been duly posted for public inspection.

With respect to the merits of the requested export authorization, ERCOT takes no position on whether the request 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. Based on the description in the published Notice of Application, ERCOT understands that the application does not seek to increase the transfer capacity over the existing ties between the ERCOT system and the Mexican electric system, but simply to use the existing ties to transfer energy between the two systems. Under normal operations, additional imports to, or exports from, the ERCOT system can be

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<sup>1</sup> The Notice states that "Copies of this application will be made available, upon request, for public inspection and copying at the address provided above, by accessing the program Web site at <http://energy.gov/node/11845>, or by email Angela Troy at [Angela.Troy@hq.doe.gov](mailto:Angela.Troy@hq.doe.gov)." 81 Fed. Reg. 70669.

managed through established scheduling procedures and should not have a material impact on reliability, although they could have an impact on energy prices in the ERCOT system. In any case in which transactions over the ties would contribute to a generation shortage in the ERCOT system or otherwise threaten the reliability of the ERCOT system, ERCOT is permitted by its Protocols and by the NERC Reliability standards to deny or curtail those transactions as necessary.

**V. CONCLUSION**

ERCOT respectfully requests that the DOE grant its motion to intervene and give due 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: November 14, 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 14<sup>th</sup> day of November, 2016.

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

Nathan Bigbee