

US EPA ARCHIVE DOCUMENT

## Cox, Kyndall

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**From:** Robinson, Jeffrey  
**Sent:** Tuesday, February 17, 2015 4:55 PM  
**To:** Cox, Kyndall  
**Subject:** FW: Red Gate Siting

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**From:** John Packard [mailto:japackard@stec.org]  
**Sent:** Tuesday, February 10, 2015 4:28 PM  
**To:** Robinson, Jeffrey  
**Cc:** Wilson, Aimee  
**Subject:** Re: Red Gate Siting

I should have qualified any new transmission over 1 mile in length triggers a CCN. I don't think that is the only trigger necessarily, but having the connection on our property kept that length below a mile and allowed us to avoid the CCN process.

Also, just in case I wasn't clear, we do own the property.

John Packard  
South Texas Electric Cooperative  
2849 FM 447, PO Box 119  
Nursery, TX 77976  
P: 361.485.6320  
F: 361.485.6329  
M: 361.571.1312

On Feb 10, 2015, at 4:21 PM, John Packard <[japackard@stec.org](mailto:japackard@stec.org)> wrote:

Yes, the site offers on-site access to transmission. This is significant because any new transmission proposed has to go through the Public Utility Commission's Certificate of Convenience and Necessity (CCN) process to site the line. That process can take over 2 years to complete, which is more time than it takes to construct the plant and would have caused delays to the project.

The location in the Valley is advantageous from a transmission congestion perspective as well. Considering approximately half of STEC's load is located in the Rio Grande Valley, we wanted to site there to minimize transmission congestion costs and to increase the reliability of the region. That region has had a history of transmission congestion and reliability issues as noted in my earlier submissions.

John Packard  
South Texas Electric Cooperative  
2849 FM 447, PO Box 119  
Nursery, TX 77976  
P: 361.485.6320  
F: 361.485.6329

On Feb 10, 2015, at 3:24 PM, Robinson, Jeffrey <[Robinson.Jeffrey@epa.gov](mailto:Robinson.Jeffrey@epa.gov)> wrote:

John:

Does STEC already own the property that it proposing to construct Red Gate on?

Is there a specific reason for the siting at this location (siting, electricity generation/transmission studies)???

Jeff Robinson, Section Chief

Air Permits Section

EPA Region 6

214-665-6435