

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

APPLICATION OF PUBLIC SERVICE)
COMPANY OF OKLAHOMA ("PSO") FOR)
APPROVAL OF THE COST RECOVERY OF THE)
WIND CATCHER ENERGY CONNECTION)
PROJECT; A DETERMINATION THERE IS A)
NEED FOR THE PROJECT; APPROVAL FOR)
FUTURE INCLUSION IN BASE RATES COST)
RECOVERY OF PRUDENT COSTS INCURRED)
BY PSO FOR THE PROJECT; APPROVAL OF A)
TEMPORARY COST RECOVERY RIDER;)
APPROVAL OF CERTAIN ACCOUNTING)
PROCEDURES REGARDING FEDERAL)
PRODUCTION TAX CREDITS; WAIVER OF)
OAC 165:35-38-5(e); AND SUCH OTHER RELIEF)
THE COMMISSION DEEMS PSO IS ENTITLED.)

CAUSE NO. PUD 201700267

FILED
JUN 19 2018

COURT CLERK'S OFFICE - OKC
CORPORATION COMMISSION
OF OKLAHOMA

MOTION TO CONTINUE HEARING

Comes now City of Bixby pursuant to OAC 165:5-9-2 state as follows:


- (1) On July 31, 2017, PSO filed an Application in this cause which, among other things, requests regulatory approval for a 350-380 mile generation interconnection tie-line called the Wind Catcher Generation Tie-Line.
- (2) On July 31, 2017, PSO filed direct testimony from multiple witnesses that affirmed the Gen Tie-Line would connect to the Tulsa North 345 kV substation. *See, e.g.,* Pearce Direct Testimony at 13:18-19 (July 31, 2017) ("... delivered to PSO's existing Tulsa North 345 kV substation . . ."); Pfeifenberger Direct Testimony at 13:4-7 (July 31, 2017) ("The Project Case, additionally included a new 765 kV Gen-Tie connecting the Companies' contemplated Oklahoma panhandle wind generation to PSO's existing Tulsa North 345 kV substation."); Weber Direct Testimony at 3:15-17 (July 31, 2017) ("Specifically, the Gen-Tie line will interconnect the Wind Facility, via two proposed substations, to PSO's existing Tulsa North 345 kV Substation located in Tulsa County, Oklahoma."); *id.* at 5:7-10 ("The Tulsa North 765 kV Generation Substation will be designed to step down the voltage of the incoming 765 kV generation tie-line to 345 kV for interconnection with the existing PSO Tulsa North facilities.").
- (3) On January 3, 2018, PSO announced it would hold open houses in Pawnee, Woodward, and Enid from January 29-31.
- (4) On January 4, 2018, the Commission held an open hearing for public comment.
- (5) From January 8, 2018 to January 18, 2018, the parties put on evidence on the merits of the Application before ALJ Mary Candler.

- (6) On January 19, 2018, the day after the hearing closed, PSO announced a series of open house events for a proposed "southern route" that would connect to an electric substation on the south side of Tulsa. *See* Tulsa World, "PSO Adds Alternate Wind Catcher powerline routes, more public meetings." (Jan. 20, 2018). The open houses were scheduled for Glenpool, Bristow, and Cushing. None of the proposed meetings were in Bixby.
- (7) On February 12, 2018, ALJ Candler submitted a Report and Recommendation recommending denial of the Application.
- (8) In May 2018, Bixby residents received their first notice that PSO planned to route through Bixby.
- (9) This May 2018 notice materially changes the City of Bixby's interest in the project.
- (10) In May 2018, PSO sought injunctions in several counties to survey landowners' lands for the installation of the Gen-Tie Line.
- (11) To movants' knowledge, PSO has never formally notified the Commission that it is now planning to connect to a south Tulsa substation, never provided evidence of the increased cost of the longer planned route, never updated its Application or testimony to reflect the significant differences between routes, and never addressed how a 765kV electric may affect the health, safety and welfare of citizens of Oklahoma who may live adjacent to such Gen-Tie Line.
- (12) Accordingly, City of Bixby moves to continue the scheduled July 2, 2018 hearing on PSO's Joint Stipulations to permit:
 - a. the parties to provide the Commission updated information concerning the longer proposed route for the Gen-Tie Line.
 - b. City of Bixby time to review the cause;
 - c. City of Bixby an opportunity to ensure all health and safety concerns that a metropolitan area might have with the 765 kV power lines are addressed; and
 - d. A second open hearing for public comment for residents along the newly proposed southern route to provide feedback to the Commission.

WHEREFORE, City of Bixby respectfully requests the Commission:

- (1) Continue the July 2, 2018 hearing to permit participation by persons impacted by the new routing.
- (2) Schedule a second open hearing for public comment for persons impacted by the new routing.

- (3) Reset the July 2, 2018 hearing to a date after the second open hearing for public comment and no earlier than September 1, 2018 to permit City of Bixby time to prepare now that PSO has changed its proposed route and altered who has an interest in the Gen-Tie Line proposal.



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CERTIFICATE OF SERVICE

This is to certify that on this 19th day of June, 2018, a true and correct copy of the above and foregoing Motion to Continue Hearing was sent via electronic mail to the following interested parties:

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