

**JOINT APPLICATION OF AEP TEXAS INC. AND THE
CITY OF SAN ANTONIO, ACTING BY AND THROUGH
THE CITY PUBLIC SERVICE BOARD TO AMEND
THEIR CERTIFICATES OF CONVENIENCE AND
NECESSITY FOR THE HOWARD TO SOLSTICE 765-KV
SINGLE-CIRCUIT TRANSMISSION LINE
IN ATASCOSA, BANDERA, BEXAR, CROCKETT,
EDWARDS, KERR, KINNEY, MEDINA, PECOS, REAL,
SUTTON, TERRELL, UVALDE, AND VAL VERDE
COUNTIES**

DOCKET NO. 59336

Joint Application of AEP Texas Inc. and the City of San Antonio, acting by and through the City Public Service Board to Amend their Certificates of Convenience and Necessity for the Howard to Solstice 765-kV Single-Circuit Transmission Line in Atascosa, Bandera, Bexar, Crockett, Edwards, Kerr, Kinney, Medina, Pecos, Real, Sutton, Terrell, Uvalde, and Val Verde Counties

Joint applicants AEP Texas Inc. (AEP Texas) and the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) request that all parties serve copies of all pleadings, discovery, correspondence, and other documents on the following representatives:

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1. Applicant (Utility) Name: AEP Texas Inc. (AEP Texas)

Certificate Number: 30028¹
Street Address: 539 North Carancahua
Corpus Christi, Texas 78401
Mailing Address: 539 North Carancahua
Corpus Christi, Texas 78401

Applicant (Utility) Name: City of San Antonio, acting by and through the City Public Service Board
(CPS Energy)

Certificate Number: 30031
Street Address: 500 McCullough Ave.
San Antonio, Texas 78215
Mailing Address: 500 McCullough Ave.
San Antonio, Texas 78215

2. Please identify all entities that will hold an ownership interest or an investment interest in the proposed project but which are not subject to the Commission's jurisdiction.

There are no entities that will hold an ownership interest or an investment interest in the proposed project but which are not subject to the Commission's jurisdiction.

3. Person to Contact: Chad D. Tomanec (representing AEP Texas)

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Person to Contact: Antonio DeMendonca (representing CPS Energy)
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Support
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San Antonio, TX 78701
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¹ Certificate Number 30028 was assigned to AEP Texas Central Company, which with AEP Texas North Company, merged with their immediate parent company AEP Utilities, Inc. effective December 31, 2016. The merger was approved by the Public Utility Commission of Texas in the *Application of AEP Texas Central Company, AEP Texas North Company, and AEP Utilities, Inc. for Approval of Merger*, Docket No. 46050, Final Order [December 12, 2016]. As of January 2017, the merged company is doing business as AEP Texas.

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Alternate Contact: Kathryn Schmidt (representing AEP Texas)

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Legal Counsel: Kirk Rasmussen (representing CPS Energy)

Phone Number: (512) 236-2310

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Austin, Texas 78701

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4. Project Description:

Name or Designation of Project:

Joint Application of AEP Texas Inc. (AEP Texas) and the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) to Amend their Certificates of Convenience and Necessity for the Howard to Solstice 765-kV Single-Circuit Transmission Line in Atascosa, Bandera, Bexar, Crockett, Edwards, Kerr, Kinney, Medina, Pecos, Real, Sutton, Terrell, Uvalde, and Val Verde Counties (Project).

Joint Application of AEP Texas Inc. and the City of San Antonio, acting by and through the City Public Service Board to Amend their Certificates of Convenience and Necessity for the Howard to Solstice 765-kV Single-Circuit Transmission Line in Atascosa, Bandera, Bexar, Crockett, Edwards, Kerr, Kinney, Medina, Pecos, Real, Sutton, Terrell, Uvalde, and Val Verde Counties

Provide a general description of the project, including the design voltage rating (kV), the operating voltage (kV), the CREZ Zone(s) (if any) where the project is located (all or in part), any substations and/or substation reactive compensation constructed as part of the project, and any series elements such as sectionalizing switching devices, series line compensation, etc. For HVDC transmission lines, the converter stations should be considered to be project components and should be addressed in the project description.

AEP Texas and CPS Energy are jointly proposing to construct a new single-circuit 765-kV transmission line. Both the design voltage rating and operating voltage are 765-kV. The Project will begin in the vicinity of the existing CPS Energy Howard 345-kV Station, which is located in the southwest San Antonio area, approximately two miles north of the intersection of State Highway (SH) 1604 and SH 16 in Bexar County, and which will be expanded for 765-kV operation. The new 765-kV transmission line will extend west-northwest until it reaches the vicinity of the existing AEP Texas Solstice 345-kV Station, which is located approximately 28 miles west of the City of Fort Stockton along Interstate 10 in Pecos County, and which will be expanded for 765-kV operation. The Project includes telecommunication facilities (including necessary fiber repeater huts) that are critical to the reliable operation of the proposed transmission line facilities.

If the project will be owned by more than one party, briefly explain the ownership arrangements between the parties and provide a description of the portion(s) that will be owned by each party. Provide a description of the responsibilities of each party for implementing the project (design, Right-Of-Way acquisition, material procurement, construction, etc.).

AEP Texas and CPS Energy have agreed to determine an appropriate location along the approved route for a division of ownership that will generally divide the line in proportionately owned parts by distance of the line. Specifically, AEP Texas will own approximately 50 percent of the Project beginning at the AEP Texas Solstice 765-kV Station and CPS Energy will own approximately 50 percent of the Project beginning at the CPS Energy Howard 765-kV Station. Station construction at the CPS Energy Howard 765-kV Station will belong to CPS Energy. Station construction at the AEP Texas Solstice 765-kV Station will belong to AEP Texas. Each Applicant will own 100 percent of its respective portion of the Project and will have no ownership interest in the other Applicant's portion of the Project. The Applicants will not own any part of the Project as tenants in common, partners, or any other form of joint ownership. Each Applicant will be responsible for their respective portions of the Project, including design, right-of-way (ROW) acquisition, material procurement, and construction.

If applicable, identify and explain any deviation in transmission project components from the original transmission specifications as previously approved by the Commission or recommended by a PURA §39.151 organization.

There are no transmission specifications that have been previously approved by the Commission for this Project. There have been no deviations in the Project components from the original transmission specifications previously recommended by the Electric Reliability Council of Texas (ERCOT) (a PURA § 39.151 organization).

5. Conductor and Structures:

Conductor Size and Type

The Project will use bundled 795-kilocircular-mil (kcmil) 45/7 Aluminum Conductor Steel Reinforced (ACSR) conductors with two (2) optical ground wires.

Number of Conductors per Phase

The Project will be constructed with six conductors per phase.

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Continuous Summer Static Current Rating (A)

The Continuous Summer Static Current Rating for the Project is approximately 5000 Amps.

Continuous Summer Static Line Capacity at Operating Voltage (MVA)

The Continuous Summer Static Line Capacity at Operating Voltage for the Project is approximately 6625 MVA.

Continuous Summer Static Line Capacity at Design Voltage (MVA)

The Continuous Summer Static Line Capacity at Design Voltage for the Project is approximately 6625 MVA.

Type and Composition of Structures

The Project will be constructed using steel lattice structures, as is further described below.

Height of Typical Structures

Typical structures will range in height between 140 to 160 feet above grade.

Estimated Maximum Height of Structures

Depending on clearance requirements, the estimated maximum height of structures is 220 feet.

Explain why these structures were selected; include such factors as landowner preference, engineering considerations, and costs comparisons to alternate structures that were considered. Provide dimensional drawings of the typical structures to be used in the project.

Please see the description below.

For joint applications, provide and separately identify the above-required information regarding structures for the portion(s) of the project owned by each applicant.

Both AEP Texas and CPS Energy selected AEP's standard 765-kV lattice steel tower family due to its successful line performance and cost-optimized structures that can be used across the line route in various terrain conditions. The tower family consists of multiple tower types, including guyed and self-supporting lattice steel towers. AEP's tower family is designed with a zero-degree shielding angle to enhance lightning performance, strike distance, and insulation level to increase line performance. Structures are designed for anti-cascade structural loading to prevent longitudinal cascade events from high-impact low-probability weather events. Lattice steel towers provide the optimal solution for 765-kV construction due to the high strength-to-weight ratio compared to tubular steel pole structures. Additionally, towers utilize multiple foundation options to minimize cost and accommodate different methods of access and construction. Towers are designed with climbing and working appurtenances and specific rigging locations to satisfy energized maintenance activities.

Dimensional drawings of typical lattice structures are included as Figures 1-2 through 1-7 of the *Howard-to-Solstice Single-Circuit 765-kV Transmission Line Project Environmental Assessment and Alternative Route Analysis*. This document, prepared by the Applicants' routing consultant WSP USA Inc. (WSP), is also referred to in this application as the "EA," and is included as Attachment 1 to this application.

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6. Right-of-way:

Miles of Right-of-Way

The miles of ROW for the alternative routes range from approximately 335.26 to 393.14 miles.

Miles of Circuit

The Project will be a single-circuit 765-kV transmission line. The number of miles of circuit would range from approximately 335.26 to 393.14 miles.

A table that shows the miles of ROW and the miles of circuit for each route is included as Attachment 2 of the application.

Width of Right-of-Way

The typical ROW is 200 feet wide (100 feet on either side of the centerline). More or less ROW may be necessary in certain areas. Temporary easements might be required in some areas for additional working space during construction. Access roads may also be required.

Percent of Right-of-Way Acquired

None of the ROW has been acquired for the Project.

For joint applications, provide and separately identify the above-required information for each route for the portion(s) of the project owned by each applicant.

The Applicants identified the geographical midpoint of each of the alternative routes and then adjusted the dividing point to the structure closest to the midpoint. CPS Energy will acquire and own ROW for approximately 50 percent (eastern half) of the transmission line and AEP Texas will acquire and own ROW for approximately 50 percent (western half) of the transmission line. The total length of the ROW for each alternative route and the length of the ROW for each of the Applicants is shown in Attachment 2 of the Application.

Provide a brief description of the area traversed by the transmission line. Include a description of the general land uses in the area and the type of terrain crossed by the line.

The primary land uses in the area traversed by the alternative routes (Study Area) for this Project are pastureland/ranchland, low-density and medium-density residential and commercial development, oil and gas infrastructure, and transportation infrastructure.

The Study Area is located within the following physiographic provinces: Gulf Coastal Plains (subprovinces Interior Coastal Plains and Blackland Prairies), Edwards Plateau (subprovinces Pecos Canyons and Stockton Plateau), High Plains (subprovince Southern High Plains), and Basin and Range (Bureau of Economic Geology 1996). Elevations within the study area range from approximately 600 feet above mean sea level (amsl) to 5,000 feet amsl. See Section 3.0 of the EA for additional detail.

7. Substations or Switching Stations:

List the name of all existing HVDC converter stations, substations or switching stations that will be associated with the new transmission line. Provide documentation showing that the owner(s) of the existing HVDC converter stations, substations and/or switching stations have agreed to the installation of the required project facilities.

The Project will be constructed between the expanded CPS Energy Howard Station and expanded AEP Texas Solstice Station. The expanded 765-kV Stations will be built in the vicinity of the existing Howard

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345-kV and Solstice 345-kV stations. There are no existing HVDC converter stations associated with the Project. CPS Energy will be the owner of the expanded Howard 765-kV Station, and AEP Texas will be the owner of the expanded Solstice 765-kV Station.

Solstice 765-kV Station:

Work at the expanded AEP Texas Solstice 765-kV Station consists of the design and construction of a 765-kV yard that accommodates the line to the expanded CPS Energy Howard 765-kV Station, and two 765/345-kV autotransformers. The yard will be designed in the form of a ring bus, expandable to a future breaker and a half substation, with the capability to operate it as a double-breaker, double-bus station. AEP Texas will have three 765-kV line breakers and three 765-kV autotransformer breakers to build out the ring. Additionally, there will be a total of two 300 MVAR reactors in the station, one on the line to the CPS Howard 765-kV Station and one on the bus, each with its own breaker for a total of two 765-kV reactor breakers. The initial build out of the station will also include an extension of the bus to accommodate one future ring. At the 765-kV level, transformers and reactors are single-phase units. The rest of the major materials consist of switches, arresters, insulators, and various instrument transformers.

Solstice 765-kV Station Components:

- Reactors - 8 total (6 single phase plus 2 spares) 100MVAR
- Autotransformers - 7 total (Two autos with single phase plus one spare)
- Breakers (Live Tank, 4000A) - 2 total for reactors
- Breakers (Dead Tank, 5000A) - 6 total for rungs/autos
- Switches (Vertical Break, 5000A) - 16 total for breakers/autos, 3-phase gang operated
- Switches (Semi-pan, 5000A) - 18 (3x6) total for breakers and future rung, single-phase
- Switches (Vertical Break, 4000A) - 4 total for reactor, 4000a switch for reactor, 3-phase gang operated
- Switches (Mega Switch, 5000A) - 6 (3x2) total for auto transfer bus, single-phase
- Switches (Mega Switch, 2500A) - 6 total (3x2) total, for spare reactors, single-phase
- CCVTs - 9 total, single-phase (3 for line and 6 for bus)
- Arresters - 26 total
- CTs - 6 total for reactors
- Insulators - 450 total

Howard 765-kV Station:

Work at the expanded CPS Energy Howard 765-kV Station consists of two 765/345-kV autotransformers connected into the two new positions at CPS Energy Howard 345-kV Station. A spare single-phase autotransformer will be included in the design. Initially, the Howard 765-kV Station will include a line terminal to support a 765-kV transmission line from the AEP Texas Solstice 765-kV Station to the CPS Energy Howard 765-kV Station. This includes a 300 MVAR, 765-kV reactor bank comprised of 100 MVAR reactors per phase directly connected to the Howard to Solstice 765-kV transmission line. Additionally, the Howard 765-kV Station will be designed and built to accommodate a total of four

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line terminals to support the full 765-kV build out. The Howard 765-kV Station will be built with double bus double-breaker for the four line terminals and the autos will be built in a breaker and a half configuration. AEP Texas will create the required design drawings to facilitate the construction of the expanded CPS Energy Howard 765-kV Station.

Howard 765-kV Station Components:

- Reactors - 8 total (6 single phase plus 2 spares) 100MVAR
- Autotransformers - 7 total (Two autos with single phase plus one spare)
- Breakers (Live Tank, 4000A) - 2 total for reactors
- Breakers (Dead Tank, 5000A) - 5 total for rungs/autos
- Switches (Vertical Break, 5000A) - 10 total for breakers/autos, 3-phase gang operated
- Switches (Semi-pan, 5000A) - 30 (3x10) total for breakers and future rung, single-phase
- Switches (Vertical Break, 4000A) - 4 total for reactor, 4000a switch for reactor, 3-phase gang operated
- Switches (Mega Switch, 5000A) - 6 (3x2) total for auto transfer bus, single-phase
- Switches (Mega Switch, 2500A) - 6 total (3x2) total, for spare reactors, single-phase
- CCVTs - 9 total, single-phase (3 for line and 6 for bus)
- Arresters - 26 total
- CTs - 6 total for reactors
- Insulators - 450 total

List the name of all new HVDC converter stations, substations or switching stations that will be associated with the new transmission line. Provide documentation showing that the owner(s) of the new HVDC converter stations, substations and/or switching stations have agreed to the installation of the required project facilities.

As mentioned in the prior question, AEP Texas will be owner of the expanded Solstice 765-kV Station, and CPS Energy will be the owner of the expanded Howard 765-kV Station. There are no new HVDC converter stations associated with the Project.

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8. Estimated Schedule:

<u>Estimated Dates of:</u>	<u>Start</u>	<u>Completion</u>
<i>Right-of-way and Land Acquisition</i>	September 2026	October 2028
<i>Engineering and Design</i>	September 2026	June 2028
<i>Material and Equipment Procurement</i>	September 2026	March 2030
<i>Construction of Facilities</i>	May 2028	September 2030
<i>Energize Facilities</i>	N/A	October 2030

9. Counties:

For each route, list all counties in which the route is to be constructed.

The proposed alternative routes traverse portions of the following counties:

<u>County</u>	<u>Routes</u>
<i>Atascosa</i>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21
<i>Bandera</i>	18, 24, 25, 26, 27, 30, 31, 32, 39, 40, 45, 55, 56, 57, 58, 59, 60, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77
<i>Bexar</i>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77
<i>Crockett</i>	4, 5, 6, 7, 8, 9, 11, 12, 18, 22, 23, 24, 28, 30, 33, 46, 54, 56, 61, 62, 64, 65, 66, 67, 70, 73, 74, 75, 77
<i>Edwards</i>	11, 12, 17, 18, 22, 24, 25, 26, 27, 28, 30, 31, 32, 38, 39, 40, 45, 46, 55, 56, 57, 58, 59, 60, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77
<i>Kerr</i>	24, 25, 27, 30, 31, 56, 57, 58, 59, 60, 62, 63, 64, 65, 70, 73, 74, 76, 77
<i>Kinney</i>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 19, 20, 21, 22, 23, 29, 33, 34, 35, 36, 37, 41, 42, 43, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54, 61
<i>Medina</i>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77
<i>Pecos</i>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77

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<i>Real</i>	17, 18, 24, 25, 26, 27, 28, 30, 31, 32, 38, 39, 40, 45, 55, 56, 57, 58, 59, 60, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77
<i>Sutton</i>	62, 64, 65, 77
<i>Terrell</i>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77
<i>Uvalde</i>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24, 28, 29, 33, 34, 35, 36, 37, 38, 41, 42, 43, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54, 61, 63, 75
<i>Val Verde</i>	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76

10. Municipalities:

For each route, list all municipalities in which the route is to be constructed.

The proposed alternative routes traverse portions of the following municipalities:

<u>Municipality</u>	<u>Routes</u>
City of San Antonio	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77
City of Devine	18, 19, 20, 21
Knippa (CDP)	11, 13, 14, 17, 20, 21, 23, 28, 29, 33, 34, 35, 36, 37, 41, 42, 43, 44, 46, 47, 48, 49, 50, 51, 52, 53, 54
Uvalde Estates (CDP)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 15, 16, 19, 22

For each applicant, attach a copy of the franchise, permit or other evidence of the city's consent held by the utility, if necessary or applicable. If franchise, permit, or other evidence of the city's consent has been previously filed, provide only the docket number of the application in which the consent was filed. Each applicant should provide this information only for the portion(s) of the project which will be owned by the applicant.

Not Applicable. The transmission line routing will not utilize public ROW.

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11. Affected Utilities:

Identify any other electric utility served by or connected to facilities in this application.

Not Applicable. The transmission line that is the subject of this Application will not be directly connected to any other electric utility.

Describe how any other electric utility will be affected and the extent of the other utilities' involvement in the construction of this project. Include any other utilities whose existing facilities will be utilized for the project (vacant circuit positions, ROW, substation sites and/or equipment, etc.) and provide documentation showing that the owner(s) of the existing facilities have agreed to the installation of the required project facilities.

Not Applicable. No other electric utility is involved in the construction of the Project. The Project does not utilize existing facilities owned by any other electric utility.

12. Financing:

Describe the method of financing this project. For each applicant that is to be reimbursed for all or a portion of this project, identify the source and amount of the reimbursement (actual amount if known, estimated amount otherwise) and the portion(s) of the project for which the reimbursement will be made.

AEP Texas will finance its portion of the Project through a combination of debt and equity. CPS Energy will finance its portion of the Project in a manner similar to that which has been used for projects previously constructed by CPS Energy. Such financing may include a combination of cash, tax-exempt commercial paper, tax-exempt private revolving note, or taxable commercial paper, and, subsequent to project completion, fixed rate debt.

13. Estimated Costs:

Provide cost estimates for each route of the proposed project using the following table. Provide a breakdown of "Other" costs by major cost category and amount. Provide the information for each route in an attachment to this application.

Tables that show the estimated cost of the transmission facilities and the station facilities for this Project are included as Attachment 3 to this Application.

For joint applications, provide and separately identify the above-required information for the portion(s) of the project owned by each applicant.

The estimated costs shown in Attachment 3 to this Application are provided separately for the portion of the Project that is owned by each Applicant.

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14. Need for the Proposed Project:

For a standard application, describe the need for the construction and state how the proposed project will address the need. Describe the existing transmission system and conditions addressed by this application. For projects that are planned to accommodate load growth, provide historical load data and load projections for at least five years. For projects to accommodate load growth or to address reliability issues, provide a description of the steady state load flow analysis that justifies the project. For interconnection projects, provide any documentation from a transmission service customer, generator, transmission service provider, or other entity to establish that the proposed facilities are needed. For projects related to a Competitive Renewable Energy Zone, the foregoing requirements are not necessary; the applicant need only provide a specific reference to the pertinent portion(s) of an appropriate commission order specifying that the facilities are needed. For all projects, provide any documentation of the review and recommendation of a PURA §39.151 organization.

The Permian Basin region of Texas consists of the Delaware Basin, Midland Basin, and Central Basin Platforms, including most of the counties in the Far West Weather Zone plus ten adjacent counties in the West Weather Zone and two counties in the North Weather Zone at the western most part of the Electric Reliability Council of Texas (ERCOT) system. In 2023, the Texas Legislature enacted House Bill (HB) 5066 which required the Public Utility Commission of Texas (PUC) to direct ERCOT to develop a reliability plan to identify the transmission needs of the Permian Basin region and the transmission upgrades required to meet the forecasted electric demand in the region. In accordance with Public Utility Regulatory Act (PURA) § 39.167, which implements HB 5066, ERCOT filed the Permian Basin Reliability Plan Study (the Study), which was required to address extending transmission service to areas where mineral resources have been found; address increasing available capacity to meet forecasted load; and provide available infrastructure to reduce interconnection times in areas without access to transmission service. ERCOT's Permian Basin Reliability Plan is Attachment 4 to the Application.

Steady-state reliability analysis performed by ERCOT indicated that a substantial amount of local transmission upgrades will be needed to serve all loads in the Permian Basin region for both 2030 and 2038. ERCOT identified that the Far West Weather Zone, which includes a significant portion of the Permian Basin, has experienced an average annual peak demand growth rate of approximately 11% for the latest decade due to increased development activity associated with the oil and gas industry, and the electric demand will continue to grow over the next 15 years. ERCOT modeled that the total demand in the Permian Basin region for 2030 is 23,659 MW, and the total demand modeled for 2038 is 26,400 MW.

ERCOT developed a set of transmission upgrades needed to interconnect and serve the projected load in the Permian Basin region. This includes a set of transmission import paths that can transport power from the other regions of Texas into the Permian Basin to serve the projected demand. In addition to the local transmission upgrades, ERCOT identified regional transmission upgrades that will be needed to transfer power across the ERCOT system. ERCOT's assessment utilized a two-phased approach, identifying transmission needs out to 2030 and out to 2038. ERCOT evaluated a 345-kV option for both 2030 and 2038 forecast horizons, and two extra high voltage (EHV) options, 500-kV and 765-kV, for a 2030 forecast horizon.

On December 14, 2023, the PUC issued an Order in Project No. 55718, which established a process and timeline for developing the Study and required ERCOT to submit the Study to the PUC no later than July 2024. On July 25, 2024, ERCOT filed the final Study with the PUC in Project No. 55718, which is provided as Attachment 4 to the Application. On October 7, 2024, the PUC issued the Order Approving the Reliability Plan and local transmission upgrades proposed to serve the region through 2038, but reserved a decision on which voltage level should be approved for the transmission import paths. At the April 24, 2025 Open Meeting, the Commission decided to move forward with 765-kV import paths for the Permian Basin Reliability Plan and issued a Second Order Approving the three 765-kV import paths identified in the Plan, which includes this Project.

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15. Alternatives to Project:

For a standard application, describe alternatives to the construction of this project (not routing options). Include an analysis of distribution alternatives, upgrading voltage or bundling of conductors of existing facilities, adding transformers, and for utilities that have not unbundled, distributed generation as alternatives to the project. Explain how the project overcomes the insufficiencies of the other options that were considered.

Transmission Alternatives

For analysis of alternatives considered by ERCOT, see Project No. 55718, ERCOT Permian Basin Reliability Plan Study Report (July 25, 2024) and ERCOT Permian Basin Reliability Plan Study – Addendum (September 11, 2024).

This project is part of the Permian Basin Reliability Plan approved by the PUC pursuant to HB 5066, enacted by the Texas Legislature in 2023. See Project No. 55718 *Reliability Plan for the Permian Basin Under PURA § 39.167*, Order Approving the Reliability Plan (October 7, 2024), and Second Order Approving the Reliability Plan for the Permian Basin Region (April 24, 2025).

Other Alternatives

The Project has a line capacity of 6625 MVA. There are no feasible distribution or energy efficiency alternatives that could reasonably address that level of capacity or the need for this Project.

Distributed Generation

AEP Texas is not a bundled utility and cannot own or control distributed generation. CPS Energy is a fully integrated, municipally owned utility that may construct and own distributed generation. As described above, however, the Project is a bulk 765-kV transmission line that cannot be reasonably addressed via the construction of distributed generation.

16. Schematic or Diagram:

For a standard application, provide a schematic or diagram of the applicant's transmission system in the proximate area of the project. Show the location and voltage of existing transmission lines and substations, and the location of the construction. Locate any taps, ties, meter points, or other facilities involving other utilities on the system schematic.

A diagram of the transmission system in the proximate area of the Project is included with the Application as Attachment 5.

17. Routing Study:

Provide a brief summary of the routing study that includes a description of the process of selecting the study area, identifying routing constraints, selecting potential line segments, and the selection of the routes. Provide a copy of the complete routing study conducted by the utility or consultant. State which route the applicant believes best addresses the requirements of PURA and P.U.C. Substantive Rules.

A copy of the complete environmental assessment and routing study that was prepared by WSP is included as Attachment 1 to the Application. This study is titled *Howard-to-Solstice Single-circuit 765-kV Transmission Line Environmental Assessment and Alternative Route Analysis* (EA). The EA presents the analysis that was conducted by WSP and the land use and environmental data for all of the routes that were considered for this Project.

The objective of the EA was to identify and analyze an adequate number of geographically diverse alternative transmission line routes that comply with the routing criteria in PURA and the PUC's

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Substantive Rules. The Applicants and WSP utilized a comprehensive transmission line routing methodology to delineate and analyze alternative transmission line routes.

As discussed below, the study approach utilized by WSP for this EA consisted of project scoping and study area delineation, data collection, constraint mapping, Preliminary Alternative Link identification, review and adjustment of Preliminary Alternative Links following field review, consideration of open-house input, development of Alternative Routes, and Alternative Route analysis and impact assessment from a land use and environmental perspective.

The first step in the selection of alternative routing options was to select a study area. This area needed to encompass the Project endpoints and include a sufficiently large area within which feasible and geographically diverse Alternative Routes could be delineated. The study area is shown on Figure 2-1 of the EA.

WSP used data in the development and analysis of the Alternative Routes that were drawn from a variety of sources, including published literature (documents, reports, maps, aerial photography, etc.), and information from local, state, and federal agencies. Recent Esri-hosted World Imagery (2020-2025), 2024 United States Department of Agriculture (USDA) National Agriculture Inventory Program (NAIP) color aerial imagery, Google Earth (2023-2025), aerial imagery flown by CDS Muery in August and September 2025, United States Geological Survey (USGS) 7.5-minute quadrangle topographic maps, USGS National Hydrography Dataset (NHD), Federal Emergency Management Agency (FEMA) maps, United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) maps, USFWS Information for Planning and Consultation (IPaC), Texas Parks and Wildlife Department (TPWD) Natural Diversity Database (NDD) and Ecological Mapping Systems of Texas, Texas Archeological Sites Atlas (TASA) through the Texas Archeological Research Laboratory (TARL) and Texas Historical Commission (THC), Texas Department of Transportation (TxDOT) county highway maps, Railroad Commission of Texas (RRC), Texas Speleological Survey (TSS), and aerial and ground reconnaissance surveys were used throughout the analysis of the Alternative Routes.

Aerial and ground reconnaissance of the study area and computer-based evaluation of digital aerial imagery was utilized for the development and analysis of the Alternative Routes. Though the data collection effort was concentrated in the early stages of the Project, it was ongoing and continued throughout the analysis process.

A constraint mapping process was used in the development and selection of possible Alternative Routes. The geographic locations of environmentally sensitive and other restrictive areas within the study area were located and considered during transmission line route delineation. These constraints were mapped on a topographic representation of the area created on USGS 7.5-minute quadrangle topographic base maps and on aerial photography. The environmental and land use constraints topographic maps are included as Figure C-1 located in Appendix C of Attachment 1 to the application.

Using the constraint maps, electrical system maps, field inspections, and input from the Applicants, WSP designated numerous Preliminary Alternative Links that took into consideration environmental and land use constraints. These Preliminary Alternative Links are shown on Figure 2-2 of the EA.

The Applicants hosted four public open house meetings within the study area to solicit comments, concerns, and input from residents, landowners, and other interested parties. The open house meetings were held at the Silverado Event Center in the community of Atascosa, on August 4, 2025; the Uvalde County Fairplex in the City of Uvalde, on August 5, 2025; the Enchanted Event Center in the City of Del Rio, on August 6, 2025; and the Fort Stockton Convention Center in the City of Fort Stockton, on August 7, 2025. To further ensure landowners had access to Project information, the Applicants each developed a Project website.

Following the public meetings, the Applicants' personnel and WSP performed a review and analysis of comments and information received at the public meetings and during discussions with landowners and

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interested stakeholders. The purpose of the review and analysis was to evaluate areas of concern and to consider modifications to the Preliminary Alternative Links.

Based on information obtained from the public meetings; meetings and communications with local, state, and federal agencies; additional communications with property owners; and discussions with the Applicants' project team, WSP identified the Primary Alternative Links. These Primary Alternative Links are shown on Figure 2-3 of the EA.

The Primary Alternative Links were then used by WSP, with input from the Applicants' project teams, to develop 77 Alternative Routes for analysis. WSP identified potentially affected resources and considered each during this alternative route development process. In analyzing these identified Alternative Routes, WSP considered 53 environmental and land-use criteria. These criteria are listed in Table 2-2 of the EA.

The analysis of each Alternative Route involved the inventory and tabulation of the number or quantity of each environmental criterion located along each Alternative Route (e.g., number of habitable structures within 500 feet of the centerline, the length paralleling existing compatible ROW). The number or amount of each criterion was determined by using GIS software, reviewing various maps and recent aerial imagery (CDS Muery 2025; Google Earth 2023-2025), and by field verification, where possible. Potential environmental impacts of the Alternative Routes are addressed in Section 4.0 of the EA. Comparative environmental data for the Alternative Routes are provided in Table 4-1 in Section 4.0 of the EA.

The Applicants considered all of the certification criteria in PURA and the PUC Substantive Rules, input from the public, and the environmental and land use analysis of their routing consultant, WSP. The Applicants also evaluated each Alternative Route from an engineering, design, construction, operations, and maintenance perspective, and considered the estimated cost for each of the Alternative Routes. Although the objective measurable criteria differ for each of the Alternative Routes, WSP has concluded that all 77 Alternative Routes included in the Application are feasible from an environmental and land use perspective. Applicants have evaluated each of the 77 Alternative Routes and determined that each route is feasible from an engineering and cost perspective.

The Applicants believe that Alternative Route 4 is the alternative route that best addresses the requirements of PURA and the PUC Substantive Rules. The Applicants' identification of Alternative Route 4 is informed by a number of considerations (listed below in no particular order), including that Alternative Route 4:

- Has a relatively low number of habitable structures within 500 feet of the proposed centerline at 67 (66 is the lowest and 243 is the highest);
- Has a relatively low estimated line cost of \$2,184,507,328, which is within 6.2 percent of the lowest estimated cost alternative route (\$2,049,681,012);
- Avoids crossing known existing conservation easements;
- Avoids crossing between the Devils River State Natural Areas;
- Avoids golden-checked warbler range;
- Does not cross designated critical habitat for a federally endangered or threatened species;
- Does not cross within 500 feet of San Antonio-area Karst Zones 1-3b;
- Avoids coming into close proximity to the existing and newly acquired Texas State Parks within the Project area, including the newly acquired Silver Lake State Park;
- Avoids significantly crossing the Edwards Aquifer Recharge Zone;
- Has a relatively low length of ROW within the foreground visual zone of Interstate, United States, and State highways at 13.80 miles (12.49 miles is the lowest and 44.82 is the highest);
- Is tied for the lowest length of ROW within the foreground visual zone of parks/recreational areas at 1.29 miles (4.17 miles is the highest);
- Has a relatively low number of Federal Aviation Administration (FAA)-registered public/military airfields within 10,000 feet of ROW centerline (with runway <3,200 feet) at 2 (1 is the lowest and 5 is the highest); and
- Has the lowest number of FAA-registered public/military airfields within 20,000 feet of ROW centerline (with runway >3,200 feet) at 2 (10 is the highest).

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18. Public Meeting or Public Open House:

Provide the date and location for each public meeting or public open house that was held in accordance with P.U.C. Proc. R. 22.52. Provide a summary of each public meeting or public open house including the approximate number of attendants, and a copy of any survey provided to attendants and a summary of the responses received. For each public meeting or public open house provide a description of the method of notice, a copy of any notices, and the number of notices that were mailed and/or published.

The Applicants hosted four public open house meetings to solicit comments, concerns, and input from residents, landowners, and other interested parties. The open house meetings were held at the Silverado Event Center in the community of Atascosa, on August 4, 2025; the Uvalde County Fairplex in the City of Uvalde, on August 5, 2025; the Enchanted Event Center in the City of Del Rio, on August 6, 2025; and the Fort Stockton Convention Center in the City of Fort Stockton, on August 7, 2025.

A summary of each public open house meeting and additional information concerning the open house meetings, including notice of the meetings, are provided in Section 2.7.4 and Appendix B of the EA (see Attachment 1).

19. Routing Maps:

Base maps should be a full scale (one inch = not more than one mile) highway map of the county or counties involved, or other maps of comparable scale denoting sufficient cultural and natural features to permit location of all routes in the field. Provide a map (or maps) showing the study area, routing constraints, and all routes or line segments that were considered prior to the selection of the routes. Identify the routes and any existing facilities to be interconnected or coordinated with the project. Identify any taps, ties, meter points, or other facilities involving other utilities on the routing map. Show all existing transmission facilities located in the study area. Include the locations of radio transmitters and other electronic installations, airstrips, irrigated pasture or cropland, parks and recreational areas, historical and archeological sites (subject to the instructions in Question 27), and any environmentally sensitive areas (subject to the instructions in Question 29).

Routing maps are provided in the EA. Figure C-1 is a set of topographic-based maps (scale of 1 inch = 1 mile) that show the study area, all Primary Alternative Links, routing constraints and other environmental and land use features, and existing transmission lines, and is located in Appendix C of the EA (see Attachment 1). Table 2-1 in the EA identifies the Primary Alternative Links that are included in each Alternative Route.

Figure C-2 is a set of aerial photograph-based maps (scale of 1 inch = 2,000 feet) that show the study area, all routing links, routing constraints and other environmental and land use features, and existing transmission lines, and is located in Appendix C of the EA. Figure 2-2 of the EA shows the Preliminary Alternative Links that were presented at the public open house meetings and Figure 2-3 shows the Primary Alternative Links analyzed for the Project.

Provide aerial photographs of the study area displaying the date that the photographs were taken or maps that show (1) the location of each route with each route segment identified, (2) the locations of all major public roads including, as a minimum, all federal and state roadways, (3) the locations of all known habitable structures or groups of habitable structures (see Question 19 below) on properties directly affected by any route, and (4) the boundaries (approximate or estimated according to best available information if required) of all properties directly affected by any route.

Figure C-2, located in Appendix C of the EA, is a set of aerial photograph-based maps (scale of 1 inch = 2,000 feet) that depicts, as applicable: (1) the locations of the Primary Alternative Links; (2) the locations of all major public roads, including all federal and state roadways; (3) the locations of all known habitable structures (within 500 feet of the Primary Alternative Links centerline) on properties directly affected by the route; and (4) the boundaries (approximate or estimated according to best available information) of all

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properties directly affected by the Alternative Routes. Table 2-1 in the EA identifies the Primary Alternative Links that are included in each Alternative Route.

Aerial photograph-based maps (scale of 1 inch = 2,000 feet) are included in the Application as Attachment 6 and show the approximate boundaries of all properties that are directly affected by all routes according to the best information available from county tax appraisal district records.

For each route, cross-reference each habitable structure (or group of habitable structures) and directly affected property identified on the maps or photographs with a list of corresponding landowner names and addresses and indicate which route segment affects each structure/group or property.

A cross-reference table that shows the landowner name and address, property identification number, habitable structure identification number from the landownership map, and the Primary Alternative Links associated with the landowners and habitable structures is included as Attachment 7 of the Application.

20. Permits:

List any and all permits and/or approvals required by other governmental agencies for the construction of the proposed project. Indicate whether each permit has been obtained.

The Applicants will coordinate with all of the appropriate local, state, and federal agencies with jurisdiction regarding the construction of the transmission facilities associated with this Project. The Applicants and/or WSP have initiated contact with and been provided information about the Project by various agencies. Some input from these agencies has been incorporated in this Application; however, requests for permits and/or approvals will not be submitted to the appropriate agencies until the final alignment of the approved route is determined. The following list identifies potential permits, approvals, requirements, easements, or clearances for the Project, but none have been obtained as of yet.

- Railroad crossing permits will be obtained as needed.
- Floodplain development permits and road crossing permits might be required by the counties in which the approved route is located, depending on the location of the transmission line structures.
- Permits for crossing roads, highways, and/or other properties owned or maintained by TxDOT will be obtained as necessary.
- Cultural resource clearance will be obtained from the THC for the approved Project ROW as necessary.
- A Storm Water Pollution Prevention Plan (SWPPP) is required by the Texas Commission on Environmental Quality (TCEQ). Each Applicant or their contractors will submit a Notice of Intent to the TCEQ at least 48 hours prior to the beginning of construction and will have the SWPPP on site at the initiation of clearing and construction activities.
- A Miscellaneous Easement from the Texas General Land Office will be obtained as necessary for any ROW that crosses a state-owned riverbed or navigable stream.
- Following PUC approval of a route for the proposed transmission line, the Applicants will make a final determination of the need for FAA notification based on specific structure locations and design. If any of the FAA notification criteria are met for the approved route, a Notice of Proposed Construction or Alteration, FAA Form 7460-1, will be completed and submitted to the FAA Southwest Regional Office in Fort Worth, Texas, at least 45 days prior to construction.
- Permits or other requirements associated with possible impacts to federally endangered/threatened species will be coordinated with the USFWS as necessary. The Applicants and WSP will consult with

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USFWS officials to determine the use of existing or additional habitat conservation plans that may be prudent in association with the Project.

- Permits or other requirements associated with possible impacts to waters of the United States under the jurisdiction of the United States Army Corps of Engineers (USACE) will be coordinated with the USACE as necessary. Construction of this transmission line Project will likely meet the criteria for Nationwide Permit 57. If necessary, the Applicants will coordinate with the USACE prior to clearing and construction to ensure compliance with the appropriate regulations associated with construction-related impacts to waterbodies and wetland features. No navigable waters occur within the study area that would require permitting under Section 10 of the Rivers and Harbors Act of 1899.

21. Habitable structures:

For each route list all single-family and multi-family dwellings and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, schools, or other structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis within 300 feet of the centerline if the proposed project will be constructed for operation at 230kV or less, or within 500 feet of the centerline if the proposed project will be constructed for operation at greater than 230kV. Provide a general description of each habitable structure and its distance from the centerline of the route. In cities, towns or rural subdivisions, houses can be identified in groups. Provide the number of habitable structures in each group and list the distance from the centerline of the route to the closest and the farthest habitable structure in the group. Locate all listed habitable structures or groups of structures on the routing map.

General descriptions of the habitable structures that are within 500 feet of the centerline of each Alternative Route and the distances from the centerlines are provided in Tables 4-2 through 4-78 in Appendix D of the EA (see Attachment 1). To account for the margin of error in horizontal accuracy of aerial imagery, the Consultant identified habitable structures located within 520 feet of the centerline of each Alternative Route. The habitable structures that are located within 520 feet of the Alternative Routes are shown on Figure C-2 located in Appendix C of the EA and in Attachments 6 and 7. Details regarding the number of habitable structures that are within 520 feet of the centerline of each Alternative Route are included in Table 4-1 and in Section 4.3.1.1 of the EA.

The number of known habitable structures located within 520 feet of the centerline of the Alternative Routes ranges from 66 each for Alternative Routes 5 and 8 to 243 for Alternative Route 55.

22. Electronic Installations:

For each route, list all commercial AM radio transmitters located within 10,000 feet of the center line of the route, and all FM radio transmitters, microwave relay stations, or other similar electronic installations located within 2,000 feet of the center line of the route. Provide a general description of each installation and its distance from the center line of the route. Locate all listed installations on a routing map.

AM radio towers were identified within 10,000 feet of 33 of the Alternative Route centerlines. One AM radio tower each was identified within 10,000 feet of the centerline of Alternative Routes 11, 13, 14, 17, 20 to 22, 24, 38, 61, 63, and 75, while Alternative Routes 23, 28, 29, 33 to 37, 41 to 44, and 46 to 54 each have two. The number of FM radio transmitters or other electronic communication facilities identified within 2,000 feet of the Alternative Route centerlines ranges from one each for Alternative Routes 24, 56, and 63 to 14 for Alternative Route 55 (see Table 4-1 and Section 4.3.6 of the EA in Attachment 1 of the Application).

Tables 4-2 through 4-78 in Appendix D of the EA provide the distances of the commercial AM radio towers and the FM radio transmitters or other electronic communication facilities from the centerline of each Alternative Route. Figure C-2 shows the locations of the commercial AM radio towers and the FM radio transmitters or other electronic communication facilities in relation to the Alternative Routes (see Appendix C of the EA in Attachment 1).

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23. Airstrips:

For each route, list all known private airstrips within 10,000 feet of the center line of the project. List all airports registered with the Federal Aviation Administration (FAA) with at least one runway more than 3,200 feet in length that are located within 20,000 feet of the center line of any route. For each such airport, indicate whether any transmission structures will exceed a 100:1 horizontal slope (one foot in height for each 100 feet in distance) from the closest point of the closest runway. List all listed airports registered with the FAA having no runway more than 3,200 feet in length that are located within 10,000 feet of the center line of any route. For each such airport, indicate whether any transmission structures will exceed a 50:1 horizontal slope from the closest point of the closest runway. List all heliports located within 5,000 feet of the center line of any route. For each such heliport, indicate whether any transmission structures will exceed a 25:1 horizontal slope from the closest point of the closest landing and takeoff area of the heliport. Provide a general description of each listed private airstrip, registered airport, and heliport; and state the distance of each from the center line of each route. Locate and identify all listed airstrips, airports, and heliports on a routing map.

According to FAA Regulations, Title 14 Code of Federal Regulations, Part 77, notification of the construction of the proposed transmission line will be required if structure heights exceed the height of an imaginary surface extending outward and upward at a slope of 100 to 1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway of a public or military airport having at least one runway longer than 3,200 feet.

If a runway is less than 3,200 feet, notification would be required if structure heights exceed the height of an imaginary surface extending at a slope of 50 to 1 for a distance of 10,000 feet. Notification is also required for structure heights exceeding the height of an imaginary surface extending outward and upward at a slope of 25 to 1 for a horizontal distance of 5,000 feet from the nearest point of the nearest landing and takeoff area for heliports. In addition, FAA Regulations require notification of the construction of any object that is greater than 200 feet above ground level and within 3 miles of an airport with a runway more than 3,200 feet in length.

Typical structure heights for this Project will be approximately 140 feet to 160 feet, with an estimated maximum of 220 feet, depending on location and design.

FAA-registered public airports where the runway is longer than 3,200 feet located within 20,000 feet of the centerline of the Alternative Routes range from two each for Alternative Routes 4, 6, 7, 9, 30, and 70 to 10 for Alternative Route 11. FAA-registered public airports where the runway is no longer than 3,200 feet located within 10,000 feet of the centerline of the Alternative Routes range from one each for Alternative Routes 11 and 12, to five each for Alternative Routes 31, 40, 45, 59, 73, and 74.

Alternative Routes 17, 27, 31, 32, 38 to 40, 45, and 63 each have one heliport located within 5,000 feet of the ROW centerline.

FAA-registered private airstrips located within 10,000 feet of the Alternative Route centerlines range from two each for Alternative Routes 56 and 77 to 15 for Alternative Route 71.

General descriptions of the airports, airstrips, and heliports are provided in Section 4.3.5.2 of the EA. Table 4-1 of the EA identifies the number of airports, airstrips, and heliports for each Alternative Route. The airports are shown on Figures C-1 and C-2 located in Appendix C of the EA, and the distances from the centerlines of the Alternative Routes are provided in Tables 4-2 through 4-78 in Appendix D of the EA.

24. Irrigation Systems:

For each route identify any pasture or cropland irrigated by traveling irrigation systems (rolling or pivot type) that will be traversed by the route. Provide a description of the irrigated land and state how it will be

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affected by each route (number and type of structures etc.). Locate any such irrigated pasture or cropland on a routing map.

All of the alternative routes cross lands with known mobile irrigation systems (rolling or pivot). The Alternative Routes with the shortest length across lands with known mobile irrigation systems range from 0.43 mile each for Alternative Routes 26, 27, 30–32, 57, 62, 64–68, and 70–72, to 2.76 miles each for Alternative Routes 23, 29, 33–37, 41–44, and 46–54. Table 4-1 of the EA provides the length of Alternative Route ROW across land irrigated by known mobile irrigation systems.

25. Notice:

Notice is to be provided in accordance with P.U.C. Proc. R. 22.52.

- A. Provide a copy of the written direct notice to owners of directly affected land. Attach a list of the names and addresses of the owners of directly affected land receiving notice.

A sample copy of the written direct notice and enclosures that were mailed to owners of directly affected land is provided in Attachments 8a through 8f. A list of the names and addresses of these landowners is provided in Attachment 8g.

- B. Provide a copy of the written notice to utilities that are located within five miles of the routes.

A sample copy of the written notice to utilities that are located within five miles of the proposed Project is provided in Attachment 9a. The list of the names and addresses of these utilities is provided in Attachment 9b.

- C. Provide a copy of the written notice to county and municipal authorities, and the Department of Defense Siting Clearinghouse. Notice to the DoD Siting Clearinghouse should be provided at the email address found at <http://www.acq.osd.mil/dodsc/>.

Sample copies of the written notice to county and municipal authorities are provided as Attachment 10a. The list of the names and addresses of these authorities is provided in Attachment 10b. A copy of the notice to the DoD Military Aviation and Installation Assurance Siting Clearinghouse of the open house and intent to file the CCN application is provided as Attachment 10c. A copy of the notice of this Application to the DoD Military Aviation and Installation Assurance Siting Clearinghouse is provided in Attachment 10d.

- D. Provide a copy of the notice that is to be published in newspapers of general circulation in the counties in which the facilities are to be constructed. Attach a list of the newspapers that will publish the notice for this application. After the notice is published, provide the publisher's affidavits and tear sheets.

The text of the notice to be published in newspapers of general circulation in the counties in which the proposed facilities are to be constructed is provided in Attachment 11a. A list of the newspapers that will publish the notice for this application is provided as Attachment 11b.

In addition to the notices described above, 16 TAC § 22.52 requires AEP Texas and CPS Energy to provide notice of the Application to the Office of Public Utility Counsel. A copy of that notice is included in this application as Attachment 12.

For a CREZ application, in addition to the requirements of P.U.C. Proc. R. 22.52 the applicant shall, not less than twenty-one (21) days before the filing of the application, submit to the Commission staff a "generic" copy of each type of alternative published and written notice for review. Staff's comments, if any, regarding the alternative notices will be provided to the applicant not later than seven days after receipt by Staff of the alternative notices. Applicant may take into consideration any comments made by Commission staff before the notices are published or sent by mail.

Not Applicable. This is not a CREZ application.

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26. Parks and Recreation Areas:

For each route, list all parks and recreational areas owned by a governmental body or an organized group, club, or church and located within 1,000 feet of the center line of the route. Provide a general description of each area and its distance from the center line. Identify the owner of the park or recreational area (public agency, church, club, etc.). List the sources used to identify the parks and recreational areas. Locate the listed sites on a routing map.

WSP performed a review of federal and state databases and county and local maps to identify parks and/or recreational areas within the study area. Reconnaissance surveys were also conducted to identify any additional park or recreational areas that are located within the study area.

Of the 77 Alternative Routes, 37 do not cross parks or recreational areas and each of the remaining 40 Alternative Routes crosses 0.71 mile of the Medina River Natural Area, which is managed by the City of San Antonio. There are no additional parks within 1,000 feet of the Alternative Route ROW centerlines for 39 of the 77 Alternative Routes. Of the remaining 38 Alternative Routes, 36 have one additional park within 1,000 feet of the Alternative Route ROW centerlines, and Alternative Routes 61 and 62 each have two additional parks within 1,000 feet of the Alternative Route ROW centerlines. Table 4-1 in the EA identifies the length of each Alternative Route across parks and recreation areas and the number of additional parks and recreation areas within 1,000 feet of the ROW centerline of each Alternative Route.

27. Historical and Archeological Sites:

For each route, list all historical and archeological sites known to be within 1,000 feet of the center line of the route. Include a description of each site and its distance from the center line. List the sources (national, state or local commission or societies) used to identify the sites. Locate all historical sites on a routing map. For the protection of the sites, archeological sites need not be shown on maps.

To identify the historical and archeological sites in the study area, WSP researched the available records and literature at the TARL. In addition, the THC's TASA files and TxDOT's Historic Resources Aggregator files were used to identify listed and eligible National Register of Historical Places (NRHP) properties and sites, NRHP districts, cemeteries, Official Texas Historical Markers, State Archeological Landmarks, and any other potential cultural resources to ensure the completeness of the study. To identify areas with a high probability for the occurrence of cultural resources, WSP used 7.5-minute topographic maps and aerial photography.

Two NRHP-listed archeological sites; seven resources that have been determined eligible for the NRHP, including four archeological sites; an additional 116 archeological sites; two National Historic Trails; and 15 cemeteries, including three of the archeological sites, are recorded within 1,000 feet of the centerline of the Alternative Routes. A total of 20 archeological sites and six vicinity cemeteries are crossed by the Alternative Route centerlines or the Alternative Route rights-of-way. General descriptions of the historical and archeological resources are provided in Section 4.4.4 of the EA. The distances from the centerline of the Alternative Routes are shown in Tables 4-2 through 4-78 of the EA. For the protection of the sites, archeological sites are not shown on the maps.

No systematic cultural resource surveys have been conducted along the Alternative Routes. Thus, the potential for undiscovered cultural resources exists along all of the Alternative Routes. To assess this potential, an archeologist reviewed geological, soils, and topographical maps to identify areas along the Alternative Routes where unrecorded pre-contact archeological resources have a higher probability to occur. These high probability areas (HPAs) for pre-contact archeological sites were identified near unnamed streams in the study area and adjacent to closed depressions that may have held fresh water. To facilitate the data analysis, each HPA was mapped using GIS and the length of each Alternative Route crossing these areas was tabulated. HPAs were mapped near previously recorded post-contact sites and NRHP properties, and near structures depicted on historic topographic maps.

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All of the Alternative Routes cross HPAs for cultural resources. Alternative Route 52 has the shortest length across HPAs with 226.92 miles, and Alternative Route 57 has the longest length across HPAs with 293.80 miles.

To identify the historical and archeological sites in the study area, WSP researched the available records and literature at the TARL, J.J. Pickle Research Campus, at the University of Texas at Austin. In addition, the Texas Historical Commission's Archeological Sites Atlas (TASA) files were used to identify listed and eligible NRHP properties and sites, NRHP districts, cemeteries, Official Texas Historical Markers, State Archeological Landmarks, and any other potential cultural resources such as National Historic Landmarks, National Monuments, National Memorials, National Historic Sites, and National Historical Parks to ensure the completeness of the study. To identify areas with a high probability for the occurrence of cultural resources, WSP used 7.5-minute topographic maps and aerial photography.

General descriptions of the historical and archeological resources are provided in Section 4.4.4 of the EA. The distances from the centerline of the alternative routes are shown in Tables 4-2 through 4-78 of the EA. For the protection of the sites, archeological sites are not shown on the maps.

28. Coastal Management Program:

For each route, indicate whether the route is located, either in whole or in part, within the coastal management program boundary as defined in 31 T.A.C. §503.1. If any route is, either in whole or in part, within the coastal management program boundary, indicate whether any part of the route is seaward of the Coastal Facilities Designation Line as defined in 31 T.A.C. §19.2(a)(21). Using the designations in 31 T.A.C. §501.3(b), identify the type(s) of Coastal Natural Resource Area(s) impacted by any part of the route and/or facilities.

None of the Alternative Routes are located within the Coastal Management Program boundary as defined by 31 TAC § 27.1.

29. Environmental Impact:

Provide copies of any and all environmental impact studies and/or assessments of the project. If no formal study was conducted for this project, explain how the routing and construction of this project will impact the environment. List the sources used to identify the existence or absence of sensitive environmental areas. Locate any environmentally sensitive areas on a routing map. In some instances, the location of the environmentally sensitive areas or the location of protected or endangered species should not be included on maps to ensure preservation of the areas or species. Within seven days after filing the application for the project, provide a copy of each environmental impact study and/or assessment to the Texas Parks and Wildlife Department (TPWD) for its review at the address below. Include with this application a copy of the letter of transmittal with which the studies/assessments were or will be sent to the TPWD.

Wildlife Habitat Assessment Program
Wildlife Division
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, Texas 78744

The EA that was prepared by WSP is included with the Application as Attachment 1. Data used by WSP in the delineation and evaluation of Alternative Routes were drawn from a variety of sources, including published literature (documents, reports, maps, aerial photography, etc.), and information from local, state, and federal agencies. Recent Esri-hosted World Imagery (2020-2025), 2024 USDA NAIP color aerial imagery, Google Earth (2023-2025), aerial imagery flown by CDS Muery in August and September 2025, USGS 7.5-minute quadrangle topographic maps, USGS NHD, FEMA maps, USFWS NWI maps, USFWS IPaC, TPWD NDD and Ecological Mapping Systems of Texas, TASA through the TARL, THC, TxDOT county highway maps, RRC, and TSS were used throughout the analysis of the Alternative Routes.

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Aerial and ground reconnaissance of the study area and computer-based evaluation of digital aerial imagery were utilized for both refinement and analysis of Alternative Routes. The data collection effort, although concentrated in the early stages of the Project, was an ongoing process and continued up to the point of final Alternative Route option selections.

A copy of the letter of transmittal of the Application, including the EA for this Project, to the TPWD is included in this application as Attachment 13.

30. Affidavit:

Attach a sworn affidavit from a qualified individual authorized by the applicant to verify and affirm that, to the best of their knowledge, all information provided, statements made, and matters set forth in this application and attachments are true and correct.

The sworn affidavits of AEP Texas Regulatory Case Manager Chad Tomanec and CPS Energy Project Manager Antonio DeMendonca for this Project are included with the Application as Attachment 14.