APPLICATION OF THE CITY OF SAN ANTONIO, ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY), TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED OMICRON 138 kV TRANSMISSION LINE PROJECT IN BEXAR COUNTY, TEXAS

DOCKET NO. 58276

Submit seven (7) copies of the application and all attachments supporting the application. If the application is being filed pursuant to 16 Tex. Admin. Code § 25.101(b)(3)(D) (TAC) or 16 TAC § 25.174, include in the application all direct testimony. The application and other necessary documents shall be submitted to:

Public Utility Commission of Texas
Attn: Filing Clerk
1701 N. Congress Ave.
Austin, Texas 78711-3326

APPLICATION OF THE CITY OF SAN ANTONIO, ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY) TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED OMICRON 138 KV TRANSMISSION LINE PROJECT IN BEXAR COUNTY, TEXAS

Applicant, the City of San Antonio, acting by and through City Public Service Board (CPS Energy), is filing this application (Application) and requests that all parties serve copies of all pleadings, discovery, correspondence, and other documents on the following representatives:

Service Contacts:

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Austin, TX 78701
512-236-2000

Note: As used herein, the term "joint application" refers to an application for proposed transmission facilities for which ownership will be divided. All applications for such facilities should be filed jointly by the proposed owners of the facilities.

1. Applicant (Utility) Name:

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, TX 78215
Mailing Address:	500 McCullough Ave. San Antonio, TX 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.

Not applicable. CPS Energy will hold 100 percent ownership interest in the Omicron 138 kV Transmission Line Project. No entity not subject to the jurisdiction of the Public Utility Commission of Texas (Commission) will hold an ownership or investment interest in the project.

3. Person to Contact:

Contact for CPS Energy:	Daniel Otto
Title/Position:	Manager, Substation &Transmission Regulatory Support
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Mailing Address:	Jackson Walker LLP
	100 Congress Avenue, Suite 1100
	Austin, TX 78701
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4. Project Description:
Name or Designation of Project

Omicron 138 kV Transmission Line Project in Bexar County, Texas (the Proposed Project).

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.

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.).

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.

General Description of Project

The Proposed Project is to construct a new double-circuit 138 kilovolt (kV) transmission line that will connect the new CPS Energy-owned Omicron Substation, which is to be located approximately 0.35 miles west of the intersection of Farm-to-Market Road (FM) 1957 (also known as Potranco Road) and State Highway (SH) 211, to the existing Cagnon-Howard 138 kV transmission line segment, located approximately 4.5 miles to the southeast of the Omicron Substation in Bexar County, Texas.

Because the Proposed Project will be constructed, owned, and operated by CPS Energy primarily or wholly outside the municipal boundaries of San Antonio (the City), CPS Energy is presenting this Application to the Commission. (Only a very small portion of one proposed alternative segment, affecting a limited number of the proposed routes, is within the municipal limits of San Antonio at the point it interconnects with the Cagnon—Howard transmission line; Unless a route including this segment is selected by the Commission, the entirety of the Project will be constructed outside of the municipal boundaries of San Antonio).

Please see Figure 1-1 in the *Omicron 138 kV Transmission Line Project Environmental Assessment and Route Analysis, Bexar County, Texas* (EA), incorporated herein by reference for all purposes and included as Attachment No. 1 to this Application, which shows the location of the Proposed Project end points.

The Proposed Project is not located, all or in part, within a Competitive Renewable Energy Zone (CREZ). No substation reactive compensation and no series elements such as sectionalizing switching devices or series line compensation will be constructed as part of the Proposed Project.

Ownership Arrangements

CPS Energy will own 100 percent of the Proposed Project, including all transmission line facilities, including conductors, wires, structures, hardware, and easements.

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.

Not applicable.

5. Conductor and Structures:

Conductor Size and Type: 795 kcmil ACSS/TW "Drake"

Number of conductors per phase: Two conductors per phase

Continuous Summer Static Current Rating (A): 2,292

Continuous Summer Static Line Capacity at Operating Voltage (MVA): 698

Continuous Summer Static Line Capacity at Design Voltage (MVA): 698

Type and Composition of Structures: CPS Energy proposes to use 138 kV double-circuit steel monopole structures for typical tangent, angle, and dead-end structures.

Height of Typical Structures: The heights of typical structures proposed for the project range from 90 to 120 feet above ground.

Estimated Maximum Height of Structures: The estimated maximum height of the proposed structures is 120 feet above ground.

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.

CPS Energy proposes to use new 138 kV double-circuit monopole structures for typical tangent, angle, and dead-end structures. For further discussion of the proposed typical structures and their requirements, please refer to Section 1.3.2 of the EA.

Please refer to Figures 1-2 through 1-4 in the EA for drawings of the typical structures proposed to be used for the Proposed Project.

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

Not applicable.

6. Right-of-way:
Miles of Right-of-Way:

Depending on the route selected, the approximate miles of right-of-way (ROW) required for the Proposed Project ranges from 5.51 miles to 7.72 miles.

Miles of Circuit:

The Proposed Project will result in double-circuit transmission facilities; therefore, the project will result in approximately 11 to 15.5 miles of circuit when completed.

Width of Right-of-Way:

The typical ROW width for the Proposed Project is estimated to be 100 feet. More or less ROW may be necessary in certain areas.

Percent of Right-of-Way Acquired:

Other than a very small portion of the segment entering the CPS Energy Omicron Station, CPS Energy does not currently own and has not acquired any of the necessary ROW for the transmission line.

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.

Not applicable.

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 transmission line will connect the new CPS Energy Omicron Station, which is to be located approximately 0.35 miles west of the intersection of Farm-to-Market Road (FM) 1957 (also known as Potranco Road) and State Highway (SH) 211, and the existing Cagnon—Howard 138 kV transmission line, located approximately 4.5 miles to the southeast of the Omicron Station in Bexar County, Texas. The Proposed Project will be constructed and operated wholly or primarily outside of the municipal boundaries of the City within Bexar County, Texas.

The study area of the Proposed Project is 5.35 miles at its widest point (i.e., between east and west boundaries) and 3.37 miles long (i.e., between north and south boundaries). The study area encompasses approximately 12 square miles. The study area is shown in Figures 2-1 and 2-2 of the EA.

Land uses within the study area are a mixture of urban/developed, planned land use, agricultural, transportation/aviation/utility features, communication towers, and parks and recreation areas. Specific discussion regarding natural, human, and cultural resources in the study area is set forth in the EA, Section 3.0.

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.

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.

The only substation that will be associated with the new line is the new CPS Energy Omicron Station, which will serve as one endpoint of the Proposed Project.

<u>New facilities required at the Omicron Station:</u>

The northwestern terminal point of the Proposed Project will be the Omicron Station, which is currently under construction and will be wholly owned by CPS Energy. The new facilities required by this Application will include two additional line terminals added to the Omicron Station to accommodate the two circuits for the Proposed Project.

8. Estimated Schedule:

Estimated Dates of:	Start	Completion
Right-of-way and Land Acquisition	February 2026	January 2027
Engineering and Design	January 2026	December 2026
Material and Equipment Procurement	January 2026	January 2027
Construction of Facilities	January 2027	November 2027
Energize Facilities		November 2027

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

All route segments filed in this Application are located in Bexar County, Texas.

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

A small portion of segment C8, which is included in 13 of 31 routes, is located within the municipal boundary of San Antonio. Otherwise, no other segments or routes are located within the boundary of any municipality.

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.

Authority for CPS Energy to provide transmission service is contained in, among other dockets, Docket No. 59.

11. Affected Utilities:
Identify any other electric utility served by or connected to facilities in this application.

No other electric utility will be directly served by or connected to facilities included in this Application.

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 electric 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.

No other electric utility will be involved in the construction of the Proposed Project. No other utility's existing facilities will be utilized for the Proposed Project.

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.

CPS Energy will finance the facilities included in the Application in a manner similar to that which has been used for projects previously constructed by CPS Energy. Such financing may include a combination of tax-exempt commercial paper, tax-exempt private revolving note, or taxable commercial paper, and, subsequent to project completion, fixed rate debt. Interest on the debt may be capitalized until the project is in service, at which point it is intended that both the principal and interest will be serviced with Transmission Cost of Service revenues.

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.

The total estimated cost for the Proposed Project varies, based upon the route selected by the Commission, and ranges between a low of $40,042,000 to a high of $64,832,000. Costs for each primary alternative route presented in this Application are shown in Attachment No. 2 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.

Not applicable.

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.

The Proposed Project is needed to increase the load-serving capability of the far western portion of the CPS Energy transmission system to accommodate increasing customer load growth in the area, including new large customer loads. The Electric Reliability Council of Texas (ERCOT) endorsed the Proposed Project as a needed transmission system improvement on July 26, 2024.

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.

Not applicable to the Proposed Project.

For all projects, provide any documentation of the review and recommendation of a PURA § 39.151 organization.

In February 2024, CPS Energy submitted the Proposed Project to the ERCOT Regional Planning Group (RPG) for review. CPS Energy proposed this project to address both thermal and voltage violations observed in the San Antonio area associated with new customer load. ERCOT performed an Independent Review and confirmed the project need as submitted by CPS Energy. See Attachment No. 3a to this Application. ERCOT evaluated six different transmission project options in the Independent Review, and recommended Option 1B as the preferred solution because it addresses the project need in the West San Antonio area, is the least expensive option, provides better long-term load-serving capability compared to Option 4, and requires the least mileage of (Certificate of Convenience and Necessity (CCN). Option 1B consists of the following:

- Construct a new approximately 5-mile line extension with ratings of 698 MVA from the new Omicron 138 kV substation to the existing Cagnon to Howard 138 kV transmission line. This creates a new Cagnon to Omicron 138 kV transmission line and a new Howard to Omicron 138 kV transmission line. **(This is the subject of this Application)**

- Rebuild approximately 1.7-mile Leon Creek to Pearsal 138 kV transmission line with ratings of at least 468 MVA.

On July 26, 2024, the ERCOT Board voted unanimously to endorse the Proposed Project. Attachment No. 3b is the ERCOT endorsement letter for the Proposed Project, which was received by CPS Energy on August 16, 2024.

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.

ERCOT evaluated six system improvement options to address the needs in the study base case in the San Antonio area. The options considered by ERCOT are identified below.

Option 1 consists of the following:

- Construct a new approximately 5-mile line extension with ratings of 698 MVA from the new Omicron 138 kV substation to the existing Cagnon to Howard 138 kV transmission line. This creates a new Cagnon to Omicron 138 kV transmission line and a new Howard to Omicron 138 kV transmission line.

- Construct a new approximately 14.3-mile Talley Rd to Ranchtown 138 kV transmission line with ratings of at least 570 MVA.

- Rebuild approximately 1.7-mile Leon Creek to Pearsal 138 kV transmission line with ratings of at least 468 MVA.

Option 1A consists of the following:

- Construct a new approximately 5-mile line extension with ratings of 698 MVA from the new Omicron 138 kV substation to the existing Cagnon to Howard 138 kV transmission line. This creates a new Cagnon to Omicron 138 kV transmission line and a new Howard to Omicron 138 kV transmission line.

Option 1B consists of the following:

- Construct a new approximately 5-mile line extension with ratings of 698 MVA from the new Omicron 138 kV substation to the existing Cagnon to Howard 138 kV transmission line. This creates a new Cagnon to Omicron 138 kV

transmission line and a new Howard to Omicron 138 kV transmission line. **(This is the subject of this Application)**

- Rebuild approximately 1.7-mile Leon Creek to Pearsal 138 kV transmission line with ratings of at least 468 MVA.

Option 2 consists of the following:

- Rebuild approximately 6.1-mile Castroville to Rafter single circuit 138 kV transmission line as a double circuit 138 kV transmission line with ratings of at least 570 MVA.

Option 3 consists of the following:

- Rebuild approximately 14.8-mile Castroville to Rafter 138 kV single circuit transmission line and Castroville to Lytle 138 kV single circuit transmission line as a double circuit 138 kV transmission line with circuits Castroville to Rafter, Castroville to Lytle, and Rafter to Lytle with ratings of at least 570 MVA per circuit.

- Construct a new approximately 14.3-mile Talley Rd to Ranchtown 138 kV transmission line with ratings of at least 570 MVA.

Option 4 consists of the following:

- Construct a new 345-kV bus at the existing 138 kV Castroville substation.

- Construct two new 345/138 kV autotransformers at the Castroville substation.

- Construct a new approximately 7-mile line extension with ratings of at least 1746 MVA from the new Castroville 345-kV substation to the existing Cagnon to Howard 345-kV transmission line. This creates a new Cagnon to Castroville 345-kV transmission line and a new Howard to Castroville 345-kV transmission line.

ERCOT staff performed an N-1 reliability analysis on all six options and found no thermal violations under any of the options, but did find several voltage violations. ERCOT then performed X-1 + N-1 and G-1 + N-1 reliability analyses to further evaluate the six options. There were no X-1 + N-1 or G-1 + N-1 violations for any of the six options. The table below summarizes the cost estimates and feasibility of the six options.

Option	Cost Estimates ($M)	Feasibility
1	$59.9*	Yes
1A	$38.0	Yes

1B	$44.3	Yes
2	$36.2	Yes
3	$96.3*	Yes
4	$135.9	Yes

* Cost estimate included Talley Rd to Ranchtown 138 kV transmission line addition which was captured in the STEC Rio Medina project and endorsed by ERCOT in May 2024.

ERCOT staff then conducted a planned maintenance outage analysis on all six of the options to compare their relative performance. Options 1, 1B, and 4 showed no thermal violations in the N-1-1 analysis. However, Options 1A, 2, and 3 all showed one thermal violation in the N-1-1 analysis. Therefore, ERCOT staff then focused on Options 1, 1B, and 4, as the only options without a thermal violation in the N-1-1 analysis and developed the comparison table below.

	Option 1	Option 1B	4
Meets ERCOT and NERC Reliability Criteria	Yes	Yes	Yes
Improves Long-Term Load Serving Capability	Yes (Better)	Yes (Better)	Yes
Improves Operational Flexibility (Planned Maintenance Outages)	Yes	Yes	Yes
CCN Needed (Miles)	Yes (~19.3)	Yes (~5.0)	Yes (~7.0)
Project Feasibility	Yes	Yes	Yes
Capital Cost Estimate ($M)	~59.9	~44.3	~135.9

ERCOT staff ultimately recommended Option 1B as the preferred option because it addresses the project need in the West San Antonio area, is the least expensive option, provides better long-term load-serving capability compared to Option 4, and requires the least mileage of CCN. See Attachment No. 3a (CPS Omicron Reliability Project.pdf) Page 20. The ERCOT Board unanimously approved Option 1B to address the identified ERCOT system needs. See Attachment No. 3b (ERCOT RPG Endorsement Letter).

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 schematic of the transmission system in the proximate area of the Proposed Project is shown in Figure 4.4 (page 12) of Attachment No. 3a.

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.

CPS Energy retained Halff Associates, Inc. (Halff) to prepare the EA for the Proposed Project, which is included as Attachment No. 1 to this Application. The objective of the EA was to provide information in support of this Application in addressing the requirements of PURA § 37.056(c)(4)(A)–(D), the PUC CCN Application form, and PUC Substantive Rule 25.101. By examining existing environmental conditions, including the human and natural resources that are located in the area of the Proposed Project, the EA evaluates the environmental effects that could result from the construction, operation, and maintenance of the Proposed Project. The EA will also be used in support of any additional local, state, or federal permitting activities that may be required for the Proposed Project, including the City's evaluation of the portion of the Proposed Project within the City boundaries following the Commission's determination on the need for the project and the routing outside of the City.

To assist Halff in its evaluation, CPS Energy provided information regarding the Proposed Project's endpoints, the need for the Proposed Project, engineering and design requirements, construction practices, and ROW requirements for the Proposed Project.

Selecting the Study Area

Halff, with input and assistance from CPS Energy, delineated the study area within which to review the existing environment and to locate geographically diverse alternative routes for the Proposed Project. The boundaries of the study area were determined by the existing project endpoints, which are the CPS Energy Omicron Station, which is to be located approximately 0.35 miles west of the intersection of Farm-to-Market Road (FM) 1957 (also known as Potranco Road) and State Highway (SH) 211, and the existing Cagnon-Howard 138 kV transmission line, located approximately 4.5 miles to the southeast of the Omicron

Station in Bexar County. The study area of the Proposed Project is 5.35 miles at its widest point (between east and west boundaries) and 3.37 miles long (between north and south boundaries). The study area encompasses approximately 12 square miles, and is shown in Figures 2-1 and 2-2 of the EA.

Route Constraints

Once the study area was defined, data related to land use, aesthetics, ecology, and cultural resources were collected by Halff through conducting ground reconnaissance; reviewing available maps and aerial photography; reviewing previous studies conducted in the area; contacting a variety of local, state, and federal agencies; and considering criteria established in PURA § 37.056(c)(4)(A)–(D), the PUC's CCN Application form, and PUC Substantive Rule 25.101. Using this information, the locations of any sensitive features and other constraints were identified.

Selection of Potential Routing Segments

Initially 46 preliminary alternative route segments were identified by evaluation of the constraints mapped for the study area and then by identifying routing opportunity areas such as exiting corridors and other linear features, and these 46 preliminary alternative route segments were presented at the public open house. Through application of the PUC's routing criteria, as described above, and consideration of feedback after the public open house, 49 primary alternative route segments were identified for inclusion in this Application and developed into potentially viable alternative routes for comparative purposes. These primary alternative route segments were further evaluated based on information received from government agencies, the public meeting, and additional public input. Ultimately, 31 primary alternative routes were identified for comparison. These routes were evaluated using all applicable land use and environmental criteria considered by the Commission. Impacts were evaluated by Halff for each identified primary alternative route. Additional forward progressing alternative routes may also be formed by configuring the various segments proposed in this Application in different ways.

Specific discussion regarding selection of the study area, identification of constraints, the selection of potential preliminary alternative route segments, and the alternative route analysis is set forth in the EA in Sections 2.0, 3.0, 4.0, and 5.0.

Selection of the alternative route the applicant believes best addresses the requirements of PURA and P.U.C. Substantive Rules

CPS Energy identified Route 27 as the alternative route that they believe best addresses the requirements of PURA and the PUC Substantive Rules. CPS Energy's identification of Route 27 is informed by a number of considerations (listed below in no particular order), including that Route 27:

- Is tied for the fewest number of habitable structures
- Is the 13th cheapest route of 31 routes
- Is the 12th shortest route of 31 routes
- Parallels compatible corridors for 55 percent of its distance

Apart from identifying Route 27 as the route that best addresses PURA and PUC Substantive Rules for the purposes of completing this portion of the Application, CPS Energy did not rank the other alternative routes.

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 16 TAC § 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.

CPS Energy held an open house meeting for the Proposed Project on February 13, 2025, from 6:00 p.m. to 8:00 p.m. at Ladera Elementary School at 14750 West Grosenbacher Road in San Antonio, Texas 78245. A summary of the open house meeting and additional information concerning the open house meeting is contained in Section 6.0 and Appendix B of the EA, which is Attachment No. 1 to this Application.

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).

A one inch = 800 feet map is included as Figure 3-1 in Appendix C of the EA, which is Attachment No. 1 to this Application. The base map includes sufficient cultural and natural features to identify the location of all routes in the field. Figure 3-1 delineates the study area, routing constraints, and all routes and route links considered in the selection of routes.

This map also depicts the approximate location of electronic installations (such as radio transmitters), airstrips, irrigated pasture or cropland, parks and recreational areas, historical sites, and environmentally sensitive areas, if any. For the protection of archeological sites, these sites are not mapped on Figure 3-1. Figure 3-1 also identifies existing transmission facilities in the area of the Proposed Project, including taps, ties, meter points, or other utility facilities, as applicable.

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 3-1 in Appendix C of the EA, depicts on an aerial photograph, as applicable: (1) the location of each link that is used in the alternative routes filed in this Application, with each link identified; (2) the locations of all major public roads, including all federal and state roadways; (3) the locations of all know habitable structures on properties directly affected by any link used in the alternative routes, if any; (4) the boundaries (approximate or estimated according to best available county tax information) of all properties directly affected by any link used in an alternative route.

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.

Attachment No. 4 to this Application identifies the location of each habitable structure and directly affected property identified on Figure 3-1 in Appendix C of the EA; the cross-reference table is found in Attachment No. 6 and includes corresponding landowner names and addresses.

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.

Upon approval of this Application by the Commission, the following permits/approvals would be required and obtained prior to the commencement of construction:

- Permits and approvals for crossing state-maintained roads and highways will be obtained by CPS Energy from the Texas Department of Transportation as necessary.

- Where the transmission line crosses a state-owned riverbed or navigable stream, CPS Energy will obtain a Miscellaneous Easement (ME) from the General Land Office (GLO) as necessary.

- Floodplain development permits may be required by Bexar County, depending on the location of transmission line structures. Coordination with the local floodplain administrator will be completed as necessary.

- A Storm Water Pollution Prevention Plan (SWPPP) may be required by the Texas Commission on Environmental Quality (TCEQ). As necessary, a Notice of Intent (NOI) will be prepared by CPS Energy and submitted to the TCEQ. The controls specified in the SWPPP will be monitored in the field.

- CPS Energy will obtain clearance as necessary from the Texas Historical Commission (THC) regarding requirements concerning historic and prehistoric cultural resources, prior to initiating any ground disturbance.

- CPS Energy will coordinate with Texas Parks & Wildlife Department (TPWD) as necessary to determine the need for any surveys, and to avoid or minimize any potential adverse impacts to sensitive habitats, threatened or endangered species, and other fish and wildlife resources along the route.

- Permits or other requirements associated with possible impacts to waters of the U.S. under the jurisdiction of the U.S. Army Corps of Engineers (USACE) will be coordinated with the USACE as necessary.

- Permits or other requirements associated with possible impacts to species or potential habitats protected under the Endangered Species Act (ESA) will be coordinated with the U.S. Fish and Wildlife Service (USFWS) as necessary.

- After alignments and structure locations/heights are designed and engineered, CPS Energy will make a final determination of the need for Federal Aviation Administration (FAA) notification, based on structure locations and designs. Requirements to alter the design of the structures or potential requirements to mark and/or illuminate the line will be coordinated with the FAA as needed by CPS Energy.

- CPS Energy will report the status of the Proposed Project to the Commission on their Monthly Construction Progress Reports, beginning with the first report

following the filing of this Application, and in each subsequent monthly progress report until construction is completed and actual project costs have been reported. As required by the Commission, CPS Energy will submit locational and attribute data for the new facilities along the approved route after it is constructed.

- ROW permits will be obtained from Bexar County, as needed.
- CPS Energy will provide a notice of the filing of the Application to the U.S. Department of Defense (DoD) Military Aviation and Installation Assurance Siting Clearinghouse when the Application is filed with the PUC.

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.

The locations of habitable structures within 300 feet of the centerline of each route segment are listed and described with the approximate distance from the route segment centerline in Table 4-3 (Appendix D) of the EA and are shown on Figure 3-1 (Appendix C) of the EA. The total number of habitable structures for the proposed routes is shown on Table 4-1 (Appendix D), and range from a low of 36 for Routes 25, 26, and 27 to a high of 230 for Route 17.

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 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.

There are no amplitude modulation radio (AM radio) transmitters within 10,000 feet of the study area. There are four frequency modulation radio (FM radio) transmitter/microwave

tower/other electronic installations identified within the study area. There are two additional FM radio transmitters/microwave towers/other electronic installations within 2,000 feet of the study area boundary. For each primary alternative route, the number of electronic installations (including commercial FM transmitters, microwave relay stations, and other similar electronic installations) within 2,000 feet of the route centerline are shown in Table 4-1 (Appendix D) of the EA. General descriptions of the electronic installations and their distances from the centerlines of the routes are provided in Section 4.2.4 and in Table 4-4 (Appendix D) of the EA and are shown on Figure 3-1 (Appendix C) of the EA.

As noted, no commercial AM radio transmitters were identified within 10,000 feet of the ROW centerline for any of the primary alternative routes. The number of FM radio transmitters, microwave towers, and other electronic communication facilities located within 2,000 feet of each of the primary alternative route ROW centerlines ranges from three each for 24 of the primary alternative routes, while the remaining seven primary alternative routes (2, 3, 4, 15, 16, 17, and 29) have four.

For additional information on electronic installations, see Section 3.2.4 and Section 4.2.4 of the EA. The Proposed Project is not anticipated to have any significant impacts on existing communication towers.

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.

Halff's review determined that no public-use or military FAA registered airports were identified within the study area; however, an Alert Area and Military Operations Area bisects the southeastern portion of the study area. No airports were identified within 20,000

feet of the study area boundary. Although pre-existing landing areas (PELAs) for air ambulance services may exist in the study area, no public-use heliports or heliports with an instrument approach procedure are listed for the study area in the Chart Supplement for the South Central US. In addition, Halff also reviewed the FAA database, USGS topographic maps, recent aerial photography, and conducted field reconnaissance surveys from publicly accessible areas to identify private-use airstrips and private-use heliports not subject to notification requirements listed in 14 CFR Part 77.9. There were no private-use airstrips and no private-use heliports identified within the study area.

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

Based on Halff's review, none of the primary alternative routes cross lands with known mobile irrigation systems (rolling or pivot type).

25. Notice:

Notice is to be provided in accordance with 16 TAC § 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 copy of the written notice, with attachments, mailed to owners of directly affected land is included as Attachment No. 5 to this Application. A list of the names and addresses of those owners of directly affected land to whom notice was mailed by first-class mail is included as Attachment No. 6 to this Application. Landowners of record and their mailing addresses were determined by review of information obtained from the Bexar County Appraisal District.

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

A copy of the written notice sent to utilities that are located within five miles of the routes is included as Attachment No. 7 to this Application. The names and addresses of whom the written notices were sent are included in Attachment No. 8 to this Application.

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/.

A copy of the written notice sent to county and municipal authorities, including the Department of Defense Siting Clearinghouse (or, as it is currently known, the Military Aviation and Installation Assurance Siting Clearinghouse) (the "Clearinghouse") is included as Attachment No. 7 to this Application. The names and addresses of county and municipal authorities and the Clearinghouse to whom the written notices were sent are included in Attachment No. 8 to this Application. The Texas Office of Public Utility Counsel will be hand delivered a notice of the Application in accordance with the provisions of 16 TAC § 22.74(b).

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.

A copy of the public notice that will be published in the *San Antonio Express News,* a newspaper with general circulation in Bexar County, is included as Attachment No. 9 to this Application. Publisher's affidavits and tear sheets will be filed with the Commission showing proof of notice in accordance with the procedural schedule established in this proceeding.

For a CREZ application, in addition to the requirements of 16 TAC § 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.

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.

Halff's review of federal, state, and local websites and maps, as well as a reconnaissance surveys, found twelve parks/recreation areas, ten community pools, four dog parks, three golf courses, one community garden, one shooting range, and two trail areas within the study area. There are no TPWD parks or public hunting units located within the study area. A review of the National Park Service (NPS) website did not indicate any national parks, national historic trails, national historic sites, national monuments, national memorials or national battlefields within the study area. The length across and number of parks or recreational areas within 1,000 feet for each of the primary alternative routes is presented in Table 4-1 (Appendix D) of the EA. General descriptions of the parks or recreational areas and their distances from the closest route centerline are provided in Section 4.3 and in Table 4-5 (Appendix D) of the EA and are shown on Figure 3-1 (Appendix C) of the EA.

For additional information on park and recreation areas, see Section 3.3 and Section 4.3 of the EA. The Proposed Project is not anticipated to have any significant impacts on the use of parks and recreation areas.

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.

Halff's review of THC, NPS, and Texas Department of Transportation (TxDOT) data, as described in Section 3.5 of the EA, indicated that there are 25 archeological sites recorded within 1,000 feet of the 31 primary alternative route centerlines. There are no National Registry of Historic Places (NRHP) listed resources, cemeteries, Official Texas Historical Markers (OTHM), or State Antiquities Landmarks (SAL) within this same vicinity (see Table 4-1 in Appendix D). The distance of each recorded site located within 1,000 feet of the primary alternative route centerlines were measured using Geographic Information Systems (GIS) software and aerial photography interpretation. The cultural resources recorded within 1,000 feet of each primary alternative route centerline and the closest distance from those segments are documented in Table 4-6 (Appendix D) and summarized in Section 4.5.3 of the EA.

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 TAC §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 TAC §19.2(a)(21). Using the designations in 31 TAC §501.3(b), identify the type(s) of Coastal Natural Resource Area(s) impacted by any part of the route and/or facilities.

Title 31, section 27.1(a) of the Texas Administrative Code is the updated reference for the coastal program management boundary definition; however, no part of any primary alternative route is located within the Coastal Management Program boundary, as defined in 31 TAC § 27.1(a).

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 applicant shall file an affidavit confirming that the letter of transmittal and studies/assessments were sent to TPWD.

CPS Energy will deliver a copy of the EA to TPWD on the date the Application is filed. A copy of the letter of transmittal of the EA to TPWD is provided as Attachment No. 10.

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.

A sworn affidavit of the Manager, S&T Regulatory Support for CPS Energy is included with this Application as Attachment No. 11.