# JOINT APPLICATION OF THE CITY OF SAN ANTONIO, ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY), AND AEP TEXAS INC. (AEP TEXAS) TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR THE PROPOSED PAWNEE TO TANGO 345 KV TRANSMISSION LINE REBUILD IN KARNES AND BEE COUNTIES

## DOCKET NO. 58253

***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**

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

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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:**
**For Joint applications, provide all information for each applicant.**

| | |
|---|---|
| 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.<br>San Antonio, TX 78215 |
| Mailing Address: | 500 McCullough Ave.<br>San Antonio, TX 78215 |
| Applicant (Utility) Name: | AEP Texas Inc. (AEP Texas) |
| Certificate Number: | 30028[1] |
| Street Address: | 539 North Carancahua<br>Corpus Christi, TX 78401 |
| Mailing Address: | 539 North Carancahua<br>Corpus Christi, TX 78401 |

**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 and AEP Texas hold separate ownership interests in the Pawnee to Tango 345 kV Transmission Line Project. Both entities are subject to the jurisdiction of the Public Utility Commission of Texas (Commission). No entity not subject to the jurisdiction of the Commission will hold an ownership or investment interest in the project.

[1] Certificate Number 30028 was assigned to AEP Texas Central Company, which is now AEP Texas Inc.

**3. Person to Contact:**
**For joint applications, provide all information for each applicant.**

| | |
|---|---|
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| | |
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**4. Project Description:**
**Name or Designation of Project**

Pawnee to Tango 345 kV Transmission Line Rebuild Project in Karnes and Bee Counties, 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 rebuild the existing Pawnee to Tango 345 kV single-circuit transmission line in Karnes and Bee Counties as a double-circuit transmission line. The existing 345-kV transmission line is not capable of having a second circuit added. This rebuild is to provide necessary power transfer capability to address current loading issues and projected increased loading issues that ERCOT has determined will occur in the future. CPS Energy and AEP Texas propose to replace approximately 12 miles of existing transmission line infrastructure between the South Texas Electric Cooperative (STEC) Pawnee Station and the AEP Texas Tango Station. This is part of a larger project that will also require the replacement of the existing transmission line between the CPS Energy J.K. Spruce Station and the STEC Pawnee Station with an upgraded increased capacity transmission line. The portion of the replacement project between the Spruce Station and the Pawnee Station is the subject of a separate application by CPS Energy. Although STEC owns the Pawnee Station, the transmission facilities between the Spruce Station and the Pawnee Station are owned by CPS Energy, and the transmission facilities between the Pawnee Station and the Tango Station are owned jointly by CPS Energy and AEP Texas. The new and existing circuits on the replacement structures are currently anticipated to be located primarily within the CPS Energy and AEP Texas right-of-way for the existing circuit. Because the Proposed Project includes the addition of a second circuit to an existing transmission line and the upgrade of existing facilities, only one single route is proposed, which follows the path of the existing transmission line. The addition of the second circuit is necessary due to historical and studied high loading concerns of the existing Pawnee to Tango 345 kV transmission line, new generation resources in South Texas, and planned retirement of generation in San Antonio. The Electric Reliability Council of Texas (ERCOT) Board of Directors endorsed the project as critical to the reliability of the ERCOT system on April 23, 2024.

The Proposed Project will be constructed, owned, and operated by CPS Energy and AEP Texas outside the municipal boundaries of the City of San Antonio.

The Proposed Project is primarily intended to be constructed on double circuit monopole structures.

Please see Figure 1-1 in the *Pawnee to Tango 345 kV Transmission Line Rebuild Project Environmental Assessment and Route Analysis in Karnes and Bee Counties, 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 and AEP Texas will jointly own the Proposed Project, with approximately 90 percent owned by CPS Energy and 10 percent owned by AEP Texas. CPS Energy will construct, own, operate, and maintain the northern 90 percent of the transmission line connecting from the Pawnee Station and AEP Texas will construct, own, operate, and maintain the southern 10 percent of the transmission line connecting to AEP Texas' Tango Station (including all necessary construction within the Tango Station).

The ownership change point of the Proposed Project is the dead-end structure located 120 feet north of County Rd 121 at or near Latitude 28°35'32.04"N, Longitude 97°57'30.54"W. The ownership change point structure will be owned by AEP Texas and is consistent with the current ownership change point between the CPS Energy and AEP Texas facilities on the currently existing transmission line.

CPS Energy will own, operate, and maintain all transmission line facilities, including conductors, wires, structures, hardware, and easements of the northern 90 percent of the transmission line connecting to the Pawnee Station. AEP Texas will own, operate, and maintain all transmission line facilities, including conductors, wires, structures, hardware, and easements on the southern 10 percent of the transmission line connecting to the Tango Station. Each utility will be responsible for their respective portions of the Proposed Project, including design, right-of-way (ROW) acquisition, material procurement, construction, etc.

STEC will add new line terminals utilizing three new breakers and associated isolation devices into the breaker and a half arrangement at the Pawnee Station to accommodate the new circuit for the Proposed Project. STEC will connect the new line terminal to the last CPS Energy owned transmission structure outside (south) of the Pawnee substation. The northern ownership change point of the Proposed Project is the dead-end structure at or near Latitude 28°44'16.65"N, Longitude 98°1'7.58"W. The ownership change point structure will be owned by CPS Energy and is consistent with the current ownership change point between the CPS Energy and STEC facilities on the currently existing transmission line.

**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:** | 1272 ACSS/TW with 2-OPGW "Pheasant" |
| **Number of conductors per phase:** | Two conductors per phase |
| **Continuous Summer Static Current Rating (A):** | 3,928 A |
| **Continuous Summer Static Line Capacity at Operating Voltage (MVA):** | 2,347 MVA |
| **Continuous Summer Static Line Capacity at Design Voltage (MVA):** | 2,347 MVA |
| **Type and Composition of Structures:** | CPS Energy and AEP Texas propose to use 345 kV double-circuit steel monopole structures for typical tangent, angle, and dead-end structures. For some angles and dead-ends, more than one pole structure may be utilized. |
| **Height of Typical Structures:** | The estimated heights of typical structures proposed for the Proposed Project range from 175 to 195 feet above ground. |
| **Estimated Maximum Height of Structures:** | 195 feet above the 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 and AEP Texas engineers selected double-circuit steel monopoles as the typical structure type for the Proposed Project. Steel monopoles generally require a smaller footprint and are typically the most favored structure type by landowners. For further discussion of the proposed typical structures and their requirements, please refer to Section 1.3 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.**

CPS Energy and AEP Texas will each use similar types of structures (double-circuit steel monopoles as discussed above) for their respective portions of the Proposed Project.

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

Approximately 12 miles of existing ROW will be utilized for the Proposed Project.

**Miles of Circuit:**

The Proposed Project will upgrade the existing single-circuit transmission line to a double-circuit configuration. Upon completion, there will be approximately 24 miles of circuit miles in total, doubling the circuit mileage from the current 12 miles to 24 miles.

**Width of Right-of-Way:**

The ROW width for the existing circuit is approximately 125 feet for the length of the line. CPS Energy and AEP Texas propose to construct the Proposed Project within the existing ROW. Although not anticipated, additional permanent ROW may be necessary in certain areas. Temporary ROW may also be necessary during construction.

**Percent of Right-of-Way Acquired:**

As stated above, CPS Energy and AEP Texas anticipate building the Proposed Project within the existing ROW. Thus, Joint Applicants currently estimate that they have 100 percent of the necessary ROW for operation of the Proposed Project. Although not anticipated, further evaluation during the survey, design, and construction phase of the Proposed Project may determine the need for limited additional ROW.

**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.**

As discussed previously, CPS Energy and AEP Texas will each construct, own, operate, and maintain a portion of the Proposed Project, with CPS Energy owning 90 percent and AEP Texas owning 10 percent.

**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 proposed transmission line will add a second 345 kV connection between the existing STEC Pawnee Station, located approximately one mile northwest of Farm-to Market (FM) 882, to the existing AEP Texas Tango Station, located approximately 0.2 mile northeast of FM 673. The Proposed Project will be constructed and operated in Karnes and Bee Counties, outside of the municipal boundaries of any city.

Land uses within the study area include agricultural, transportation/utility features, oil and gas production and transport, solar and wind production, and communication towers.

The study area is oriented in a northwest to southeast direction with the existing Pawnee Substation located in the northern portion of the study area and the existing Tango Substation located in the southern portion of the study area. The study area is shown in Figure 2-1 of the EA.

Specific discussion regarding natural, human, and cultural resources in the study area is set forth in the EA, Section 3.0, pages 3-1 through 3-52.

**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.**

There are no existing HVDC converter facilities associated with the Proposed Project. The stations associated with the Proposed Project are the existing STEC Pawnee Station and the existing AEP Texas Tango Station, which are the stations that the Proposed Project is connecting with a second circuit.

New facilities required at the STEC Pawnee Station:

The northern terminal point of the Proposed Project is the Pawnee Station, which is wholly owned by STEC. STEC will add new line terminals into the breaker and a half arrangement at the Pawnee Station to minimize outage times required for the equipment replacements.

New facilities required at the AEP Texas Tango Station:

The southern terminal point of the Proposed Project is the Tango Station, which is wholly owned by AEP Texas. The Tango Station will include a new station bay which will include necessary switches, breaker, voltage and current transformers for operations and line protection, expansion of switch house to include relay and monitoring equipment, and new cabling and conduit trays necessary for the new breakers to accommodate the additional circuit for the Proposed Project.

**8. Estimated Schedule:**

| **Estimated Dates of:** | **Start** | **Completion** |
|---|---|---|
| Right-of-way and Land Acquisition | Not Anticipated | Not Anticipated |
| Engineering and Design | November 2024 | November 2025 |
| Material and Equipment Procurement | April 2025 | June 2026 |
| Construction of Facilities | December 2025[2] | December 2026 |
| Energize Facilities | N/A | December 2026 |

**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 Karnes and Bee Counties, Texas.

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

The rebuild route presented in this Application is not located within the municipal boundaries of any municipality.

[2] Work will begin on the existing single circuit Pawnee to Tango 345 kV transmission line prior to December 2025. However, work associated with this CCN application will not begin until approval by the Commission, currently anticipated in December 2025.

**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 Nos. 44 and 59. Authority for AEP Texas to provide transmission service is contained in, among other dockets, Docket No. 44.

**11. Affected Utilities:**

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

CPS Energy, STEC, and AEP Texas are the only electric utilities directly served by or connected to the facilities involved in this Application. No adverse impacts to any other utility are anticipated as a result of the Proposed Project.

**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 as presented in this Application other than CPS Energy and AEP Texas. As addressed previously, STEC will be responsible for adding facilities at the existing Pawnee Station to facilitate the interconnection of the second proposed circuit. STEC's facilities at the Pawnee Station are not part of this Application.

**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.

As in previous projects, AEP Texas will utilize short-term borrowings and owner equity.

**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.**

Please refer to Attachment No. 2 to this Application for estimated costs for the Proposed Project.

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

Please refer to Attachment No. 2 to this Application for estimated costs for the Proposed Project, separately identified for each Applicant.

**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 address historical and forecasted high loading concerns of the existing Pawnee to Tango single circuit 345 kV transmission line and to provide an additional pathway in ERCOT for the transmission of new renewable generation in South Texas. The ERCOT Board of Directors endorsed the project as critical to the reliability of the ERCOT system on April 23, 2024. By separate correspondence to CPS Energy and AEP Texas on March 13, 2025, ERCOT requested acceleration of construction of the Proposed Project to address imminent needs on the ERCOT system.

**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 September 2023, Brazos Electric Cooperative (BEC) submitted the San Miguel to Marion 345 kV Project to the ERCOT Regional Planning Group (RPG). BEC proposed that project to address thermal planning criteria violations they observed in the San Antonio area. ERCOT performed an Independent Review and did not confirm the original project need as submitted by BEC. However, ERCOT did confirm a need for a project in the region under N-1 conditions and designated the project as the San Antonio South Reliability II Project. Please refer to Attachment No. 3a (ERCOT Board Agenda – April 23, 2024). ERCOT evaluated 15 different transmission project options in its Independent Review. Please refer to pages 6-52 of Attachment No. 3a. ERCOT recommended Option 14 as the preferred solution because it addresses the thermal violation with no reliability issues, requires the least additional mileage of CCN and ROW, has the lowest cost, and has the highest combined load-serving capability among all options evaluated. Option 14 consists of the following:

- Rebuild the existing Spruce to Pawnee 345 kV single circuit into a 345 kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 45.8 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service; **(This is the subject of a separate application)**

- Rebuild the existing Pawnee to Tango 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 12.2 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service; **(This is the subject of this application)** and

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

- Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
- Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
- Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
- Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
- Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

On April 23, 2024, the ERCOT Board of Directors (Board) considered the Proposed Project. Please refer to Attachment No. 3a, which is the ERCOT Board notes concerning the Proposed Project. The ERCOT Board voted unanimously to approve the recommendation of ERCOT staff, which was to endorse the need for the Tier 1 CPS Energy – San Antonio South Reliability II Project in order to meet the reliability requirements of the ERCOT system. Please refer to Attachment Nos. 3b and 3c, which are the ERCOT Board meeting minutes from April 23, 2024, and ERCOT endorsement letter for the Proposed Project.

The ERCOT Board additionally designated the Proposed Project as critical to the reliability of the ERCOT system pursuant to Commission Substantive Rule 25.101(b)(3)(D) (16 TAC § 25.101(b)(3)(D)). Please refer to Attachment No. 3b. By letter dated March 13, 2025, ERCOT requested CPS Energy and AEP Texas to accelerate construction of the Proposed Project to ensure that the second circuit is in-service by December 2026. Please refer to Attachment No. 3d. This Application reflects the accelerated timeline requested by ERCOT.

**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 initially evaluated 15 system improvement options to address the thermal overloads that were observed in the study base case in the San Antonio Area. Of the 15 options studied, only options 3, 6, 7, 8, 9, 10, 13, 14, and 15 resolved the thermal overload of the 345-kV Pawnee to Spruce transmission line (primary project need driver). The options considered by ERCOT are identified below.

Option 1 consists of the following:

- Rebuild the existing San Miguel to Elm Creek 345-kV double circuit transmission line with a normal and emergency rating of at least 2,620 MVA per circuit; and
- Rebuild the existing Elm Creek to Marion 345-kV double circuit transmission line with a normal and emergency rating of at least 2,620 MVA per circuit.

Option 2 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
  - o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
  - o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
  - o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
  - o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
  - o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and

- Construct a new Elm Creek to Lytton Springs 345-kV double circuit transmission line.

Option 3 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

  o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and

- Construct a new Elm Creek to Lytton Springs 345-kV double circuit transmission line.

Option 4 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and
- Construct a new Elm Creek to John Dumas 345-kV double circuit transmission line.

Option 5 consists of the following:

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

  o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

Option 6 consists of the following:

- Construct a new Tango to Marion 345-kV double circuit transmission line.

Option 7 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

  o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line;
- Construct a new Elm Creek to Lytton Springs 345-kV double circuit transmission line; and
- Add a second Wilsco to Pawnee 345-kV circuit.

Option 8 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

  o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line;

- Construct a new Elm Creek to John Dumas 345-kV double circuit transmission line; and

- Add a second Wilsco to Pawnee 345-kV circuit.

Option 9 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and
- Construct a new Coleto Creek to Shaula and Shaula to John Dumas 345-kV double circuit transmission line.

Option 10 consists of the following:

- Construct a new Tango to Marion 345-kV double circuit transmission line; and
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

  o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

Option 11 consists of the following:

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station

o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

- Construct a new Beck Rd to Elm Creek 345-kV double circuit transmission line; and

- Construct a new Coleto Creek to Shaula 345-kV double circuit transmission line.

Option 12 consists of the following:

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

  o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

- Construct a new Coleto Creek to Shaula 345-kV double circuit transmission line; and

- Construct a new Shaula to Holman 345-kV double circuit transmission line.

Option 13 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

  o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and

- Construct a new Coleto Creek to John Dumas 345-kV double circuit transmission line.

Option 14 consists of the following:

- Rebuild the existing Spruce to Pawnee 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit, this transmission line will require approximately 45.8 miles of expanded Right of Way (ROW), which will be used to build one of the new circuits while the original circuit is left in service;

- Rebuild the existing Pawnee to Tango 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit, this transmission line will require approximately 12.2 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service; and

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

  o Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

  o Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

  o Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and

  o Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

Option 15 consists of the following:

- Rebuild the existing Spruce to Pawnee 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit, this transmission line will require approximately 45.8 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service.

ERCOT staff performed an N-1 reliability analysis on all 15 initial options and then created a short-list of options that addressed the primary project need and did not create new N-1 violations. ERCOT then performed X-1 + N-1 and G-1 + N-1 reliability analyses to further evaluate the short-listed options. Based on the results of these analyses, a modified short-list of options was selected for further evaluation.

All 15 initial options were evaluated and no N-1 reliability criteria violations were identified for options 3, 7, 8, 10, 14, and 15, as shown in Table 5.1 of Attachment 3a. There were no X-1 + N-1 or G-1 + N-1 violations for options 7, 8, 10, and 14, as shown in Table

5.2 of Attachment 3a. Those options formed the final short-list. The table below summarizes the cost estimates, mileage of certificate of convenience and necessity (CCN) required, and feasibility of the three short-listed options.

| Option | Cost Estimates ($M) | CCN Required (Miles) | Feasibility |
|---|---|---|---|
| Option 7 | 631 | 103.2 | Feasible |
| Option 8 | 570 | 89.4 | Feasible |
| Option 10 | 492 | 87 | Feasible |
| Option 14 | 435 | 58 | Feasible |

| | Option 7 | Option 8 | Option 10 | Option 14 |
|---|---|---|---|---|
| Meets ERCOT and NERC Reliability Criteria | Yes | Yes | Yes | Yes |
| Improves Long-Term Load Serving Capability | Yes | Yes | Yes (Better) | Yes (Better) |
| Improves Operational Flexibility | Yes | Yes | Yes | Yes (Marginally) |
| Additional transfer circuits from southern Texas | 2 | 2 | 2 | 1 |
| Requires CCN (Miles) | Yes (~103.2) | Yes (~89.4) | Yes (~87.0) | Yes (~58.0) |
| Project Feasibility | Yes | Yes | Yes | Yes |
| Cost Estimate* ($M) | ~631 | ~570 | ~492 | ~435 |

ERCOT staff ultimately recommended Option 14 as the preferred option to address the reliability need in the San Antonio area based on the following considerations:

- Option 14 is the least expensive option
- Option 14 provides the best combined long-term load-serving capability
- Option 14 requires the least mileage of CCN and ROW

See Attachment No. 3a. The ERCOT Board unanimously approved Option 14, which includes the Proposed Project, to address the identified critical ERCOT system needs. See Attachment Nos. 3b and 3c.

**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 1.1 (page 12) of Attachment No. 3a. The previously approved, but not yet constructed, San Antonio South Reliability I Project with future San Miguel to Howard Rd 345 kV double-circuit transmission line is included in this figure.

**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 and AEP Texas retained POWER Engineers, Inc. (POWER) 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.

To assist POWER in its evaluation, CPS Energy and AEP Texas 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**

POWER, with input and assistance from CPS Energy and AEP Texas, delineated the study area within which to review the existing environment and encompass the existing 345 kV transmission line for the Proposed Project. The boundaries of the study area were determined by the existing project endpoints (the location of the existing STEC Pawnee Station and the location of the existing AEP Texas Tango Station), other existing ROW

(e.g., roadways and existing transmission lines), and existing cultural and land use features across the study area. The study area, shown in Figure 2-1 of the EA, is approximately 12 miles long by 1,600 feet wide, and encompasses an area of approximately 3.8 square miles.

**Route Constraints**

Once the study area was defined, data related to land use, aesthetics, ecology, and cultural resources were collected by POWER 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**

Because this project involves a rebuild of an existing line to add an additional circuit, there are no alternative route segments identified; rather, only the segments associated with the existing transmission line are identified.

Specific discussion regarding selection of the study area, identification of constraints, and discussion of the 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**

Because this project involves a rebuild of an existing line to add an additional circuit, there are no alternative routes identified; rather, only the route associated with the existing transmission line is identified.

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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 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 and AEP Texas held an open house meeting for the Proposed Project on February 26, 2025, from 5:00 p.m. to 7:00 p.m. at the Bee County Exposition Center, 214 FM 351, Beeville, Texas 78102. 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).**

**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.**

**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.**

Base Maps

EA Figure 4-1 (Appendix C), titled *Project Route with Environmental and Land Use Constraints* (Topographic Base Map), produced at a scale of 1 inch = 1,500 feet, is provided in Appendix C (map pocket) in the EA. This map was produced using a U.S. Geological Survey (USGS) topographic base. It depicts the study area for the Proposed Project, locations of existing utilities, radio transmitters and other electronic installations, airports/airstrips, cemeteries, hydraulic features, administrative boundaries, and other constraints. Figure 4-1 also includes the Project Route identified for the Proposed Project. For their protection, locations of archeological sites are not shown on Figure 4-1.

EA Figure 4-2 (Appendix D), titled *Habitable Structures and Other Land Use Features in the Vicinity of the Project Route* (Aerial Base Map), consists of aerial photography

produced at a scale of 1 inch = 1,500 feet using recent aerial imagery (2022). The aerial photo-based map includes parcel boundaries identified from a review of the tax appraisal district records and combined, as appropriate, to reflect instances where multiple parcels are owned by a single individual or group in the study area. The locations of all known habitable structures within 500 feet of the centerline of the Proposed Route are also identified on Figure 4-2.

Figures 4-1 and 4-2 include sufficient cultural and natural features to permit the location of the Project Route in the field, and they depict existing electric transmission lines and major public roads located within the study area.

A map showing the study area and the Project Route in a format similar to EA Figure 4-2 was presented at the public open house meeting.

Directly Affected Property Maps

Attachment No. 5 to this Application includes 14 maps (utilizing aerial photography) that identify directly affected properties, tract IDs, and the location of habitable structures (including labels) within at least 500 feet of the centerline of the route included in this Application and approximate parcel boundary lines (based on tax appraisal district records). These maps show the locations of all major public roads. Attachment No. 4 to this Application is an overview map showing the entire study area and the location of each of the 14 individual maps included in Attachment No. 5.

Attachment No. 7 to this Application is a list of directly affected landowners that were provided notice of the Application that cross-references each habitable structure, or group of habitable structures, and directly affected properties identified on the maps provided in Attachment No. 5 with a list of tract IDs and corresponding landowner names and addresses. Landowner names and addresses were obtained by review of information obtained from the Karnes and Bee County appraisal districts.

**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 and AEP Texas from the Texas Department of Transportation as necessary.

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

- Floodplain development permits may be required by Karnes and Bee Counties, 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 AEP Texas and submitted to the TCEQ. The controls specified in the SWPPP will be monitored in the field.

- CPS Energy and AEP Texas 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 and AEP Texas 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 and AEP Texas 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 and AEP Texas 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 and AEP Texas will submit locational and attribute data for the new facilities along the approved route after it is constructed.

- ROW permits will be obtained from Karnes and Bee County as needed, as well as any other necessary governmental body.

- CPS Energy and AEP Texas will provide a notice of the filing of the Application to the 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 500 feet of the centerline of the Project Route are listed and described with the approximate distance from the route centerline in Table 4-5 of the EA and are shown on Figure 4-2 (Appendix D) of the EA. The total number of habitable structures for the Project Route is four.

**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 known commercial AM radio transmitters located within 10,000 feet of the Project Route. There are two known communication towers (FM radio transmitters, microwave towers, or other electronic communications towers) that are located within

2,000 feet of the Project Route. A listing, description, and approximate distance from the centerline of the Project Route are presented in Tables 4-3 and 4-5 of the EA and the locations of these electronic installations are shown in Figures 4-1 (Appendix C) and 4-2 (Appendix D) of the EA.

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.**

POWER's review of federal and state aviation/airport maps and directories, aerial photo interpretation and reconnaissance surveys, as well as information received from the TxDOT Division of Aviation, identified no known FAA registered public or military airports with a runway longer than 3,200 feet within 20,000 feet of the Project Route, and no FAA registered public or military airports with runways shorter than 3,200 feet, within 10,000 feet of the Project Route. One private airstrip, the San Christoval Ranch Airstrip, was identified within 10,000 feet of the centerline of the Project Route. No known private heliports were identified within 5,000 feet of the centerline of the Project Route. The Proposed Project is not anticipated to have any significant impacts on existing airstrips or heliports.

Each airport/airstrip/heliport is listed and described with the approximate distance from the centerline of the Project Route in Table 4-5 of the EA. These facilities are shown on Figures 4-1 (Appendix C) and 4-2 (Appendix D) of the EA.

For additional information on airports/airstrips, see Section 3.2.3 and Section 4.2.3 of the EA. No significant impacts to these airports/airstrips/heliports are anticipated from construction of the Proposed Project. Following approval of the route by the Commission, CPS Energy and AEP Texas will make a final determination of the need for FAA notification, respectively, based on specific route location and structure design. The result of this notification, and any subsequent coordination with FAA, could include changes in the line design and/or potential requirements to mark and/or light the structures.

**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 POWER's review of aerial photography and field reconnaissance, the Project Route for the Proposed Project does not cross known cropland or pastureland irrigated by traveling irrigation systems, either 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. 6 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. 7 to this Application. Landowners of record and their mailing addresses were determined by review of information obtained from the Karnes and Bee County appraisal districts.

**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 Project Route is included as Attachment No. 8 to this Application. The names and addresses of whom the written notices were sent are included in Attachment No. 9 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. 8 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. 9 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 Karnes Countywide* and *Beeville Bee-Picayune*, newspapers with general circulation in Karnes and Bee counties respectively, is included as Attachment No. 10 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.**

POWER reviewed USGS topographic maps, TxDOT county highway maps, recent aerial photography, and field reconnaissance to identify parks and recreation areas within the study area. Based on this review, POWER identified no known park or recreation areas crossed by any portion of the Project Route.

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.**

POWER conducted a literature review and records search at the Texas Historical Commission and The Texas Archeological Research Laboratory at the University of Texas at Austin to identify known historical and archeological sites located within 1,000 feet of the centerline of the Project Route. For more information regarding site descriptions and the evaluation of the historical and archeological sites located within the study area, see Section 3.5 and Section 4.5 of the EA.

Based on POWER's review, there are no known recorded archeological sites located within the ROW of the Project Route. Three archeological sites and one cemetery are located within 1,000 feet of the centerline of the Project Route. The sites are listed and described, along with their approximate distances from the centerline, in Tables 4-4 and 4-5 of the EA. For the protection of these sites, their locations are not shown on Figure 4-2. The description of the sites is included in Section 4.5.3 of the EA. The Proposed Project is not anticipated to have any significant impacts on the archeological sites identified within 1,000 feet of the Project Route.

**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.**

The EA describes the natural resources, cultural resources, land uses, and other sensitive areas that may occur within the study area. The EA also describes how the Proposed Project may impact such resources. Specifically, the EA includes data obtained from TPWD, including the Texas Natural Diversity Database (TXNDD) and a list of Ecologically Significant Stream Segments (ESSS) in the study area.

CPS Energy and AEP Texas 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. 11.

**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 and a sworn affidavit of the Transmission Project Coordinator for AEP Texas are included with this Application as Attachment No. 12.

# Attachment 1

# Attachment 2

## CPS Energy/AEP Texas CCN Application
## 6/10/2025
## Estimated Costs for Transmission Line and Substation Facilities

**Table 1: Transmission and Substation Facilities Total Estimated Costs**

| Route | Sub Sites | Estimated Total Cost | ROW & Land Acquisition | Engineering & Design (Utility) | Engineering & Design (Contract) | Procurement of Material & Equipment | Construction of Facilities (Utility) | Construction of Facilities (Contract) | Other |
|---|---|---|---|---|---|---|---|---|---|
| Existing | Pawnee to Tango | **$86,382,000** | $0 | $649,000 | $2,606,000 | $43,190,000 | $10,000 | $39,927,000 | $0 |

**Table 2: CPS Energy Transmission and Substation Facilities Estimated Costs**

| Route | Transmission | Estimated Total Cost | ROW & Land Acquisition | **Engineering & Design (Utility) | **Engineering & Design (Contract) | **Procurement of Material & Equipment | Construction of Facilities (Utility) | **Construction of Facilities (Contract) | Other |
|---|---|---|---|---|---|---|---|---|---|
| Existing | CPS Energy | **$70,597,000** | $0 | $243,800 | $2,328,750 | $38,964,300 | $0 | $29,059,350 | $0 |

**Estimated Costs include a 15% Contingency for unknown project costs not evident at the time these estimates were created.

**Table 3: AEP Transmission and Substation Facilities Estimated Costs**

| Route | Transmission | Estimated Total Cost | ROW & Land Acquisition | **Engineering & Design (Utility) | **Engineering & Design (Contract) | **Procurement of Material & Equipment | Construction of Facilities (Utility) | **Construction of Facilities (Contract) | Other |
|---|---|---|---|---|---|---|---|---|---|
| Existing | AEP Texas | **$15,783,050** | $0 | $404,642 | $276,257 | $4,224,943 | $10,000 | $10,867,208 | $0.00 |

**Estimated Costs include a 15% Contingency for unknown project costs not evident at the time these estimates were created.

# Attachments
# 3a - 3d

**Date:** April 16, 2024
**To:** Board of Directors
**From:** Bob Flexon, Reliability and Markets (R&M) Committee Chair
**Subject:** San Antonio South Reliability II Regional Planning Group (RPG) Project

## Issue for the ERCOT Board of Directors

**ERCOT Board of Directors Meeting Date:** April 23, 2024
**Item No.:** 10.1

**Issue:**
Whether the Board of Directors (Board) of Electric Reliability Council of Texas, Inc. (ERCOT) should accept the recommendation of ERCOT staff to: (1) endorse the need for the Tier 1 San Antonio South Reliability II Regional Planning Group (RPG) Project (Option 14) in order to meet the reliability requirements for the ERCOT System and address thermal overloads in the San Antonio area, located in Guadalupe, Wilson, and Atascosa Counties in the South and South-Central Weather Zones, which ERCOT staff has independently reviewed and which the Technical Advisory Committee (TAC) has voted unanimously to endorse, and (2) designate the San Antonio South Reliability II RPG Project as critical to the reliability of the ERCOT System pursuant to Public Utility Commission of Texas (PUCT) Substantive Rule 25.101(b)(3)(D).

**Background/History:**
Brazos Electric Cooperative (BEC) proposed the San Miguel to Marion 345-kV Project in September 2023. Protocol Section 3.11.4.7, Processing of Tier 1 Projects, requires ERCOT to independently review submitted projects. ERCOT's independent review did not confirm the original project need as submitted by BEC but did confirm a separate need for a project under NERC and ERCOT Planning Criteria to address thermal overloads on 45.8-miles of 345-kV transmission lines and 13.4 miles of 138-kV transmission lines in San Antonio area, located in Guadalupe, Wilson, and Atascosa Counties in the South and South-Central Weather Zones. ERCOT redesignated the project as the San Antonio South Reliability II Project, a $435 million, Tier 1 project with the expected in-service dates from 2028 to 2029, to meet reliability planning criteria with the following ERCOT System improvements:

- Rebuild the existing Spruce to Pawnee 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 45.8 miles of expanded Right of Way (ROW) with an estimated in-service date of December 2028;
- Rebuild the existing Pawnee to Tango 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit, this transmission line will require approximately 12.2 miles of expanded ROW with an estimated in-service date of May 2029;

- The Spruce to Pawnee 345-kV rebuild and the Pawnee to Tango 345-kV rebuild will be done without the need for extended outages.
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA with an estimated in-service date of June 2028, and will be interconnected as follows:
  - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
  - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
  - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
  - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
  - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

For construction to meet the June 2028, December 2028 and May 2029 in-service dates, the San Antonio South Reliability II requires Public Utility Commission of Texas (PUCT, Commission) approval of a Certificate of Convenience and Necessity, following Board designation of the project as critical to the reliability of the ERCOT System, which per PUCT Substantive Rule 25.101(b)(3)(D) authorizes Commission consideration on an expedited basis of 180-days from the date of filing for projects deemed critical to reliability. The reliability needs for project completion as soon as possible and the need to limit the duration of any necessary Constraint Management Plans (CMPs) render the project critical to reliability.

Of fifteen options ERCOT analyzed during independent review of the San Antonio South Reliability II Project, ERCOT preferred Option 14 as it addressed the reliability violations, is the least cost solution, improves long-term load serving capability, improves operational flexibility and provides an additional transfer circuit from Southern Texas into the San Antonio area. ERCOT's independent review identified a reliability need for the San Antonio South Reliability II Project to satisfy ERCOT Planning Guide Section 4.1.1.2(1)(a) and 4.1.1.2(1)(c), Reliability Performance Criteria, contingencies are the loss of generating unit followed by a single transmission element and loss of a common tower, respectively.

RPG considered project overviews during meetings in November 2023 and April 2024. Between November 2023 and March 2024, ERCOT staff presented scope and status updates at RPG meetings in November, January, February, and March. Pursuant to paragraph (2) of Protocol Section 3.11.4.9, Regional Planning Group Acceptance and ERCOT Endorsement, ERCOT presented the Tier 1 project to the Technical Advisory Committee (TAC) for review and comment, and on April 15, 2024, TAC unanimously endorsed the project as recommended by ERCOT. Pursuant to paragraph (1)(a) of

Protocol Section 3.11.4.3, Categorization of Proposed Transmission Projects, projects with an estimated capital cost of $100 million or greater are Tier 1 projects, for which Protocol Section 3.11.4.7(2) requires endorsement by the Board. Pursuant to Section 3.11.4.9, ERCOT's endorsement of a Tier 1 project is obtained upon affirmative vote of the Board. Section IV(B)(2)(a) of the R&M Committee Charter requires the R&M Committee to review and make a recommendation to the Board regarding any Tier 1 project.

ERCOT's assessment of the Sub-Synchronous Resonance (SSR) of BEC's existing facilities in the Guadalupe, Wilson, and Atascosa Counties in the South and South-Central Weather Zones, conducted pursuant to Protocol Section 3.22.1.3, Transmission Project Assessment, yielded no adverse SSR impacts to the existing and planned generation resources at the time of the study. Results of the congestion analysis ERCOT conducted pursuant to Planning Guide Section 3.1.3, Project Evaluation, indicate no additional congestion in the area with the addition of Option 14.

The project completion date may change depending on material acquisition, outage coordination, and construction. The cost estimate accounts for the expectation that some construction activities will occur in an energized transmission line corridor. TSP cooperation with ERCOT could be necessary to develop and implement CMPs based on summer 2028 operational conditions.

The report describing the ERCOT Independent Review of the San Antonio South Reliability II Project, including ERCOT staff's recommendation for Option 14, is attached as ***Attachment A***.

**Key Factors Influencing Issue:**

1. ERCOT System improvements are needed to meet reliability planning criteria for the Guadalupe, Wilson, and Atascosa Counties in the South and South-Central Weather Zones.
2. ERCOT staff found the recommended set of improvements to be the most efficient solution for meeting the planning reliability criteria and addressing thermal overloads.
3. Protocol Section 3.11.4.7 requires Board endorsement of a Tier 1 project, which is a project with an estimated capital cost of $100 million or greater pursuant to Protocol Section 3.11.4.3(1)(a).
4. TAC voted unanimously to endorse the Tier 1 San Antonio South Reliability II Regional Planning Group Project (Option 14), as recommended by ERCOT, on April 15, 2024.
5. Since there is reliability need to have the project in place as soon as possible, ERCOT staff has deemed this project critical to reliability.

**Conclusion/Recommendation:**
ERCOT staff recommends, and the R&M Committee is expected to recommend, that the Board: (1) endorse the need for the Tier 1 San Antonio South Reliability II RPG Project (Option 14), which ERCOT staff has independently reviewed and which TAC has voted unanimously to endorse based on ERCOT reliability planning criteria, and (2) designate the San Antonio South Reliability II Project (Option 14) as critical to the reliability of the ERCOT System pursuant to PUCT Substantive Rule 25.101(b)(3)(D).

ercot

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.**
**BOARD OF DIRECTORS RESOLUTION**

WHEREAS, pursuant to Section 3.11.4.3(1)(a) of the Electric Reliability Council of Texas, Inc. (ERCOT) Protocols, projects with an estimated capital cost of $100 million or greater are Tier 1 projects, for which Section 3.11.4.7 requires endorsement by the ERCOT Board of Directors (Board); and

WHEREAS, after due consideration of the alternatives, the Board deems it desirable and in the best interest of ERCOT to accept ERCOT staff's and the and Reliability and Markets (R&M) Committee's recommendations to (1) endorse the need for the Tier 1 San Antonio South Reliability II Regional Planning Group Project (Option 14), which ERCOT staff has independently reviewed and which the Technical Advisory Committee (TAC) has voted to endorse based ERCOT reliability planning criteria, and (2) designate the San Antonio South Reliability II Regional Planning Group Project (Option 14) as critical to the reliability of the ERCOT System pursuant to Public Utility Commission of Texas (PUCT) Substantive Rule 25.101(b)(3)(D);

THEREFORE, BE IT RESOLVED, that the Board hereby (1) endorses the need for the Tier 1 San Antonio South Reliability II Regional Planning Group Project (Option 14), which ERCOT staff has independently reviewed and which TAC has voted to endorse based on ERCOT reliability planning criteria, and (2) designates the San Antonio South Reliability II Regional Planning Group Project (Option 14) as critical to the reliability of the ERCOT System pursuant to PUCT Substantive Rule 25.101(b)(3)(D), as recommended by ERCOT staff and the R&M Committee.

**CORPORATE SECRETARY'S CERTIFICATE**

I, Jonathan M. Levine, Assistant Corporate Secretary of ERCOT, do hereby certify that, at its April 23, 2024 meeting, the Board passed a motion approving the above Resolution by _____.

IN WITNESS WHEREOF, I have hereunto set my hand this ___ day of April, 2024.

_____
Jonathan M. Levine
Assistant Corporate Secretary

# ERCOT Independent Review of the San Antonio South Reliability II Project

# Document Revisions

| Date | Version | Description | Author(s) |
|---|---|---|---|
| 04/09/2024 | 1.0 | Final Draft | Caleb Holland |
| | | Reviewed by | Robert Golen, Prabhu Gnanam |

# Executive Summary

Brazos Electric Cooperative (BEC) submitted the San Miguel to Marion 345-kV Project to the Regional Planning Group (RPG) in October 2023. BEC proposed this project to address thermal planning criteria violations they observed in the San Antonio area, located in Guadalupe, Wilson, and Atascosa Counties in the South and South-Central (SSC) Weather Zones.

The project was submitted to address NERC TPL-001-5.1 reliability criteria thermal violations. This BEC-proposed project was classified as a Tier 1 project pursuant to ERCOT Protocol Section 3.11.4.3, with an estimated cost of approximately $258.5 million. A Certificate of Convenience and Necessity (CCN) was not required for the BEC-proposed solution. The expected in-service date (ISD) of the project as submitted was December 2027.

ERCOT performed an Independent Review and did not confirm the original project need as submitted by BEC. However, ERCOT did confirm a need for a project in the region under N-1 conditions and now designates the project as the San Antonio South Reliability II Project.

Among the 15 different transmission project options evaluated in the Independent Review, ERCOT recommends Option 14 to address the thermal overload based on the study results described in Section 5 of this report. Option 14 consists of the following:

- Rebuild the existing Spruce to Pawnee 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 45.8 miles of expanded Right of Way (ROW), which will be used to build one of the new circuits while the original circuit is left in service;
- Rebuild the existing Pawnee to Tango 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 12.2 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service; and
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

The cost estimate for this Tier 1 project is approximately $435 million. A CCN will be required for the construction of the new double circuit 345-kV line from Spruce Substation to Tango Substation due to approximately 58 miles of expanded ROW. The Spruce to Pawnee 345-kV rebuild and the Pawnee to Tango 345-kV rebuild will be done without the need for extended outages. The expected ISD for the Spruce to Pawnee portion of this project is December 2028. The expected ISD for the Eastside Station portion of this project is June 2028. The expected ISD for the Pawnee to Tango portion of this project is May 2029.

ERCOT designates this project as critical to reliability of the ERCOT system based on historic line loading reflected in the recent high congestion costs, new renewable generation development, and local CPS generation reaching technical and potential end of life.

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# 1 Introduction

In October 2023, Brazos Electric Cooperative (BEC) submitted the Brazos San Miguel to Marion 345-KV Project to the Regional Planning Group (RPG) to address NERC TPL-001-5.1 reliability criteria thermal violations. This proposed project was located in the South and South-Central (SSC) Weather Zones in Guadalupe, Wilson, and Atascosa Counties.

This BEC-proposed project was classified as a Tier 1 project pursuant to ERCOT Protocol Section 3.11.4.3, with an estimated cost of approximately $258.5 million. A Certificate of Convenience and Necessity (CCN) was not required for the BEC-proposed solution. ERCOT conducted an Independent Review of this project to identify any reliability needs in the area and evaluate various transmission upgrade options. This report describes the study assumptions, methodology, and results of ERCOT Independent Review of the project.

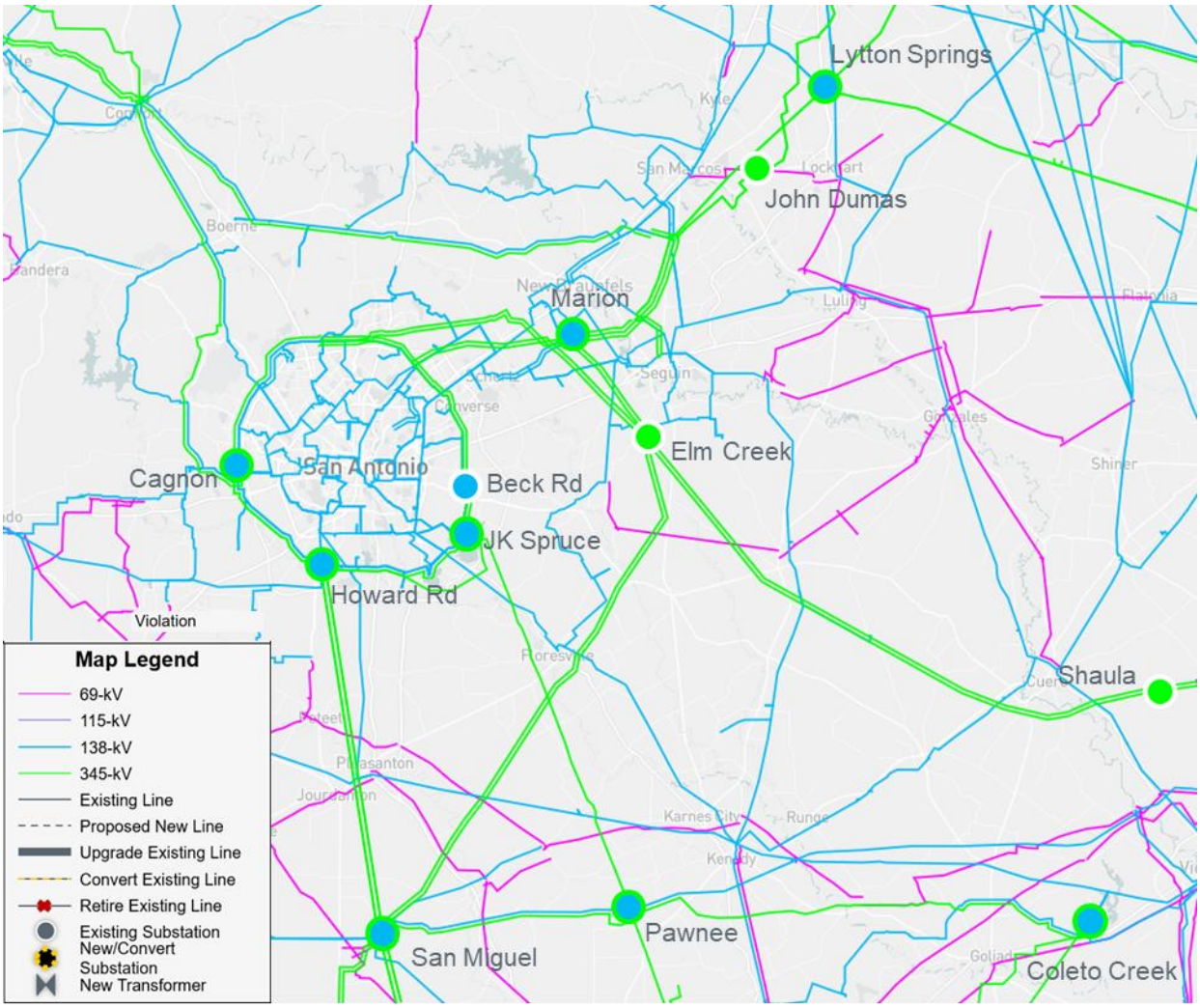


**Figure 1.1: Map of Transmission System in San Antonio Area**

# 2 Study Assumptions and Methodology

ERCOT performed studies under various system conditions to identify any reliability issues and to determine appropriate transmission upgrades, should upgrades be necessary. This section describes the study assumptions and criteria used to conduct the independent study.

## 2.1 Study Assumptions for Reliability Analysis

This project is in the SSC Weather Zones in Guadalupe, Wilson, and Atascosa Counties. Nearby counties that were also studied because they are electrically close include Bexar, Caldwell, Comal, Frio, Gonzales, Hays, Karnes, La Salle, Live Oak, McMullen, and Medina Counties.

### 2.1.1 Steady-State Study Base Case

The Final 2023 Regional Transmission Plan (RTP) cases, published on the Market Information System (MIS) on December 22, 2023, were used as reference cases in this study. Year 2029 Summer was selected for the long-term outlook. The steady-state study base case for SSC Weather Zones was constructed by updating the transmission, generation, and loads of the following 2029 Summer Peak Load case for the SSC Weather Zones:

- Case: 2023RTP_2029_SUM_SSC_12222023[1].

### 2.1.2 Transmission Topology

Transmission projects within the study area with In-Service Dates (ISDs) by December 2027 were added to the study base case. The ERCOT Transmission Project Information and Tracking (TPIT)[2] report posted in October 2023 was used as reference. The added TPIT projects are listed in Table 2.1.

[1] 2023 Regional Transmission Plan Postings: https://mis.ercot.com/secure/data-products/grid/regional-planning?id=PG3-3200-M
[2] TPIT Report: https://www.ercot.com/gridinfo/planning

**Table 2.1: List of Transmission Projects Added to Study Base Case**

| TPIT No | Project Name | Tier | Project ISD | TSP | From County |
|---|---|---|---|---|---|
| 67992 | CPSE_345KV_Howard_Switching_Station,CPSE_Hamilton_to_MedCtr_Upgrade,CPSE_Medina_to_36th_Street_Upgrade | Tier 3 | 26-Jan | CPS | Bexar |
| 71873 | CPSE_Hill Country Auto# 2 Impedance Upgrade | Tier 3 | 25-Jun | CPS | Bexar |
| 71917 | Upgrade STEC Castroville to Pearson to 138kV | Tier 2 | 25-May | STEC | Medina |
| 71935 | STEC_71935_HCCastrovl138 | Tier 2 | 25-Feb | STEC | Medina |
| 72882 | LCRA TSC_Lockhart_Luling_69kV_TL_Overhaul | Tier 4 | 25-Jun | LCRA TSC | Caldwell |
| 73050 | LCRA TSC_JohnDumas_Substation_Addition | Tier 4 | 25-Feb | LCRA TSC | Caldwell |
| 73053 | Wimberley Loop to New Substation | Tier 2 | 27-May | PEC | Hays |
| 73417 | LCRA TSC_Schumansville_SheriffsPosse_StormHardening | Tier 4 | 25-May | LCRA TSC | Guadalupe |
| 73793 | LCRA TSC_McCartyLaneEast_Zorn_TL_Storm_Hardening | Tier 4 | 25-May | LCRA TSC | Hays |
| 73838 | LCRA TSC_Redwood_SanMarcos_TL_Upgrade | Tier 4 | 25-May | LCRA TSC | Hays |
| 75682 | Add Branch between Libra and Elm Creek | Tier 4 | 23-Nov | CPS | Wilson |
| 76790 | Upgrade Pearsall Auto | Tier 4 | 27-May | STEC | Frio |
| 73025 | CPSE_NEW_SHAULA | Tier 4 | 24-Nov | CPS | Dewitt |

Transmission projects listed in Table 2.2, identified in the 2023 RTP as placeholders within the study area, were removed from the study base case.

**Table 2.2: List of Transmission Projects Removed from Study Base Case**

| RTP Project ID | Project Name | TSP | County |
|---|---|---|---|
| 2023-SC5 | Beck Road 345/138-kV Substation Expansion | CPS | Bexar |
| 2023-SC19 | South to Central Texas 345-kV Double-Circuit Line Additions | AEN, AEPSC, LCRA, ONCOR | San Patricio, Bee, Karnes, Wilson, Guadalupe, Comal, Hays, Travis, Williamson |
| 2023-SC10 | Wiseman 138-kV Substation Addition and CPS Multiple Cap Bank Additions | CPS | Bexar, Comal |

### 2.1.3 Generation

Based on the September 2023 Generator Interconnection Status (GIS)[3] report posted on the ERCOT website on October 2, 2023, generators in the study area that met Planning Guide Section 6.9(1)

[3] GIS Report: https://www.ercot.com/misapp/GetReports.do?reportTypeId=15933

conditions with a Commercial Operations Date (COD) prior to December 31, 2027 were added to the study base case if not already present in the case. These generation additions are listed in Table 2.3. All new generation dispatches were consistent with the 2023 RTP methodology.

**Table 2.3: List of Generation Added to Study Base Case Based on September 2023 GIS Report**

| GINR | Project Name | Fuel | Project COD | Capacity (MW) | County |
|---|---|---|---|---|---|
| 22INR0366 | BRP Libra BESS | OTH | 01/26/2024 | 206.2 | Guadalupe |
| 22INR0368 | Padua Grid BESS | OTH | 12/01/2024 | 51.4 | Bexar |
| 22INR0422 | Ferdinand Grid BESS | OTH | 05/31/2026 | 202.7 | Bexar |
| 23INR0027 | Cachena Solar SLF | SOL | 12/31/2025 | 600.0 | Wilson |
| 23INR0154 | Ebony Energy Storage | OTH | 04/01/2024 | 203.5 | Comal |
| 23INR0381 | Soportar ESS | OTH | 03/15/2025 | 102.1 | Bexar |
| 24INR0427 | CPS AvR CT1 Rotor Replacement | GAS | 01/30/2024 | 11.3 | Bexar |
| 25INR0223 | Uhland Maxwell | GAS | 04/15/2025 | 181.1 | Caldwell |
| 22INR0251 | Shaula I Solar | SOL | 10/30/2025 | 205.2 | DeWitt |
| 22INR0267 | Shaula II Solar | SOL | 05/30/2026 | 205.2 | DeWitt |

The status of each unit that was projected to be either indefinitely mothballed or retired at the time of the study were reviewed. The units listed in Table 2.4 were opened (turned off) in the study base case to reflect their mothballed/retired status.

**Table 2.4: List of Generation Opened to Reflect Mothballed/Retired/Forced Outage Status**

| Bus No | Unit Name | Capacity (MW) | Weather Zone |
|---|---|---|---|
| 110941 | SL_SL_G1 | 65.0 | Coast |
| 110942 | SL_SL_G2 | 65.0 | Coast |
| 110943 | SL_SL_G3 | 30.0 | Coast |
| 110944 | SL_SL_G4 | 30.0 | Coast |
| 130121 | SGMTN_SIGNALM2 | 6.6 | Far West |

### 2.1.4 Loads

Loads both inside and outside of the SSC study Weather Zones were consistent with the 2023 RTP.

## 2.2 Long-Term Load-Serving Capability Assessment

ERCOT performed long-term load-serving capability assessments to compare the performance of the study options.

Scenario 1 assessed the capability to serve load in the San Antonio Area, and Scenario 2 assessed the same in a high Southern wind export condition. In Scenario 1, ERCOT increased load at substations within the San Antonio area and decreased conforming load outside of the SSC Weather Zones to balance power. In Scenario 2, ERCOT increased load at substations within the study area and increased the Southern wind import to balance power.

## 2.3 Maintenance Outage Scenario

ERCOT developed an off-peak maintenance season scenario to further evaluate the study options. The load level in the South Weather Zone was reduced to 90.1% of its summer peak load level and the load level in the South-Central Weather Zone was reduced to 83.6% of its summer peak load level in the study base case. This scaling is meant to reflect assumed off-peak season loads based on ERCOT load forecast for future years as well as historical load in the SSC Weather Zones.

## 2.4 Study Assumptions for Congestion Analysis

Congestion analysis was conducted to identify any new congestion in the study area with the addition of the preferred transmission upgrade option.

The 2023 RTP 2028 economic case was updated based on the January 2024 GIS[4] report and the October 2023 TPIT[5] for generation and transmission updates. The 2028 study year was selected based on the proposed ISD of the project.

New generation additions listed in Table A.1 in Appendix A were added to the economic base case. Transmission projects listed in Table A.2 in Appendix A were also added to the economic base case. All generation listed in Table 2.4 were opened in the study base case to reflect their mothballed/retired status.

## 2.5 Methodology

This section lists the Contingencies and Criteria used for project review along with the tools used to perform each of the various analyses.

### 2.5.1 Contingencies and Criteria

The reliability assessments were performed based on NERC Reliability Standard TPL-001-5.1, ERCOT Protocols, and ERCOT Planning Criteria.[6]

Contingencies[7] were updated based on the changes made to the topology as described in Section 2.1 of this document. The following steady-state contingencies were simulated for the study region:

- P0 (System Intact)
- P1, P2-1, P7 (N-1 conditions);
- P2-2, P2-3, P4, and P5 (Extra High Voltage (EHV) only);
- P3-1: G-1 + N-1 (G-1: generation outages) {Guadalupe Gen Units Gas 1, Gas 2, and Steam 5, San Miguel Unit 1, and Spruce Unit 2}; and
- P6-2: X-1 + N-1 (X-1: 345/138-kV transformers only) {Hill Country circuit 1, Marion circuit 1, San Miguel circuit 1, and Skyline circuit 1}.

[4] GIS Report: https://www.ercot.com/mp/data-products/data-product-details?id=PG7-200-ER
[5] TPIT Report: https://www.ercot.com/gridinfo/planning
[6] ERCOT Planning Criteria: http://www.ercot.com/mktrules/guides/planning/current
[7] Details of each event and contingency category is defined in the NERC reliability standard TPL-001-5.1

All 69-kV and above buses, transmission lines, and transformers in the study region were monitored (excluding generator step-up transformers) and the following thermal and voltage limits were enforced:

- Thermal
  - Rate A (normal rating) for pre-contingency conditions; and
  - Rate B (emergency rating) for post-contingency conditions.
- Voltages
  - Voltages exceeding pre-contingency and post-contingency limits; and
  - Voltage deviations exceeding 8% on non-radial load buses.

### 2.5.2 Study Tool

ERCOT utilized the following software tools to perform this independent study:

- PowerWorld Simulator version 23 for Security Constrained Optimal Power Flow (SCOPF) and steady-state contingency analysis and
- UPLAN version 12.3.0.29978 to perform congestion analysis.

# 3 Project Need

Steady-state reliability analysis was performed in accordance with NERC TPL-001-5.1 and ERCOT Planning Criteria described in Section 2.5.1 of this document. This analysis indicated thermal overload issues under N-1 and G-1 + N-1 contingency conditions in the study area. Under the P7 contingency where the 345-kV Howard Road to San Miguel double circuit transmission line is lost, the 345-kV Pawnee to Spruce transmission line becomes overloaded. These issues are summarized in Table 3.1 and visually illustrated in Figure 3.1.

**Table 3.1: Thermal Overloads Observed in San Antonio Area**

| NERC Contingency Category | Overloaded Element | Voltage Level (kV) | Length (miles) | Loading % |
|---|---|---|---|---|
| P7: N-1 | Spruce (5400) – Pawnee Switching Station (5725) Ckt 1 | 345 | 45.8 | 105 |
| P3: G-1 N-1 | Marion (7178) – Cibolo (7608) Ckt 1 | 138 | 4.8 | 100 |
| P3: G-1 N-1 | Marion (7178) – Cibolo (7608) Ckt 2 | 138 | 4.8 | 100 |
| P3: G-1 N-1 | Castle (5080) – Dresden (5130) Ckt 1 | 138 | 3.8 | 100 |

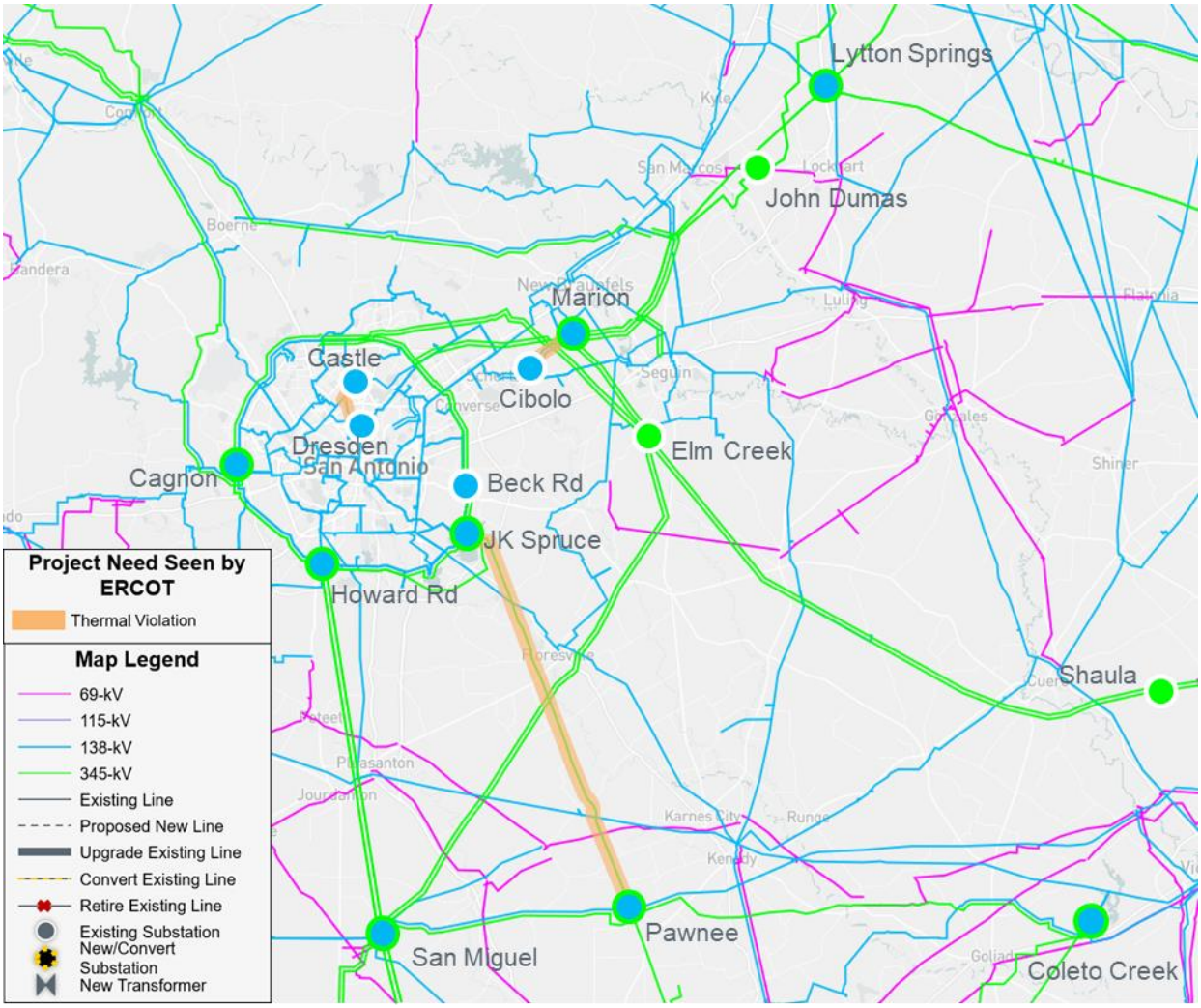


**Figure 3.1: Study Area Map Showing Project Need**

# 4 Description of Project Options

ERCOT initially evaluated 15 system improvement options to address the thermal overloads that were observed in the study base case in the San Antonio Area. Of the 15 options studied, only options 3, 6, 7, 8, 9, 10, 13, 14, and 15 resolved the thermal overload of the 345-kV Pawnee to Spruce transmission line (primary project need driver). Detailed maps of each option are provided in Appendix A.

Option 1 consists of the following:

- Rebuild the existing San Miguel to Elm Creek 345-kV double circuit transmission line with a normal and emergency rating of at least 2,620 MVA per circuit; and

- Rebuild the existing Elm Creek to Marion 345-kV double circuit transmission line with a normal and emergency rating of at least 2,620 MVA per circuit.

Option 2 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and
- Construct a new Elm Creek to Lytton Springs 345-kV double circuit transmission line.

Option 3 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and
- Construct a new Elm Creek to Lytton Springs 345-kV double circuit transmission line.

Option 4 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and
- Construct a new Elm Creek to John Dumas 345-kV double circuit transmission line.

Option 5 consists of the following:

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

Option 6 consists of the following:

- Construct a new Tango to Marion 345-kV double circuit transmission line.

Option 7 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line;
- Construct a new Elm Creek to Lytton Springs 345-kV double circuit transmission line; and
- Add a second Wilsco to Pawnee 345-kV circuit.

Option 8 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line;
- Construct a new Elm Creek to John Dumas 345-kV double circuit transmission line; and
- Add a second Wilsco to Pawnee 345-kV circuit.

Option 9 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and
- Construct a new Coleto Creek to Shaula and Shaula to John Dumas 345-kV double circuit transmission line.

Option 10 consists of the following:

- Construct a new Tango to Marion 345-kV double circuit transmission line; and
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

Option 11 consists of the following:

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;

    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Elm Creek 345-kV double circuit transmission line; and
- Construct a new Coleto Creek to Shaula 345-kV double circuit transmission line.

Option 12 consists of the following:

- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Coleto Creek to Shaula 345-kV double circuit transmission line; and
- Construct a new Shaula to Holman 345-kV double circuit transmission line.

Option 13 consists of the following:

- Construct a new 345-kV station (Wilsco) near the intersection of the San Miguel to Elm Creek 345-kV transmission line and the Spruce to Pawnee 345-kV transmission line;
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.
- Construct a new Beck Rd to Wilsco 345-kV double circuit transmission line; and
- Construct a new Coleto Creek to John Dumas 345-kV double circuit transmission line.

Option 14 consists of the following:

- Rebuild the existing Spruce to Pawnee 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit, this transmission line will require approximately 45.8 miles of expanded Right of Way (ROW), which will be used to build one of the new circuits while the original circuit is left in service;
- Rebuild the existing Pawnee to Tango 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit, this transmission line will require approximately 12.2 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service; and
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
    - Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

Option 15 consists of the following:

- Rebuild the existing Spruce to Pawnee 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit, this transmission line will require approximately 45.8 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service.

# 5 Option Evaluations

ERCOT performed an N-1 reliability analysis on all 15 initial options and then created a short-list of options that addressed the primary project need and did not create new N-1 violations. ERCOT then performed X-1 + N-1 and G-1 + N-1 reliability analyses to further evaluate the short-listed options. Based on the results of these analyses, a modified short-list of options was selected for further evaluation. This section details these studies and their results and compares the short-listed options.

## 5.1 Results of Reliability Analysis

All 15 initial options were evaluated based on the contingencies described in the methodology section of the report, and no N-1 reliability criteria violations were identified for options 3, 7, 8, 10, 14, and 15 as shown in Table 5.1. There were no X-1 + N-1 or G-1 + N-1 violations for options 7, 8, 10, and 14, as shown in Table 5.2. Those options formed the final short-list.

**Table 5.1: Results of Initial N-1 Reliability Assessment of All 15 Options**

| | N-1 | | |
|---|---|---|---|
| Option | Unsolved Power Flow | Thermal Overload | Voltage Violation |
| 1 | None | 1 | None |
| 2 | None | 1 | None |
| 3 | None | None | None |
| 4 | None | 1 | None |
| 5 | None | 1 | None |
| 6 | None | None* | None |
| 7 | None | None | None |
| 8 | None | None | None |
| 9 | None | 1 | None |
| 10 | None | None | None |
| 11 | None | 1 | None |
| 12 | None | 1 | None |
| 13 | None | 2 | None |
| 14 | None | None | None |
| 15 | None | None | None |

*Very high loading observed on lines and transformers

**Table 5.2: Results of Reliability Assessment of Initial Short-Listed Options**

| | N-1 | | | X-1 + N-1 | | G-1 + N-1 | |
|---|---|---|---|---|---|---|---|
| Option | Unsolved Power Flow | Thermal Overload | Voltage Violation | Thermal Overload | Voltage Violation | Thermal Overload | Voltage Violation |
| 3 | None | None | None | None | None | 1 | None |
| 7 | None | None | None | None | None | None | None |
| 8 | None | None | None | None | None | None | None |
| 10 | None | None | None | None | None | None | None |
| 14 | None | None | None | None | None | None | None |
| 15 | None | None | None | 1 | None | None | None |

## 5.2 Short-listed Options

Based on the results shown in Section 5.1, Options 7, 8, 10, and 14 were selected as short-listed options for further evaluations. This section details these studies and their results and compares the short-listed options. These four options are illustrated in Figures 5.1, 5.2, 5.3, and 5.4.

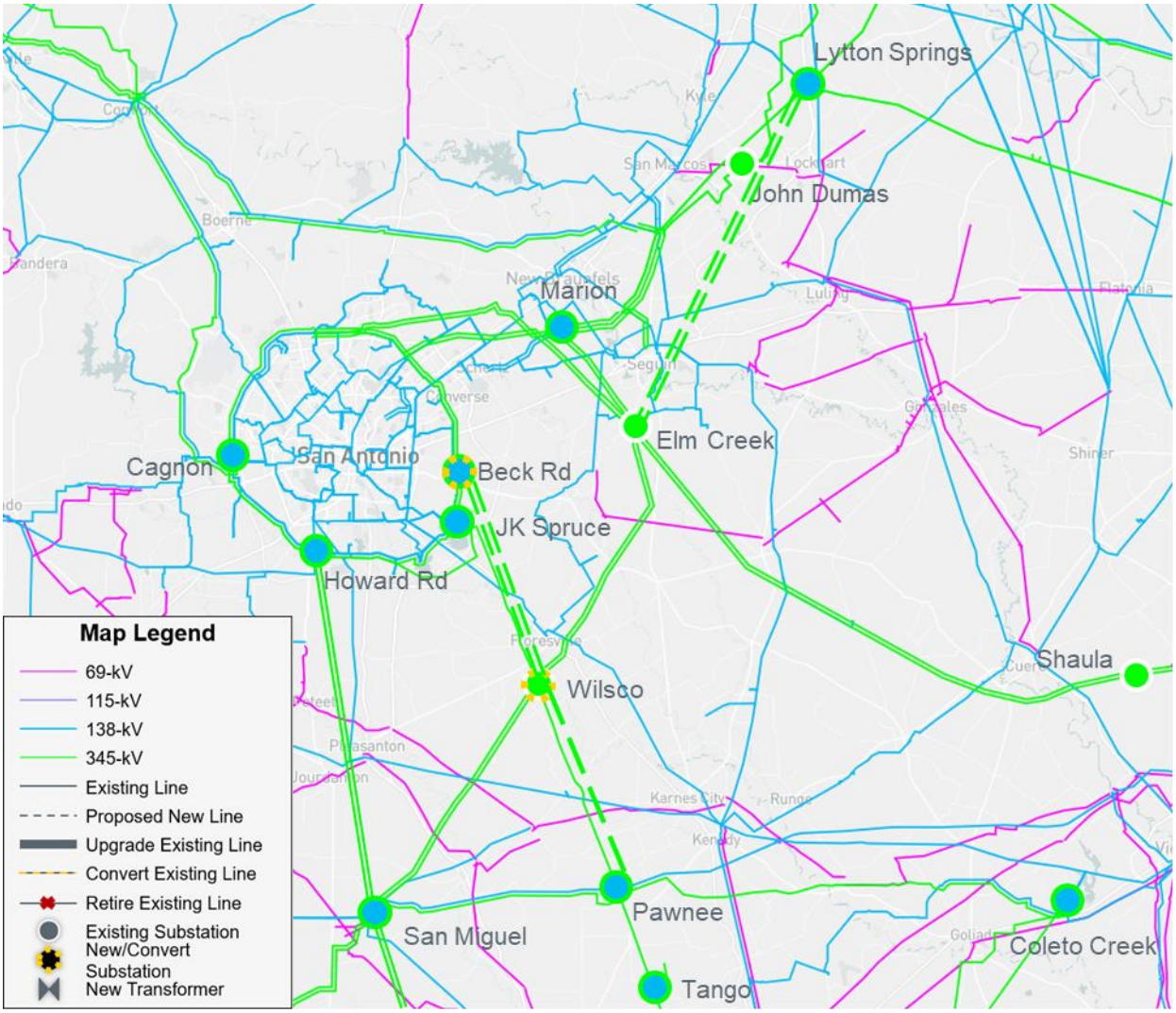


**Figure 5.1: Map of Option 7**

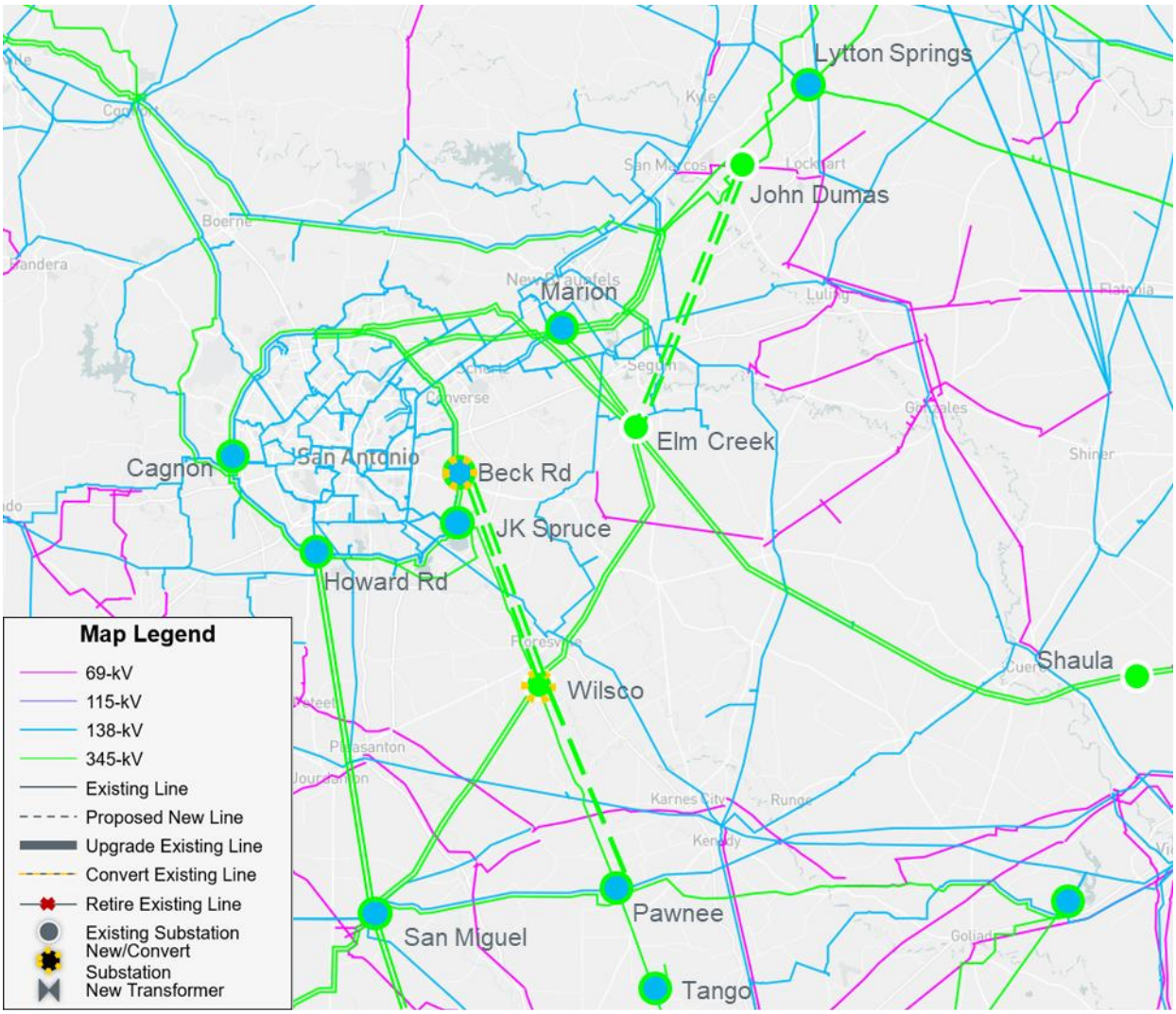


**Figure 5.2: Map of Option 8**

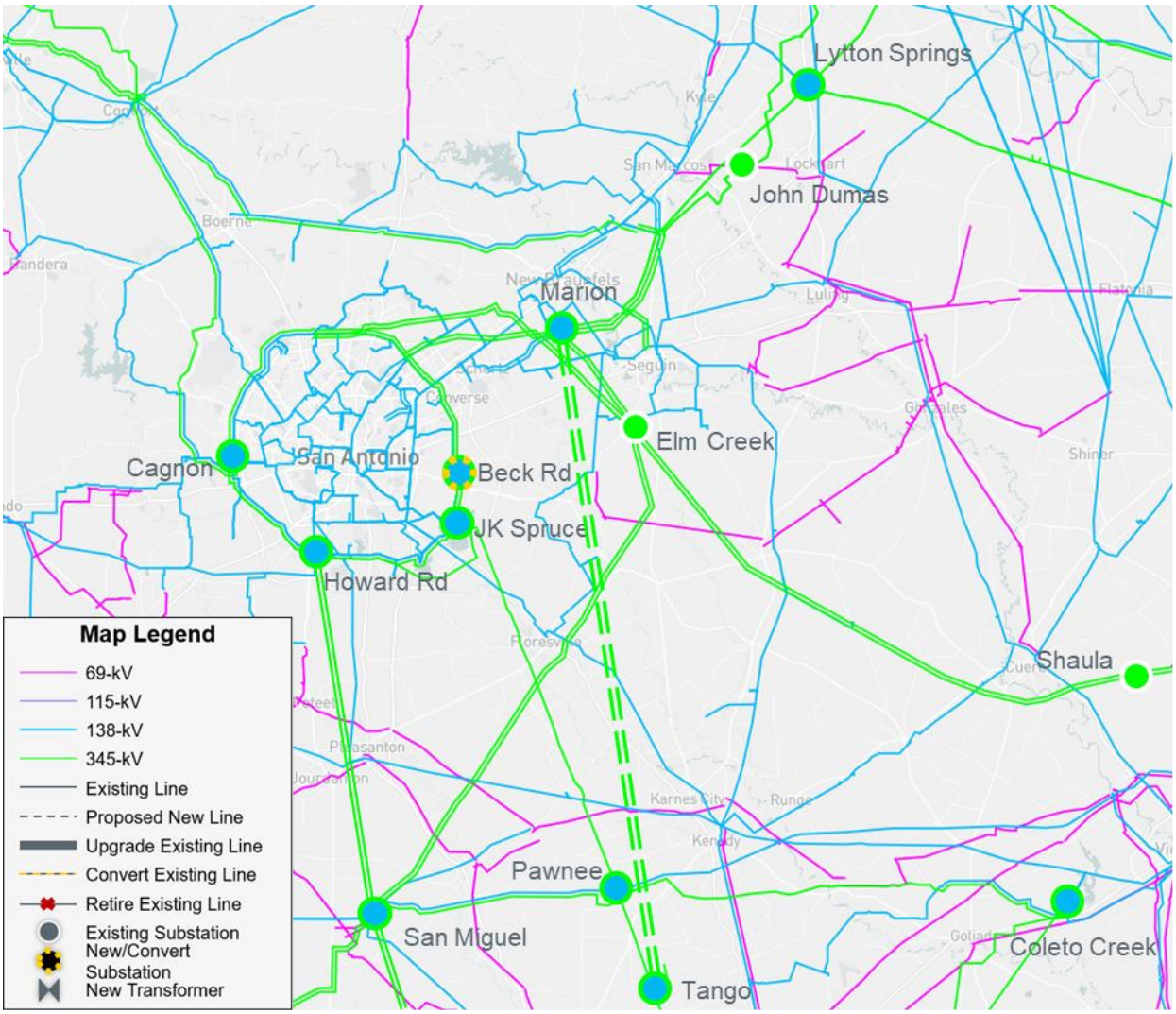


**Figure 5.3: Map of Option 10**

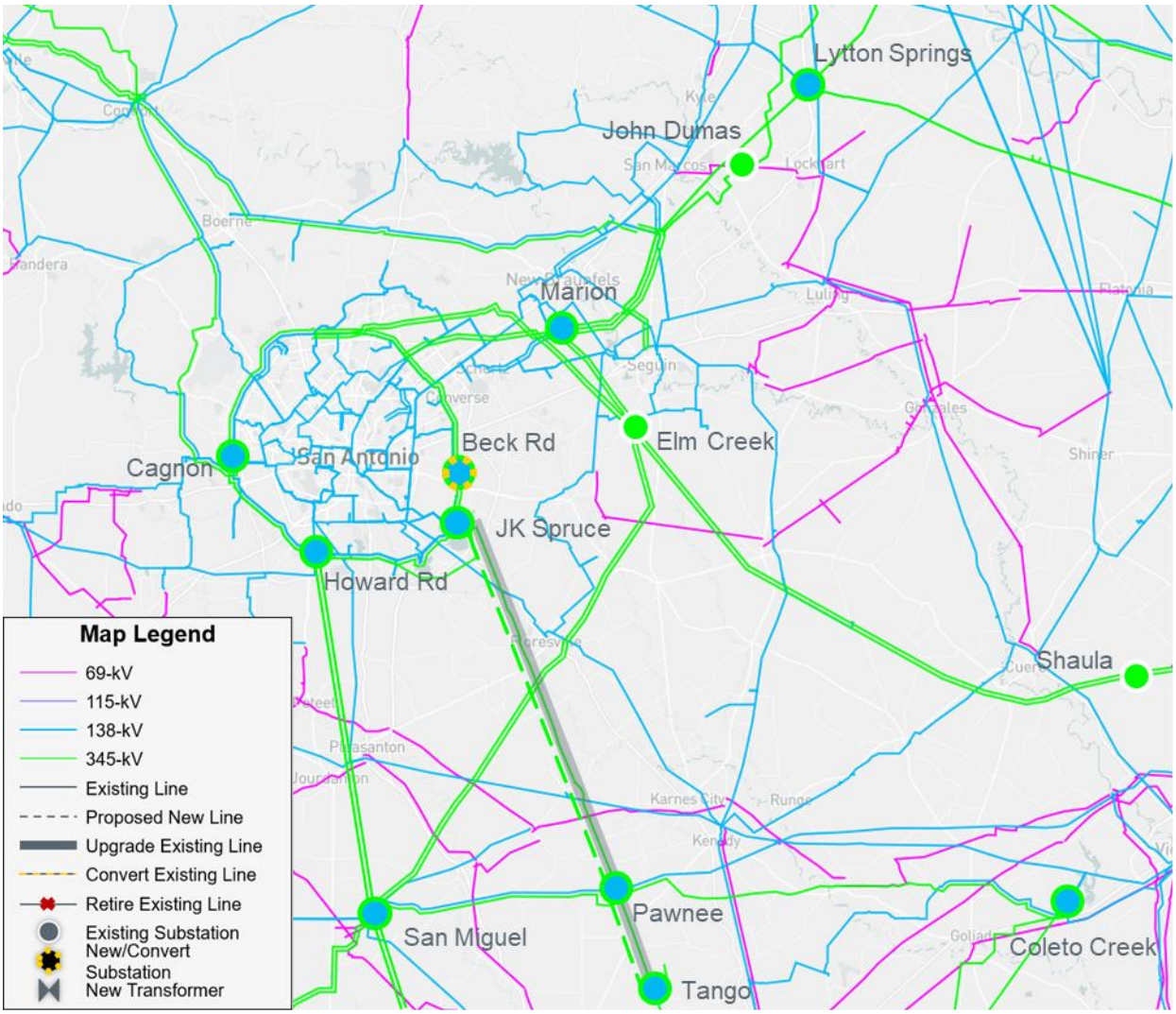


**Figure 5.4: Map of Option 14**

## 5.3 Long-Term Load-Serving Capability Analysis

ERCOT performed a long-term load-serving capability assessment on the short-listed options. Scenario 1 assesses the capability to serve load in the San Antonio Area, and Scenario 2 assess the same in a high Southern wind import condition. In Scenario 1, ERCOT increased load at substations within the San Antonio area and decreased conforming load outside of the SSC Weather Zones to balance power. In Scenario 2, ERCOT increased load at substations within the study area and increased wind generation within the South Weather Zone to balance power. The results of the long-term load-serving capability assessment are shown in Table 5.3.

The results show Option 10 performs best in the general import scenario (Scenario 1), while Option 14 performs best in the Southern wind import.

**Table 5.3: Results of Long-Term Load-Serving Capability Assessment for Short-Listed Options**

| Option | Incremental Load-Serving Capability (MW) | |
|---|---|---|
| | Scenario 1 | Scenario 2 |
| Base case | 151 | 159 |
| 7 | 593 | 670 |
| 8 | 570 | 670 |
| 10 | 663 | 884 |
| 14 | 582 | 1080 |

## 5.4 Planned Maintenance Outage Evaluation

Using the P1, P2.1, and P7 contingencies based on the review of the system topology of the San Antonio area, ERCOT conducted an N-2 contingency analysis for each short-listed option to represent system element outage(s) under planned maintenance condition (N-1-1) in the area. Then, each N-2 violation was run as an N-1-1 contingency scenario, with system adjustments between the contingencies. The transmission elements in the local area of the San Antonio South Reliability II Project were monitored in the maintenance outage evaluation.

As shown in Table 5.4, the results of this maintenance assessment indicate that all options perform satisfactorily under maintenance outage conditions.

**Table 5.4: Results of Planned Maintenance Outage Evaluation for Short-Listed Options**

| Option | Voltage Violations | Thermal Overloads | Unsolved Power Flow |
|---|---|---|---|
| 7 | None | None | None |
| 8 | None | None | None |
| 10 | None | None | None |
| 14 | None | None | None |

## 5.5 Cost Estimate and Feasibility Assessment

AEPSC, BEC, CPS, LCRA TSC, and STEC performed feasibility assessments and provided cost estimates for the four short-listed options. Table 5.5 summarizes the cost estimate, estimated mileage of CCN required, and option feasibility for the four short-listed options.

**Table 5.5: Cost Estimates for Short-Listed Options**

| Option | Cost Estimates (~$M) | CCN Required (~Miles) | Feasible |
|---|---|---|---|
| 7 | 631 | 103.2 | Feasible |
| 8 | 570 | 89.4 | Feasible |
| 10 | 492 | 87 | Feasible |
| 14 | 435 | 58 | Feasible |

# 6 Comparison of Short-listed Options

The comparison of Options 7, 8, 10, and 14 with corresponding cost estimates provided by AEPSC, BEC, CPS, LCRA TSC, and STEC are summarized in Table 6.1.

**Table 6.1: Comparison of Short-Listed Options**

| | Option 7 | Option 8 | Option 10 | Option 14 |
|---|---|---|---|---|
| Meets ERCOT and NERC Reliability Criteria | Yes | Yes | Yes | Yes |
| Improves Long-Term Load-Serving Capability | Yes | Yes | Yes (Better) | Yes (Better) |
| Improves Operational Flexibility | Yes | Yes | Yes | Yes (Marginally) |
| Additional transfer circuits from Southern Texas | 2 | 2 | 2 | 1 |
| Requires CCN (miles) | ~103.2 | ~89.4 | ~87.0 | ~58.0 |
| Project Feasibility | Yes | Yes | Yes | Yes |
| Cost Estimate ($M) | ~631 | ~570 | ~492 | ~435 |

ERCOT recommends Option 14 as the preferred option to address the reliability need in the San Antonio area based on the following considerations:

- Option 14 is the least expensive option
- Option 14 provides the best combined long-term load-serving capability
- Option 14 requires the least mileage of CCN and ROW

# 7 Additional Analysis and Assessment

The preferred option (Option 14, approximately $435 million) is categorized as a Tier 1 project, pursuant to ERCOT Protocol Section 3.11.4.3(1)(a). As required by Planning Guide Section 3.1.3(4), ERCOT performed generation and load sensitivity studies to identify the preferred option performance. Additionally, a Sub-Synchronous Resonance (SSR) Assessment was performed.

## 7.1 Generation Addition Sensitivity Analysis

ERCOT performed a generation addition sensitivity analysis based on Planning Guide Section 3.1.3(4)(a).

Based on a review of the January 2024 GIS[8] report, 7 units were found within the SSC Weather Zones load pocket that could have an impact on the identified reliability issues. These units are listed in Table 7.1. After the addition of the units to the Option 14 case, no new thermal or voltage violations were identified.

[8] GIS Report: https://www.ercot.com/mp/data-products/data-product-details?id=PG7-200-ER.

**Table 7.1: List of Units that Could have an Impact on Identified Reliability Issues**

| GINR | Unit Name | Fuel Type | Capacity (~MW) | County |
|---|---|---|---|---|
| 16INR0112 | Loma Pinta Wind | WIN | 197.0 | La Salle |
| 21INR0391 | Grandslam Solar | SOL | 121.9 | Atascosa |
| 22INR0559 | Honeycomb Solar | SOL | 61.1 | Bee |
| 23INR0035 | Starling Solar | SOL | 123.0 | Gonzales |
| 23INR0207 | El Patrimonio Solar | SOL | 146.9 | Bexar |
| 23INR0231 | Rocinante Solar | SOL | 95.0 | Gonzales |
| 25INR0503 | Uhland Maxwell Expansion | GAS | 188.4 | Caldwell |

## 7.2 Load Scaling Sensitivity Analysis

Planning Guide Section 3.1.3(4)(b) requires an evaluation of the potential impact of load scaling on the criteria violations seen in this ERCOT independent review. As stated in Section 2.1.1, ERCOT used the 2029 SSC summer peak case from the 2023 RTP. This study base case, which was created in accordance with the 2023 RTP Study Scope and Process document and Section 2.1 of this document, included load scaled down from the respective non-coincident peaks in the Coast, East, Far West, North, North Central, and West Weather Zones.

The Power Transfer Distribution Factors (PTDFs) of overloaded elements with respect to the load transfer for each Weather Zone (excluding SSC) were calculated using PowerWorld Simulator. The PTDFs were 2.5% or less for each of the overloaded elements—i.e., they were not significant enough to have an impact on the overloaded element. ERCOT concluded that the load scaling used to develop the base case in this study did not have a material impact on the project need, which was primarily driven by thermal overloads in the San Antonio area.

## 7.3 Sub-synchronous Resonance (SSR) Assessment

Pursuant to Protocol Section 3.22.1.3(2), ERCOT conducted an SSR screening assessment for the preferred option (Option 14) and found no adverse SSR impacts to the existing and planned Generation Resources in the study area.

# 8 Congestion Analysis

ERCOT conducted a congestion analysis to identify any potential impact on system congestion related to the addition of the recommended project, Option 14, using the 2023 RTP 2028 economic study case.

The results of the congestion analysis indicated Option 14 increased congestion on one transmission line as shown in Table 8.1.

**Table 8.1: List of New and Existing Congestion Due to Transmission Upgrade of Option 14**

| Monitored Line | % Time of Congestion | New / Existing |
|---|---|---|
| Lytle to Somerset 138-kV Line | 35.6 | Existing |

An additional test was conducted by upgrading the Lytle to Somerset 138-kV line to alleviate the increased congestion. Based on the results summarized in Table 8.2, the additional upgrade did not yield any economic benefit. Therefore, no upgrades will be recommended to solve the increased congestion as part of Option 14.

**Table 8.2: Test Results with Line Upgrade**

| Upgrade Tested | Mileage (mi) | Passed Production Cost Savings Test | Passed Generation Revenue Reduction Test |
|---|---|---|---|
| Lytle to Somerset 138-kV Line | 9.45 | No | No |

# 9 Conclusion

ERCOT evaluated the 15 transmission upgrade options to resolve the thermal overload violation in the San Antonio area. Based on the results of the independent review, ERCOT recommends Option 14 as the preferred solution because it addresses the thermal violation with no reliability issues, requires the least additional mileage of CCN and ROW, has the lowest cost, and has the highest combined load-serving capability among all options evaluated.

Option 14 consists of the following upgrades and is estimated to cost $435 million:

- Rebuild the existing Spruce to Pawnee 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 45.8 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service;
- Rebuild the existing Pawnee to Tango 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 12.2 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service; and
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:
    - Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
    - Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
    - Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;

- Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
- Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

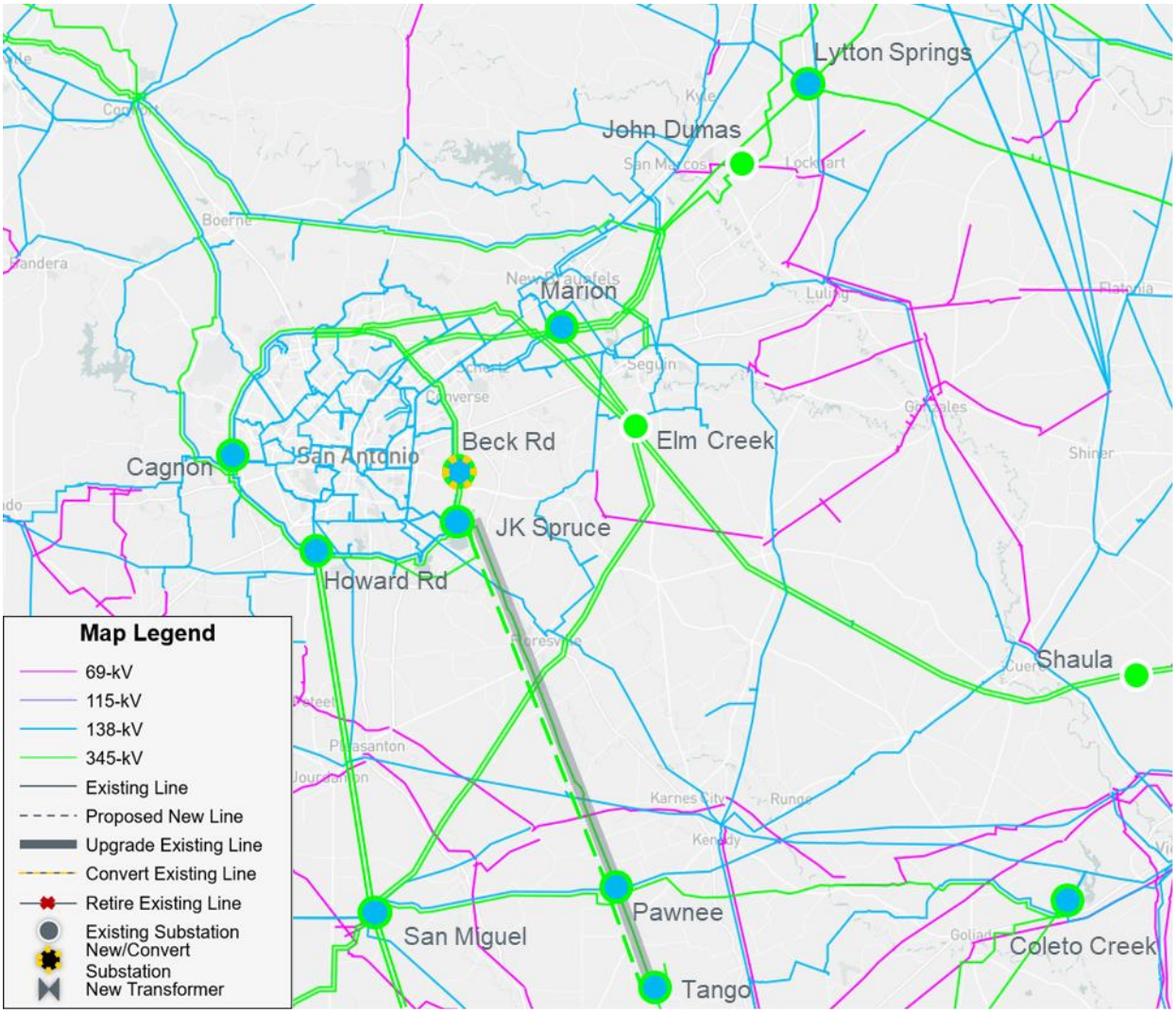


**Figure 9.1: Map of Option 14**

This project will require an updated CCN for the new 345-kV double circuit transmission line from the Spruce 345-kV substation to the Pawnee 345-kV substation and from the Pawnee 345-kV substation to the Tango 345-kV substation. The Spruce to Pawnee 345-kV rebuild and the Pawnee to Tango 345-kV rebuild will be done without the need for extended outages. The expected ISD for the Spruce to Pawnee portion of this project is December 2028. The expected ISD for the Eastside Station portion of this project is June 2028. The expected ISD for the Pawnee to Tango portion of this project is May 2029.

# Appendix

**Table A.1: List of Generation Added to Economic Base Case Based on January 2024 GIS Report**

| GINR | Project Name | Fuel | Project COD | Capacity (~MW) | County |
|---|---|---|---|---|---|
| 20INR0248 | Second Division Solar | SOL | September-24 | 100.3 | Brazoria |
| 23INR0026 | Baker Branch Solar | SOL | August-24 | 469.4 | Lamar |
| 23INR0525 | Pyron Wind Repower | WND | February-24 | 19.9 | Nolan |
| 24INR0070 | Sypert Branch Solar Project | SOL | June-25 | 261.8 | Milam |
| 25INR0223 | Uhland Maxwell | NG | April-25 | 188.4 | Caldwell |
| 25INR0232 | Isaac Solar | SOL | March-26 | 51.6 | Matagorda |
| 22INR0555 | Guevara Storage | BAT | July-25 | 125.4 | Rockwall |
| 24INR0100 | Sheep Creek Storage | BAT | July-24 | 142.0 | Callahan |
| 24INR0138 | Midpoint Storage | BAT | August-25 | 52.2 | Hill |
| 24INR0140 | Gaia Storage | BAT | July-25 | 76.8 | Navarro |
| 24INR0273 | Al Pastor BESS | BAT | September-24 | 100.8 | Dawson |
| 24INR0295 | Lucky Bluff BESS | BAT | May-25 | 100.8 | Erath |
| 23INR0349 | Tokio Solar | SOL | August-25 | 177.6 | McLennan |
| 24INR0010 | Pinnington Solar | SOL | October-25 | 666.1 | Jack |
| 24INR0139 | Midpoint Solar | SOL | August-25 | 103.8 | Hill |
| 24INR0141 | Gaia Solar | SOL | July-25 | 152.7 | Navarro |
| 25INR0105 | Diver Solar | SOL | June-26 | 228.2 | Limestone |
| 23INR0091 | Cascade Solar | SOL | December-24 | 254.2 | Brazoria |
| 23INR0114 | True North Solar | SOL | June-24 | 238.3 | Falls |
| 24INR0312 | Wigeon Whistle BESS | BAT | September-24 | 122.9 | Collin |
| 24INR0337 | Eldora Solar | SOL | June-26 | 200.9 | Matagorda |
| 24INR0338 | Eldora BESS | BAT | June-26 | 201.3 | Matagorda |
| 25INR0328 | Longbow BESS | BAT | November-24 | 180.8 | Brazoria |
| 19INR0203 | Angelo Solar | SOL | May-24 | 195.4 | Tom Green |
| 23INR0418 | Angelo Storage | BAT | May-24 | 103.0 | Tom Green |
| 22INR0366 | BRP Libra BESS | BAT | November-23 | 202.4 | Guadalupe |
| 19INR0134 | Cottonwood Bayou Solar U1 | SOL | June-24 | 175.0 | Brazoria |
| 19INR0134 | Cottonwood Bayou Solar U2 | SOL | June-24 | 175.0 | Brazoria |
| 23INR0154 | Ebony Energy Storage | BAT | April-24 | 205.0 | Comal |
| 21INR0368 | Eliza Solar | SOL | November-24 | 151.9 | Kaufman |
| 22INR0260 | Eliza Storage | BAT | November-24 | 100.2 | Kaufman |
| 24INR0015 | Five Wells Solar U1 | SOL | December-23 | 193.7 | Bell |
| 24INR0015 | Five Wells Solar U2 | SOL | December-23 | 129.1 | Bell |
| 23INR0159 | Five Wells Storage | BAT | December-23 | 220.8 | Bell |
| 23INR0239 | Giga Texas Energy Storage | BAT | December-23 | 131.1 | Travis |
| 23INR0637 | Goodnight Wind II U3 | WND | December-23 | 127.6 | Armstrong |
| 23INR0637 | Goodnight Wind II U4 | WND | December-23 | 83.4 | Armstrong |
| 23INR0637 | Goodnight Wind II U5 | WND | December-23 | 48.2 | Armstrong |

| GINR | Project Name | Fuel | Project COD | Capacity (~MW) | County |
|---|---|---|---|---|---|
| 14INR0033 | Goodnight Wind U1 | WND | December-23 | 121.0 | Armstrong |
| 14INR0033 | Goodnight Wind U2 | WND | December-23 | 137.1 | Armstrong |
| 23INR0460 | GULF STAR STORAGE B1 | BAT | February-24 | 150.5 | Wharton |
| 23INR0460 | GULF STAR STORAGE B2 | BAT | February-24 | 150.5 | Wharton |
| 20INR0210 | Hopkins Solar U1 | SOL | December-23 | 174.3 | Hopkins |
| 20INR0210 | Hopkins Solar U2 | SOL | December-23 | 75.7 | Hopkins |
| 23INR0062 | Noria Storage | BAT | September-25 | 75.0 | Nueces |
| 23INR0387 | Pioneer DJ Wind | WND | April-24 | 140.3 | Midland |
| 21INR0389 | Red Tailed Hawk Solar | SOL | June-24 | 353.4 | Wharton |
| 21INR0515 | Roadrunner Crossing Wind II U1 | WND | December-23 | 98.7 | Eastland |
| 21INR0515 | Roadrunner Crossing Wind II U2 | WND | December-23 | 27.7 | Eastland |
| 22INR0502 | Shamrock Wind U1 | WND | July-24 | 203.0 | Crockett |
| 22INR0502 | Shamrock Wind U2 | WND | July-24 | 20.9 | Crockett |
| 22INR0251 | Shaula I Solar | SOL | October-25 | 205.2 | DeWitt |
| 22INR0267 | Shaula II Solar | SOL | May-26 | 205.2 | DeWitt |
| 21INR0325 | Sheep Creek Wind | WND | December-23 | 153.0 | Callahan |
| 20INR0208 | Signal Solar | SOL | March-25 | 51.8 | Hunt |
| 23INR0331 | Talitha BESS | BAT | June-24 | 61.4 | Jim Wells |
| 23INR0054 | Tanglewood Solar | SOL | January-25 | 257.0 | Brazoria |
| 20INR0040 | Montgomery Ranch Wind | WND | July-23 | 200.2 | Foard |
| 22INR0261 | Dorado Solar | SOL | July-23 | 406.3 | Callahan |
| 21INR0424 | Tierra Bonita Solar | SOL | July-23 | 309.7 | Pecos |
| 23INR0296 | Trojan Solar | SOL | July-23 | 151.3 | Cooke |
| 23INR0470 | BoCo BESS | BAT | June-24 | 155.5 | Borden |
| 22INR0353 | BRP Carina BESS | BAT | December-24 | 151.9 | Nueces |
| 21INR0450 | Danish Fields Storage | BAT | February-24 | 152.4 | Wharton |
| 21INR0505 | Ramsey Storage | BAT | June-24 | 510.4 | Wharton |
| 22INR0422 | Ferdinand Grid BESS | BAT | May-26 | 202.7 | Bexar |
| 23INR0219 | Dogfish BESS | BAT | December-24 | 75.0 | Pecos |
| 23INR0381 | Soportar ESS | BAT | March-25 | 102.1 | Bexar |
| 24INR0039 | SP Jaguar BESS | BAT | June-25 | 300.0 | McLennan |
| 24INR0109 | Oriana BESS | BAT | July-25 | 60.3 | Victoria |
| 24INR0265 | Ironman BESS | BAT | November-24 | 304.2 | Brazoria |
| 24INR0281 | Red Egret BESS | BAT | June-25 | 309.0 | Galveston |
| 24INR0436 | Carambola BESS | BAT | May-26 | 97.4 | Hidalgo |
| 25INR0162 | SOHO II BESS | BAT | January-25 | 206.3 | Brazoria |
| 21INR0302 | Aureola Solar | SOL | June-24 | 203.0 | Milam |
| 21INR0303 | Mandorla Solar | SOL | January-24 | 254.0 | Milam |
| 21INR0304 | Halo Solar | SOL | June-24 | 254.0 | Bell |
| 22INR0354 | XE MURAT Solar | SOL | May-24 | 60.4 | Harris |
| 23INR0367 | Fewell Solar | SOL | September-25 | 203.5 | Limestone |
| 24INR0038 | SP Jaguar Solar | SOL | June-25 | 300.0 | McLennan |

| GINR | Project Name | Fuel | Project COD | Capacity (~MW) | County |
|---|---|---|---|---|---|
| 19INR0054 | Monte Cristo 1 Wind | WND | December-24 | 236.9 | Hidalgo |

**Table A.2: List of Transmission Projects Added to Economic Base Case Based on October 2023 TPIT Report**

| TPIT No | Project Name | Tier | Project ISD | TSP | From County |
|---|---|---|---|---|---|
| 23RPG024 | BigFoot to DileySwitch 138-kV Conversion Project | Tier 3 | 8/30/2026 | AEPSC | Frio |
| 73063 | Big Foot to Lytle Conversion | Tier 4 | 9/1/2025 | AEPSC | Medina |
| 67915 | AEPSC_TCC_Asherton-West Batesville138kVLineRebuild | Tier 3 | 12/1/2026 | BEC | Dimmit |
| 67992 | CPSE_345KV_Howard_Switching_Station_ALL | Tier 3 | 2/1/2024 | CPS | Bexar |
| 71871 | CPSE_Cagnon to Shepherd Rd Rebuild Phase A | Tier 4 | 5/1/2023 | CPS | Bexar |
| 67329 | STEC_67329_Cruce-SanMiguel | Tier 1 | 6/1/2027 | STEC | Bexar, Atascosa |
| 23RPG024 | Big Foot to Dilley Switch 138-kV Conversion Project | Tier 4 | 8/30/2026 | AEPSC | Frio |
| 73063 | AEPSC_TCC_BigFoot_LytleConversion | Tier 4 | 9/20/2025 | AEPSC | Medina, Frio |
| 67915 | AEPSC_TCC_Asherton-West Batesville138kVLineRebuild | Tier 3 | 12/30/2028 | AEPSC | Dimmit, Zavala |

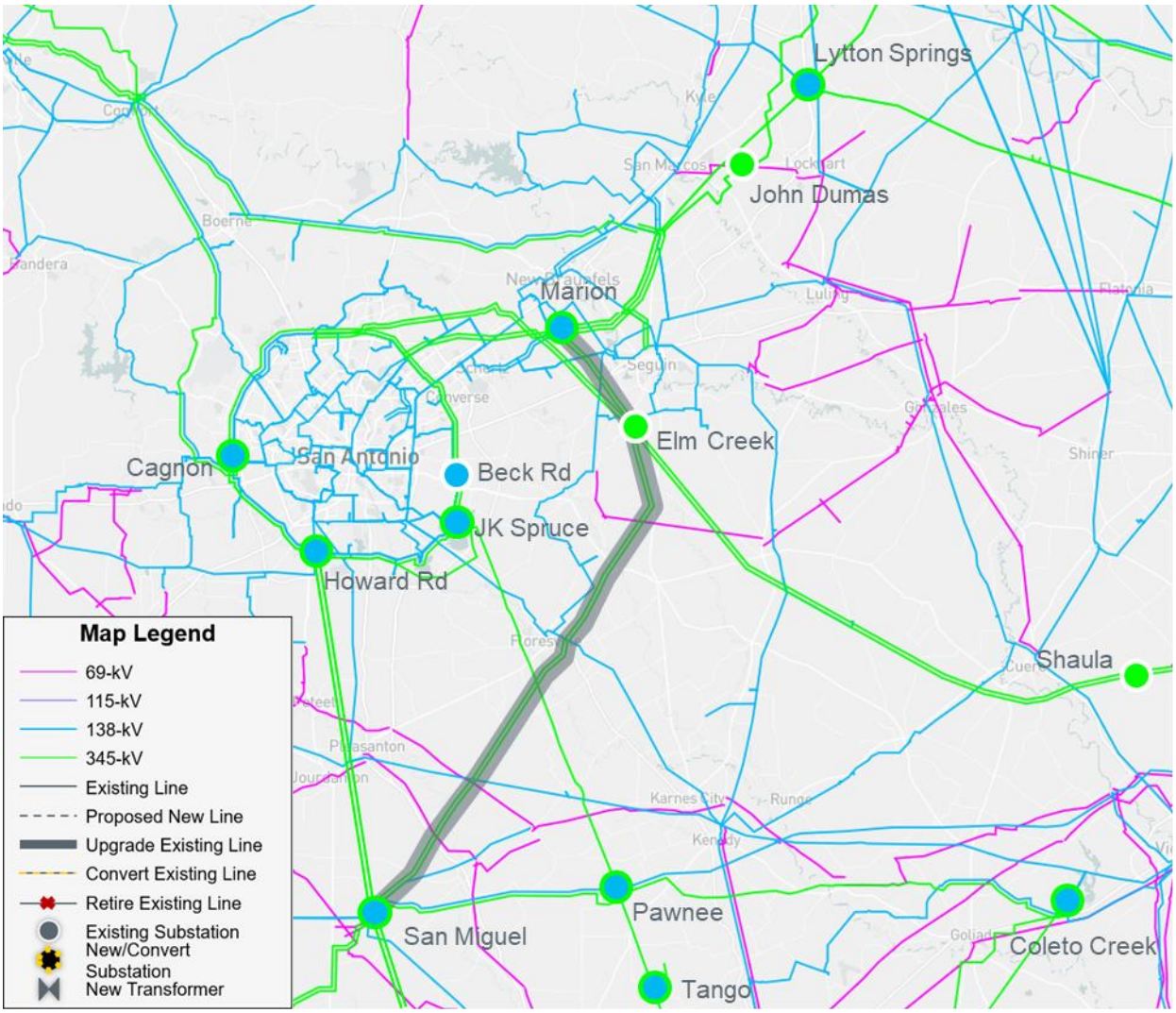


**Figure A.1: Map of Option 1**

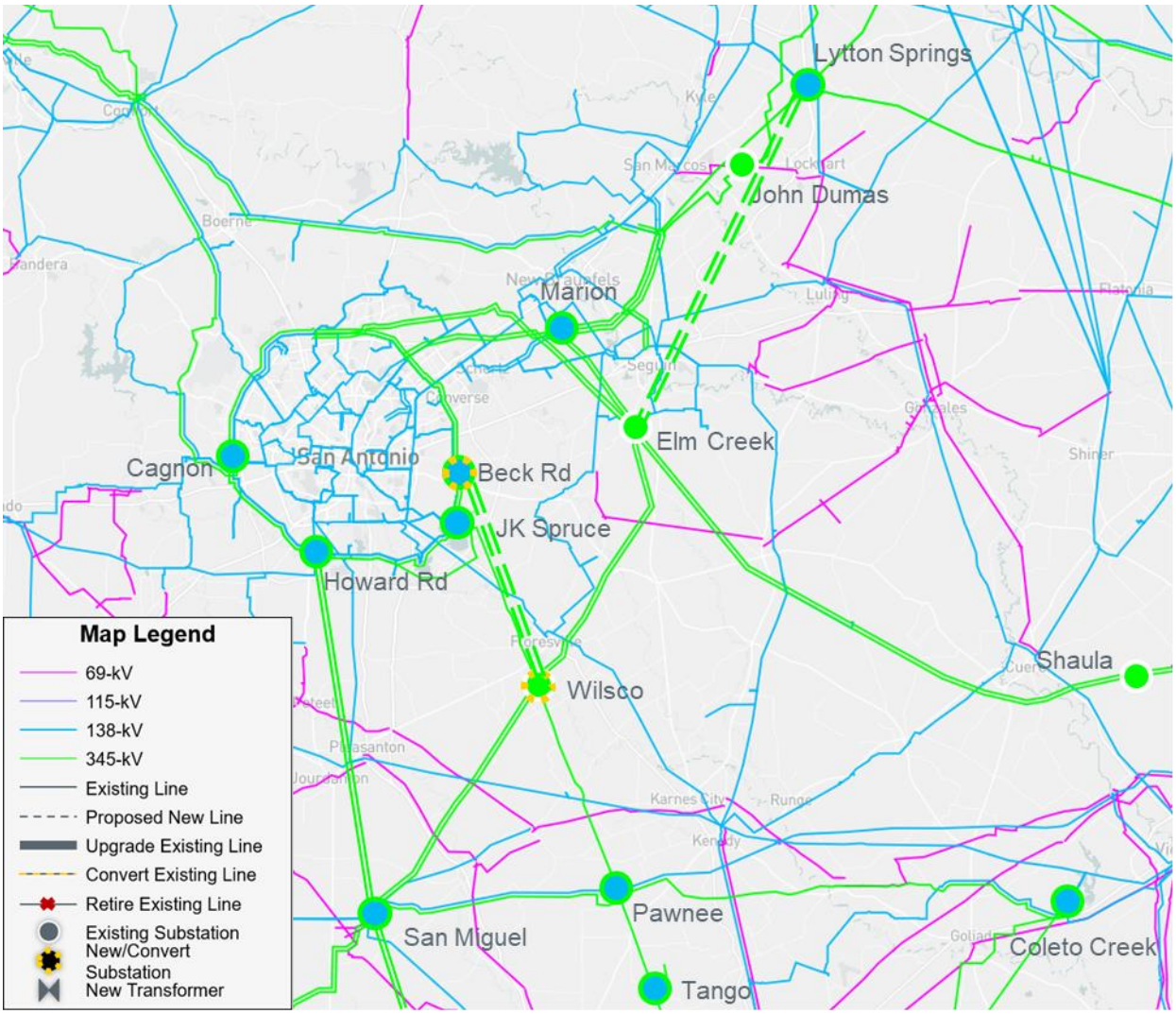


**Figure A.2: Map of Option 2**

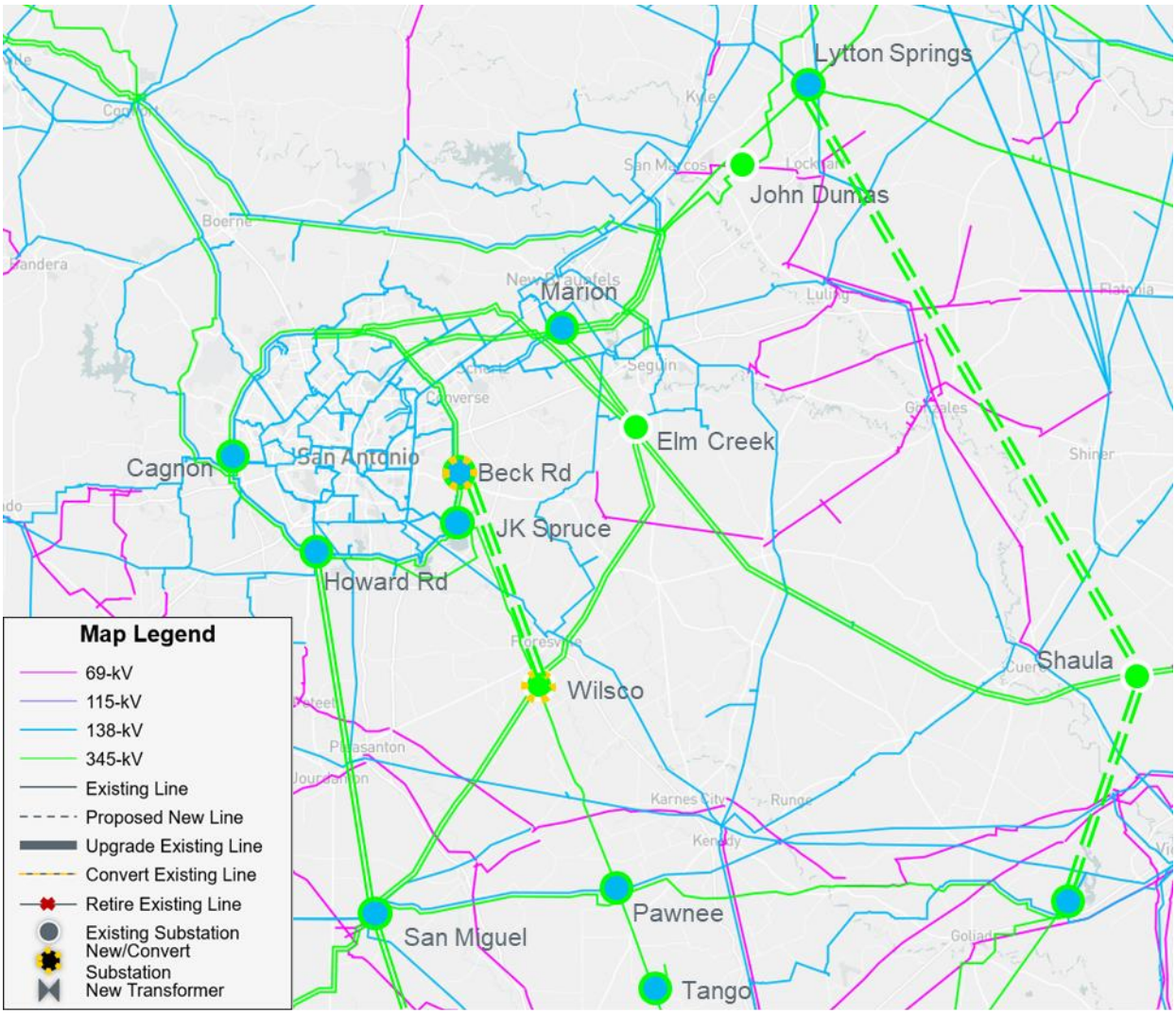


**Figure A.3: Map of Option 3**

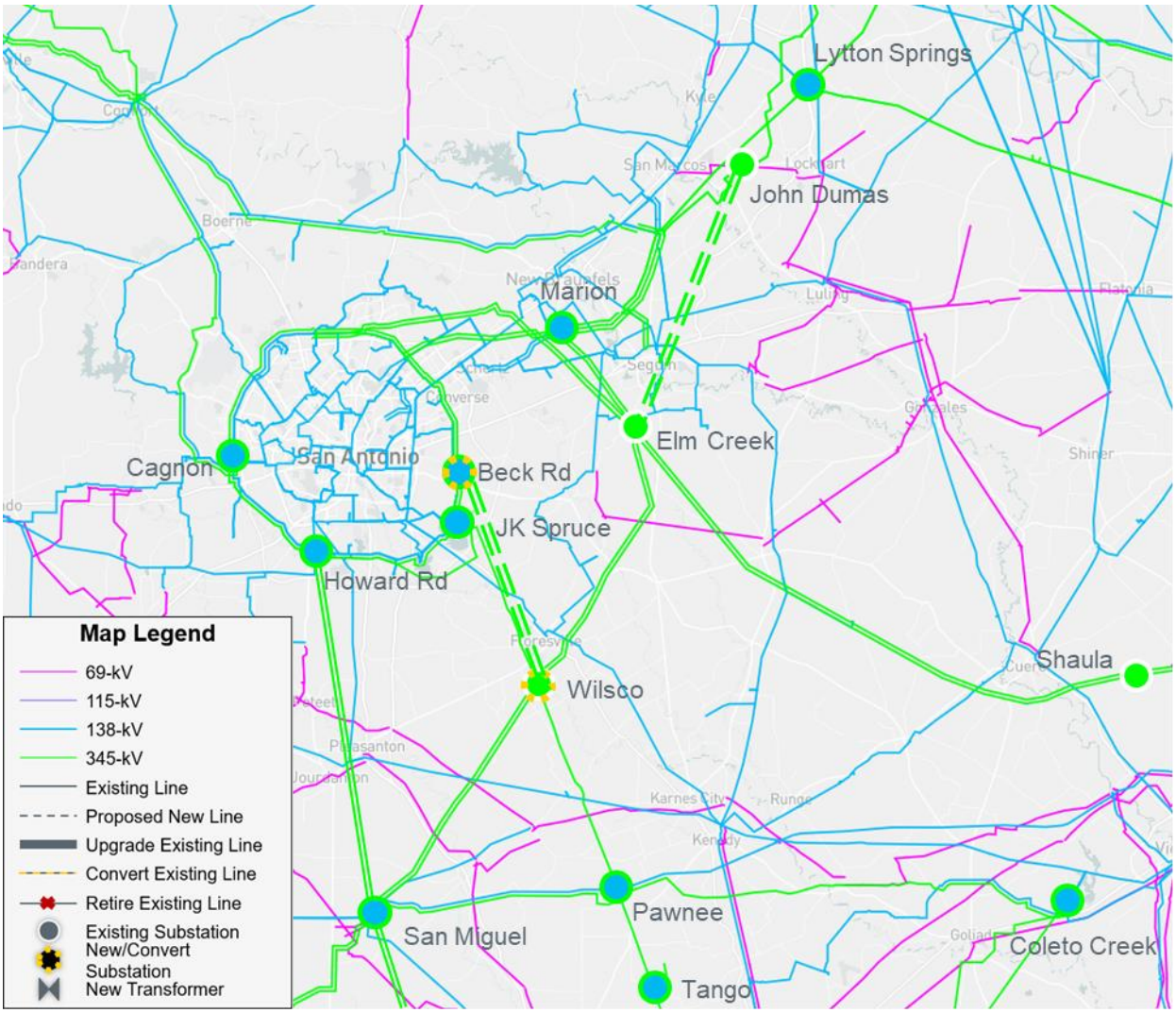


**Figure A.4: Map of Option 4**

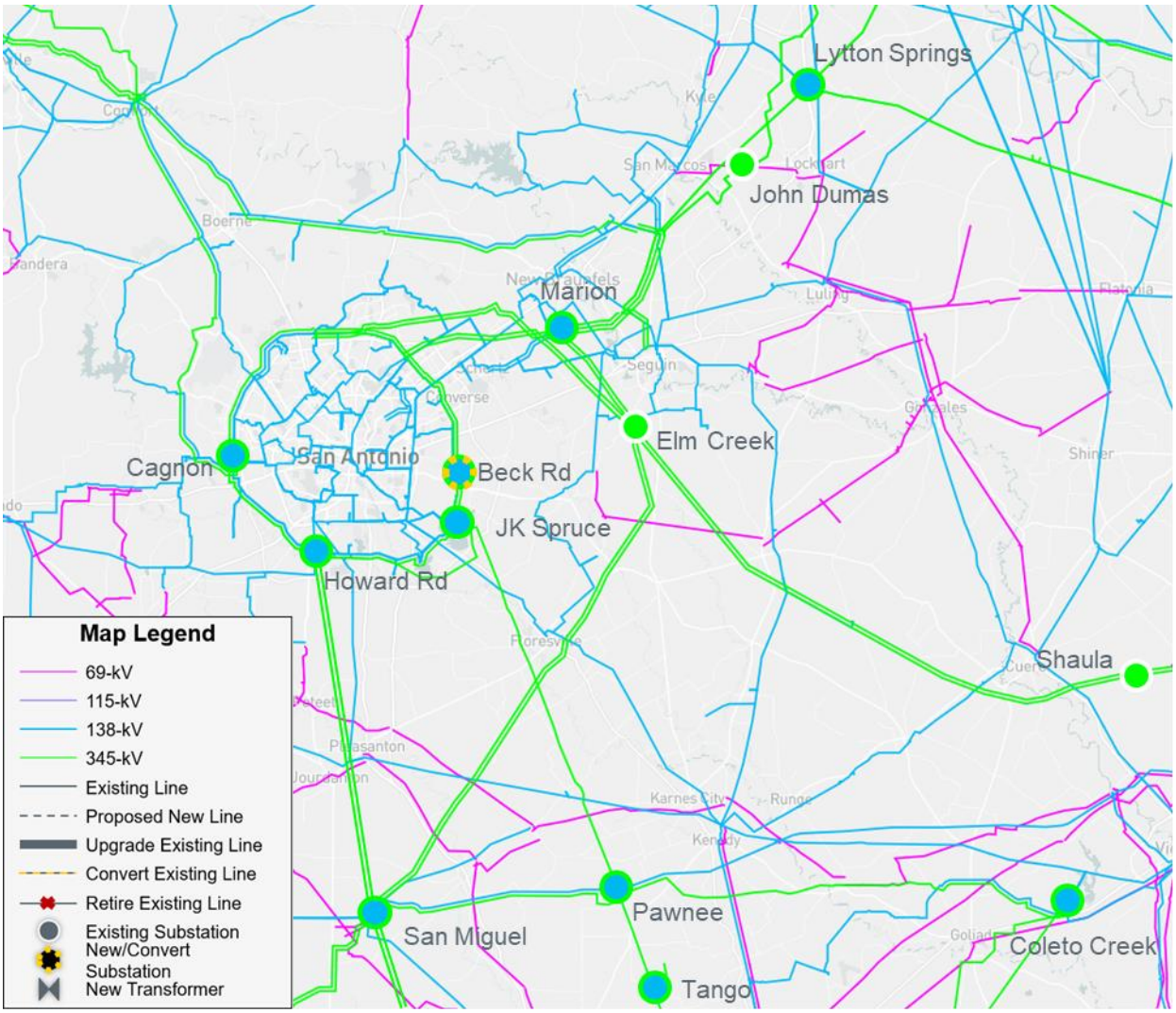


**Figure A.5: Map of Option 5**

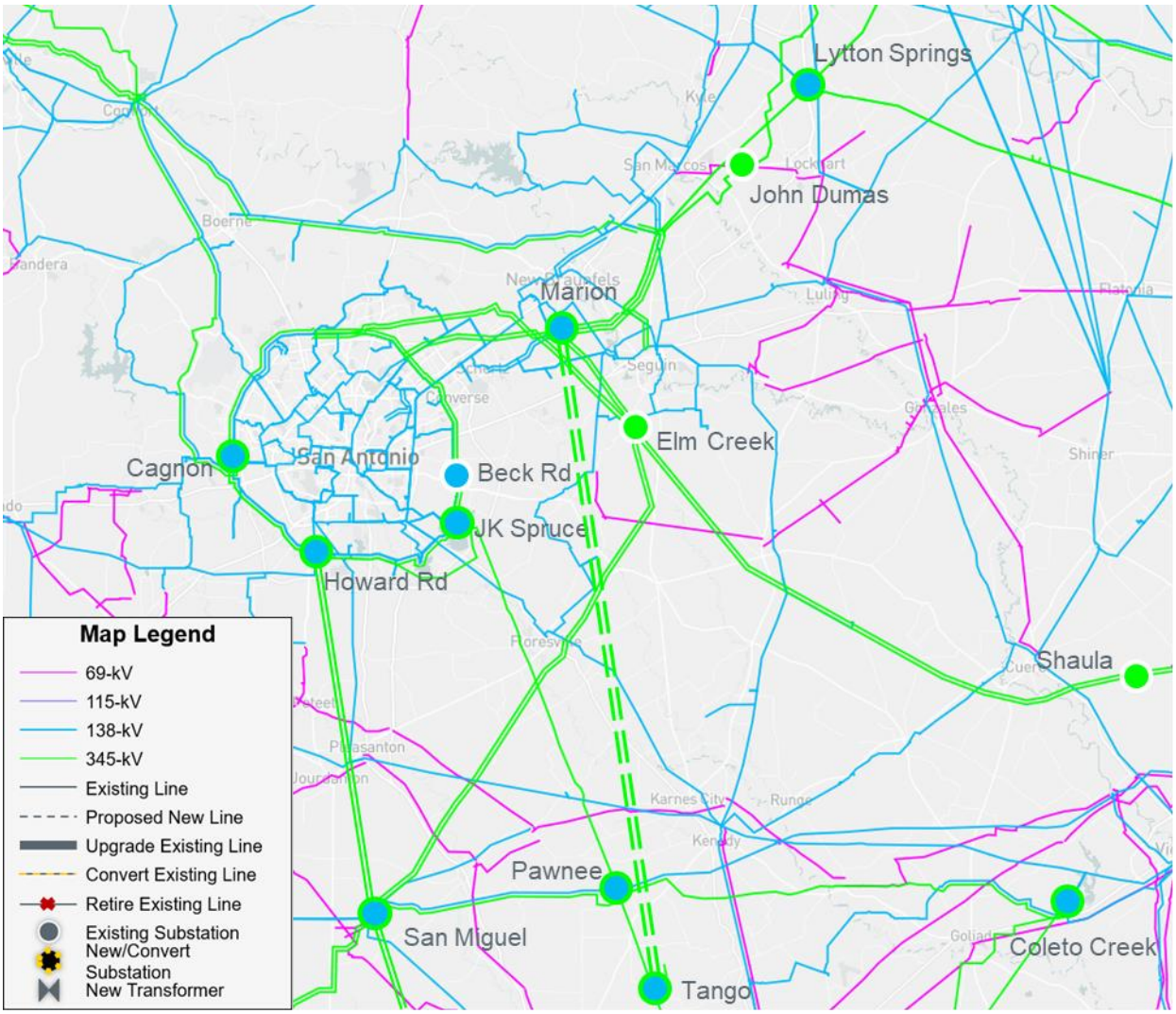


**Figure A.6: Map of Option 6**

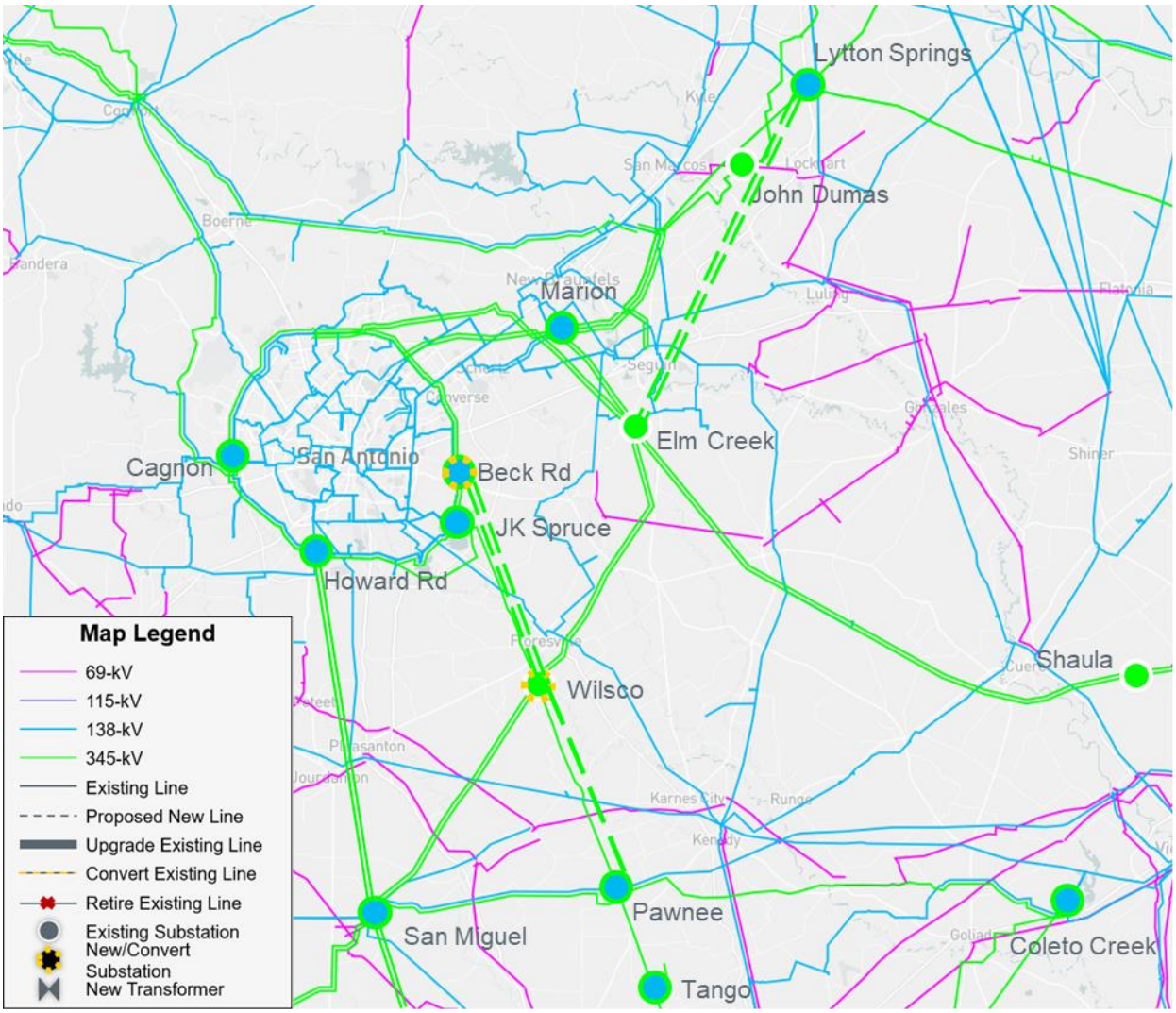


**Figure A.7: Map of Option 7**

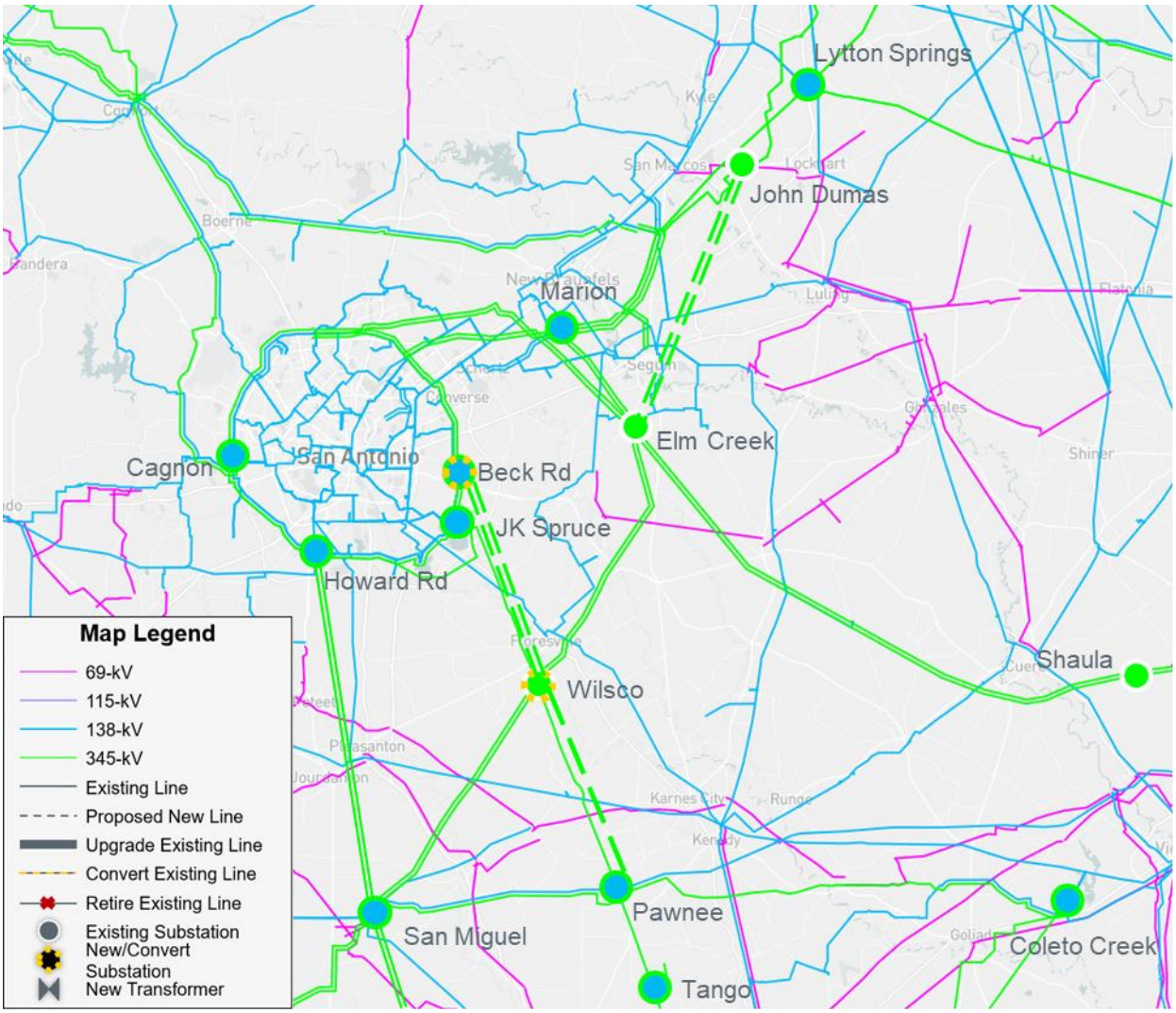


**Figure A.8: Map of Option 8**

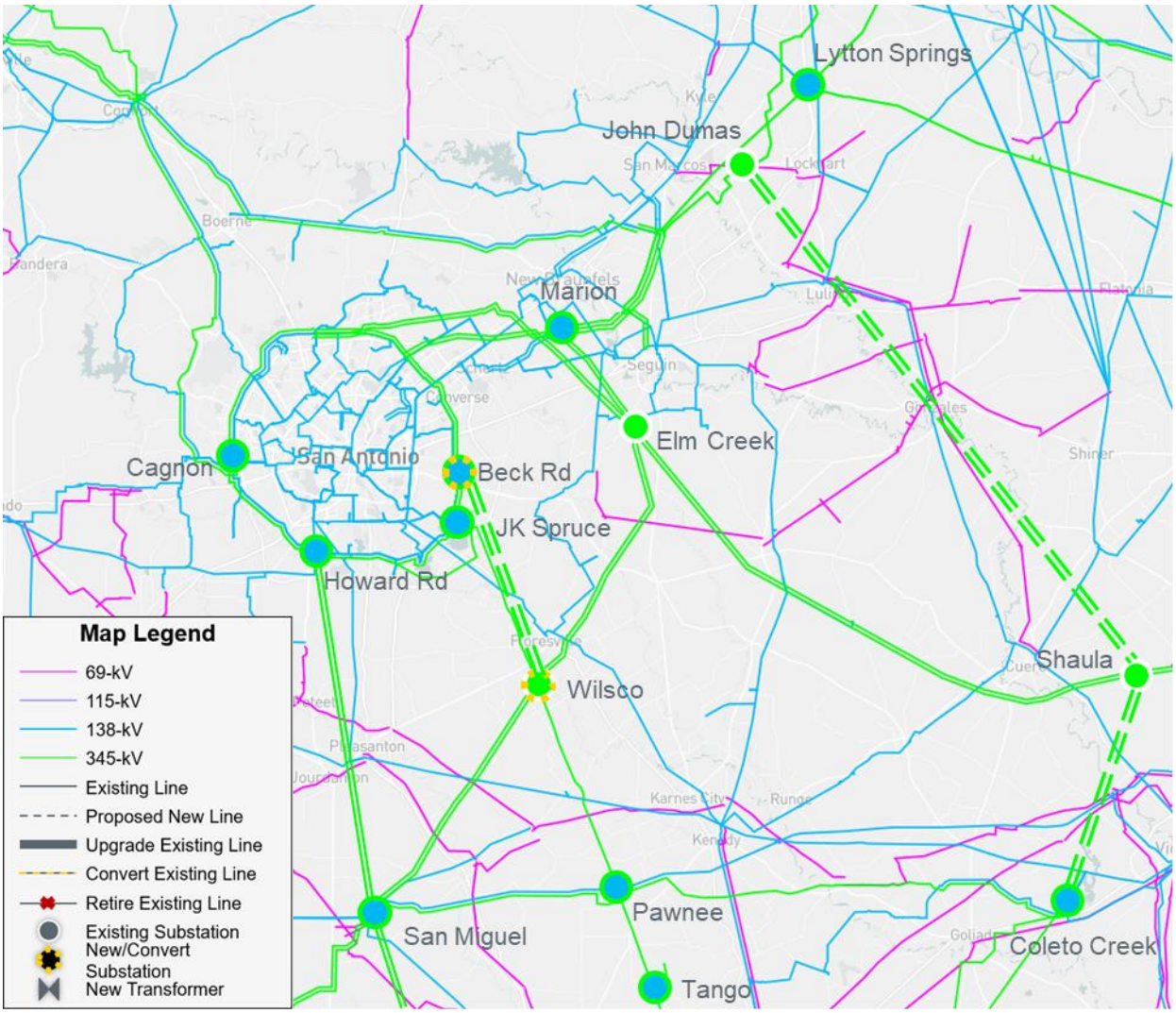


**Figure A.9: Map of Option 9**

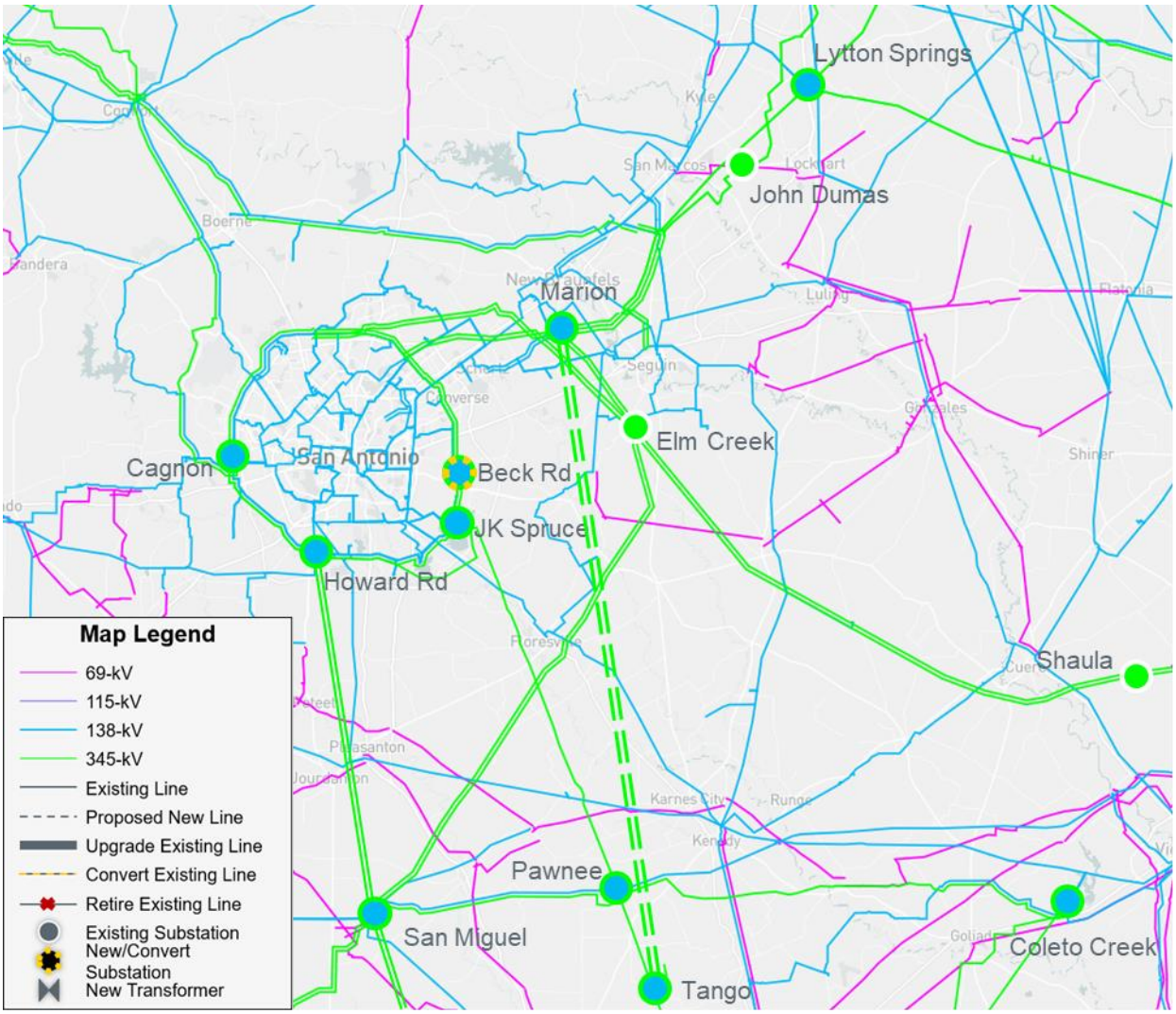


**Figure A.10: Map of Option 10**

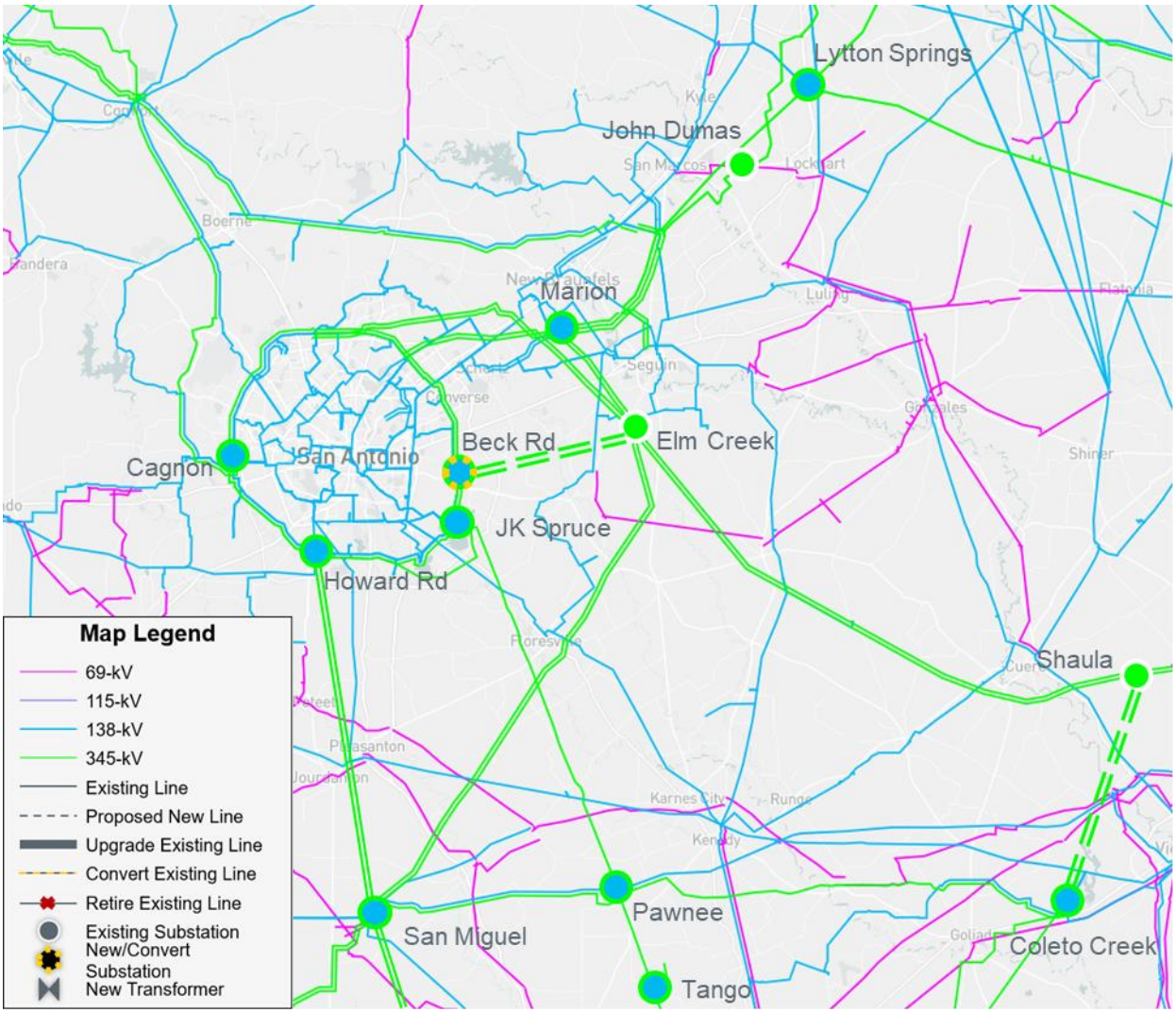


**Figure A.11: Map of Option 11**

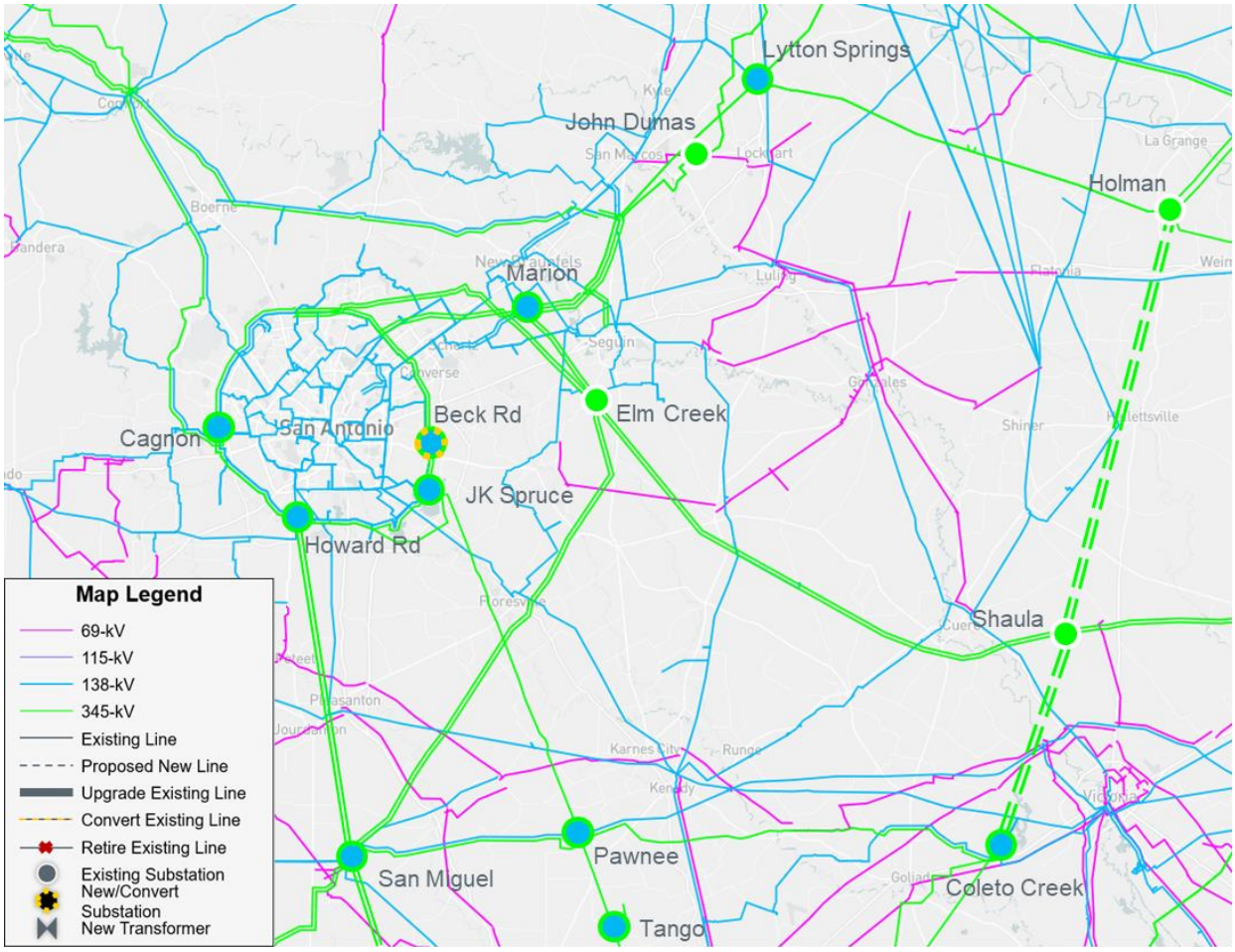


**Figure A.12: Map of Option 12**

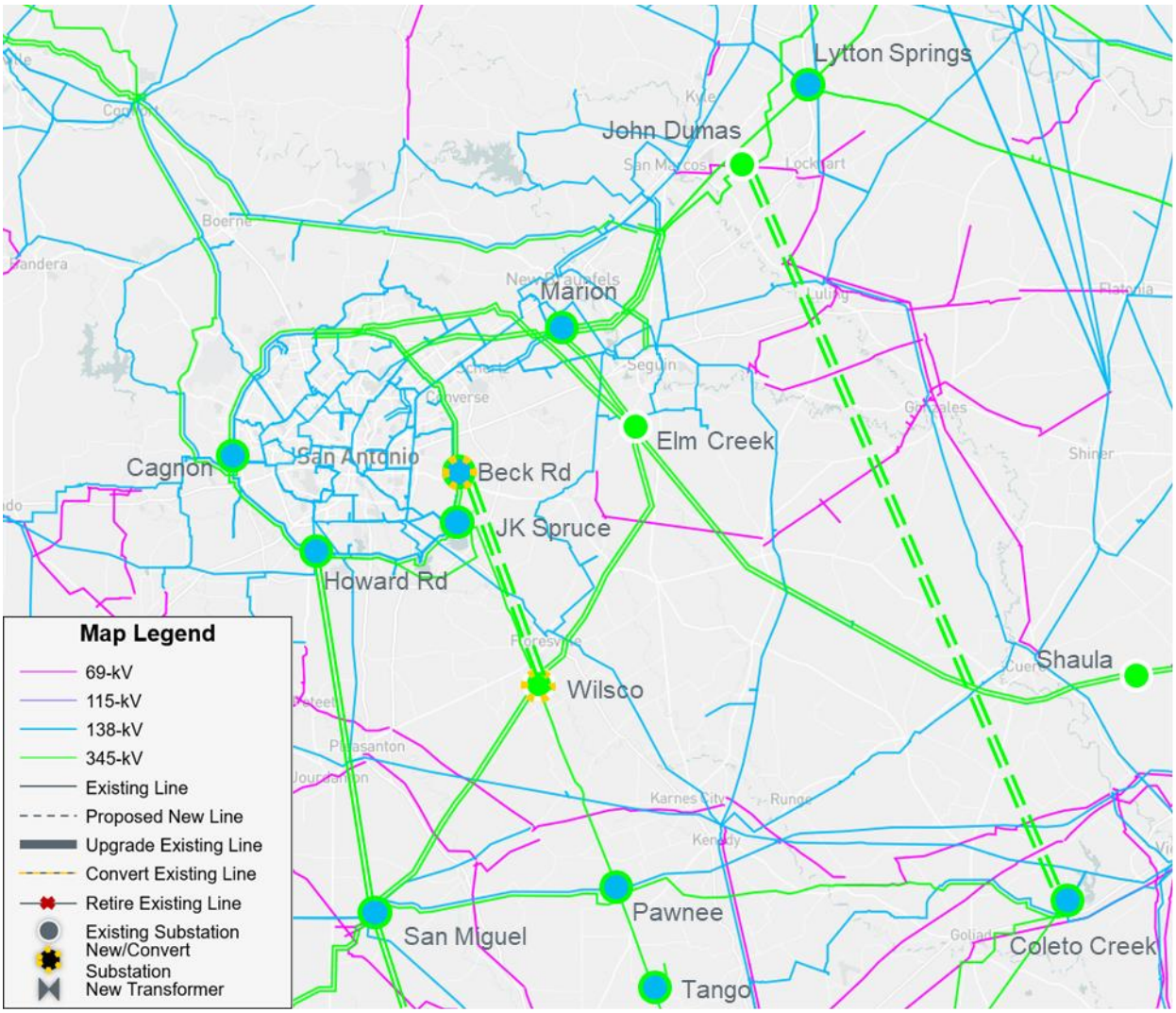


**Figure A.13: Map of Option 13**

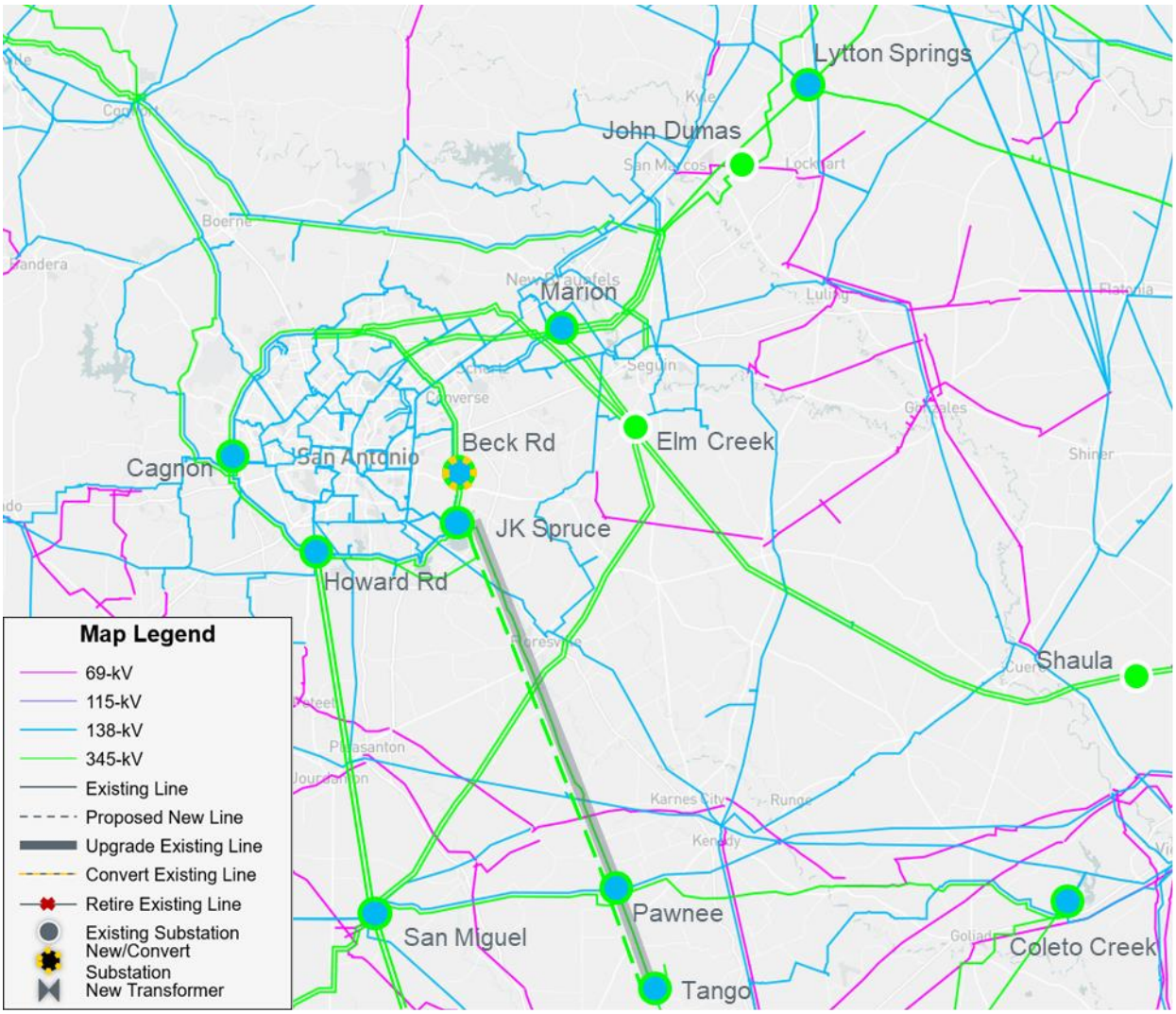


**Figure A.14: Map of Option 14**

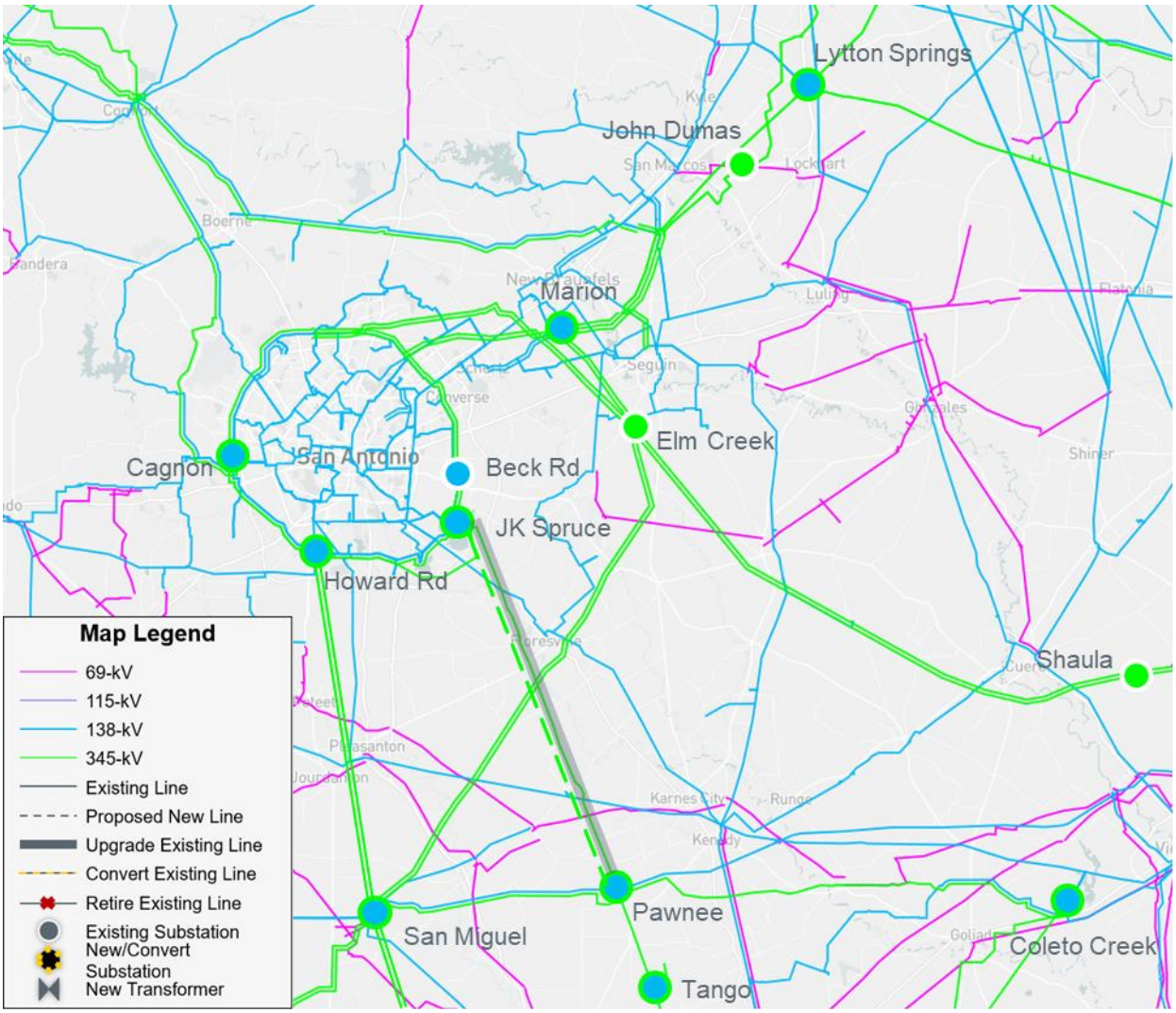


**Figure A.15: Map of Option 15**

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# GENERAL SESSION MINUTES OF THE BOARD OF DIRECTORS MEETING OF ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.

8000 Metropolis Drive (Building E), Suite 100, Boardroom B
Austin, Texas 78744
April 23, 2024

Pursuant to notice duly given, the meeting of the Board of Directors (Board) of Electric Reliability Council of Texas, Inc. (ERCOT) convened on the above-referenced date.

## Meeting Attendance:

Board Members:

| Director | Affiliation/Role (if any) | Voting Category |
|---|---|---|
| Aguilar, Carlos | N/A | Voting |
| Capuano, Linda | N/A | Voting |
| Cobos, Lori | Public Utility Commission of Texas (PUCT, Commission), Commissioner | Non-Voting |
| England, Julie | N/A | Voting |
| Flexon, Bob | N/A *(Via Teleconference; Not Present for Agenda Item 13)* | Voting |
| Flores, Bill (Vice Chair) | N/A | Voting |
| Foster, Paul (Chair) | N/A | Voting |
| Gleeson, Thomas | PUCT Chair | Non-Voting |
| Heeg, Peggy | N/A | Voting |
| Hjaltman, Courtney | Office of Public Utility Counsel (OPUC), Public Counsel | Voting |
| Swainson, John | N/A | Voting |
| Vegas, Pablo | ERCOT President and Chief Executive Officer (CEO) | Non-Voting |

Officers and Guests:

| Officer/Guest | Role |
|---|---|
| Berlin, Anna | ERCOT Associate Corporate Counsel |
| Black, Robert | ERCOT Vice President of Public Affairs |
| Day, Betty | ERCOT Vice President of Security and Compliance and Chief Compliance Officer |
| Gallo, Andy | ERCOT Assistant General Counsel |

| | |
|---|---|
| Hobbs, Kristi | ERCOT Vice President of System Planning and Weatherization |
| Horton, Shana | ERCOT Corporate Counsel |
| Jackson, Kathleen | PUCT Commissioner |
| Levine, Jonathan | ERCOT Assistant General Counsel and Assistant Corporate Secretary |
| Martin, Collin | Oncor Electric Delivery Company LLC, Technical Advisory Committee (TAC) Vice Chair |
| Martinez, Adam | ERCOT Vice President of Enterprise Risk and Strategy |
| Parakkuth, Jayapal | ERCOT Senior Vice President and Chief Information Officer |
| Rainwater, Kim | ERCOT Corporate Counsel |
| Rickerson, Woody | ERCOT Senior Vice President and Chief Operating Officer |
| Rychetsky, Penny | ERCOT Director of Internal Audit |
| Schue, Jamie | ERCOT Senior Corporate Counsel |
| Seely, Chad V. | ERCOT Senior Vice President, General Counsel and Corporate Secretary |
| Spak, Mara | ERCOT Vice President of Human Resources |
| Taylor, Sean | ERCOT Senior Vice President, Chief Financial Officer and Chief Risk Officer |

**Call General Session to Order (Agenda Item 1)**
Paul Foster, Board Chair, determined that a quorum was present and called the Board meeting to order at approximately 10:00 a.m.

Chair Foster recognized Thomas Gleeson, Chairman of the PUCT. Chair Gleeson called an Open Meeting of the Commission to order to consider matters that had been duly posted with the Texas Secretary of State for April 23, 2024.

Chair Foster highlighted the Antitrust Admonition and addressed the following Agenda Items in the order below.

**Notice of Public Comment, if Any (Agenda Item 2)**
Chair Foster announced that on the agenda for the meeting, which was posted publicly on April 16, 2024, ERCOT had provided instructions for members of the public who were interested in commenting in person and that to date no individuals had expressed interest in commenting, which Chad Seely confirmed.

**Consent Agenda; Unopposed Revision Requests Recommended by TAC for Approval (Agenda Items 3 – 3.1.2)**
Chair Foster presented the Consent Agenda, including unopposed Revision Requests recommended by TAC for approval. Mr. Seely reviewed the cost impacts of the Revision Requests. Chair Foster entertained a motion to recommend approval of the Consent Agenda as follows:

- NPRR1205, Revisions to Credit Qualification Requirements of Banks and Insurance Companies; and

- RMGRR177, Switch Hold Removal Clarification.

**Julie England moved to recommend approval of the Consent Agenda as presented. Board Vice Chair Bill Flores seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

**February 27, 2024 General Session Meeting Minutes (Agenda Item 4)**
Chair Foster entertained a motion to approve the February 27, 2024 General Session Meeting Minutes (Minutes).

**Peggy Heeg moved to approve the Minutes as presented. Vice Chair Flores seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

**CEO Update (Agenda Item 5)**
Pablo Vegas presented the CEO Update, highlighting forecasts for rapid electric demand growth in Texas in the next five to seven years that could exceed the pace at which transmission capacity can be built to support it, including growth attributable to the new House Bill 5066 (88th Texas Legislature) requirement to consider Load for which an electric utility has yet to sign an interconnection agreement, which led to significant increases in large Loads considered in studies. Mr. Vegas and Board members discussed improving and accelerating planning processes to meet the pace of forecasted growth, such as by integrating into Regional Transmission Plans (RTPs) the concept of generation hubs that identify the optimal locations for generation in order to support future Load growth needs and optimize transmission investments, as well as studying 765 kV transmission lines and multi-year transmission outage scheduling.

**Reliability Monitor Update (Agenda Item 6)**
Andy Gallo presented the Reliability Monitor Update. Mr. Gallo summarized the ERCOT Reliability Monitor (ERM) function, which the Commission appointed ERCOT to perform in November 2022, to support the PUCT Enforcement Division on compliance with PUCT and ERCOT reliability rules. Mr. Gallo reviewed the background of the PUCT's appointment of ERCOT to the ERM role, the team involved, the initial policies and processes that have been developed, and outreach efforts to employees and Market Participants. Mr. Gallo reviewed the distinction between ERCOT's role generally with respect to compliance as compared with the ERM role, ERCOT's core ERM responsibilities, and the budget for the ERM function. Board members and Mr. Gallo discussed the statutory authority for ERCOT's performance of the ERM function and the transition of ERM responsibilities from Texas Reliability Entity, Inc. (Texas RE) to ERCOT; processes and controls in place to ensure independence, objectivity, and protection of confidential information; and the use of funds collected as fines for compliance violations.

**TAC Report; Non-Unanimous and Other Selected Revision Requests Recommended by TAC for Approval; NPRR1197, Optional Exclusion of Load from Netting at ERCOT-Polled Settlement (EPS) Metering Facilities which Include Resources; NOGRR245, Inverter-Based Resource (IBR) Ride-Through Requirements; Reliability and Markets (R&M) Committee Recommendations on Non-Unanimous and Other Selected Revision Requests; Comments on Non-Unanimous and Other Selected Revision Requests Recommended by TAC for Approval; ERCOT Comments on NOGRR245; Stakeholder Comments on NOGRR245, if any (Agenda Items 7 – 7.3.2)**

Collin Martin, TAC Vice Chair, presented the TAC Report, including TAC's recommendations regarding NPRR1197 and NOGRR245.

Reliability and Markets (R&M) Committee Chair Bob Flexon reported that the Committee considered NPRR1197 at its meeting the prior day and recommended approval as recommended by TAC.

**Ms. England moved to recommend approval of NPRR1197 as recommended by TAC. John Swainson seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

Mr. Flexon reported that the R&M Committee considered NOGRR245 at its meeting the prior day and recommended that the Board remand NOGRR245 to TAC and that TAC bring NOGRR245 back to the Board in June. Mr. Flexon commented that as R&M Committee Chair, he would like TAC to return with a more detailed set of comments that explain the policy rationale on why TAC did or did not address the key concerns ERCOT laid out in its presentation to the R&M Committee.

**Ms. Heeg moved to remand NOGRR245 to TAC with direction to bring NOGRR245 back for the Board's consideration at its June 2024 regular meeting. Carlos Aguilar seconded the motion. The motion passed by voice vote with one abstention (Courtney Hjaltman).**

**Finance and Audit (F&A) Committee Report; Acceptance of ERCOT Consolidated Financial Statements Audit Report; Acceptance of Texas Electric Market Stabilization Funding M LLC Financial Statements Audit Report; Acceptance of Texas Electric Market Stabilization Funding N LLC Financial Statements Audit Report (Agenda Items 8 – 8.3)**

Vice Chair Flores, F&A Committee Chair, reported that the F&A Committee met the prior day and highlighted items discussed at the F&A Committee meeting, including the Committee's recommendation that the Board accept the audited financials and Financial Statements Audit Reports for ERCOT, Inc. consolidated, Texas Electric Market Stabilization Funding M LLC (TEMSFM), and Texas Electric Market Stabilization Funding N LLC (TEMSFN).

**Mr. Flores moved to accept the audited financials and Financial Statements Audit Reports for (1) ERCOT, Inc. consolidated; (2) TEMSFM; and (3) TEMSFN, each as recommended by the F&A Committee. Mr. Swainson seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

**Human Resources and Governance (HR&G) Committee Report (Agenda Item 9)**
Ms. Heeg, HR&G Committee Chair, reported the HR&G Committee met the prior day and highlighted items discussed at the HR&G Committee meeting, including reports on retirement benefits and health and welfare benefits.

**Reliability and Markets (R&M) Committee Report; San Antonio South Reliability II Regional Planning Group (RPG) Project; Real-Time Market Price Correction – Incorrect Line, Series Device, and Transformer Ratings Impacting the Real-Time and Day-Ahead Markets; Real-Time Market Price Correction – Incorrect Constraint Data for GTCs impacting Real-Time Market (Agenda Items 10 – 10.3)**
Mr. Flexon reported the R&M Committee met the prior day and highlighted items discussed at the R&M Committee meeting, including the Committee's recommendations regarding the San Antonio South Reliability II RPG Project; Real-Time Market Price Correction – Incorrect Line, Series Device, and Transformer Ratings Impacting the Real-Time and Day-Ahead Markets; and Real-Time Market Price Correction – Incorrect Constraint Data for GTCs impacting Real-Time Market.

**Mr. Flexon moved to (1) endorse the need for the Tier 1 San Antonio South Reliability II RPG Project (Option 14), which ERCOT staff has independently reviewed and which TAC has voted unanimously to endorse based on ERCOT reliability planning criteria, and (2) designate the San Antonio South Reliability II Project (Option 14) as critical to the reliability of the ERCOT System pursuant to PUCT Substantive Rule 25.101(b)(3)(D), each as recommended by the R&M Committee. Mr. Aguilar seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

**Mr. Flexon moved to (1) determine that Day-Ahead Market Clearing Prices for Capacity (DAMCPCs), Day-Ahead Settlement Point Prices (DASPPs), Real-Time Market Locational Marginal Prices (RTLMPs), Real-Time Market Settlement Point Prices (RTSPPs), Real-Time Price for Energy Metered for Resources (RTRMPRs), and Real-Time Price for Energy Metered for Settlement Only Generators (RTESOGPRs) for certain Operating Days (ODs) in January 2024 were significantly affected by incorrect transmission element ratings, and (2) direct ERCOT staff to implement the appropriate price corrections pursuant to Protocol Sections 4.5.3 and 6.3, each as recommended by the R&M Committee. Ms. England seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

**Mr. Flexon moved to (1) determine that RTLMPs, RTSPPs, RTRMPRs, and RTESOGPRs for OD February 28, 2024, were significantly affected by incorrect Generic Transmission Constraint (GTC) Shift Factors, and (2) direct ERCOT staff to implement the appropriate price corrections pursuant to Protocol Section 6.3, each as recommended by the R&M Committee. Ms. Hjaltman seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

**Technology and Security (T&S) Committee Report (Agenda Item 11)**
Mr. Swainson, T&S Committee Chair, reported the T&S Committee met the prior day and highlighted items discussed at the T&S Committee meeting.

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**Other Business (Agenda Item 12)**
No other business was discussed at this time.

**Executive Session; Vote on Matters from Executive Session (Agenda Item 13)**
Chair Foster recessed General Session at approximately 11:19 a.m. and convened Executive Session at approximately 11:40 a.m. Chair Foster reconvened General Session at approximately 2:20 p.m.

Chair Foster entertained motions for four matters discussed during Executive Session.

**Vice Chair Flores moved to select Baker Tilly US, LLP as the qualified public accounting firm to perform the following for the year ending December 31, 2024: (1) the financial statements audit, servicer's certificate report, and Form 990 review for ERCOT, Inc.; (2) the financial statements audit and consolidation procedures for TEMSFM; and (3) the financial statements audit and consolidation procedures for TEMSFN. Ms. Hjaltman seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

**Ms. Heeg moved to approve the risk management matter discussed during Executive Session under Agenda Item ES 2.2.1. Vice Chair Flores seconded the motion. The motion passed by unanimous voice vote with no abstentions.**

**Adjournment (Agenda Item 14)**
Chair Foster adjourned the meeting at approximately 2:22 p.m.

Board materials and presentations from the meeting are available on ERCOT's website at https://www.ercot.com/committees/board.

Jonathan M. Levine
Assistant Corporate Secretary

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May 1, 2024

Mr. George J. Tamez
Director, Transmission Planning & Operations Engineering
CPS Energy
500 McCullough Avenue
San Antonio, Texas 78215

Mr. Robert W. Bradish
Vice President, Planning & Engineering
American Electric Power
8500 Smiths Mill Road, 3rd floor
New Albany, OH 43054

Mr. Clif Lange
General Manager
South Texas Electric Cooperative
PO BOX 119
Nursery, TX 77976

RE: San Antonio South Reliability II Project

Dear Mr. Tamez, Mr. Bradish, and Mr. Lange:

On April 23, 2024, the Electric Reliability Council of Texas (ERCOT) Board of Directors endorsed the following Tier 1 transmission project in accordance with ERCOT Protocol Section 3.11.4:

San Antonio South Reliability II Project:

- Rebuild the existing Spruce to Pawnee 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 45.8 miles of expanded Right of Way (ROW), which will be used to build one of the new circuits while the original circuit is left in service;
- Rebuild the existing Pawnee to Tango 345-kV single circuit into a 345-kV double circuit transmission line with a normal and emergency rating of at least 1,746 MVA per circuit; this transmission line will require approximately 12.2 miles of expanded ROW, which will be used to build one of the new circuits while the original circuit is left in service; and
- Construct a new Eastside 345/138-kV station near Beck Rd. The Eastside 345/138-kV station includes two 345/138-kV autotransformers, each with normal and emergency ratings of at least 600 MVA, and will be interconnected as follows:

- Loop the existing Skyline to Spruce 345-kV double circuit transmission line into the new Eastside 345-kV station;
- Loop the existing Deely to Martinez 138-kV single circuit transmission line into the new Eastside 138-kV station;
- Loop the existing Deely to Walzem 138-kV single circuit transmission line into the new Eastside 138-kV station;
- Loop the existing Beck to Kirby 138-kV single circuit transmission line into the new Eastside 138-kV station; and
- Loop the existing Kirby to Sulphur 138-kV single circuit transmission line into the new Eastside 138-kV station.

Should you have any questions please contact me at any time.

Sincerely,

Kristi J Hobbs

Kristi Hobbs
Vice President, System Planning and Weatherization
Electric Reliability Council of Texas

cc:

Pablo Vegas, ERCOT
Woody Rickerson, ERCOT
Prabhu Gnanam, ERCOT
Robert Golen, ERCOT
Brandon Gleason, ERCOT

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March 13, 2025

*Via Email Only*

Richard Medina
Chief Energy Delivery Officer
CPS Energy
P.O. Box 1771
San Antonio, Texas 78296-1771
rgmedina@cpsenergy.com

Re: Acceleration of San Antonio South Reliability II Project

Dear Richard:

On behalf of Electric Reliability Council of Texas, Inc. (ERCOT), I am writing to request that CPS Energy proceed with the acceleration of its portion of the San Antonio South Reliability II Project to mitigate the need for ERCOT-wide load-shedding due to anticipated post-contingency overloads of the transmission lines that transfer power to the San Antonio area. Accelerating this project will provide reliability benefits far in excess of the incremental cost.

As you know, the San Antonio South Reliability II Project consists of the following elements:

- Construction of a new 345/138-kV switching station on the east side of San Antonio near the Beck Rd station (projected in-service date of June 2028),
- Rebuilding the 345-kV single circuit from JK Spruce to Pawnee into a 345-kV double circuit transmission line (projected in-service date of December 2028), and
- Rebuilding the 345-kV single circuit from Pawnee to Tango into a 345-kV double circuit transmission line (projected in-service date of May 2029).

CPS Energy has responsibility for rebuilding the JK Spruce to Pawnee and Pawnee to Tango transmission lines. Based on our discussions, it is ERCOT's understanding that CPS Energy could accelerate the in-service dates of these upgrades by constructing each of the new double-circuit transmission lines while the existing single-circuit remains in service. ERCOT understands that an energized construction of the lines could accelerate the in-service date of the first circuits of the rebuilt JK Spruce to Pawnee and the Pawnee to Tango double-circuit transmission lines to as early as August 31, 2026 and that it could accelerate the in-service date of the second circuits of these transmission lines to as early as December 31, 2026. ERCOT further understands that this acceleration would be undertaken in accordance with good utility practice, including accounting for all appropriate safety considerations.

CPS Energy has informed ERCOT that accelerating these projects would likely increase the expected $291 million cost for its share of the line replacement by 15% to 25%—i.e., by as much as approximately $73 million. ERCOT's internal cost-benefit analysis has concluded that the reliability benefit of accelerating the in-service dates of the two circuits to the dates identified by CPS Energy would substantially exceed the incremental cost of that acceleration due to avoided risk of load-shedding that would otherwise be necessary to alleviate projected transmission overloads.

For this reason, **ERCOT requests that CPS Energy proceed with an accelerated schedule, including the energized construction of these transmission lines and all other appropriate actions consistent with good utility practice, with the aim of placing the first circuits of the rebuilt JK Spruce to Pawnee and the Pawnee to Tango double-circuit transmission lines in service by August 31, 2026 and the second circuits of these transmission lines in service by December 31, 2026.** While ERCOT understands that a variety of factors could influence the actual in-service dates and that CPS Energy cannot commit to a date certain, ERCOT appreciates CPS Energy taking all reasonable measures to expedite these efforts, given the reliability implications of any delay.

ERCOT also understands that CPS Energy will need to obtain an amendment to its certificate of convenience and necessity (CCN) from the Public Utility Commission of Texas to construct the second circuits of these transmission lines. Consequently, ERCOT's request is subject to the Commission's approval of that CCN amendment.

It is also ERCOT's understanding that CPS Energy's Board of Trustees will need to approve the acceleration of this project later this month. Once that decision has been made, I would appreciate you promptly notifying me.

ERCOT will also notify AEP Services Corp. and South Texas Electric Cooperative, Inc. (STEC) of this request and provide a similar request for acceleration of their respective projects. ERCOT appreciates CPS Energy's willingness to investigate the possibility of accelerating this project and its consideration of this request. If I can provide any information that may be of assistance to you or to the CPS Energy Board of Trustees, please do not hesitate to let me know.

Sincerely,

*/s/ D.W. Rickerson, P.E.*

D.W. Rickerson, P.E.
Senior Vice President and Chief Operating Officer
Electric Reliability Council of Texas, Inc.
(512) 248-6501
Woody.Rickerson@ercot.com

Cc: Kenneth Bowen (kbowen@cpsenergy.com)
Shana Ramirez (smramirez@cpsenergy.com)
Kipling Giles (kdgiles@cpsenergy.com)

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# Attachment 6

June 20, 2025

«FirstName» «LastName» «Suffix»
«SecondName»
«Address1» «Address2»
«City», «STATE» «ZIP»

***RE: Application of the City of San Antonio, Acting By and Through City Public Service Board (CPS Energy) and AEP Texas Inc. to Amend their Certificates of Convenience and Necessity for the Proposed Pawnee to Tango 345 kV Transmission Line Rebuild in Karnes and Bee Counties***

**PUBLIC UTILITY COMMISSION OF TEXAS (PUC) DOCKET NO. 58253**

Tract ID: «Tract_IDs»

Dear Landowner:
This letter is to inform you that the City of San Antonio, acting by and through City Public Service Board (CPS Energy), and AEP Texas Inc. (AEP Texas) are requesting approval from the Public Utility Commission of Texas (PUC) to amend their Certificates of Convenience and Necessity (CCN) to construct the proposed Pawnee to Tango 345 kV Transmission Line Rebuild in Karnes and Bee Counties.

The proposed transmission line will connect the Pawnee Station in Karnes County to the AEP Texas Tango Station in Bee County. The entire project will be approximately 12 miles in length and is estimated to cost approximately $86 million.

Your land may be directly affected in this docket. If the route on your land is approved by the PUC, CPS Energy and AEP Texas will have the right to build the facilities, which may directly affect your land. This docket will not determine the value of your land or the value of an easement if one is needed by CPS Energy and AEP Texas to build the facilities.

If you have questions about the transmission line, please call CPS Energy at (210) 353-6673 or AEP Texas at (361) 881-5703. The description of the proposed route and a map showing the proposed route is enclosed for your convenience.

The CCN application, including detailed routing maps illustrating the proposed transmission line project and project area, may be reviewed on the project website at https://www.cpsenergy.com/content/corporate/en/about-us/new-infrastructure/pawnee-to-tango.html and at the following locations:

- CPS Energy, 500 McCullough, San Antonio, Texas 78215
- Joe Barnhart Bee County Library, 110 W Corpus Christi St, Beeville, Texas 78102

***The route and route segment(s) included in this notice are available for selection and approval by the Public Utility Commission of Texas.***

The enclosed brochure entitled "Landowners and Transmission Line Cases at the PUC" provides basic information about how you may participate in this docket, and how you may contact the PUC. Please read this brochure carefully. Also included in this packet are sample forms for making comments and for making a request to intervene as a party in this docket.

The PUC's brochure emphasizes the following: ***The only way to fully participate in the PUC's decision on where to locate the transmission line is to intervene in the docket. It is important for an affected person to intervene because the utility is not obligated to keep affected persons informed of the PUC's proceedings and cannot predict which route may or may not be approved by the PUC.*** CPS Energy will place updates on the project site listed above, however all affected persons are encouraged to participate in the process.

Your request for intervention should be filed electronically and you will be required to serve the request on other parties by email. Therefore, please include your own email address on the intervention form. Instructions for electronic filing via the "PUC Filer" on the Commission's website can be found here: https://interchange.puc.texas.gov/filer Instructions for using the PUC Filer are available at https://ftp.puc.texas.gov/public/puct-info/industry/filings/E-Filing_Instructions.pdf Once you obtain a tracking sheet associated with your filing from the PUC Filer, you may email the tracking sheet and the document you wish to file to: centralrecords@puc.texas.gov. For assistance with your electronic filing, please contact the Commission's Help Desk at (512) 936-7100 or helpdesk@puc.texas.gov. You can review materials filed in this docket on the PUC Interchange at: http://interchange.puc.texas.gov/.

In addition to the contacts listed in the brochure, you may call the PUC's Customer Assistance Hotline at (888) 782-8477. Hearing- and speech-impaired individuals with text telephones (TTY) may contact the PUC's Customer Assistance Hotline at (512) 936-7136 or toll free at (800) 735-2989. If you wish to participate in this proceeding by becoming an intervenor, the deadline for intervention in the proceeding is July 21, 2025, and the PUC should receive a letter from you requesting intervention by that date.

While the preferred method is for you to submit your request for intervention electronically, if you are unable to do so you may mail 10 copies of the request to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, Texas 78711-3326

Persons who wish to intervene in the docket must also mail or email a copy of their request for intervention to all parties in the docket and all persons that have pending motions to intervene, at or before the time the request for intervention is mailed to the PUC. In addition to the intervention deadline, other important deadlines may already exist that affect your participation in this docket. You should review the orders and other filings already made in the docket. The enclosed brochure explains how you can access these filings.

Sincerely,

**CPS Energy**
**Kevin Phillips, PE**
S&T Regulatory Support Project Manager
Mail Code RT0801
500 McCullough Ave.
San Antonio, Texas 78215
210.353.6673
Pawnee-TangoProject@cpsenergy.com

**AEP Texas, Inc.**
**Chad Tomanec**
Regulatory Consultant
539 N. Carancahua
Corpus Christi, TX 78401
(361) 881-5703
Enclosures

20 de junio de 2025

«FirstName» «LastName» «Suffix»
«SecondName»
«Address1» «Address2»
«City», «STATE» «ZIP»

***RE: Solicitud de la Ciudad de San Antonio, Actuando Por y A Través de la Junta de Servicios Públicos de la Ciudad (CPS Energy) y AEP Texas Inc. para Enmendar sus Certificados de Conveniencia y Necesidad para el Proyecto Propuesto de Reconstrucción de la Línea de Transmisión de 345 kV de Pawnee a Tango en los condados de Karnes y Bee, Texas***

**COMISIÓN DE SERVICIOS PÚBLICOS DE TEXAS (PUC) EXPEDIENTE NO. 58523**

Tract ID: «Tract_IDs»

Estimado Propietario:
Esta carta es para informarle que la Ciudad de San Antonio, actuando por y a través de la Junta de Servicios Públicos de la Ciudad (CPS Energy), y AEP Texas Inc. (AEP Texas) están solicitando la aprobación de la Comisión de Servicios Públicos de Texas (PUC) para enmendar sus Certificados de Conveniencia y Necesidad (CCN) para construir el Proyecto de Reconstrucción de la Línea de Transmisión de 345 kV Pawnee a Tango propuesto en los Condados de Karnes y Bee.

La línea de transmisión propuesta conectará la estación de Pawnee, en el condado de Karnes, con la estación de Tango de AEP Texas, en el condado de Bee. El proyecto completo tendrá una longitud aproximada de 12 millas y se calcula que costará unos $86 millones de dólares.

Su terreno puede verse directamente afectado en este expediente. Si la PUC aprueba la ruta en su terreno, CPS Energy y AEP Texas tendrán derecho a construir las instalaciones, lo que puede afectar directamente su terreno. Este expediente no determinará el valor de su terreno o el valor de una servidumbre si CPS Energy y AEP Texas la necesitan para construir las instalaciones.

Si tiene preguntas sobre la línea de transmisión, llame a CPS Energy al (210) 353-6673 o a AEP Texas al (361) 881-5703. La descripción de la ruta propuesta y un mapa que muestra la ruta propuesta se adjunta para su conveniencia.

La solicitud de CCN, incluidos los mapas de ruta detallados que ilustran el proyecto de línea de transmisión propuesto y el área del proyecto, puede consultarse en el sitio web del proyecto en https://www.cpsenergy.com/content/corporate/en/about-us/new-infrastructure/pawnee-to-tango.html y en los siguientes lugares:

- CPS Energy, 500 McCullough, San Antonio, Texas 78215
- Joe Barnhart Bee Biblioteca del Condado, 110 W Corpus Christi St, Beeville, TX 78102

***La ruta y el segmento o segmentos de ruta incluidos en este anuncio están disponibles para su selección y aprobación por parte de la Comisión de Servicios Públicos de Texas.***

El folleto adjunto titulado "Casos de Propietarios de Tierras y Líneas de Transmisión en la PUC" proporciona información básica sobre cómo puede participar en este expediente y cómo puede ponerse en contacto con la PUC. Por favor, lea atentamente este folleto. También se incluyen en este paquete formularios de muestra para hacer comentarios y para hacer una solicitud para intervenir como parte en este expediente. La única manera de participar plenamente en la decisión de la PUC sobre la ubicación de la línea de transmisión es intervenir en el expediente.

El folleto de la PUC hace énfasis en lo siguiente: **La única manera de participar plenamente en la decisión de la PUC sobre dónde ubicar la línea de transmisión es intervenir en el expediente. Es importante que una persona afectada intervenga porque la compañía de servicios públicos no está obligada a mantener a las personas afectadas informadas de los procedimientos de la PUC y no puede predecir qué ruta puede o no ser aprobada por la PUC.** CPS Energy publicará actualizaciones en el sitio del proyecto mencionado anteriormente, pero se anima a todas las personas afectadas a participar en el proceso.

Su solicitud de intervención debe presentarse electrónicamente y se le pedirá que notifique la solicitud a las demás partes por correo electrónico. Por lo tanto, incluya su propia dirección de correo electrónico en el formulario de intervención. Las instrucciones para la presentación electrónica a través del "PUC Filer" en el sitio web de la Comisión se pueden encontrar aquí: https://interchange.puc.texas.gov/filer Las instrucciones para utilizar el PUC Filer están disponibles en https://ftp.puc.texas.gov/public/puct-info/industry/filings/E-Filing_Instructions.pdf Una vez que obtenga una hoja de seguimiento asociada a su presentación del PUC Filer, puede enviar por correo electrónico la hoja de seguimiento y el documento que desea presentar a: centralrecords@puc.texas.gov. Si necesita ayuda con su presentación electrónica, póngase en contacto con el servicio de asistencia de la Comisión llamando al (512) 936-7100 o escribiendo a helpdesk@puc.texas.gov. Puede revisar los materiales presentados en este expediente en el PUC Interchange en: http://interchange.puc.texas.gov/.

Además de los contactos indicados en el folleto, puede llamar a la línea directa de asistencia al cliente de la PUC al (888) 782-8477. Las personas con discapacidad auditiva o del habla que dispongan de teléfonos de texto (TTY) pueden ponerse en contacto con la línea directa de asistencia al cliente de la PUC en el (512) 936-7136 o en el número gratuito (800) 735-2989. Si desea participar en este procedimiento convirtiéndose en interviniente, la fecha límite para intervenir en el procedimiento es el 21 de julio, 2025, y la PUC debe recibir una carta suya solicitando la intervención antes de esa fecha.

Aunque el método preferido es que presente su solicitud de intervención electrónicamente, si no puede hacerlo puede enviar por correo 10 copias de la solicitud a:

Comisión de Servicios Públicos de Texas
Registros Centrales
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, Texas 78711-3326

Las personas que deseen intervenir en el expediente también deben enviar por correo postal o electrónico una copia de su solicitud de intervención a todas las partes del expediente y a todas las personas que tengan mociones de intervención pendientes, en el momento en que se envíe la solicitud de intervención a la PUC o antes. Además del plazo de intervención, es posible que ya existan otros plazos importantes que afecten a su participación en este expediente. Debería consultar las órdenes y otros documentos ya presentados en el expediente. En el folleto adjunto se explica cómo acceder a estos documentos.

Atentamente,

**CPS Energy**
**Kevin Phillips, PE**
S&T Regulatory Support
Director de Proyectos
Código postal RT0801
500 McCullough Ave.
San Antonio, Texas 78215
210.353.6673
Pawnee-TangoProject@cpsenergy.com

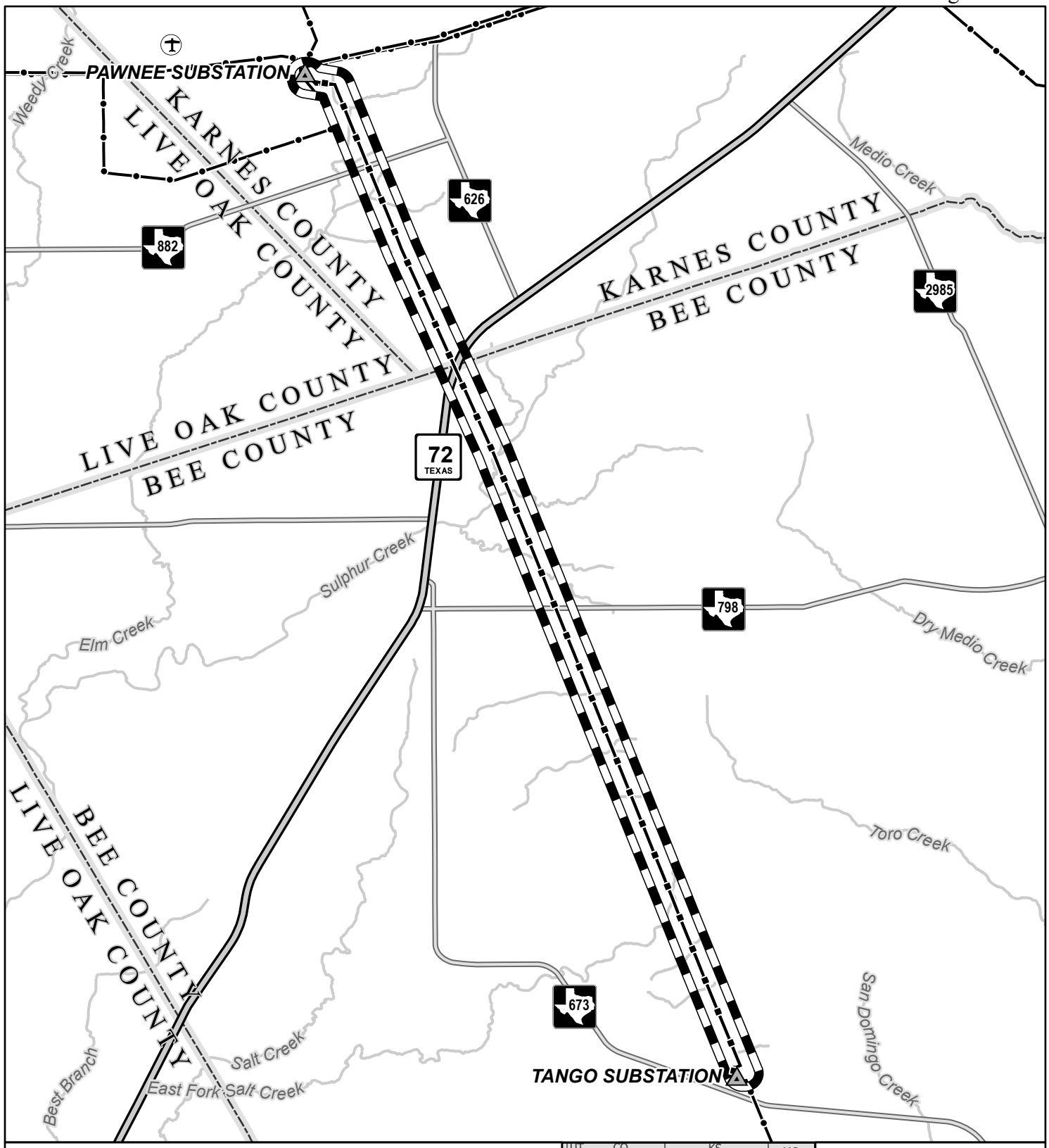
**AEP Texas, Inc.**
**Chad Tomanec**
Consultor Regulatorio
539 N. Carancahua
Corpus Christi, TX 78401
(361) 881-5703

**CPS Energy and AEP Texas**
**Proposed Pawnee to Tango 345 kV Transmission Line Rebuild**
**PUC Docket No. 58253**
**Description of the Project Route**

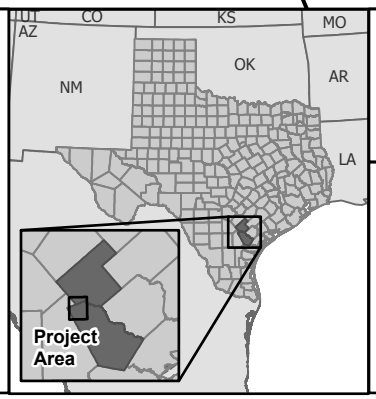
City Public Service Board (CPS Energy) and AEP Texas Inc. (AEP Texas) have filed a joint Certificate of Convenience and Necessity (CCN) application with the Public Utility Commission of Texas (PUC) to reconstruct an existing single-circuit 345-kV Transmission Line to a new double-circuit 345-kV Transmission line (Project) in Karnes and Bee Counties. In their CCN application for this Project, CPS Energy and AEP Texas have presented a single route composed of one segment that encompasses the existing single-circuit 345-kV Transmission Line for consideration by the PUC. The following narrative describes the proposed project route, along with the enclosed map that shows the proposed project route.

*Note: All distances listed below are approximate and rounded to the nearest hundredths of a mile.*

**Segment: 12.23 miles**
The project route composed of one segment begins at the South Texas Electric Cooperative Pawnee Substation, located approximately 4.5 miles northwest of State Highway (SH) 72. The segment leaves the Pawnee Substation and proceeds southeast for approximately 0.16 mile. The segment then turns east-southeast for approximately 0.18 mile. The segment then turns southeast for approximately 11.74 miles, crossing Farm-to-Market (FM) 882, the Karnes and Bee County line, SH 72, and Farm-to-Market 798. Finally, the segment turns southwest for approximately 0.15 mile and terminates at the AEP Texas Tango Substation, located approximately 0.15 mile northeast of FM 673.




- Existing Project Station
- Project Route
- Study Area
- Existing Electrical Transmission Line
- Private Airport
- State Highway
- FM Road
- River or Stream
- County Boundary




PAWNEE TO TANGO
345 KV TRANSMISSION LINE
REBUILD PROJECT

REBUILD ROUTE

0 1 2
Miles

Date: 3/24/2025

# Landowners and Transmission Line Cases at the PUC

### Why am I receiving this notice?

You are receiving this notice because your property is near one of the possible routes for a proposed electric transmission line or near a proposed substation site. You can find maps of the proposed routes in the company's application on the Public Utility Commission of Texas' (PUCT) Interchange using the five -digit docket number.

### What does the (PUCT) do?

The PUCT is the Texas state agency that decides if a transmission line is needed and what route the line will follow. The PUCT does not build or operate electric transmission lines or substations.

### What are transmission lines and why do we need them?

Electric transmission lines carry electricity over long distances across the state. They bring electricity from power plants to cities and neighborhoods where they link to electric substations and smaller wires called distribution-level wires, that carry electricity to individual customers' homes and businesses. New electric transmission lines are needed where there is growth in electricity demand or where existing transmission lines are at full capacity and need to be expanded.

## Public Participation in the Transmission Line Siting Process

### How can I participate?

**Depending on the level of participation you choose, you can either be a protestor or an intervenor.**

- **Protestors** – If you have concerns about the transmission line, you can send us written comments about the proposed routes. These comments are filed publicly and are available to anyone who is interested in the application. Comments help inform the PUCT Commissioners and staff of the public's concerns, however, they do not serve as evidence or enable the protestor to participate in the case as a participant or party.

- **Intervenors** – Intervening makes you an official participant or party in the legal case where the proposed transmission line routes are reviewed in front of a judge and the PUCT Commissioners. If you are approved as an intervenor, you will be allowed to present written evidence in the case and can cross-examine witnesses. Additionally, you can testify in the case and may also be cross-examined by the other parties in the case. Intervenors must follow along with the process of the case, respond to requests from the Administrative Law Judge (ALJ) and other parties, and actively participate in the case. Otherwise, they may lose their status as an intervenor. Intervenors are not required to have an attorney. The notice you received lists the deadline to intervene. Forms for intervenors can be found on the PUC website.

## Why should I participate?

If you have any concerns about the proposed routes, the PUCT encourages you to participate in the siting process. As a landowner, you have detailed knowledge of the impacted area that might not be reflected in the application. Sharing your knowledge with the PUCT allows the PUCT Commissioners to make better-informed decisions about the route of the line.

## How can I follow the process?

All the documents related to a case are filed in the PUCT public document interchange. You can search for the case by name or by the five-digit docket number located on your notice letter. You can also sign up to receive a notification every time a new document is added related to the case. The interchange is at https://interchange.puc.texas.gov/

## What is the process?

After the company files an application with the PUCT to build a new transmission line, the PUCT's technical staff reviews the application in a legal proceeding. When an intervenor or PUCT technical staff requests a hearing, the PUCT will send the application to the State Office of Administrative Hearings (SOAH). The SOAH judge will set a hearing date, deadlines to request information from other participants and deadlines to file written testimony or a statement of position prior to the hearing. The SOAH judge may determine the format of conferences and hearings, such as through video conference with a call-in option. Participants in the case must attend the hearing to have their written testimony entered into evidence. After the hearing, the SOAH judge will provide the PUCT Commissioners a recommendation about the proposed transmission line route.

The PUCT Commissioners are not bound by the SOAH judge's recommendation in selecting a route for the transmission line. The PUCT Commissioners will issue a final decision at a public meeting that participants to the case can attend and request to make a statement. PUCT public meetings are broadcast online. The PUCT Commissioners can and sometimes do make alterations to the route in response to statements from landowners. The company building the transmission line will then negotiate with landowners to purchase easement rights on their property. The PUCT does not determine the amount of money to be paid to landowners for easements or other rights-of-way.

Until the PUCT Commissioners make a final decision, participants in the case also negotiate to find a route that satisfies everyone. The PUCT Commissioners are not required to approve a negotiated route.

The entire PUCT transmission line route review process can take up to six months.

## Where do I go for more information?

The company that has applied to build the line may have more information available on their website. For more information about how to participate in the process please contact the PUCT Office of Public Engagement at 512-936-7374 or public@puc.texas.gov.

# Casos de Propietarios de Tierras y Líneas de Transmisión en la PUC

### ¿Por qué recibo este aviso?

Está recibiendo este aviso porque su propiedad está cerca de una de las posibles rutas para una línea de transmisión eléctrica propuesta o cerca de un sitio de subestación propuesto. Puede encontrar mapas de las rutas propuestas en la solicitud de la compañía en el intercambio de la Comisión de Servicios Públicos de Texas (PUCT) utilizando el número de expediente de cinco dígitos.

### ¿Qué hace la PUCT?

La PUCT es la agencia estatal de Texas que decide si se necesita una línea de transmisión y qué ruta seguirá la línea. La PUCT no construye ni opera líneas de transmisión eléctrica.

### ¿Qué son las líneas de transmisión y por qué las necesitamos?

Las líneas de transmisión eléctrica transportan electricidad a largas distancias por todo el estado. Llevan la electricidad desde las plantas de energía a las ciudades y vecindarios donde se conectan a cables más pequeños llamados cables de nivel de distribución, que llevan la electricidad a los hogares y negocios de los clientes individuales. Se necesitan nuevas líneas de transmisión eléctrica donde hay un aumento en la demanda de electricidad o donde las líneas de transmisión existentes están a capacidad completa y es necesario ampliarlas.

## Participación Pública en el Proceso de Emplazamiento de Líneas de Transmisión

### ¿Cómo puedo participar?

**Según el nivel de participación que elija, puede ser un manifestante o un interventor.**

- **Manifestantes** – Si tienen inquietudes sobre la línea de transmisión, pueden enviarnos comentarios por escrito sobre las rutas propuestas. Estos comentarios se archivan en el registro público y están disponibles para cualquier persona interesada en la solicitud. Los comentarios ayudan a informar a los comisionados y al personal de la PUCT sobre las preocupaciones del público.

- **Interventores** – -La intervención lo convierte en un participante oficial en el caso legal donde la transmisión y la ruta se debaten frente a un juez y los Comisionados de la PUC. Se le permitirá presentar pruebas en el caso y podrá contrainterrogar a los testigos. Puede testificar en el caso y también puede ser interrogado por las otras partes en el caso. Los interventores deben seguir con el proceso del caso, responder a las solicitudes del Juez de Derecho Administrativo (ALJ) y otras partes, y participar activamente en el caso. De lo contrario, puede perder su condición de interventor. Los interventores no están obligados a tener un abogado. El aviso que recibió indica la fecha límite para intervenir. Los formularios para interventores se pueden encontrar en el sitio web de la PUC.

## ¿Por qué debo participar?

Si tiene inquietudes sobre las rutas propuestas, la PUCT lo alienta a participar en el proceso de ubicación. Como propietario, tiene un conocimiento detallado del área afectada que podría no estar reflejado en la solicitud. Compartir su conocimiento con la PUCT nos permite tomar una decisión mejor informada sobre la ruta de la línea.

## ¿Cómo puedo seguir el proceso?

Todos los documentos relacionados con un caso se archivan en el intercambio de documentos públicos de la PUCT. Puede buscar el caso por nombre o por el número de expediente de cinco dígitos. También puede registrarse para recibir una notificación cada vez que se agregue un nuevo documento relacionado con el caso. El intercambio está en https://interchange.puc.texas.gov/

## ¿Cuál es el proceso?

Después de que la empresa presenta una solicitud ante la PUCT para construir una nueva línea de transmisión, el personal técnico de la PUCT revisa la solicitud en un procedimiento legal. Cuando un interventor o personal técnico de la PUCT solicite una audiencia, la PUCT enviará la solicitud a la Oficina Estatal de Audiencias Administrativas (SOAH). El juez de SOAH fijará una fecha de audiencia, plazos para solicitar información de otros participantes y plazos para presentar testimonio escrito o una declaración de posición antes de la audiencia. El juez de SOAH puede determinar el formato de las conferencias y audiencias, por ejemplo, mediante videoconferencia con opción de llamada telefonica. Los participantes en el caso deben asistir a la audiencia para que su testimonio escrito se convierta en prueba. Después de la audiencia, el juez de SOAH brindará a los Comisionados de la PUCT una recomendación sobre la ruta propuesta para la línea de transmisión.

Los Comisionados de la PUCT no están obligados por la recomendación del juez de la SOAH al seleccionar una ruta para la línea de transmisión. Los Comisionados de la PUCT emitirán una decisión final en una reunión pública a la que podrán asistir los participantes del caso y solicitar declarar. Las reuniones públicas de la PUCT se transmiten en línea. Los Comisionados de la PUCT pueden y en ocasiones hacen modificaciones a la ruta en respuesta a declaraciones de los propietarios de terrenos. Luego, la empresa que construye la línea de transmisión negociará con los propietarios de terrenos para comprar derechos de servidumbre sobre sus propiedades. La PUCT no determina la cantidad de dinero que se debe pagar a los propietarios por servidumbres u otros derechos de paso.

Hasta que los comisionados de la PUCT tomen una decisión final, los participantes en el caso también negocian para encontrar una ruta que satisfaga a todos. Los Comisionados de la PUCT no están obligados a aprobar una ruta negociada.

Todo el proceso de revisión de ruta de la línea de transmisión de la PUCT puede tardar hasta seis meses.

## ¿Dónde me dirijo para obtener más información?

La empresa que haya solicitado construir la línea tendrá mapas en su sitio web. Para obtener más información sobre cómo participar en el proceso, comuníquese con la Oficina de Participación Pública de PUCT https://www.puc.texas.gov/agency/about/ope/ o 512-936-7374.

# Request to Intervene in PUC Docket No. [ ]

The following information must be submitted by the person requesting to intervene in this proceeding. This completed form will be provided to all parties in this docket. **If you DO NOT want to be an intervenor, but still want to file comments, please complete the "Comments" page.**

Mail this completed form and 10 copies to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, TX 78711-3326

First Name:_____ Last Name: _____

Phone Number:_____ Fax Number:_____

Address, City, State:_____

Email Address:_____

**I am requesting to intervene in this proceeding. As an INTERVENOR, I understand the following:**

- I am a party to the case;
- I am required to respond to all discovery requests from other parties in the case;
- If I file testimony, I may be cross-examined in the hearing;
- If I file any documents in the case, I will have to provide a copy of that document to every other party in the case; and
- I acknowledge that I am bound by the Procedural Rules of the Public Utility Commission of Texas (PUC) and the State Office of Administrative Hearings (SOAH).

**Please check one of the following:**

☐ I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.

☐ One or more of the utility's proposed routes would cross my property.

☐ Other. Please describe and provide comments. You may attach a separate page, if necessary.

_____

_____

_____

**Signature of person requesting intervention:**

_____ Date: _____

# Comments in Docket No. _____

**If you want to be a PROTESTOR only, please complete this form.** Although public comments are not treated as evidence, they help inform the PUC and its staff of the public concerns and identify issues to be explored. The PUC welcomes such participation in its proceedings.

For USPS, send one copy to:

Public Utility Commission of Texas
Central Records
P.O. Box 13326
Austin, TX 78711-3326

For all other delivery or courier services, send one copy to:

Public Utility Commission of Texas
Central Records
1701 N. Congress Ave.
Austin, TX 78701

First Name: _____ Last Name: _____

Phone Number: _____ Fax Number: _____

Address, City, State: _____

**I am NOT requesting to intervene in this proceeding. As a PROTESTOR, I understand the following:**

- I am NOT a party to this case;
- My comments are not considered evidence in this case; and
- I have no further obligation to participate in the proceeding.

**Please check one of the following:**

☐ I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.

☐ One or more of the utility's proposed routes would cross my property.

☐ Other. Please describe and provide comments. You may attach a separate page, if necessary. _____

_____

_____

_____

_____

**Signature of person submitting comments:**

_____ Date: _____

# Attachment 7

| TRACT NO. | Habitable Structures | PID (North to South) | COUNTY | GEO_ID | OWNER_NAME | LEGAL_DESC | NAME_CARE OF | MAIL_ADDR |
|---|---|---|---|---|---|---|---|---|
| TA-KA-001.1 | | 66516 | KARNES | 1051110000000 | T-H-B FAMILY LTD PARTNERSHIP ETAL | AB 115 G FRISBIE TR 63 | C/O KAREN K HUGENBERG | PO BOX 398, MCQUEENEY ,TX 78123-0398 |
| TA-KA-001 | | 66518 | KARNES | 10511310000000 | T-H-B FAMILY LTD PARTNERSHIP ETAL | (1124/802)(1187/102) (1225/530) | C/O KAREN K HUGENBERG | PO BOX 398, MCQUEENEY ,TX 78123-0398 |
| TA-KA-002 | | 66520 | KARNES | 10511330000000 | SOUTH TEXAS ELEC COOP | AB 292 J WARE TR 62(TR1) (748/490) | C/O 21071 - KROLL, LLC | PO BOX 119, NURSERY, TX 77976 |
| TA-KA-003 | | 66519 | KARNES | 10511320000000 | CITY OF SAN ANTONIO | AB 292 J WARE TR 62 (733/003) | SYSTEM | P O BOX 1771, SAN ANTONIO, TX 78296-1771 |
| TA-KA-004 | | 106211 | KARNES | 10511350000000 | CITY OF SAN ANTONIO | AB 292 J WARE TR 62(TR1) | CITY OF SAN ANTONIO | 500 MCCULLOUGH AVE, SAN ANTONIO, TX 78215 |
| TA-KA-007 | | 62975 | KARNES | 10219500000000 | PONISH BETTY RUTH | AB 130 E L GARRETT TR 4 (TR7) (797/10) | | 105 EDGEMONT DR SAN MARCOS TX 78666 |
| TA-KA-010 | | 71135 | KARNES | 10907800000000 | JGLG2 PROPERTIES LLC | AB 130 E L GARRETT TR 22 (TR3) (202400001126) (513/208) (595/105) | PAWNEE PROPERTY SERIES | PO BOX 212 LOUISE TX 77455-0212 |
| TA-KA-013 | | 71136 | KARNES | 10907900000000 | JGLG2 PROPERTIES LLC | AB 352 J T K LATHROP TR 18 (202400001126) (TR4) (513/208)(595/105) | PAWNEE PROPERTY SERIES | PO BOX 212 LOUISE TX 77455 0212 |
| TA-KA-016 | 1 | 104091 | KARNES | 10473910000000 | KRAUSE JIMMY DON | AB352 JTK LATHROP TR 14(TR1) (201600000605) | | 9903 FM 626, KENNEDY, TX 78119-5133 |
| TA-KA-017 | | 71629 | KARNES | 10953700000000 | HORN JCIL ANN W & JACKSON JNIL A, TRUSTEES OF THE J'CIL & J'NIL TRUST, DATED MAY 2, 2013 | AB 352 JTK LATHROP TR 14 (TR 11) (591/44) (595/470) (933/220-222) | TRUSTEES JCIL & JNIL TRUST | 10644 BLACK HORSE HELOTES TX 78023 4368 |
| TA-KA-020 | | 71630 | KARNES | 10953800000000 | HORN JCIL ANN W & JACKSON JNIL A, TRUSTEES OF THE J'CIL & J'NIL TRUST, DATED MAY 2, 2013 | AB 79 E COBB TR 13(TR4) (591/44) (595/470) (933/220-222) | TRUSTEES JCIL & JNIL TRUST | 10644 BLACK HORSE HELOTES TX 78023 4368 |
| TA-KA-022 | | 67141 | KARNES | 10559850000000 | GUSTAFSON THEADORE Q & | AB 79 E COBB (TR7) (722/506) | ELVENIA | 3727 WATERLOO DR, CORPUS CHRISTI, TX 78415 |
| TA-KA-023 | | 67142 | KARNES | 10559860000000 | GUSTAFSON THEADORE Q & | AB 79 E COBB (TR7A) (722/506) S#1348009384A&B (ELECTED REAL) | ELVENIA | 3727 WATERLOO DR, CORPUS CHRISTI, TX 78415 |
| TA-KA-025 | | 67140 | KARNES | 10559840000000 | GUSTAFSON THEADORE Q & | AB 141 GEO HEARST TR 15(TR13) (722/506) | ELVENIA | 3727 WATERLOO DR, CORPUS CHRISTI, TX 78415 |
| TA-KA-028 | | 60659 | KARNES | 10023130000000 | GUSTAFSON THEADORE Q & | AB 141 GEO HEARST TR 15(TR3) (436/63)(486/433)(805/138) | ELVENIA | 3727 WATERLOO DR, CORPUS CHRISTI, TX 78415 |
| TA-KA-030 | | 60657 | KARNES | 10023110000000 | GUSTAFSON THEADORE | AB 141 GEO HEARST TR 15 (4) (436/63) | | 3727 WATERLOO DR, CORPUS CHRISTI, TX 78415 |
| TA-KA-032 | | 64071 | KARNES | 10313900000000 | ESTATE OF KATHY LYNN GRISHAM, DECEASED, HICKS PRICILLA & DEVIN JAMES HICKS | AB 141 GEO HEARST TR 2{TR5} {688/372}{695/639} 16 ACRES | | 15833 GARRISON CIRCLE AUSTIN TX 78717 3053 |
| TA-KA-033 | | 64072 | KARNES | 10314000000000 | ESTATE OF KATHY LYNN GRISHAM, DECEASED, HICKS PRICILLA & DEVIN JAMES HICKS | AB 79 E COBB TR 1{TR10} {688/372}{695/639} 4 ACRES | | 15833 GARRISON CIRCLE AUSTIN TX 78717 3053 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **TA-BE-034** | | 7640 | BEE | 10202-00030-00000-000000 | Priscilla Hicks, Devin Hicks and Estate of Kathy Lynn Grisham, deceased | B G IJAMS ABST 202 TR 3 75.50 AC | % PRISCILLA HICKS | 15833 GARRISON CIR, AUSTIN TX, 78717 3053 |
| **TA-BE-035** | 4 | 17197 | BEE | 10202-00051-00000-000000 | WIEDING ALICIA G & RONNIE TTEES OF | B G IJAMS ABST 202 TR 5A 1.00 AC | RONNIE & ALICIA WIEDING LIVING TRUST | 15470 W HWY 72, KENEDY TX, 78119 |
| **TA-BE-036** | 2, 3 | 7745 | BEE | 10202-00050-00000-000000 | STANTON SANDRA S | B G IJAMS ABST 202 TR 5 99.00 AC | | 2363 FM 2509, KENEDY TX, 78119 |
| **TA-BE-037** | | 21442 | BEE | 56000-02510-00000-000000 | BENDER HARLAN M & AYLA F | PLUMMER SEC 2 1/2 TR 1 112.39 AC | CO TTEE H & A BENDER REVOC TR | 3330 MOUNT OLIVE RD ADKINS TX, 78101 2278 |
| **TA-BE-038** | | 7610 | BEE | 56000-05040-00000-000000 | The Estate of Romualdo Garza, Jr.<br>Diana G. Saenz<br>Arlandro Rumaldo Garza<br>Juana M. Garza guardian of Homer Garza | PLUMMER SEC 5 TR 4 (OLD TR 7 & TR 6-A) 19.00 AC | | 15242 HWY 72, KENEDY TX 78119 |
| **TA-BE-041** | | 7443 | BEE | 56000-05060-00000-000000 | TREVERS RANCH LP | PLUMMER SEC 5 TR 6 THRU 9 (E1/2) 320.00 AC | | 1249 FM 467, SEGUIN TX, 78155 |
| **TA-BE-043** | | 21609 | BEE | 56000-11020-00000-002013 | LKM CAPITAL LLC | PLUMMER SEC 11 TR 2 158.00 AC | C/O KIRK MIXON | 2366 BRANSLEY PLACE DULUTH, GA 30097 |
| **TA-BE-045** | | 93809 | BEE | 56000-12030-01000-002000 | TREVERS RANCH LP | PLUMMER SEC 12 TR 3-1 SW/4 OF NW/4 40.00 AC | | 1249 FM 467 SEGUIN TX 78155 |
| **TA-BE-047** | | 7274 | BEE | 56000-12060-00000-000000 | ANDREWS ALBERT G | PLUMMER SEC 12 LOT SW 1/4 OF 6 160.00 AC | | PO BOX 2677 MCALLEN, TX 78502 2677 |
| **TA-BE-048** | | 7755 | BEE | 56000-15040-00010-000000 | SCHROEDER LAND & CATTLE CO INC | PLUMMER SEC 15 TR 4 60.00 AC | | 257 W TURBO, SAN ANTONIO TX 78216 |
| **TA-BE-049** | | 7756 | BEE | 56000-15050-00010-000000 | SCHROEDER LAND & CATTLE CO INC | PLUMMER SEC 15 TR 5 40.00 AC | | 257 W TURBO, SAN ANTONIO TX 78216 |
| **TA-BE-051** | | 7804 | BEE | 56000-15020-00000-000000 | DANFORTH ENTERPRISES 1 LP | PLUMMER SEC 15 SE/4 OF NW/4 & W/2 OF SW/4 & S/2 OF SW/4 OF NW/4 | | 1003 MADRONE RD, AUSTIN TX 78746 |
| **TA-BE-052** | | 8098 | BEE | 56000-15070-00000-000000 | SCHROEDER LAND & CATTLE CO INC | PLUMMER SEC 15 E/2 OF SW/4 TR 7 80.00 AC | | 257 W TURBO, SAN ANTONIO TX 78216 |
| **TA-BE-053** | | 8099 | BEE | 56000-15060-00000-000000 | SCHROEDER LAND & CATTLE CO INC | PLUMMER SEC 15 TR 6 SE1/4 160.00 AC | | 257 W TURBO, SAN ANTONIO TX 78216 |
| **TA-BE-055** | | 7944 | BEE | 56000-22050-00010-002014 | PAL LAND INC LLC | PLUMMER SEC 22 TR 5-1 (N1/2 OF E1/2) 59.537 AC | | 18101 SANDY CV, HOUSTON TX, 77058 |
| **TA-BE-056** | | 7947 | BEE | 56000-22050-00020-002014 | PAWNEE DOVE LEASE LLC | PLUMMER SEC 22 TR 5-2 (S1/2 OF E1/2) 59.551 AC | | 921 COLUMBIA STREET, HOUSTON TX, 77008 |
| **TA-BE-057** | | 7945 | BEE | 56000-22040-00000-000000 | ESTATE OF BILLIE JO WOLFF, DECEASED, BILLY FLOYD WOLFF, INDIVIDUALLY AND AS INDEPENDENT EXECUTOR | PLUMMER SEC 22 TR 4 (W PART TRACT 4) 99.45 AC | | PO BOX 335, STOCKDALE TX, 78160-0335 |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **TA-BE-058** | | 94101 | BEE | 56000-22042-00000-000000 | WOLFF FLOYD | PLUMMER SEC 22 TR 4-B 94.550 AC | | 13295 CR 133, KENEDY TX, 78119-4464 |
| **TA-BE-059** | | 93995 | BEE | 56000-22041-00000-000000 | WOLFF FLOYD | PLUMMER SEC 22 TR 4-A 1.00 AC | | 13295 CR 133, KENEDY TX, 78119-4464 |
| **TA-BE-061** | | 7769 | BEE | 56000-24040-00000-000000 | GENTRY RANCHES LTD | PLUMMER SEC 24 TR 4 SEC 24 N PT OF NE1/4 100.00 AC | | PO BOX 4228, CORPUS CHRISTI TX 78469 |
| **TA-BE-062** | | 7768 | BEE | 56000-23010-00005-000000 | GENTRY RANCHES LTD | PLUMMER SEC 23 TR 1 N1/2 OF FR 161.28 AC | | PO BOX 4228, CORPUS CHRISTI TX 78469 |
| **TA-BE-066** | | 8260 | BEE | 56000-23020-00005-000000 | GENTRY RANCHES LTD | PLUMMER SEC 23 FR S 1/2 OF FR SEC 23 1/2 TR 2 157.46 AC | | PO BOX 4228 CORPUS CHRISTI TX 78469 |
| **TA-BE-068** | | 104261 | BEE | 56000-32020-00010-000000 | DAVIS MIRELLA ESCAMILLA | PLUMMER SEC 32 TR 2 {PRT N PRT OF FR. SEC 32} & 7 - 9 | | RT 1 BOX 58 KENEDY TX 78145 |
| **TA-BE-070** | | 8149 | BEE | 10453-00010-00000-002011 | DOBSON CLARENCE P | E L & R R CO ABST 453 85 AC | | 5369 CR 121 KENEDY TX 78119 4487 |
| **TA-BE-071** | | 102589 | BEE | 10453-00010-01000-000000 | DOBSON CLARENCE P | E L & R R CO ABST 453 227 AC | | 5369 CR 121 KENEDY TX 78119 4487 |
| **TA-BE-072** | | 19573<br>97033 | BEE | 10114-00020-00000-002011 | DOBSON CLARENCE P | T B BARTON ABST 114 332 AC | | 5369 CR 121 KENEDY TX 78119 4487 |
| **TA-BE-073** | | 103056 | BEE | 10114-00010-00020-000000 | ORSTED ONSHORE REAL ESTATE HOLDINGS LLC | T B BARTON ABST 114 TR 1-2 297.637 AC | CUMMINGS WESTLAKE LLC | 812 SAN ANTONIO STE 500, AUSTIN TX 78701 |
| **TA-BE-074** | | 19537 | BEE | 10114-00010-00000-002013 | ORSTED ONSHORE REAL ESTATE HOLDINGS LLC | T B BARTON ABST 114 273.346 AC | CUMMINGS WESTLAKE LLC | 812 SAN ANTONIO STE 500, AUSTIN TX 78701 |
| **TA-BE-075** | | 105366 | BEE | 10114-00010-00030-000000 | AEP TEXAS INC | T B BARTON ABST 114 TR 1-3 34.363 AC | | 1 RIVERSIDE PLAZA 16TH FLOOR, COLUMBUS, OH 43215 |

# Attachment 8

June 20, 2025

«Prefix» «Contact»
«FormalTitle»
«Organization»
«Address1»
«City», «State» «Zip»

***RE: Application of the City of San Antonio, Acting By and Through City Public Service Board (CPS Energy) and AEP Texas Inc. to Amend their Certificates of Convenience and Necessity for the Proposed Pawnee to Tango 345 kV Transmission Line Rebuild Project in Karnes and Bee Counties, Texas***

**PUBLIC UTILITY COMMISSION OF TEXAS (PUC) DOCKET NO. 58253**

Dear «Formal»:

As part of our efforts to keep you and the public informed about electric transmission projects, we want you to know the City of San Antonio, acting by and through City Public Service Board (CPS Energy), and AEP Texas Inc. (AEP Texas) are requesting approval from the Public Utility Commission of Texas (PUC) to amend their Certificates of Convenience and Necessity (CCN) to construct the proposed Pawnee to Tango 345 kV Transmission Line Rebuild Project in Karnes and Bee Counties.

The proposed transmission line will connect the Pawnee Station in Karnes County to the AEP Texas Tango Station in Bee County. The entire project will be approximately 12 miles in length and is estimated to cost approximately $86 million.

If you have questions about the transmission line, please call CPS Energy at (210) 353-6673 or AEP Texas at (361) 881-5703. The description of the proposed route and a map showing the proposed route is enclosed for your convenience.

The CCN application, including detailed routing maps illustrating the proposed transmission line project and project area, may be reviewed on the project website at https://www.cpsenergy.com/content/corporate/en/about-us/new-infrastructure/pawnee-to-tango.html and at the following locations:

- CPS Energy, 500 McCullough, San Antonio, Texas 78215
- Joe Barnhart Bee County Library, 110 W Corpus Christi St, Beeville, TX 78102

***The route included in this notice are available for selection and approval by the Public Utility Commission of Texas.***

The enclosed brochure entitled "Landowners and Transmission Line Cases at the PUC" provides basic information about how you may participate in this docket, and how you may contact the PUC. Please read this brochure carefully. Also included in this packet are sample forms for making comments and for making a request to intervene as a party in this docket.

The PUC's brochure emphasizes the following: ***The only way to fully participate in the PUC's decision on where to locate the transmission line is to intervene in the docket. It is important for an affected person to intervene because the utility is not obligated to keep affected persons informed of the PUC's proceedings and cannot predict which route may or may not be approved by the PUC.*** CPS Energy will place updates on the project site listed above, however all affected persons are encouraged to participate in the process.

Your request for intervention should be filed electronically and you will be required to serve the request on other parties by email. Therefore, please include your own email address on the intervention form. Instructions for electronic filing via the "PUC Filer" on the Commission's website can be found here: https://interchange.puc.texas.gov/filer Instructions for using the PUC Filer are available at https://ftp.puc.texas.gov/public/puct-info/industry/filings/E-Filing_Instructions.pdf Once you obtain a tracking sheet associated with your filing from the PUC Filer, you may email the tracking sheet and the document you wish to file to: centralrecords@puc.texas.gov. For assistance with your electronic filing, please contact the Commission's Help Desk at (512) 936-7100 or helpdesk@puc.texas.gov. You can review materials filed in this docket on the PUC Interchange at: http://interchange.puc.texas.gov/.

In addition to the contacts listed in the brochure, you may call the PUC's Customer Assistance Hotline at (888) 782-8477. Hearing- and speech-impaired individuals with text telephones (TTY) may contact the PUC's Customer Assistance Hotline at (512) 936-7136 or toll free at (800) 735-2989. If you wish to participate in this proceeding by becoming an intervenor, the deadline for intervention in the proceeding is July 21, 2025, and the PUC should receive a letter from you requesting intervention by that date.

While the preferred method is for you to submit your request for intervention electronically, if you are unable to do so you may mail 10 copies of the request to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, Texas 78711-3326

Persons who wish to intervene in the docket must also mail or email a copy of their request for intervention to all parties in the docket and all persons that have pending motions to intervene, at or before the time the request for intervention is mailed to the PUC. In addition to the intervention deadline, other important deadlines may already exist that affect participation in this docket. The enclosed brochure explains how an interested person can access these filings.

Sincerely,

**CPS Energy**
**Kevin Phillips, PE**
S&T Regulatory Support Project Manager
Mail Code RT0801
500 McCullough Ave.
San Antonio, Texas 78215
210.353.6673
Pawnee-TangoProject@cpsenergy.com

**AEP Texas, Inc.**
**Chad Tomanec**
Regulatory Consultant
539 N. Carancahua
Corpus Christi, TX 78401
(361) 881-5703

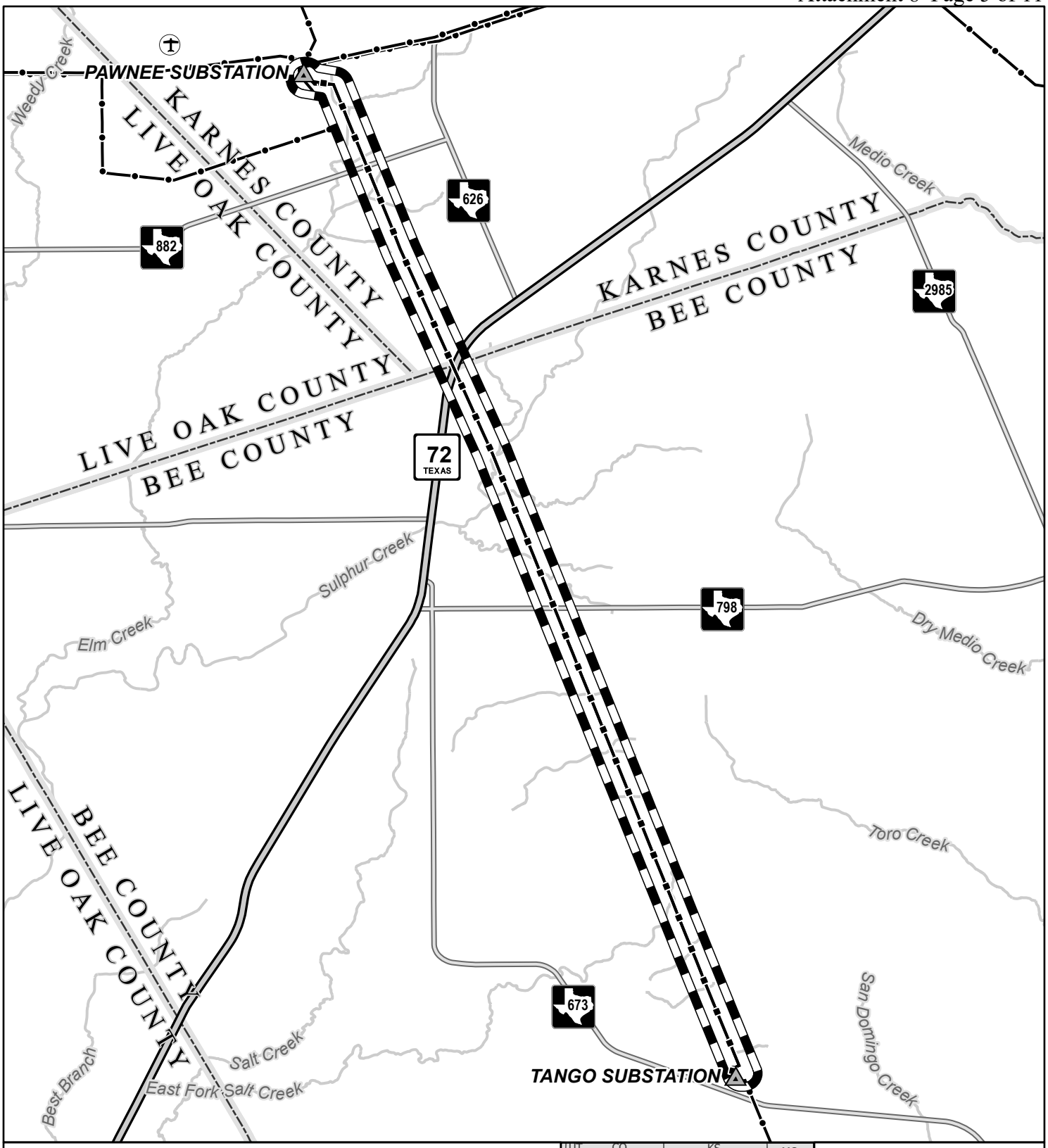
Enclosures

**CPS Energy and AEP Texas**
**Proposed Pawnee to Tango 345 kV Transmission Line Rebuild**
**PUC Docket No. 58253**
**Description of the Project Route**

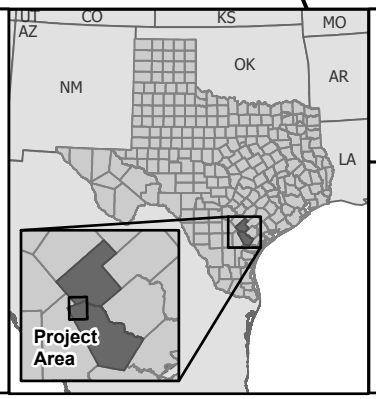
City Public Service Board (CPS Energy) and AEP Texas Inc. (AEP Texas) have filed a joint Certificate of Convenience and Necessity (CCN) application with the Public Utility Commission of Texas (PUC) to reconstruct an existing single-circuit 345-kV Transmission Line to a new double-circuit 345-kV Transmission line (Project) in Karnes and Bee Counties. In their CCN application for this Project, CPS Energy and AEP Texas have presented a single route composed of one segment that encompasses the existing single-circuit 345-kV Transmission Line for consideration by the PUC. The following narrative describes the proposed project route, along with the enclosed map that shows the proposed project route.

*Note: All distances listed below are approximate and rounded to the nearest hundredths of a mile.*

**Segment: 12.23 miles**
The project route composed of one segment begins at the South Texas Electric Cooperative Pawnee Substation, located approximately 4.5 miles northwest of State Highway (SH) 72. The segment leaves the Pawnee Substation and proceeds southeast for approximately 0.16 mile. The segment then turns east-southeast for approximately 0.18 mile. The segment then turns southeast for approximately 11.74 miles, crossing Farm-to-Market (FM) 882, the Karnes and Bee County line, SH 72, and Farm-to-Market 798. Finally, the segment turns southwest for approximately 0.15 mile and terminates at the AEP Texas Tango Substation, located approximately 0.15 mile northeast of FM 673.




Existing Project Station
Project Route
Study Area
Existing Electrical Transmission Line
Private Airport
State Highway
FM Road
River or Stream
County Boundary




PAWNEE TO TANGO
345 KV TRANSMISSION LINE
REBUILD PROJECT

REBUILD ROUTE

0 1 2
Miles

Date: 3/24/2025

# Landowners and Transmission Line Cases at the PUC

### Why am I receiving this notice?

You are receiving this notice because your property is near one of the possible routes for a proposed electric transmission line or near a proposed substation site. You can find maps of the proposed routes in the company's application on the Public Utility Commission of Texas' (PUCT) Interchange using the five -digit docket number.

### What does the (PUCT) do?

The PUCT is the Texas state agency that decides if a transmission line is needed and what route the line will follow. The PUCT does not build or operate electric transmission lines or substations.

### What are transmission lines and why do we need them?

Electric transmission lines carry electricity over long distances across the state. They bring electricity from power plants to cities and neighborhoods where they link to electric substations and smaller wires called distribution-level wires, that carry electricity to individual customers' homes and businesses. New electric transmission lines are needed where there is growth in electricity demand or where existing transmission lines are at full capacity and need to be expanded.

## Public Participation in the Transmission Line Siting Process

### How can I participate?

**Depending on the level of participation you choose, you can either be a protestor or an intervenor.**

- **Protestors** – If you have concerns about the transmission line, you can send us written comments about the proposed routes. These comments are filed publicly and are available to anyone who is interested in the application. Comments help inform the PUCT Commissioners and staff of the public's concerns, however, they do not serve as evidence or enable the protestor to participate in the case as a participant or party.

- **Intervenors** – Intervening makes you an official participant or party in the legal case where the proposed transmission line routes are reviewed in front of a judge and the PUCT Commissioners. If you are approved as an intervenor, you will be allowed to present written evidence in the case and can cross-examine witnesses. Additionally, you can testify in the case and may also be cross-examined by the other parties in the case. Intervenors must follow along with the process of the case, respond to requests from the Administrative Law Judge (ALJ) and other parties, and actively participate in the case. Otherwise, they may lose their status as an intervenor. Intervenors are not required to have an attorney. The notice you received lists the deadline to intervene. Forms for intervenors can be found on the PUC website.

## Why should I participate?

If you have any concerns about the proposed routes, the PUCT encourages you to participate in the siting process. As a landowner, you have detailed knowledge of the impacted area that might not be reflected in the application. Sharing your knowledge with the PUCT allows the PUCT Commissioners to make better-informed decisions about the route of the line.

## How can I follow the process?

All the documents related to a case are filed in the PUCT public document interchange. You can search for the case by name or by the five-digit docket number located on your notice letter. You can also sign up to receive a notification every time a new document is added related to the case. The interchange is at https://interchange.puc.texas.gov/

## What is the process?

After the company files an application with the PUCT to build a new transmission line, the PUCT's technical staff reviews the application in a legal proceeding. When an intervenor or PUCT technical staff requests a hearing, the PUCT will send the application to the State Office of Administrative Hearings (SOAH). The SOAH judge will set a hearing date, deadlines to request information from other participants and deadlines to file written testimony or a statement of position prior to the hearing. The SOAH judge may determine the format of conferences and hearings, such as through video conference with a call-in option. Participants in the case must attend the hearing to have their written testimony entered into evidence. After the hearing, the SOAH judge will provide the PUCT Commissioners a recommendation about the proposed transmission line route.

The PUCT Commissioners are not bound by the SOAH judge's recommendation in selecting a route for the transmission line. The PUCT Commissioners will issue a final decision at a public meeting that participants to the case can attend and request to make a statement. PUCT public meetings are broadcast online. The PUCT Commissioners can and sometimes do make alterations to the route in response to statements from landowners. The company building the transmission line will then negotiate with landowners to purchase easement rights on their property. The PUCT does not determine the amount of money to be paid to landowners for easements or other rights-of-way.

Until the PUCT Commissioners make a final decision, participants in the case also negotiate to find a route that satisfies everyone. The PUCT Commissioners are not required to approve a negotiated route.

The entire PUCT transmission line route review process can take up to six months.

## Where do I go for more information?

The company that has applied to build the line may have more information available on their website. For more information about how to participate in the process please contact the PUCT Office of Public Engagement at 512-936-7374 or public@puc.texas.gov.

# Casos de Propietarios de Tierras y Líneas de Transmisión en la PUC

### ¿Por qué recibo este aviso?

Está recibiendo este aviso porque su propiedad está cerca de una de las posibles rutas para una línea de transmisión eléctrica propuesta o cerca de un sitio de subestación propuesto. Puede encontrar mapas de las rutas propuestas en la solicitud de la compañía en el intercambio de la Comisión de Servicios Públicos de Texas (PUCT) utilizando el número de expediente de cinco dígitos.

### ¿Qué hace la PUCT?

La PUCT es la agencia estatal de Texas que decide si se necesita una línea de transmisión y qué ruta seguirá la línea. La PUCT no construye ni opera líneas de transmisión eléctrica.

### ¿Qué son las líneas de transmisión y por qué las necesitamos?

Las líneas de transmisión eléctrica transportan electricidad a largas distancias por todo el estado. Llevan la electricidad desde las plantas de energía a las ciudades y vecindarios donde se conectan a cables más pequeños llamados cables de nivel de distribución, que llevan la electricidad a los hogares y negocios de los clientes individuales. Se necesitan nuevas líneas de transmisión eléctrica donde hay un aumento en la demanda de electricidad o donde las líneas de transmisión existentes están a capacidad completa y es necesario ampliarlas.

## Participación Pública en el Proceso de Emplazamiento de Líneas de Transmisión

### ¿Cómo puedo participar?

**Según el nivel de participación que elija, puede ser un manifestante o un interventor.**

- **Manifestantes** – Si tienen inquietudes sobre la línea de transmisión, pueden enviarnos comentarios por escrito sobre las rutas propuestas. Estos comentarios se archivan en el registro público y están disponibles para cualquier persona interesada en la solicitud. Los comentarios ayudan a informar a los comisionados y al personal de la PUCT sobre las preocupaciones del público.

- **Interventores** – -La intervención lo convierte en un participante oficial en el caso legal donde la transmisión y la ruta se debaten frente a un juez y los Comisionados de la PUC. Se le permitirá presentar pruebas en el caso y podrá contrainterrogar a los testigos. Puede testificar en el caso y también puede ser interrogado por las otras partes en el caso. Los interventores deben seguir con el proceso del caso, responder a las solicitudes del Juez de Derecho Administrativo (ALJ) y otras partes, y participar activamente en el caso. De lo contrario, puede perder su condición de interventor. Los interventores no están obligados a tener un abogado. El aviso que recibió indica la fecha límite para intervenir. Los formularios para interventores se pueden encontrar en el sitio web de la PUC.

## ¿Por qué debo participar?

Si tiene inquietudes sobre las rutas propuestas, la PUCT lo alienta a participar en el proceso de ubicación. Como propietario, tiene un conocimiento detallado del área afectada que podría no estar reflejado en la solicitud. Compartir su conocimiento con la PUCT nos permite tomar una decisión mejor informada sobre la ruta de la línea.

## ¿Cómo puedo seguir el proceso?

Todos los documentos relacionados con un caso se archivan en el intercambio de documentos públicos de la PUCT. Puede buscar el caso por nombre o por el número de expediente de cinco dígitos. También puede registrarse para recibir una notificación cada vez que se agregue un nuevo documento relacionado con el caso. El intercambio está en https://interchange.puc.texas.gov/

## ¿Cuál es el proceso?

Después de que la empresa presenta una solicitud ante la PUCT para construir una nueva línea de transmisión, el personal técnico de la PUCT revisa la solicitud en un procedimiento legal. Cuando un interventor o personal técnico de la PUCT solicite una audiencia, la PUCT enviará la solicitud a la Oficina Estatal de Audiencias Administrativas (SOAH). El juez de SOAH fijará una fecha de audiencia, plazos para solicitar información de otros participantes y plazos para presentar testimonio escrito o una declaración de posición antes de la audiencia. El juez de SOAH puede determinar el formato de las conferencias y audiencias, por ejemplo, mediante videoconferencia con opción de llamada telefonica. Los participantes en el caso deben asistir a la audiencia para que su testimonio escrito se convierta en prueba. Después de la audiencia, el juez de SOAH brindará a los Comisionados de la PUCT una recomendación sobre la ruta propuesta para la línea de transmisión.

Los Comisionados de la PUCT no están obligados por la recomendación del juez de la SOAH al seleccionar una ruta para la línea de transmisión. Los Comisionados de la PUCT emitirán una decisión final en una reunión pública a la que podrán asistir los participantes del caso y solicitar declarar. Las reuniones públicas de la PUCT se transmiten en línea. Los Comisionados de la PUCT pueden y en ocasiones hacen modificaciones a la ruta en respuesta a declaraciones de los propietarios de terrenos. Luego, la empresa que construye la línea de transmisión negociará con los propietarios de terrenos para comprar derechos de servidumbre sobre sus propiedades. La PUCT no determina la cantidad de dinero que se debe pagar a los propietarios por servidumbres u otros derechos de paso.

Hasta que los comisionados de la PUCT tomen una decisión final, los participantes en el caso también negocian para encontrar una ruta que satisfaga a todos. Los Comisionados de la PUCT no están obligados a aprobar una ruta negociada.

Todo el proceso de revisión de ruta de la línea de transmisión de la PUCT puede tardar hasta seis meses.

## ¿Dónde me dirijo para obtener más información?

La empresa que haya solicitado construir la línea tendrá mapas en su sitio web. Para obtener más información sobre cómo participar en el proceso, comuníquese con la Oficina de Participación Pública de PUCT https://www.puc.texas.gov/agency/about/ope/ o 512-936-7374.

# Request to Intervene in PUC Docket No. [ ]

The following information must be submitted by the person requesting to intervene in this proceeding. This completed form will be provided to all parties in this docket. **If you DO NOT want to be an intervenor, but still want to file comments, please complete the "Comments" page.**

Mail this completed form and 10 copies to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, TX 78711-3326

First Name:_____ Last Name: _____

Phone Number:_____ Fax Number:_____

Address, City, State:_____

Email Address:_____

**I am requesting to intervene in this proceeding. As an INTERVENOR, I understand the following:**

- I am a party to the case;
- I am required to respond to all discovery requests from other parties in the case;
- If I file testimony, I may be cross-examined in the hearing;
- If I file any documents in the case, I will have to provide a copy of that document to every other party in the case; and
- I acknowledge that I am bound by the Procedural Rules of the Public Utility Commission of Texas (PUC) and the State Office of Administrative Hearings (SOAH).

**Please check one of the following:**

☐ I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.

☐ One or more of the utility's proposed routes would cross my property.

☐ Other. Please describe and provide comments. You may attach a separate page, if necessary.

_____

_____

_____

**Signature of person requesting intervention:**

_____ Date: _____

# Comments in Docket No. _____

**If you want to be a PROTESTOR only, please complete this form.** Although public comments are not treated as evidence, they help inform the PUC and its staff of the public concerns and identify issues to be explored. The PUC welcomes such participation in its proceedings.

For USPS, send one copy to:

Public Utility Commission of Texas
Central Records
P.O. Box 13326
Austin, TX 78711-3326

For all other delivery or courier services, send one copy to:

Public Utility Commission of Texas
Central Records
1701 N. Congress Ave.
Austin, TX 78701

First Name: _____ Last Name: _____

Phone Number: _____ Fax Number: _____

Address, City, State: _____

**I am NOT requesting to intervene in this proceeding. As a PROTESTOR, I understand the following:**

- I am NOT a party to this case;
- My comments are not considered evidence in this case; and
- I have no further obligation to participate in the proceeding.

**Please check one of the following:**

☐ I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.

☐ One or more of the utility's proposed routes would cross my property.

☐ Other. Please describe and provide comments. You may attach a separate page, if necessary. _____

_____

_____

_____

_____

**Signature of person submitting comments:**

_____ Date: _____

# Attachment 9

# CPS Energy and AEP Texas Pawnee to Tango 345 kV Rebuild Project

| Name | Company or Title | Department | Email Address | Address | City, State, Zip | Hand Delivery |
|---|---|---|---|---|---|---|
| FEDERAL | | | | | | |
| MILITARY AVIATION AND INSTALLATION ASSURANCE SITING CLEARINGHOUSE | | | | | | |
| Mr. Steven Sample | Executive Director | Military Aviation and Installation Assurance Siting Clearinghouse | | 3400 Defense Pentagon, Room 5C646 | Washington, DC 20301-3400 | |
| | | | | | | |
| STATE | | | | | | |
| Benjamin Barkley | Public Counsel | Office of Public Utility Counsel | | 1701 N Congress Ave., STE 9-180 | Austin, TX 78701 | YES |
| | | | | | | |
| TEXAS PARKS AND WILDLIFE DEPT | | | | | | |
| Ms. Laura Zebehazy | Program Leader | TPWD - Wildlife Habitat Assessment Program | WHAB@tpwd.texas.gov | 4200 Smith School Road | Austin, Texas 78744-3291 | YES |
| | | | | | | |
| MUNICIPALITIES | | | | | | |
| | | | | | | |
| COUNTIES | | | | | | |
| Honorable Wade Hedtke | Karnes County Judge | Karnes County Court | | 101 North Panna Maria Avenue, Suite 101 | Karnes City, TX 78118 | |
| Commissioner David Wiatrek | Karnes County Commissioner | Karnes County, Precinct 1 | | 101 North Panna Maria Avenue | Karnes City, TX 78118 | |
| Commissioner Benny Lyssy | Karnes County Commissioner | Karnes County, Precinct 2 | | 102 North Panna Maria Avenue | Karnes City, TX 78118 | |
| Commissioner James Rosales | Karnes County Commissioner | Karnes County, Precinct 3 | | 103 North Panna Maria Avenue | Karnes City, TX 78118 | |
| Commissioner Wesley Gisler | Karnes County Commissioner | Karnes County, Precinct 4 | | 104 North Panna Maria Avenue | Karnes City, TX 78118 | |
| Honorable George Morrill, III | Bee County Judge | Bee County Court | | 105 W. Corpus Christi, Rm #305 | Beeville, TX 78102 | |
| Commissioner Kristofer Linney | Bee County Commissioner | Bee County, Precinct 1 | | 105 W. Corpus Christi St., Rm. 107 | Beeville, TX 78102 | |
| Commissioner Dennis DeWitt | Bee County Commissioner | Bee County, Precinct 2 | | 105 W. Corpus Christi St., Rm. 104 | Beeville, TX 78102 | |
| Commissioner Sammy G. Farias | Bee County Commissioner | Bee County, Precinct 3 | | 105 W. Corpus Christi St., Rm. 103 | Beeville, TX 78102 | |
| Commissioner Tino Olivares | Bee County Commissioner | Bee County, Precinct 4 | | 105 W. Corpus Christi St., Rm. 106 | Beeville, TX 78102 | |
| UTILITIES | | | | | | |
| Eric Halfmann | General Manager | Karnes Electric Cooperative, Inc | | PO Box 7 | Karnes City, TX 78118 | |
| Clif Lange | General Manager | South Texas Electric Cooperative | | 2849 Farm Road 447 | Victoria, TX 77976 | |
| Ron Hughes | General Manager | San Patricio Electric Cooperative | | P.O. Drawer 400 | Sinton, TX 78387 | |
| | | | | | | |
| OTHER PUBLIC OFFICIALS, ORGANIZATIONS, AND INTERESTED PARTIES | | | | | | |
| Mr. Charles Benavides, P.E. | San Antonio District Engineer | Texas Department of Transportation | | 4615 NW Loop 410 | San Antonio, TX 78229 | |
| Mr. Mike Walsh, P.E. | Corpus Christi District Engineer | Texas Department of Transportation | | 1701 S. Padre Island Drive | Corpus Christi, TX 78416 | |

# Attachment 10

**City of San Antonio, Acting By and Through City Public Service Board (CPS Energy) and AEP Texas Inc. to Amend their Certificates of Convenience and Necessity for the Proposed Pawnee to Tango 345 kV Transmission Line Rebuild in Karnes and Bee Counties**

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**Public Utility Commission of Texas (PUC) Docket No. 58253**

The City of San Antonio, acting by and through City Public Service Board (CPS Energy), and AEP Texas Inc. (AEP Texas) are requesting approval from the Public Utility Commission of Texas (PUC) to amend their Certificates of Convenience and Necessity (CCN) to construct the proposed Pawnee to Tango 345 kV Transmission Line Rebuild Project in Karnes and Bee Counties.

The proposed transmission line will connect the Pawnee Station in Karnes County to the AEP Texas Tango Station in Bee County. The entire project will be approximately 12 miles in length and is estimated to cost approximately $86 million.

Persons with questions about the transmission line may contact CPS Energy at (210) 353-6673 or AEP Texas at (361) 881-5703. The CCN application, including detailed routing maps illustrating the proposed transmission line project and project area, may be reviewed on the project website at https://www.cpsenergy.com/content/corporate/en/about-us/new-infrastructure/pawnee-to-tango.html and at:

- CPS Energy, 500 McCullough, San Antonio, Texas 78215
- Joe Barnhart Bee County Library, 110 W Corpus Christi St, Beeville, Texas 78102

***The route included in this notice is available for selection and approval by the Public Utility Commission of Texas.***

Persons who are affected by the proposed transmission line and wish to intervene in the docket or comment on the joint applicants' application should do so by filing electronically and you will be required to serve the request on other parties by email. Therefore, please include your own email address on the intervention form. Instructions for electronic filing via the "PUC Filer" on the Commission's website can be found here: https://interchange.puc.texas.gov/filer Instructions for using the PUC Filer are available at https://ftp.puc.texas.gov/public/puct-info/industry/filings/E-Filing_Instructions.pdf. Once you obtain a tracking sheet associated with your filing from the PUC Filer, you may email the tracking sheet and the document you wish to file to: centralrecords@puc.texas.gov. For assistance with your electronic filing, please contact the Commission's Help Desk at (512) 936-7100 or helpdesk@puc.texas.gov. You can review materials filed in this docket on the PUC Interchange at: http://interchange.puc.texas.gov/.

While the preferred method is for you to submit your request for intervention electronically, if you are unable to do so you may mail 10 copies of the request to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, Texas 78711-3326

***The only way to fully participate in the PUC's decision on where to locate the transmission line is to intervene in the docket. It is important for an affected person to intervene because the utility is not obligated to keep affected persons informed of the PUC's proceedings and cannot predict approval by the PUC.***

The deadline for intervention in the docket is July 21, 2025, and the PUC should receive a filing from anyone requesting intervention by that date.

The PUC has a brochure titled "Landowners and Transmission Line Cases at the PUC." Copies of the brochure are available from CPS Energy at 210-353-6673 and AEP Texas at 361-881-5703 or may be downloaded from the PUC's website at www.puc.state.tx.us. To obtain additional information about this docket, you may contact the PUC's Customer Assistance Hotline at (512) 936-7120 or (888) 782-8477. Hearing-and speech-impaired individuals with text telephones (TTY) may contact the PUC's Customer Assistance Hotline at (512) 936-7136 or toll free at (800) 735-2989.

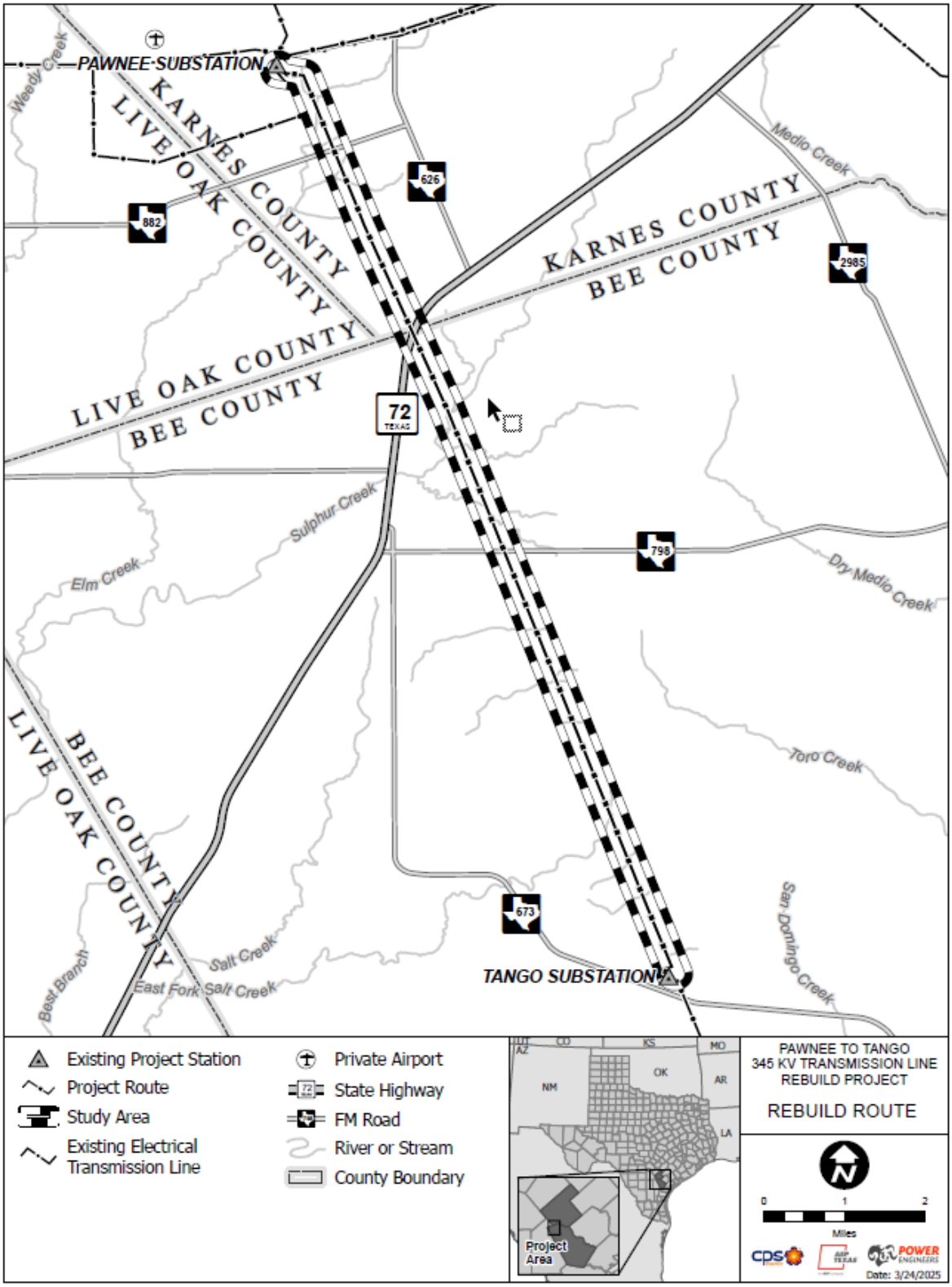
In addition to the intervention deadline, other important deadlines may already exist that affect your participation in this docket. You should review the orders and other filings already made in the docket.

In their CCN application for this project, CPS Energy and AEP Texas have presented a single route for consideration by the PUC. The following description provides segment information that makes up the route for this project. This route is available for approval by the PUC.

*Note: All distances listed below are approximate and rounded to the nearest hundredths of a mile.*

**Project Route: 12.23 miles**
The project route composed of one segment begins at the South Texas Electric Cooperative Pawnee Substation, located approximately 4.5 miles northwest of State Highway (SH) 72. The segment leaves the Pawnee Substation and proceeds southeast for approximately 0.16 mile. The segment then turns east-southeast for approximately 0.18 mile. The segment then turns southeast for approximately 11.74 miles, crossing Farm-to-Market (FM) 882, the Karnes and Bee County line, SH 72, and Farm-to-Market 798. Finally, the segment turns southwest for approximately 0.15 mile and terminates at the AEP Texas Tango Substation, located approximately 0.15 mile northeast of FM 673.

**City of San Antonio, Acting By and Through City Public Service Board (CPS Energy) and AEP Texas Inc. to Amend their Certificates of Convenience and Necessity for the Proposed Pawnee to Tango 345 kV Transmission Line Rebuild in Karnes and Bee Counties**



# Newspaper Publication List

**Beeville Bee-Picayun**
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# Attachment 11

Jackson Walker LLP

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June 20, 2025

**Via Hand Delivery**

Ms. Laura Zebehazy
Wildlife Habitat Assessment Program
Wildlife Division
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, Texas 78744-3291

***RE: Application of the City of San Antonio, Acting By and Through City Public Service Board (CPS Energy), and AEP Texas Inc. to Amend Their Certificates of Convenience and Necessity for the Proposed Pawnee to Tango 345 kV Transmission Line Rebuild in Karnes and Bee Counties***

**PUBLIC UTILITY COMMISSION OF TEXAS (PUC) DOCKET NO. 58253**

Dear Ms. Zebehazy:

On Friday, June 20, 2025, the City of San Antonio, acting by and through City Public Service Board (CPS Energy), and AEP Texas Inc. (AEP Texas) filed with the Public Utility Commission of Texas (Commission) the above-referenced application to amend their Certificates of Convenience and Necessity (CCN) to construct the Pawnee to Tango 345 kV Transmission Line Rebuild in Karnes and Bee Counties, Texas.

As you are aware, the Commission's CCN application requires that CPS Energy and AEP Texas provide for review and comment a copy of the project environmental assessment (EA) to Texas Parks and Wildlife Department (TPWD) within seven days after the application is filed. Accordingly, enclosed with this letter is a copy of the EA prepared for the referenced project as well as a complete copy of the CCN application filed by CPS Energy and AEP Texas at the Commission. The CCN application also requires that a copy of this transmittal letter be included with the project application. You will find a copy of this letter included as Attachment 11 to the filed Application.

Under the traditional CCN process, TPWD typically provides the Commission Staff with comments about the application. CPS Energy and AEP Texas would also appreciate receiving a copy of any comments TPWD may choose to provide to Commission Staff. You may send those comments to Kevin Phillips (CPS Energy) at 500 McCullough Ave., San Antonio, Texas 78215 and to Chad Tomanec (AEP Texas) at 539 N Carancahua, Corpus Christi, Texas 78401. Of course, CPS Energy and AEP Texas reserve the right to inquire into the basis of any comments or recommendations TPWD may choose to submit in this case, but I am certain the appropriate arrangements can be made for that inquiry if the necessity arises.

If you have any questions about the EA, please feel free to contact Kevin Phillips (CPS Energy) at (210) 353-3114, Chad Tomanec (AEP Texas) at (361) 881-5703, or me at (512) 236-2087.

Sincerely,

Craig R. Bennett

cc: Kevin Phillips, CPS Energy
Chad Tomanec, AEP Texas
Russell Hooten, TPWD

# Attachment 12

**AFFIDAVIT OF DANIEL T. OTTO**

**STATE OF TEXAS** §
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Before me, the undersigned authority, Daniel T. Otto, being first duly sworn, deposes and states:

"My name is Daniel T. Otto. My title is Manager, S&T Regulatory Support for CPS Energy. I am over the age of twenty-one, and am competent to make the following affidavit:
On behalf of CPS Energy and in my capacity as Manager for Regulatory Support for CPS Energy, I am authorized to file and verify the CCN Application for CPS Energy. I am personally familiar with the documents filed with this application, and I have complied with all the requirements contained in the application; furthermore, all such statements made and matters set forth herein with respect to CPS Energy are true and correct."

_____
Daniel T. Otto
Affiant

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public in and for the State of Texas, this ___ day of June, 2025.

_____
Notary Public

**AFFIDAVIT OF WILLIAM E. LOVELACE**

**STATE OF TEXAS** §
§
§

Before me, the undersigned authority, William E. Lovelace, being first duly sworn, deposes and states:

"My name is William E. Lovelace. My title is Staff Project Manager, Transmission Services Department, for American Electric Power Service Corporation (AEPSC). I am over the age of twenty-one, and am competent to make the following affidavit:

On behalf of AEP Texas and in my capacity as Staff Project Manager, Transmission Services Department, I am authorized to file and verify the CCN Application for AEP Texas. I am personally familiar with the documents filed with this application, and I have complied with all the requirements contained in the application; furthermore, all such statements made and matters set forth herein with respect to AEP Texas are true and correct."

_____
William E. Lovelace
Affiant

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public in and for the State of Texas, this ___ day of June, 2025.

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_____
Notary Public