APPLICATION OF THE CITY OF SAN ANTONIO, ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY) TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED RANCHTOWN TO TALLEY ROAD 138 KV TRANSMISSION LINE IN BEXAR AND MEDINA COUNTIES

DOCKET NO. 57206

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

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

   Certificate Number: 30031

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

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

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

   CPS Energy will hold the sole interest in the project that is the subject of this Application. No entities will hold an ownership or investment interest in the project that are not subject to the jurisdiction of the Public Utility Commission of Texas (PUC or Commission).

3. **Person to Contact:** Antonio DeMendonca
   Title/Position: EDS Project Manager, S&T Regulatory Support
   Phone Number: (210) 353-5318
   500 McCullough Ave.
   San Antonio TX 78215
   Email Address: ademendonca@cpsenergy.com

   Alternate Contact: Daniel T. Otto
   Manager, S&T Regulatory Support
   Phone Number: (210) 353-4852
   Mailing Address: 500 McCullough Ave.
   San Antonio TX 78215
   Email Address: dtotto@cpsenergy.com

   Legal Counsel: Kirk Rasmussen
   Phone Number: (512) 236-2310
   Mailing Address: Jackson Walker LLP
   100 Congress Avenue, Suite 1100
   Austin, TX 78701
   Email Address: krasmussen@jw.com

4. Project Description:
Name or Designation of Project

Ranchtown to Talley Road 138 kV Transmission Line Project in Bexar and Medina Counties (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 a new 138 kV transmission line in Bexar and Medina Counties. In total, the Proposed Project will consist of approximately 12.11 miles of new transmission line connecting the existing CPS Energy Ranchtown and Talley Road substations.

A significant portion of the Proposed Project (approximately 10.80 miles) will involve the installation of the new line in a vacant position on existing CPS Energy 345 kV structures (hereafter the "Vacant Position Segment"). No additional permanent right-of-way (ROW) will be needed for this segment of the project. Temporary construction easements may be required for portions of this segment.

The remaining segment of the Proposed Project (approximately 1.31 miles) will involve rebuilding existing single circuit CPS Energy transmission facilities to add the new line for double circuit operation in that area (hereafter the "Rebuild Segment"). This portion of the project will require additional ROW to expand the current ROW for the existing single circuit towers, which is necessary to safely construct and operate double circuit poles along the same corridor.

Please see Figure 1-1 in the *Environmental Assessment for the Proposed Ranchtown — Talley Road 138 kV Transmission Line Project in Medina and Bexar 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 will hold the sole interest in the project that is the subject of this Application. CPS Energy will design, procure, construct, operate, and maintain all transmission line facilities for the Proposed Project, including all conductors, wires, structures, hardware, and ROW.

Deviation from original PURA § 39.151 organization (ERCOT)

The Proposed Project does not deviate from the project analyzed and endorsed by ERCOT on February 16, 2024.

5. Conductor and Structures:

Conductor Size and Type:	1,272 kcmil ACSS/TW "Pheasant"
Number of conductors per phase:	One conductor per phase and static wire per circuit
Continuous Summer Static Current Rating (A):	1,964 Amperes (A)
Continuous Summer Static Line Capacity at Operating Voltage (MVA):	469 Megavolt ampere (MVA)
Continuous Summer Static Line Capacity at Design Voltage (MVA):	469 MVA
Type and Composition of Structures:	For the Vacant Position Segment (approximately 10.80 miles), CPS Energy proposes to use a vacant position on existing CPS Energy 345 kV double circuit capable steel monopole structures.

For the Rebuild Segment (approximately 1.31 miles), CPS Energy proposes to rebuild existing structures with 138 kV double circuit steel monopole structures that will hold an existing CPS Energy circuit and the new circuit.

Height of Typical Structures: The heights of existing structures for the Vacant Position Segment range from 130 to 190. The heights of typical structures proposed for the Rebuild Segment range from 100 to 150 feet above the ground.

Estimated Maximum Height of Structures: The estimated maximum height of the proposed structures is 190 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 proposes to use existing CPS Energy structures for the Vacant Position Segment. This proposal saves significant cost and community impact by utilizing existing infrastructure. CPS Energy engineers selected steel monopoles as the structure type for the Rebuild Segment. Steel monopoles are the least-cost structure alternative, generally require a smaller footprint, and are typically the most favored structure type by landowners. For a detailed discussion of the proposed typical structures and their requirements please refer to Section 1.3.2 of the EA.

Please refer to Figures 1-2 through 1-6 in the EA for drawings of the typical structures proposed to be used for the Proposed Project.

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

Not applicable. This is not a joint application.

6. Right-of-way:

Miles of Right-of-Way: Approximately 12.11 miles of ROW will be utilized for the Proposed Project.

Miles of Circuit:	Approximately 12.11 miles of circuit will be required for the Proposed Project.
Width of Right-of-Way:	The existing ROW width for the Vacant Position Segment (10.80 miles) is approximately 150 feet. Additional permanent ROW does not need to be acquired for this portion of the Proposed Project. However, temporary access easements for construction (that is, non-permanent ROW) may be required for construction of the Vacant Position Segment. The typical ROW width for the Rebuild Segment (1.31 miles) is estimated to be 100 feet. Additional ROW is required.
Percent of Right-of-Way Acquired:	CPS Energy owns 100 percent of the necessary ROW for approximately 10.80 miles of the Proposed Project (the Vacant Position Segment). CPS Energy owns approximately 50 percent of the necessary ROW for approximately 1.31 miles of the Proposed Project (the Rebuild Segment).

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

Not applicable. This is not a joint application.

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

The new transmission line will connect CPS Energy's existing Ranchtown Substation to its existing Talley Road Substation. The new line will utilize existing transmission infrastructure and corridors, which are located to the west of the City of San Antonio and on the west side of State Highway 211 and along and to the north of State Highway 16.

Land uses within the study area consist of a mix of urban/developed, planned land use, agriculture, quarries, transportation/aviation/utility features, communication towers, and parks and recreation areas.

The study area of the Proposed Project is oriented in a north to south direction. The study area is shown in Figures 2-1 and 2-2 of the EA.

Specific discussion regarding natural, human, and cultural resources in the study area is set forth in the EA, Section 3, pages 3-1 through 3-76.

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.

CPS Energy is the owner of both existing substations, the Ranchtown Substation and the Talley Road Substation, which will be associated with the Proposed Project and that will serve as the endpoints for the new line.

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.

None.

8. Estimated Schedule:

Estimated Dates of:	**Start**	**Completion**
Right-of-way and Land Acquisition	September 2025	September 2026
Engineering and Design	August 2025	April 2026
Material and Equipment Procurement	August 2025	March 2027
Construction of Facilities	July 2026	May 2027
Energize Facilities	N/A	May 2027

9. Counties:

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

The Proposed Project will be constructed in Bexar and Medina Counties.

10. Municipalities:

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

A portion of the Proposed Project will be constructed within the City of San Antonio.

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 within Bexar and Medina Counties is contained in, among other dockets, Docket Nos. 51 and 59.

11. Affected Utilities:

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

No other electric utility is served by or connected to the facilities proposed in this Application.

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

As discussed in response to Question 14, below, the Proposed Project is needed as part of several projects related to the South Texas Electric Cooperative, Inc. (STEC) Rio Medina project. The Proposed Project will allow STEC and its member electric cooperative (Medina Electric Cooperative, Inc.) to serve 129 MW of new load in the area.

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.

CPS Energy is the sole applicant, and, therefore, no other party will be reimbursed for any portion of the Proposed Project.

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 cost 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.

Not applicable. This is not a joint application.

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 necessary to support the accelerating growth in and surrounding San Antonio, and it will increase the reliability of the region's and State's transmission grid.

The Proposed Project, endorsed by ERCOT on February 16, 2024, is one project in a suite of projects that constitute the Rio Medina Project. The Rio Medina Project was submitted to ERCOT's Regional Planning Group by STEC in September 2023. The Rio Medina Project was proposed to serve 129 MW of load at the proposed new Rio Medina 138 kV

substation and address thermal overloads and voltage violations in the area. See Attachment Nos. 3a and 3b.

STEC submitted the Rio Medina Project to address NERC TPL-001-5.1 reliability criteria violations—thermal and voltage—resulting from the 129 MW of new load in the South-Central Weather Zone. Steady-state reliability analysis, in accordance with NERC TPL-001-5.1, the ERCOT Nodal Protocols, and ERCOT Planning Criteria, was performed by ERCOT staff in its independent review. ERCOT performed this analysis under various system conditions to identify reliability issues and to determine transmission upgrades to support the proposed Rio Medina Project if any upgrades were deemed necessary. ERCOT performed reliability analysis, planned maintenance outage evaluation, and long-term load serving capability assessment, as well as congestion analysis and cost and feasibility assessments.

The Proposed Project is needed to resolve thermal overloads, voltage violations, and unsolved contingencies observed under planned maintenance outage conditions. The ERCOT independent review of the Rio Medina Project is included as Attachment No. 3b. On March 5, 2024, ERCOT sent a letter noticing that the Proposed Project, as part of the Rio Medina Project, had been endorsed by ERCOT on February 16, 2024, as a Tier 2 transmission project in accordance with ERCOT Protocol Section 3.11.4. On May 28, 2024, ERCOT reissued the endorsement letter to a new point of contact at CPS Energy. See Attachment No. 3c.

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.

Please refer to Attachment Nos. 3a, 3b, and 3c to this Application for the documents pertaining to ERCOT's review and endorsement of the Proposed Project.

15. Alternatives to Project:

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

Explain how the project overcomes the insufficiencies of the other options that were considered.

ERCOT evaluated six alternative system-improvement project sets to address the thermal overloads and voltage violations observed under maintenance outage conditions in the study base case. See Attachment No. 3b. While all six options resolved reliability violations in the summer peak conditions, only two options, one of which includes the Proposed Project, resolved thermal violations, voltage violations, and power flows for N-1-1 contingency scenarios under planned maintenance conditions.

The two short-listed options (Options 5 and 6) both include (among other new substations and lines, upgraded lines, and rebuilt lines) a new transmission line that has the existing Ranchtown Substation as an endpoint. The Proposed Project (part of Option 5) involves connecting the Ranchtown Substation to the existing Talley Road Substation, as described in this Application, and the other short-listed option (Option 6) considered connecting the Ranchtown Substation to a new CPS Energy substation (labeled 381ESTIMATE1), which would be located south of the existing Talley Road substation. These two options were evaluated in detail by ERCOT, which found that both options improved operational flexibility and long-term load serving capability and that the set of projects constituting Option 5, which includes the Proposed Project, requires fewer miles of new CCN and has a lower estimated cost than Option 6.

ERCOT endorsed Option 5, thus, the Proposed Project, because it is the least-cost solution that addresses the thermal overloads and voltage violations under maintenance outage conditions with no reliability issues, and it also provides operational flexibility and long-term load serving capability for future load growth in the area. See Attachment 3b.

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 project is shown on Figure 1.1 of Attachment No. 3b.

17. Routing Study:

Provide a brief summary of the routing study that includes a description of the process of selecting the study area, identifying routing constraints, selecting potential line segments, and the selection of the routes. Provide a copy of the complete routing

study conducted by the utility or consultant. State which route the applicant believes best addresses the requirements of PURA and P.U.C. Substantive Rules.

CPS Energy retained Halff Associates, Inc. (Halff) to prepare the EA for the Project, which is included as Attachment No. 1 to the 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), PUC Substantive Rule 25.101 (16 TAC § 25.101), and the PUC CCN Application form. 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 Halff in its evaluation, CPS Energy provided information regarding the project endpoints, the location of the existing centerline for the Vacant Position Segment, the approximate centerline for the Rebuild Segment, the need for the project, engineering and design requirements, construction practices, and ROW requirements for the Proposed Project.

Selecting the Study Area

Halff, with input and assistance from CPS Energy, delineated the study area within which to review the existing environment for the Proposed Project. The boundaries of the study area were determined by the project endpoints (the Ranchtown and Talley Road substations), the location of the Cagnon to Kendall 345 kV transmission line (for the Vacant Position Segment), and the location of the Ranchtown to Menger Creek 138 kV transmission line (for the Rebuild Segment). The final study area, shown in Figure 2-1 of the EA, is a parallelogram in shape and approximately 9.23 miles long (north and south) by 4.21 miles wide (east and west), and encompasses an area of approximately 37 square miles.

Route Data

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

Specific discussion regarding selection of the study area, identification of land features, and the Proposed Project analysis is set forth in the EA in Sections 2.0, 3.0, and 4.0.

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

This Application presents a single route for the Proposed Project along two segments—the Vacant Position Segment (approximately 10.80 miles) and the Rebuild Segment (approximately 1.31 miles). Each segment is described below.

The Vacant Position Segment (shown in yellow on Figure 1-1, below) involves location of the new line on an available position on the existing CPS Energy Cagnon to Kendall 345 kV single pole structures. The Cagnon to Kendall line was originally constructed for double circuit operation and only a single position is being utilized today. This Application requests certification to construct, operate, and maintain the Proposed Project in the vacant position on the existing Cagnon to Kendall structures for approximately 10.80 miles.

The Rebuild Segment (shown in Green on Figure 1-1) proposes rebuilding the existing CPS Energy Ranchtown to Menger Creek 138 kV transmission line structures for double circuit operation. The Ranchtown to Menger Creek line is currently operated on lattice structures designed for a single circuit. This Application requests certification to rebuild the Ranchtown to Menger Creek structures for double circuit operation on steel single pole structures for approximately 1.31 miles as the Proposed Project enters the Ranchtown Substation. The existing ROW for the Ranchtown to Menger Creek line is approximately 50 feet wide. In order to safely operate both the Ranchtown to Menger Creek line and the Proposed Project, the existing ROW will need to be expanded to approximately 100 feet.

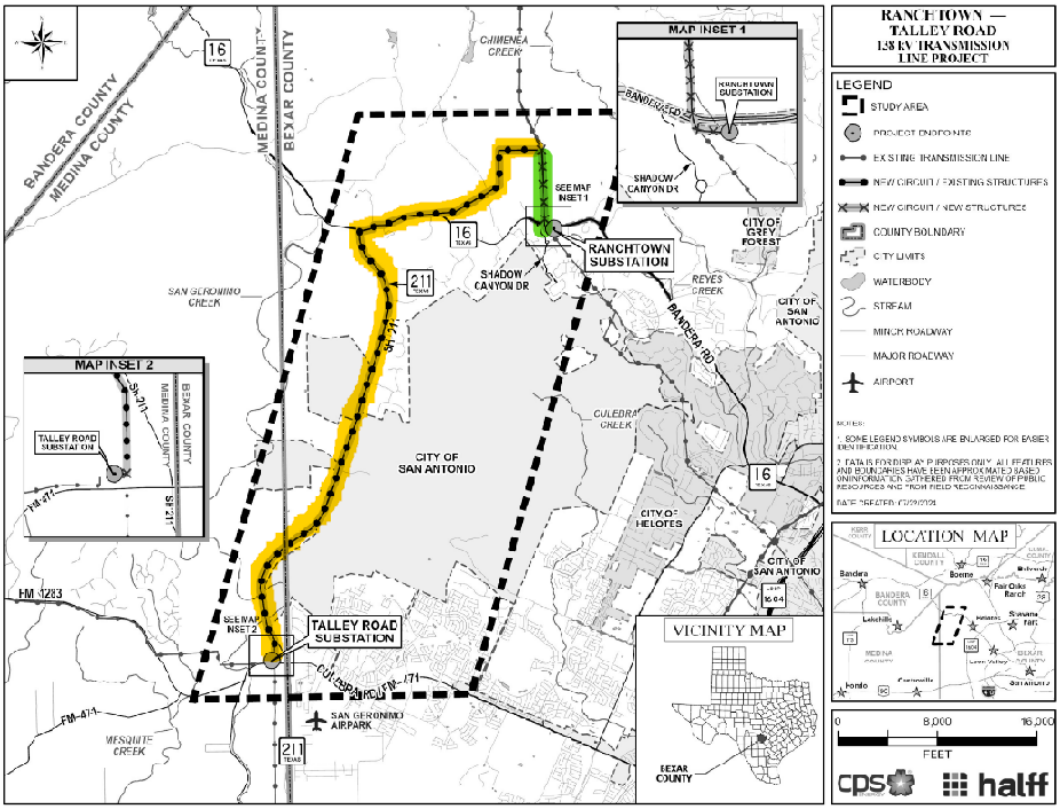

Figure 1-1 – Proposed Project Segments

Because the Proposed Project can be constructed for almost 90 percent of its length on the vacant position of existing transmission line structures and for 1.31 miles along an existing transmission line corridor (by rebuilding the existing line for double circuit operation), there are no alternative routes that better address the totality of the factors the Commission must consider in evaluating a new proposed transmission line project, including estimated cost and use of vacant positions on existing multiple circuit transmission line structures.

18. Public Meeting or Public Open House:

Provide the date and location for each public meeting or public open house that was held in accordance with 16 TAC § 22.52. Provide a summary of each public meeting or public open house including the approximate number of attendants, and a copy of any survey provided to attendants and a summary of the responses received. For each public meeting or public open house provide a description of the method of notice, a copy of any notices, and the number of notices that were mailed and/or published.

CPS Energy held an open house meeting for the Proposed Project on August 12, 2024, from 5:30 p.m. to 7:30 p.m. at Los Reyes Elementary School in the City of Helotes, Texas.

A summary of the open house meeting and additional information concerning the open house meeting is contained in Section 6 and Appendix B of the EA.

19. Routing Maps:

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

A one inch = 1,200 feet map is included as Figure 3-1 in Appendix C of the EA. This base map includes sufficient cultural and natural features to identify the location of the proposed route in the field. This figure delineates the study area and route for the Proposed Project. The map also depicts the approximate locations of radio transmitters and other electronic installations (e.g., communication towers), airstrips, irrigated pasture or cropland, parks and recreational areas, historical and archeological sites, and environmentally sensitive areas, if any. Figure 3-1 in Appendix C of the EA identifies existing facilities in the area of the Proposed Project.

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

Figure 3-1 in Appendix C of the EA depicts on aerial photography, as applicable: (1) the location of the Proposed Project's route; (2) the locations of all major public roads, including all federal and state roadways; (3) the locations of all known habitable structures on properties directly affected by the proposed route; and (4) the boundaries (approximate or estimated according to best available information) of all properties directly affected by the proposed route. In addition, the locations of radio transmitters

and other electronic installations, airstrips, irrigated pasture or cropland, parks and recreational areas, historical and archeological sites, and any environmentally sensitive areas are depicted, if any.

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

Attachment No. 5 to this Application includes 16 maps (utilizing aerial photography) that identify directly affected properties, tract IDs, and the location of habitable structures (including labels) within at least 300 feet of the centerline of the route of the Proposed Project and approximate parcel boundary lines (based on tax appraisal district records). These maps show the location of the proposed route and the locations of all major public roads. Attachment No. 4 to this Application is an overview map of the Attachment No. 5 maps showing the entire study area and the location of each of the sixteen Attachment No. 5 maps.

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 Bexar and Medina 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 the Application by the PUC, the following permits/approvals would be required and obtained prior to the commencement of construction:

- Where the approved route of the transmission line crosses a state-maintained road of highway, CPS Energy will obtain a permit from the Texas Department of Transportation (TxDOT). If any portion of the transmission line will be accessed from a state-maintained road or highway, CPS Energy will obtain a permit from TxDOT.

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

- Since more than five acres will be disturbed during construction of the project, a Storm Water Pollution Prevention Plan (SWPPP) will be necessary, and a Notice of Intent (NOI) will be prepared by CPS Energy for the Texas Commission on Environmental Quality (TCEQ). The controls specified in the SWPPP will be monitored in the field.

- Upon approval of the Application and prior to construction, a detailed Natural Resources Assessment (NRA) and Cultural Resources Assessment (CRA) will be performed on the approved route. Depending on the results of various post-approval assessments, permits or regulatory approvals may be required from the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), TCEQ, or Texas Historical Commission/State Historic Preservation Officer. Such permits or regulatory approvals will be obtained by CPS Energy prior to construction.

- After alignments and structure locations/heights are designed and engineered, CPS Energy will make a final determination of the need for Federal Aviation Administration (FAA) notification, based on structure locations and designs. In some areas, if necessary, CPS Energy could use lower-than-typical structure heights and could add marking and/or lighting to certain structures to avoid or accommodate FAA requirements.

- CPS Energy will report the status of the Proposed Project to the PUC on CPS Energy's Monthly Construction Progress Report, beginning with the first report following the filing of a CCN application, and in each subsequent monthly progress report until construction is completed and actual project costs have been reported. As required by the PUC, CPS Energy will submit locational and attribute data for the new facilities along the approved route after it is constructed.

- ROW and other permits will be obtained from Bexar and Medina Counties and the City of San Antonio as needed.

21. Habitable structures:

For each route list all single-family and multi-family dwellings and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, schools, or other structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis within 300 feet of the centerline if the proposed project will be constructed for operation at 230kV or less, or within 500 feet of the centerline if the proposed project will be constructed for operation at greater than 230kV. Provide a general description of each habitable structure and its distance from the centerline of

the route. In cities, towns or rural subdivisions, houses can be identified in groups. Provide the number of habitable structures in each group and list the distance from the centerline of the route to the closest and the farthest habitable structure in the group. Locate all listed habitable structures or groups of structures on the routing map.

The locations of habitable structures within 300 feet of the centerline of each route segment are listed and described with the approximate distance from the route segment centerline in Table 4-2, pages 4-14 through 4-15 of the EA. There are a total of 37 habitable structures identified within 300 feet of the ROW centerline for the route of the Proposed Project. The identified habitable structures are all shown on Figure 3-1 in Appendix C of the EA and Attachment No. 5.

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 route of the Proposed Project. There are five known communication towers (FM radio transmitters, microwave towers, or other electronic communications towers) that are located within 2,000 feet of the route of the Proposed Project. The listing, description, and approximate distance from the centerline of the route of the Proposed Project are presented in Table 4-4, page 4-18 of the EA.

For additional information on electronic installations, see Section 3.2.4, page 3-56; and Section 4.2.4, page 4-18 of the EA. The Proposed Project is not anticipated to have any significant impacts on existing communication towers.

23. Airstrips:

For each route, list all known private airstrips within 10,000 feet of the center line of the project. List all airports registered with the Federal Aviation Administration (FAA) with at least one runway more than 3,200 feet in length that are located within 20,000 feet of the center line of any route. For each such airport, indicate whether any transmission structures will exceed a 100:1 horizontal slope (one foot in height for each 100 feet in distance) from the closest point of the closest runway. List all listed airports registered with the FAA having no runway more than 3,200 feet in length that are located within 10,000 feet of the center line of any route. For each such airport, indicate whether any transmission structures will exceed a 50:1

horizontal slope from the closest point of the closest runway. List all heliports located within 5,000 feet of the center line of any route. For each such heliport, indicate whether any transmission structures will exceed a 25:1 horizontal slope from the closest point of the closest landing and takeoff area of the heliport. Provide a general description of each listed private airstrip, registered airport, and heliport; and state the distance of each from the center line of each route. Locate and identify all listed airstrips, airports, and heliports on a routing map.

Halff's review 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 FAA registered public or military airport with a runway longer than 3,200 feet within 20,000 feet of the route of the Proposed Project, and oneFAA registered public or military airports with runways shorter than 3,200 feet within 10,000 feet of the route of the Proposed Project, San Geronimo Airpark. No private airstrips were identified within 10,000 feet of the centerline of the route of the Proposed Project. There were no private heliports identified within 5,000 feet of the centerline of all of the alternative routes. 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 route of the Proposed Project in Section 4.2.3, page 4-17 through 4-18 of the EA.

For additional information on airports/airstrips, see Section 3.2.3, pages 3-55 through 3-56. Following approval of a route by the PUC, CPS Energy will make a final determination of the need for FAA notification, 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 Halff's review of aerial photography and field reconnaissance, the route of the Proposed Project does not cross any known cropland or pastureland irrigated by traveling irrigation systems, either rolling or pivot type.

Please refer to Section 3.2.2, pages 3-53; and Section 4.2.2, page 4-16 of the EA.

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 the 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 Bexar and Medina 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 route is included as Attachment No. 8 to the Application. South Texas Electric Cooperative, Inc., LCRA Transmission Services Corporation, and Medina Electric Cooperative, Inc. are electric utility providers located within five miles of the route of the Proposed Project.

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 *San Antonio Express News* (a newspaper of general circulation in Bexar and Medina counties where the transmission facilities are to be constructed) within one week after the Application is filed with the PUC is included as Attachment No. 10 to the Application. A publisher's affidavit and tear sheet will be filed with the PUC showing proof of notice as soon as available after filing of the Application.

For a CREZ application, in addition to the requirements of 16 TAC § 22.52 the applicant shall, not less than twenty-one (21) days before the filing of the application, submit to the Commission staff a "generic" copy of each type of alternative published and written notice for review. Staff's comments, if any, regarding the alternative notices will be provided to the applicant not later than seven days after receipt by Staff of the alternative notices. Applicant may take into consideration any comments made by Commission staff before the notices are published or sent by mail.

Not applicable.

26. Parks and Recreation Areas:

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

Halff 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, Halff identified one park or recreation area within the study area, Government Canyon State Natural Area. The route of the Proposed Project will cross two portions of the Government Canyon State Natural Area. The Government Canyon State Natural Area is located within 1,000 feet of the centerline of the route of the Proposed Project. The Proposed Project is not anticipated to have any significant impacts on the use of parks and recreation facilities.

Please refer to Section 3.3.1, page 3-60; and Section 4.3, page 4-20 of the EA.

27. Historical and Archeological Sites:

For each route, list all historical and archeological sites known to be within 1,000 feet of the center line of the route. Include a description of each site and its distance from

the center line. List the sources (national, state or local commission or societies) used to identify the sites. Locate all historical sites on a routing map. For the protection of the sites, archeological sites need not be shown on maps.

Halff conducted a literature review and records search at the Texas Historical Commission (THC) and The Texas Archeological Research Laboratory (TARL) at the University of Texas at Austin to identify known historical and archeological sites located within 1,000 feet of the route of the Proposed Project. 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 Halff's review, 12 recorded archeological sites are located within the ROW of the route of the Proposed Project. Twenty-one archeological sites are located within 1,000 feet of the centerline of the route of the Proposed Project. A description of the sites with the approximate distance from the route of the Proposed Project is listed on Table 4-5, page 4-24 of the EA. For the protection of the sites, they are not shown on Figure 3-1. The Proposed Project is not anticipated to have any significant impacts on the archeological sites identified within 1,000 feet.

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 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 is attached below.

AFFIDAVIT OF ANTONIO J. DEMENDONCA

STATE OF TEXAS §
§
COUNTY OF BEXAR §

Before me, the undersigned authority, Antonio J. Demendonca, being first duly sworn and states:

"My name is Antonio J. Demendonca. My title is Project Manager, Energy Delivery Services, 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 Project Manager, Energy Delivery Services, for CPS Energy, I am authorized to file and verify this 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."

"Further, affiant sayeth not."

Antonio J. Demendonca
Affiant

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public in and for the State of Texas, this 30 day of October, 2024.

NORMA PATRICIA VILLARREAL
Notary Public-State of Texas
Notary ID #12510878-3
Commission Exp. OCT. 21, 2025
Notary without Bond

Notary Public