STANDARD APPLICATION FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR A PROPOSED TRANSMISSION LINE

DOCKET NO. 59908

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:

For joint applications, provide all information for each applicant.

Applicant (Utility) Name: Texas-New Mexico Power Company ("TNMP")

Certificate Number: 30038

Street Address: 577 N. Garden Ridge Blvd.
Lewisville, Texas 75067

Mailing Address: 577 N. Garden Ridge Blvd.
Lewisville, Texas 75067

Applicant (Utility) Name: LCRA Transmission Services Corporation ("LCRA TSC")

Certificate Number: 30110

Street Address: 3505 Montopolis Drive
Austin, Texas 78744

Mailing Address: P.O. Box 220
Austin, Texas 78767

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.

TNMP and LCRA TSC ("Applicants") will each hold an ownership interest in portions of the Bakersfield to White Baker 345 kV Transmission Line Project ("Project").

3.	**Person to Contact:**	Michael O'Brien
	Title/Position:	Associate Director of Development and Planning
	Phone Number:	(409) 949-5623
	Mailing Address:	702 Highway 146 N
		Texas City, Texas 77590
	Email Address:	Michael.Obrien@tnmp.com
	Person to Contact:	Susana Duarte Thorne
	Title/Position:	Sr. Regulatory Case Manager
	Phone Number:	(512) 730-6833
	Mailing Address:	P.O. Box 220
		Austin, Texas 78767-0220
	Email Address:	Susana.Thorne@lcra.org
3a.	**Alternate Contact:**	Christopher Gerety, P.E.
	Title/Position:	Vice President of Technical Services and System Reliability
	Phone Number:	(409) 949-5605
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		Texas City, Texas 77590
	Email Address:	Christopher.Gerety@tnmp.com
	Alternate Contact:	Emily R. Jolly

Title/Position:	SVP Chief Regulatory Compliance Officer
Phone Number:	(512) 578-4011
Mailing Address:	P.O. Box 220 Austin, Texas 78767-0220
Email Address:	Emily.Jolly@lcra.org

3b. Legal Counsel – TNMP: Stephanie Sparks
Natosha Greene
Leon Cao

Phone Number:	(469) 895-4830
Mailing Address:	Vedder Price P.C. 300 Crescent Court, Suite 400 Dallas, Texas 75201
Email Address:	ssparks@vedder.com ngreene@vedder.com lcao@vedder.com

Legal Counsel – LCRA TSC: Kirk Rasmussen
Catherine E. Garza

Phone Number:	(512) 236-2200
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100 Congress Avenue, Suite 1100

Austin, Texas 78701

Email Address: krasmussen@jw.com

cegarza@jw.com

Please contact Stephanie Sparks or Kirk Rasmussen with any inquiries regarding the Project.

4. Project Description:

Bakersfield – White Baker 345 kV Transmission Line Project in Pecos County, Texas (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.

The Project is part of the Permian Basin Reliability Plan approved by the Public Utility Commission of Texas ("PUC" or "Commission") on October 5, 2024. It consists of a new, double-circuit 345 kV transmission line (design and initial operating voltage) to be built on double-circuit steel monopoles (TNMP) and steel lattice tower structures (LCRA TSC) between TNMP's proposed White Baker 345/138 kV Substation and LCRA TSC's existing Bakersfield Substation in Pecos County, Texas. The Project includes two components of the local project that the Electric Reliability Council of Texas ("ERCOT") identified as Upgrade L13 in its Permian Basin Reliability Plan Study Report ("Permian Basin Reliability Study"),

which is included as Attachment No. 4. The Commission's Order Approving the Reliability Plan for the Permian Basin Region ("Order of Approval") is included as Attachment No. 5. Upgrade L13 includes (1) a new White Baker 345/138 kV substation at TNMP's existing White Baker 138 kV substation, and (2) a new Bakersfield – White Baker 345 kV double-circuit transmission line.

The length of the Project is approximately 13.3 miles. The Project includes the addition of TNMP's proposed 345/138 kV Substation located at TNMP's existing White Baker 138 kV Substation, which is located along the Interstate Highway (IH) 10 frontage road approximately one mile southwest from the intersection of IH 10 and Legion Road, approximately 24.8 miles east of Fort Stockton, Texas. The Project will connect the proposed TNMP White Baker 345/138 kV Substation to LCRA TSC's existing Bakersfield Substation, which is located approximately six miles north of IH 10 and one mile west of Farm-to-Market Road 1901 (FM 1901), approximately 10.7 miles southwest of McCamey, Texas.

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.).

Applicants will each own 50 percent of the Project. TNMP will construct, own, operate, and maintain the southwestern half of the line connecting to TNMP's proposed White Baker 345/138 kV Substation (including all necessary construction within the White Baker 345/138 kV Substation), and LCRA TSC will construct, own, operate, and maintain the northeastern

half of the transmission line connection to LCRA TSC's existing Bakersfield Substation (including all necessary construction within the Bakersfield Substation).

Applicants are proposing one route for the Project because all directly affected landowners have provided written consent for the proposed route, and the route meets the applicable criteria of the Public Utility Regulatory Act ("PURA") and the Commission's rules. Each utility will be responsible for their respective portions of the Project, including design, right-of-way ("ROW") acquisition, material procurement, 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.

Not applicable.

5. Conductor and Structures:

Conductor Size and Type:	1926.9 kcmil ACSS/TW "Cumberland"
Number of conductors per phase:	Two conductors per phase
Continuous Summer Static Current Rating (A):	5,166 Amperes (TNMP) 6,156 Amperes (LCRA TSC)
Continuous Summer Static Line Capacity at Operating Voltage (MVA):	3,086 Megavolt-Amperes (MVA) at 345-kV (TNMP)

	3,679 Megavolt-Amperes at 345-kV (LCRA TSC)
Continuous Summer Static Line Capacity at Design Voltage (MVA):	3,086 MVA (TNMP) 3,679 MVA at 345-kV (LCRA TSC)
Type and composition of Structures:	Double-Circuit Steel Poles (TNMP) Double-Circuit Steel Lattice Tower (LCRA TSC)
Height of Typical Structures:	120 – 155 feet* (TNMP) 140 – 170 feet* (LCRA TSC)
Estimated Maximum Height of Structures:	190 feet (TNMP) 185 feet (LCRA TSC)

* This number reflects the approximate visible height of the structure from ground to structure top, which may vary depending on terrain and other engineering constraints.

Explain why these structures were selected; include such factors as landowner preference, engineering considerations, and costs comparisons to alternate structures that were considered.

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

TNMP and LCRA TSC selected the double-circuit 345 kV steel monopole structures and the double-circuit 345 kV steel lattice towers, respectively, for numerous reasons including costs, technical specifications, structure footprint, ROW requirements, the specific characteristics of the study area, and other engineering-related reasons. Double-circuit 345 kV steel monopoles and double-circuit 345 kV steel lattice towers are types of standard structures that Applicants typically use for new single- and double-circuit 345 kV construction.

Provide dimensional drawings of the typical structures to be used in the project.

A dimensional drawing of TNMP's typical 345 kV tangent structure is shown in Figure 1-3 of the *Environmental Assessment and Routing Study for the Bakersfield to White Baker 345 kV Transmission Line Project in Pecos County, Texas* ("Environmental Assessment and Routing Study"), prepared by HDR, Inc. ("HDR") and included as Attachment No. 1. In some dead-end locations, TNMP may use double-circuit, two-pole steel structures, which are shown in Figures 1-4 and 1-5 of the Environmental Assessment and Routing Study.

A dimensional drawing of LCRA TSC's typical 345 kV tangent lattice tower is shown in Figure 1-6 of the Environmental Assessment and Routing Study.

Design criteria will comply with applicable statutes, the appropriate edition of the National Electrical Safety Code ("NESC"), and the Applicants' standard design practices.

6. Right-of-way:

Miles of Right-of-Way: Approximately 13.3 miles

Miles of Circuit: Approximately 26.6 miles

Width of Right-of-Way: Approximately 160 feet

Percent of Right-of-Way Acquired: 0%

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, TNMP and LCRA TSC will each construct, own, and operate 50 percent of the Project.

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 study area is located entirely within Pecos County. No portion of the study area is located within the city limits or extraterritorial jurisdiction of an incorporated municipality.

The land cover in the study area, according to the National Land Cover Dataset ("NLCD"), is largely considered to be scrub/shrub. The majority of the study area is largely unpopulated, with the exception of one development in the southeastern portion of the study area in the unincorporated community of Bakersfield. A limited number of single-family residences are present within the study area.

The study area is primarily desert with oil and gas development. Predominant land uses include resource extraction, energy production, and energy transmission. Overall, the study area consists of desert shrubland with limited topography and is largely absent of water features. The area is relatively flat, though there are three named elevated landforms: Big Mesa, Hog Peak, and Tunas Peak.

For specifics regarding the study area, please refer to Section 2.0 of the Environmental Assessment and Routing Study included as Attachment No. 1.

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.

LCRA TSC owns the existing Bakersfield Substation that will connect the new transmission line to TNMP's proposed White Baker 345/138 kV Substation.

New facilities required at the existing LCRA TSC Bakersfield Substation:

The dimensions of LCRA TSC's existing Bakersfield Substation are approximately 1,448 feet by 885 feet. The termination of the proposed White Baker 345 kV transmission lines at the Bakersfield Substation will require a substation site expansion of approximately 885 feet by five feet, all located within property currently owned by LCRA TSC. LCRA TSC will modify the existing Bakersfield Substation, which is currently configured in a double bus, breaker-and-a-half arrangement. The modification will include the addition of a new 345-kV breaker-and-a-half bay to accommodate the termination of two new 345-kV transmission lines connecting the Bakersfield Substation to the TNMP White Baker 345/138 kV Substation. The new bay will be integrated into the existing Bakersfield Substation yard and will maintain consistency with the existing breaker-and-a-half configuration. The new bay will consist of three 362-kV, 5000A, 63kA SF6 dead tank circuit breakers, six 362-kV, 5000A double-end disconnect switches, and eight CCVT instrument transformers. Please See Attachment No. 2-B for a detailed layout of the Bakersfield Substation.

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

The Project includes the addition of TNMP's proposed White Baker 345/138kV Substation located at TNMP's existing White Baker 138 kV Substation, which is along the IH 10 frontage road approximately 1.0 mile southwest from the intersection of IH 10 and Legion Road, approximately 24.8 miles east of Fort Stockton, Texas.

TNMP will own the proposed White Baker 345/138 kV Substation. The proposed White Baker 345/138 kV Substation will initially be constructed as a four-breaker ring bus configuration for the 345 kV and 138 kV sides of the station, with two 345/138kV autotransformers rated for 750MVA, and a dedicated control enclosure with associated systems. The White Baker 345/138 kV Substation is expandable to a 12 breaker, breaker and a half bus arrangement. Additional details regarding the layout of the White Baker 345/138 kV Substation are provided in Attachment No. 2-A.

8. Estimated Schedule:

***Estimated Dates of:**	**Start[1]**	**Completion[1]**
Right-of-way and Land Acquisition	1/1/2027	12/31/2027
Engineering and Design	1/1/2027	12/31/2027
Material and Equipment Procurement	4/1/2027	2/28/2028
Construction of Facilities	1/1/2028	7/31/2028
Energize Facilities		7/31/2028

[1] Estimated schedule is based on administrative approval of a consented route pursuant to 16 Texas Administrative Code (TAC) § 25.101(b)(3)(C). and numerous other factors. The estimated construction schedule should not in any way be considered a representation, promise, or guarantee.

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

The Project is located entirely within Pecos County.

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

No portions of the Project are located within an incorporated municipality.

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

Not applicable.

11. Affected Utilities:

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

Other utilities interconnected at LCRA TSC's Bakersfield Substation include South Texas Electric Cooperative (STEC), Electric Transmission Texas, LLC (ETT), and Garland Power & Light (GPL).

No other electric utility will be served by or connected to the Project other than the Applicants.

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 Project other than the Applicants. No other utilities' existing facilities will be utilized other than the Applicants' facilities.

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.

TNMP will finance its portion of the Project through TNMP's capital budget in a similar manner to the approach that has been used for projects previously constructed by TNMP.

LCRA TSC will finance its portion of the Project in a similar manner to the approach that has been used for projects previously constructed by LCRA TSC. Financing may include a combination of tax-exempt commercial paper, tax-exempt private revolving note, or taxable commercial paper, and fixed-rate debt. Interest on the debt may be capitalized until the Project is in service, at which point it is intended that both the principal and interest will be serviced with Transmission Cost of Service revenues.

13. Estimated Costs:

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

	Transmission Facilities	Station Facilities	
		LCRA TSC's Bakersfield Substation	TNMP's White Baker 345/138 kV Substation
Right-of-way and Land Acquisition	$2,189,794	-	-
Engineering and Design (Utility)	$894,000	$1,093,329	-
Engineering and Design (Contract)	$6,790,070	$1,339,144	$708,000
Procurement of Material and Equipment (including stores)	$31,609,800	$4,479,227	$47,557,000
Construction of Facilities (Utility)	-	$2,180,220	-
Construction of Facilities (Contract)	$42,000,243	$6,508,081	$9,498,000
Other (all costs not included in the above categories)	-	-	-
Estimated Total Cost[1]	**$83,483,907**	**$15,600,001**	**$57,763,000**

[1] Refer to Attachment No. 3 for cost estimates for the transmission facilities for the proposed route. Estimated costs are based on LCRA TSC's and TNMP's historical costs and do not include escalation for existing or future tariffs/import duties that may be levied on project materials, equipment, or supplies.

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

The proposed transmission line will be split evenly, and each Applicant will bear the costs associated with its respective half of the project. TNMP will bear the costs associated with the proposed White Baker 345/138 kV Substation, and LCRA TSC will bear the costs associated with the new facilities required at Bakersfield Substation.

14. Need for the Proposed Project:

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

In 2023, the 88th Texas Legislature enacted House Bill ("H.B.") 5066, which requires the Commission and ERCOT to develop a reliability plan for the Permian Basin to accomplish the following objectives: (1) extend transmission service to areas where mineral resources have been found; (2) increase available capacity to meet forecasted load; and (3) provide available infrastructure to reduce interconnection times in areas without access to transmission service. In accordance with this legislative mandate, the Commission ordered ERCOT to develop and file a Permian Basin reliability plan for the Commission's consideration.

Over the next seven months, ERCOT hosted stakeholder workshops and engaged with transmission service providers, Commission Staff, and other interested parties to identify the reliability needs and transmission system improvements necessary to reliably serve the Permian Basin. On July 25, 2024, ERCOT filed the Permian Basin Reliability Plan Study report with the Commission. ERCOT supplemented that report with an addendum filed

September 11, 2024 (together, the "Permian Basin Reliability Plan"). A copy of the Permian Basin Reliability Plan is included as Attachment No. 4.

The Permian Basin Reliability Plan concluded that the Permian Basin region lacks the necessary transmission infrastructure to reliably serve the projected demand. Looking beyond the 5-year forecast, the Permian Basin Reliability Plan combined forecasts for oil and gas load and non-oil and gas load to forecast the total projected demand in the Permian Basin in 2030 and 2038. For oil and gas load, ERCOT used a 2022 load forecast developed by S&P Global. ERCOT then incorporated demand projections provided by transmission and distribution service providers for the projected non-oil and gas demand. Using this combined data, ERCOT concluded that electric demand in the Permian Basin will reach 23,659 MW in 2030, and 26,400 MW in 2038. The following table shows the projected load growth in the Permian Basin for 2030 and 2038, as reported by ERCOT in the Permian Basin Reliability Plan.

	2023 RTP Study 2029 Case	Permian Basin Reliability Plan 2030 Case	Permian Basin Reliability Plan 2038 Case
Permian Basin Total Load (MW)	**16,577**	**23,659**	**26,400**
Permian Basin Oil & Gas Load (MW)	**12,341**	**11,964**	**14,705**
Additional Non-oil & Gas Load (MW)	**4,236**	**11,695**	**11,695**

The Permian Basin Reliability Plan details ERCOT's reliability assessment of proposed transmission improvements, including the Project, based on North American Electric

Reliability Corporation Reliability Standard TPL-001-5.1, the ERCOT Planning Guide, and the ERCOT Nodal Protocols. As part of this assessment, ERCOT first updated the transmission topology in the region to include planned generation, transmission, and load additions and then performed steady-state and dynamic studies, simulating the following contingencies:

- P0 (system intact);
- P1, P2-1, and P7 (N-1 conditions);
- P2-2, P2-3, P4, and P5 (extra high voltage only);
- P3 (G-1 + N-1 (select G-1 generation outages));
- P6-2 (X-1 + N-1 (select 345/138 kV transformers only)); and
- Maintenance outage scenario for select 345-kV level transmission outages.

ERCOT observed thermal and voltage criteria violations, voltage instability, and unsolved power flow in both the 2030 and 2038 base cases under N-0 (system intact) conditions, which strongly indicated the need for new transmission infrastructure. To identify the local upgrades necessary to serve existing and forecasted load in the Permian Basin, ERCOT added area loads incrementally, identified the upgrades needed to mitigate local reliability criteria violations, then repeated the process in other areas. After all loads were included in the study cases, ERCOT re-evaluated the identified transmission upgrades to verify the need for the proposed transmission upgrades.

ERCOT's evaluation determined that (1) significant local upgrades are needed to serve existing and forecasted load in the Permian Basin and (2) significant regional upgrades are needed to transfer power across the ERCOT system, due to the significant load growth and relative lack of conventional generation in the Permian Basin region. Thus, the Permian Basin Reliability Plan divided the identified system upgrades into two categories of projects that are needed to meet the objectives of H.B. 5066: import path projects and local transmission upgrade projects, such as this one.

ERCOT's Permian Basin Reliability Plan also divides the identified transmission upgrades into three geographic areas, one of which is Pecos County. The Permian Basin Reliability Plan identified the Project and other local projects as necessary to provide the transmission capacity required to serve the projected demand in Pecos County. The Project will provide new 345 kV sources to improve the ability to serve new load and address thermal and voltage instability. The following table from the Permian Basin Reliability Plan shows the projected load in Pecos County in 2029, 2030, and 2038.

	2023 RTP Study 2029 Case (MW)	Permian Basin Reliability Plan 2030 (MW)	Permian Basin Reliability Plan 2038 (MW)
Pecos	**627**	**976**	**1,281**

ERCOT's study process resulting in the Permian Basin Reliability Plan included substantial engagement with the Commission, TSPs, and other stakeholders. The Commission's Order Approving the Reliability Plan for the Permian Basin Region,

included as Attachment No. 5, declares that "the common local projects and import paths approved in this Order do not require additional ERCOT RPG review before a CCN application may be filed by the applicable TSPs." Therefore, the Applicants did not independently submit the Project to ERCOT's RPG.

As discussed in the Permian Basin Reliability Plan, the transmission upgrades will improve reliability in the Permian Basin region by: (1) providing increased operational flexibility during emergency conditions; (2) enhancing voltage support in the Permian Basin by creating a more-integrated transmission system; (3) addressing voltage instability that would otherwise occur; and (4) allowing for future expansion in the area.

The Project will increase the transmission system's ability to serve new load and future load growth as well as provide reliable transmission service to the region. This will improve service for new and existing customers as swift oil and gas development, and other economic expansion continues in the area.

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.

The Project includes two components of a local project identified as Upgrade L13 in the Permian Basin Reliability Plan. The Commission's Order of Approval requires that LCRA TSC and TNMP submit a CCN application for the transmission upgrades identified in the Permian Basin Reliability Plan. Therefore, Applicants did not evaluate alternatives to the

Project. For further details regarding ERCOT's evaluation pursuant to the Permian Basin Reliability Plan, refer to Attachment No. 4.

Distribution alternatives to the Project would not resolve the identified interconnection or reliability issues on the transmission system. Adding transformers, upgrading voltage, or bundling conductors for existing facilities would also fail to satisfy the need for the Project.

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 in Attachment No. 6. The location and voltage of existing transmission lines, substations, taps, ties, meter points or other facilities involving other utilities in relation to the Project are included in the map provided as Attachment No. 7. A map outlining the study area can be found at Figures 2-1 and 2-2 in the Environmental Assessment and Routing Study included as Attachment 1.

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.

Applicants retained HDR to prepare the Environmental Assessment and Routing Study. The objective of the Environmental Assessment and Routing Study was to provide information in support of this Application in addressing the requirements of PURA §

37.056(c)(4)(A)-(D), the Commission's CCN Application form, and 16 TAC § 25.101 as these apply to the Project.

By examining existing environmental conditions, including the human and natural resources that are located in the study area, the Environmental Assessment and Routing Study appraises the environmental effects of construction, operation, and maintenance of the Project. The Environmental Assessment and Routing Study may also be used in support of any additional local, state, or federal permitting activities that may be required for the Project.

To assist HDR in its evaluation, Applicants provided information regarding the Project endpoints, the need for the Project, engineering and design requirements, construction practices, and ROW requirements for the Project.

The Environmental Assessment and Routing Study identified the study area based on the Project endpoints. Refer to Figures 2-1 and 2-2 of the Environmental Assessment and Routing Study, included as Attachment No. 1, for the study area. Routing constraints were identified after collection of study area data from many sources (*e.g.*, governmental agencies, evaluation of aerial photography) and consideration of the factors established in PURA § 37.056(c)(4)(A)-(D), the Commission's CCN Application form, and 16 TAC § 25.101.

Preliminary transmission line links were identified by using an overlay of the composite environmental and land use constraints map. These links were developed based upon maximizing the use of routing opportunity areas while avoiding areas of high

environmental constraints or conflicting land uses. Aerial photography was used as the background of the composite constraints overlay to identify optimal locations for the preliminary transmission line link centerlines. During the preliminary transmission line link development process, the location of residential areas, habitable structures, industrial facilities, pipelines, surface water crossings, cultural resources, property boundaries, agricultural land, and other sensitive resource areas were considered.

Specific discussions regarding the delineation of the study area, identification of constraints, selection of potential line segments, and route analysis are set forth in the Environmental Assessment and Routing Study included as Attachment No. 1. An evaluation of the study area revealed significant property ownership by University of Texas System, University Lands Administration (referred to as "University Lands" or "UT Lands"). Based on input from University Lands, a direct, forward progressing preliminary transmission line route was identified on an overlay of the composite environmental and land use constraints map entirely on University Lands-owned parcels. University Lands provided written consent for the proposed route, which complies with the requirements of PURA and the Commission's Rules. A copy of University Lands' written consent is included as Attachment No. 8.

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.

In accordance with 16 TAC § 22.52, Applicants did not hold a public meeting because the total number of affected landowners is less than 25 people, which is the threshold established by 16 TAC § 22.52.

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).

Please refer to maps included as Figures 3-1 and 3-2 and Appendix C (Figure 4-1) of the Environmental Assessment and Routing Study included as Attachment No. 1. Sensitive cultural resource data and sites are not mapped for their protection.

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.

Please refer to maps (prepared with aerial photographs) included as Figures 3-1 and 3-2 and Appendix C (Figure 4-1) of the Environmental Assessment and Routing Study

included as Attachment No. 1. Sensitive cultural resource data and sites are not mapped for their protection.

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.

Please refer to Attachment No. 9, which is a list of directly affected landowner names and addresses that cross references directly affected property shown in Figure 3-2 and Appendix C (Figure 4-1) of the Environmental Assessment and Routing Study included as Attachment No. 1. No habitable structures are located within 510 feet of any proposed link centerline for the route filed in this Application.

20. Permits:

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

The permits and/or approvals that will be obtained after PUC approval of this Application and prior to beginning construction, if necessary, are set forth in the Environmental Assessment and Routing Study as Attachment No. 1, and include the following:

1. Texas Department of Transportation ("TxDOT") permit(s) for crossing a state-maintained roadway, if any.

2. A Storm Water Pollution Prevention Plan ("SWPPP") may be required by the Texas Commission on Environmental Quality ("TCEQ") depending on the calculated acreage of ground disturbance.

3. Consultation with the Texas Historical Society ("THC") will occur following the Commission's approval of this Application to determine the need for cultural resources surveys or additional permitting requirements.

4. Consultation with the U.S. Army Corps of Engineers ("USACE") will occur, if needed, following the Commission's approval of this Application to determine appropriate requirements under Section 404/Section 10 Permit criteria.

5. Consultation with the U.S. Fish and Wildlife Service ("USFWS") will occur, if needed, following the Commission's approval of this Application to determine appropriate requirements under the Endangered Species Act.

6. Consultation with the Federal Aviation Administration ("FAA") will occur following the Commission's approval of this Application to determine appropriate requirements and notification under Federal Aviation Regulations (14 CFR Part 77).

7. Consultation with the Pecos County floodplain administrator may occur following the Commission's approval of this Application, if needed, to determine if any permits or mitigation are necessary.

8. Texas General Land Office ("GLO") miscellaneous easement(s) will be obtained, as necessary, for crossing riverbeds, navigable streams, or other properties involving state property interests.

9. An application for a ROW easement with University Lands will be submitted, and coordination regarding existing leases and land uses with University Lands is anticipated following the Commission's approval of this Application.

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 230 kV or less, or within 500 feet of the centerline if the proposed project will be constructed for operation at greater than 230 kV. 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.

No habitable structures are located within 510 feet of any proposed link centerline comprising the proposed route filed in this Application.

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 AM radio transmitters located within 10,000 feet of the centerline of the proposed route, and no known FM radio transmitters located within 2,000 feet of the centerline of the proposed route. Other electronic installations (including microwave, land mobile, and other communications towers) are summarized in Attachment No. 1 and are identified in Appendix B (Table 4-1).

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.

HDR completed a preliminary analysis to determine if any airports or heliports would meet the FAA notification and PUC reporting criteria based on distances measured from the nearest point on each runway to the closest point on the proposed transmission line route centerline, and found (1) no FAA-registered airports with at least one runway greater than 3,200 feet in length within 20,000 feet of the proposed filed route; (2) no FAA-registered airports with all runways less than 3,200 feet in length within 10,000 feet of the proposed filed route; (3) no heliports within 5,000 feet of the proposed filed route; and (4) no non-registered private airstrip within 10,000 feet of the proposed filed route.

Please refer to Section 4.2.8.2, Appendix B (Table 4-1), and Appendix C (Figure 4-1) of the Environmental Assessment and Routing Study included as Attachment No. 1.

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.

Results of aerial photography interpretation did not identify any traveling irrigation systems within the ROW of the proposed route.

Please refer to Section 4.2.3 of the Environmental Assessment and Routing Study included as Attachment No. 1.

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 direct notice that will be provided via first-class mail to the owners of land that will be "directly affected" by the Project, as that term is used in 16 TAC § 22.52(a)(3), is provided as Attachment No. 9. This written notice includes the following enclosures: route description, map, the Commission's brochure titled *Landowners and Transmission Line Cases at the PUC*, the Commission's *Request to Intervene* form, the Commission's *Comments* form, and the *State of Texas Landowner's Bill of Rights*.

The names and addresses of the directly affected landowners to whom notice will be mailed via first-class mail are included in Attachment No. 10. The notice discussed in this response includes notice to landowners as described in PURA § 37.054(c).

Additionally, courtesy notice of the Application will be sent via first-class mail to any pipeline owners/operators/associations identified in the project area and shown in Attachment No. 10 using the form included as Attachment No. 13.

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

A representative copy of the written notice that will be provided to utilities providing the same utility service within five miles of the Project, with attached route description and map, is provided as Attachment No. 11. This notice will be provided to the following utilities on or before the Application filing date as required by Commission Rules:

American Electric Power Company, Inc.

Oncor Electric Delivery Company, LLC

South Texas Electric Cooperative, Inc.

Electric Transmission Texas, LLC

Garland Power and Light

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 representative copy of the written notice, with attached route description and map, that will be provided to county and/or municipal authorities is included as

Attachment No. 11. The following county authorities will be provided the requisite notice on or before the Application filing date, as required by Commission rules:

- Pecos County: County Judge, County Commissioners - Precincts 1,2, 3, and 4.

A representative copy of the written notice, with attached route description and map, that will be provided to the DoD Military Aviation and Installation Assurance Siting Clearinghouse by email at *osd.dod-siting-clearinghouse@mail.mil,* and by first-class mail to the address below on the date this Application is filed, is included as Attachment No. 11.

DOD Military Aviation and Installation Assurance Siting Clearinghouse
3400 Defense Pentagon, Room 5C646
Washington, DC 20301-3400

A copy of the Application and all attachments will also be provided to the Texas Office of Public Utility Counsel ("OPUC"). A representative copy of the written notice, with attached route description and map, that will be provided to OPUC is included as Attachment No. 11.

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.

Notice for this Application will be published in the *Fort Stockton Pioneer,* a newspaper of general circulation in Pecos County. A representative copy of the general published notice is included as Attachment No. 12, including the route description and maps of the filed route.

Proof of publication will be provided in the form of a publisher's affidavit and newspaper tear sheet following publication of this notice.

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.

A review of federal, state, and local websites and maps, as well as a field reconnaissance survey, identified no public recreational areas owned by a government body or an organized group, club or church within 1,000 feet of the centerline of the proposed route.

Please refer to Section 4.2.6 and Appendix B (Table 4-1) of the Environmental Assessment and Routing Study, included as Attachment No. 1.

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.

Please refer to Sections 4.2.7 and 4.4, and Appendix B (Tables 4-1 and 4-2) in the Environmental Assessment and Routing Study included as Attachment No. 1 for the identification of any known historical and archeological sites (including cemeteries and other recorded resources) for the proposed 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 T.A.C. §503.1. If any route is, either in whole or in part, within the coastal management program boundary, indicate whether any part of the route is seaward of the Coastal Facilities Designation Line as defined in 31 T.A.C. §19.2(a)(21). Using the designations in 31 T.A.C. §501.3(b), identify the type(s) of Coastal Natural Resource Area(s) impacted by any part of the route and/or facilities.

The Project is not located, either in whole or in part, within the coastal management program boundary as defined in 31 TAC § 27.1 (formerly 31 TAC § 503.1).

29. Environmental Impact:

Provide copies of any and all environmental impact studies and/or assessments of the project. If no formal study was conducted for this project, explain how the routing and construction of this project will impact the environment. List the sources used to identify the existence or absence of sensitive environmental areas. Locate any environmentally sensitive areas on a routing map. In some instances, the location of the environmentally sensitive areas or the location of protected or endangered species should not be included on maps to ensure preservation of the areas or species.

The Environmental Assessment and Routing Study prepared by HDR is included as Attachment No. 1.

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.

A copy of this Application, including the Environmental Assessment and Routing Study, will be provided to TPWD for review within seven days following the filing of the Application for the Project. Please refer to Attachment No. 14 for a copy of the transmittal letter with which the Application and its attachments, including the Environmental Assessment and Routing Study, will be sent to the TPWD.

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.

Attachment Nos. 15 and 16, respectively, are the sworn affidavits of Michael O'Brien, TNMP's Associate Director of Development and Planning, and Susana Duarte Thorne, LCRA TSC's Senior Regulatory Case Manager, who are qualified individuals authorized by Applicants to verify and affirm that, to the best of their knowledge, all information provided, statements made, and matters set forth in this Application, including its attachments, are true and correct.

31. List of Attachments to the CCN Application

Attachment No. 1: Environmental Assessment and Routing Study

Attachment No. 2-A: Preliminary Layout – White Baker 345/138 kV Substation

Attachment No. 2-B:	Modification Layout –Bakersfield 345kV Substation
Attachment No. 3:	Cost Estimates
Attachment No. 4:	ERCOT's Permian Basin Reliability Plan Study Report (July 25, 2024) and Addendum (September 11, 2024) (together, "Permian Basin Reliability Plan")
Attachment No. 5:	Commission Order Approving the Reliability Plan for the Permian Basin Region (October 5, 2024)
Attachment No. 6:	Schematic of Transmission System in Proximate Area of Project
Attachment No. 7:	Transmission System in Proximate Area of Project
Attachment No. 8:	University Lands' Consent Letter
Attachment No. 9:	Copy of Notice to Directly Affected Landowners
Attachment No. 10:	List of Directly Affected Landowners for Notice and Pipeline Owners, Operators, and Associations for Courtesy Notice
Attachment No. 11:	Copy of Notice to Utilities, Counties, OPUC, Municipalities, and Department of Defense Military Aviation and Installation Siting Clearinghouse
Attachment No. 12:	Copy of Newspaper/Public Notice
Attachment No. 13:	Copy of Courtesy Notice to Pipeline Owners, Operators, and Associations

Attachment No. 14: Transmittal Letter to TPWD

Attachment No. 15: Affidavit of Michael O'Brien (TNMP)

Attachment No. 16: Affidavit of Susana Duarte Thorne (LCRA TSC)