DOCKET NO. 55120

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

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

Applicants LCRA Transmission Services Corporation (LCRA TSC) and Wind Energy Transmission Texas, LLC (WETT) are filing this application as Joint Applicants and request that all parties serve copies of all pleadings, discovery, correspondence, and other documents on the following representatives:

Service Contacts:

Attorneys for LCRA TSC

Kirk Rasmussen State Bar No. 24013374 Krasmussen@jw.com

Craig R. Bennett State Bar No. 00793325 <u>Cbennett@jw.com</u>

Jackson Walker, LLP 100 Congress Ave., Ste. #1100 Austin, TX 78701 (512) 236-2200 Attorneys for WETT

Dennis W. Donley, Jr. State Bar No. 24004620 Donley@namanhowell.com

Stephanie Potter State Bar No. 24065923 Spotter@namanhowell.com

Naman, Howell, Smith & Lee, PLLC 8310 N. Capital of Texas Hwy., Ste. #490 Austin, Texas 78731 (512) 479-0300

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:	LCRA Transmission Services Corporation (LCRA TSC)
Certificate Number:	30110
Street Address:	3700 Lake Austin Boulevard Austin, TX 78703
Mailing Address:	P.O. Box 220 Austin, TX 78767-0220
Applicant (Utility) Name:	Wind Energy Transmission Texas, LLC (WETT)
Certificate Number:	30197
Street Address:	
	1901 Capital Parkway, Ste. #200 Austin, TX 78746

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

Not applicable. LCRA TSC and WETT will hold separate 50 percent ownership interests in the North McCamey to Bearkat 345 kV Transmission Line Project. No entity not subject to the Commission's jurisdiction will hold an ownership or investment interest in the project.

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

Contact for LCRA TSC: Title/Position: Phone Number: Mailing Address:

Senior Regulatory Case Manager (512) 730-6803 P.O. Box 220 Mail Stop DSC D140 Austin, TX 78767-0220 justin.stryker@lcra.org

Justin Stryker

Contact for WETT: Title/Position: Phone Number:

Email Address:

Email Address:

Phone Number:

Mailing Address:

Mailing Address:

Email Address:

Legal Counsel - LCRA TSC: Phone Number: Mailing Address: Travis Leverett Regulatory Manager (737) 218-4517 1901 Capital Parkway, Ste. #200 Austin, TX 78746 tleverett@wettllc.com

Kirk Rasmussen (512) 615-1203 Jackson Walker, LLC 100 Congress Ave., Ste. #1100 Austin, TX 78701 <u>Krasmussen@jw.com</u>

Dennis W. Donley, Jr. (512) 479-0300 Naman, Howell, Smith & Lee, PLLC 8310 N. Capital of Texas Hwy., Ste. #490 Austin, Texas 78731 Donley@namanhowell.com

Email Address:

4. Project Description: Name or Designation of Project

Legal Counsel - WETT:

North McCamey to Bearkat 345 kV Transmission Line Project in Glasscock, Reagan, and Upton Counties, 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 located within Glasscock, Reagan, and Upton Counties, Texas. The LCRA TSC North McCamey Station is located approximately 0.6 miles north of the City of McCamey and one mile west of U.S. Highway 67. The WETT Bearkat Station is located approximately 4.25 miles northeast of St. Lawrence on the west side of County Road 125. The Project will be designed, constructed, and operated as a double-circuit 345-kV transmission line connecting the North McCamey and Bearkat stations.

A portion of the Project is located within the Central and McCamey CREZ Zones. HVDC facilities are not included as part of the project scope.

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.).

LCRA TSC and WETT will each own 50 percent of the Project. LCRA TSC will construct, own, operate, and maintain the southwestern half of the transmission line connecting to LCRA TSC's North McCamey Station (including all necessary construction within the North McCamey Station) and WETT will construct, own, operate, and maintain the northeastern half of the transmission line connecting to WETT's Bearkat Station (including all necessary construction within the Bearkat Station).

The dividing point of the Project will be determined based upon the approval of the Public Utility Commission of Texas (PUC or Commission) of the final transmission line route. The structure closest to the middle of the approved route will be a dead-end structure owned by either LCRA TSC or WETT, depending on the location of the mid-point of the approved route. LCRA TSC will own, operate, and maintain all transmission line facilities, including conductors, wires, structures, hardware, and easements of the southwestern half of the transmission line connecting to the North McCamey Station and WETT will own, operate, and maintain all transmission line connecting to the Bearkat Station. Each utility will be responsible for their respective portions of the Project, including design, right-of-way (ROW) 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.

Not Applicable.

5. Conductor and Structures

Conductor Size and Type:	1926.9 kcmil ACSS/HS/TW Cumberland (LCRA TSC) and 1926.9 kcmil ACSS/HS/TW (WETT)
Number of conductors per phase:	Two (2) conductors per phase
Continuous Summer Static Current Rating (A):	Minimum 5,040 A (LCRA TSC) Minimum 4,846 A (WETT)
Continuous Summer Static Line Capacity at Operating Voltage (MVA):	3,011 MVA at 345-kV (LCRA TSC) 2,896 MVA at 345-kV (WETT)
Continuous Summer Static Line Capacity at Design Voltage (MVA):	3,011 MVA at 345-kV (LCRA TSC) 2,896 MVA at 345-kV (WETT)
Type and Composition of Structures:	Double-circuit steel lattice towers
Height of Typical Structures:	110 to 185 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.

LCRA TSC and WETT selected 345 kV lattice towers as the proposed structure type for the Project based on the factors discussed in the Direct Testimony of Mr. Nathan Laughlin that is being filed concurrent with the Application. LCRA TSC and WETT considered tubular steel poles and lattice towers as possible structures for the Project. Please refer to Figures 1-2 through 1-5 in the North McCamey to Bearkat 345-kV Transmission Line Project Environmental Assessment and Alternative Route Analysis, Glasscock, Reagan, and Upton Counties (EA), included as Attachment 1 to the Application, for dimensional drawings of the typical structures proposed to be used by LCRA TSC and WETT for the 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.

LCRA TSC and WETT will each use similar types of structures (double circuit steel lattice towers as discussed above), for their respective portions of the Project.

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

Approximately 61 to 84 total miles of right-of-way.

Miles of Circuit:

The Project is double-circuit; therefore, the project will result in approximately 122 to 168 miles of circuit.

Width of Right-of-Way:

Typical right-of-way for the Project will be 160 feet in width. More or less right-of-way may be necessary in certain areas.

Percent of Right-of-Way Acquired:

Zero.

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, LCRA TSC and WETT will each construct, own, and operate 50 percent of the Project. During or after the hearing on the merits, Applicants will provide specific details about the estimated structure location of ownership transition for the routes under primary consideration at that juncture of the Application process.

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 Project will connect the existing LCRA TSC North McCamey Station to the existing WETT Bearkat Station. The Project area is located within Glasscock, Reagan, and Upton Counties, Texas.

The Project area is primarily rural with a variety of scattered land uses including commercial and residential development, transportation facilities, parks and recreation areas, rural agricultural areas, oil and gas developments, and wind energy production.

The Project area is situated within the High Plains Physiographic Provinces. The High Plains region consists of predominantly flat plains that support numerous playas and local dune fields with elevations ranging from 2,200 feet to 4,800 feet above mean sea level (amsl). Elevations in the study area generally decrease from northeast to southwest and range between approximately 1,600 feet amsl and 3,000 feet amsl.

Specific discussion regarding natural, human, and cultural resources in the Project area is set forth in the EA, Section 2.0.

7. Substations or Switching Stations:

List the name of all existing HVDC converter stations, substations or switching stations that will be associated with the new transmission line. Provide documentation showing that the owner(s) of the existing HVDC converter stations,

substations and/or switching stations have agreed to the installation of the required project facilities.

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

There are no existing or new HVDC converter stations associated with the Project. The southwestern portion of the transmission line Project will terminate at LCRA TSC's existing 345 kV North McCamey Station. The northeastern portion of the transmission line Project will terminate at WETT's existing 345 kV Bearkat Station.

New facilities required at the North McCamey Station:

The dimensions of LCRA TSC's North McCamey Station are approximately 1121 feet by 740 feet, which includes both the 138 kV and 345 kV transmission facilities. The termination of the proposed 345 kV Sand Lake and Bearkat transmission lines at the North McCamey Station will require an additional area of substation site expansion measuring approximately 675 feet by 230 feet all located within property owned by LCRA TSC. The existing North McCamey 345 kV four (4) breaker ring bus will require an upgrade to a double bus arrangement including two (2) new additional breaker and half bays specifically for the Sand Lake and Bearkat circuits. The proposed 345 kV transmission circuits on existing double circuit capable transmission lines that currently terminate at North McCamey Station.

New facilities required at the Bearkat Station:

The final dimensions of the Bearkat Station will be 586 feet by 760 feet with two new bays, Bays 5 and 6, added to accommodate the Bearkat to North McCamey 345 kV transmission line. Bays 5 and 6 will have a minimum rating of 5000A, while all other equipment located in the remaining bays will have a minimum rating of 3000A.

Attachment 2 to the application depicts the schematic layout of the North McCamey and Bearkat Stations.

8. Estimated Schedule:

Estimated Dates of:	<u>Start</u>	Completion
Right-of-way and Land	Dec. 2023	Feb. 2025
Acquisition		
Engineering and Design	(LCRA TSC) Dec. 2023	Dec. 2024
	(WETT) Mar. 2023	
Material and Equipment	June 2023	Mar. 2025
Procurement		
Construction of	Jan. 2025	May 2026
Facilities		
Energize Facilities		June 2026
	-	

9. Counties:

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

All routes and route segments filed in this Application are located in Glasscock, Reagan, and Upton Counties, Texas.

Please refer to Figures 4-16a, 4-16b (Appendix D), 5-1a, and 5-1b (Appendix E) in the EA for the location of alternative route segments.

10. Municipalities:

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

None of the alternative routes in this Application will be constructed within the incorporated limits or ETJ of any municipality.

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

Not applicable.

11. Affected Utilities:

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

Other utilities connected at LCRA TSC's North McCamey Station include AEP Texas Inc. (AEP) and Garland Power & Light.

Other utilities connected at WETT's Bearkat Station include Oncor Electric Delivery Company LLC (Oncor).

Oncor and LCRA TSC are simultaneously filing a CCN application for the North McCamey to Sand Lake 345 kV transmission line (PUC Docket No. 55121), which will connect the North McCamey Station to the Sand Lake Station to address the overall need for which the Project is part.

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. No other utilities' existing facilities will be utilized for the Project. As stated in response to Question 14, below, however, the Project that is the subject of this Application is part of a larger ERCOT plan that also involves construction of the North McCamey to Sand Lake 345 kV transmission line by LCRA TSC and Oncor.

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.

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, 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.

WETT will finance its portion of the Project with a combination of debt and equity, which should approximate the capital structure authorized by the PUC and used in its previous projects. WETT plans to use internally generated funds for the equity component and proceeds from borrowings for the debt component of such financing. WETT may use shortterm construction financing that will later be repaid through long-term financing for the debt component of the project financing, as appropriate.

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.

	<u>Transmission</u> <u>Facilities *</u>	<u>Substation</u> <u>Facilities *</u>
Right-of-way and Land Acquisition	-	-
Engineering and Design (Utility)	-	-
Engineering and Design (Contract)	-	-
Procurement of Material and Equipment (including stores)	-	-
Construction of Facilities (Utility)	-	-
Construction of Facilities (Contract)	-	-
Other (all costs not included in the above categories)	-	-
Estimated Total Cost	See Attach. 3	See Attach. 3

*Please refer to Attachment 3 to this Application for Transmission and Station Facilities estimated costs for each alternative route presented in this Application.

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

The cost estimates presented in Attachment 3 represent a reasonable estimate of the costs for the transmission facilities associated with each of the alternative routes proposed for the

Project. The estimated station costs for each utility are presented separately in Attachment 3, while one estimated transmission line cost is presented for each alternative route in Attachment 3, because the dividing point of WETT and LCRA TSC's ownership will be determined when the PUC approves the final transmission line route. See testimony of Mr. Nathan Laughlin for additional discussion regarding cost estimations.

14. Need for the Proposed Project:

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

The Proposed Transmission Line Project, as a component of the overall Bearkat – North McCamey – Sand Lake Project, is needed to address reliability issues driven by rapid load growth in the oil and gas industry, as well as to improve power import capability into the Delaware Basin area. The Delaware Basin area currently lacks the necessary transmission facilities to address the area's substantial historical and projected load growth, which far exceeds other areas of ERCOT. The existing transmission system configuration is depicted in Figure 16-1 and the table below shows the Delaware Basin area's historical load.



4861-3231-1402, v. 1

The Proposed Transmission Line Project will address the Delaware Basin area's rapid increase in demand for electric power and reliability issues that will result if the project is not built.

Multiple studies and analyses show the need for the Proposed Transmission Line Project. In December 2019, ERCOT completed the Delaware Basin Load Integration Study Report ("Delaware Basin Study"). The main purpose of the Delaware Basin Study was to identify potential reliability needs and cost-effective transmission system upgrades whose need would be triggered upon reaching certain load levels in the Delaware Basin area. The Delaware Basin Study recommended the Bearkat – North McCamey – Sand Lake Project, explaining that the project's need is triggered when the Delaware Basin area load level reaches 4,022 MW. This load level could be reached as early as next year.

In December 2021, ERCOT completed the Permian Basin Load Interconnection Study Report ("Permian Basin Study"). Even though ERCOT already identified the need for the Bearkat – North McCamey – Sand Lake Project in the Delaware Basin Study, ERCOT's Permian Basin Study provided additional analysis of this project and reconfirmed its need. ERCOT's Permian Basin Study also identified the Bearkat – North McCamey – Sand Lake Project as a preferred reliability upgrade.

Oncor, LCRA TSC, and WETT submitted the Bearkat – North McCamey – Sand Lake 345 kV Transmission Line Addition Project to ERCOT's Regional Planning Group on April 7, 2022 ("RPG Submittal"), which is included as Attachment No. 4.a. Consistent with the Delaware Basin Study and Permian Basin Study, the RPG Submittal recommended the Proposed Transmission Line Project and identified the need for it to be in-service by June 2026. ERCOT considered the RPG Submittal and in July 2022 issued its Independent Review of the Bearkat - North McCamey - Sand Lake Project ("Independent Review"). The Delaware Basin Study and Permian Basin Study served as the foundations for ERCOT's Independent Review. The Independent Review-including the Delaware Basin Study and Permian Basin Study as Appendices A and B, respectively-is included as Attachment No. 4.b. ERCOT's Independent Review found that the Proposed Transmission Line Project is needed and critical to the reliability of the ERCOT transmission system. ERCOT's Independent Review recommended that the project be in-service by summer of 2026. ERCOT's Board of Directors formally endorsed the Bearkat – North McCamey – Sand Lake Project, including the Proposed Transmission Line Project, as a Tier 1 project and designated it as critical to ERCOT system reliability under 16 Texas Administrative Code ("TAC") § 25.101(b)(3)(D). ERCOT's August 16, 2022, Board of Directors meeting minutes memorializing this approval and critical designation is included as Attachment No. 4.c.

The Delaware Basin area lacks the transmission facilities necessary to address substantial occurring load growth. Without the Proposed Transmission Line Project, capacity would not exist to serve further oil and gas development and load in the general project area. If the transmission system is not upgraded as this load growth continues, the likelihood of reliability issues (e.g., voltage collapse) rises. ERCOT's Independent Review identified the Bearkat – North McCamey – Sand Lake Project as necessary to resolve potential voltage collapse and other reliability violations during an N-1 condition—that is, the unexpected failure or outage of a transmission system component—relating to certain North American Electric Reliability Corporation ("NERC") Category P7 contingencies by the summer of 2026. Under NERC Reliability Standard TPL-001-5.1, with certain exceptions, a Category P7 contingency includes the loss of any two vertically or horizontally adjacent circuits on a common structure. The Proposed Transmission Line Project will address these NERC Reliability Standard violations.

ERCOT's Independent Review recommended the Bearkat - North McCamey - Sand Lake Project to reliably serve the Delaware Basin area once the peak demand level of this area exceeds 4,022 MW. In other words, if the Proposed Transmission Line Project is not inservice by the time the area's demand level exceeds 4,022 MW, reliability issues will likely negatively affect service. Load growth in the Delaware Basin area is expected to exceed 4,022 MW no later than summer of 2026 but has the potential to surpass this level sooner. While the Permian Basin Study projected load growth in the Delaware Basin area to exceed 4,022 MW by 2030, this study only included cases for year 2025 (projecting an area load of 3,789 MW) and year 2030 (projecting an area load of 4,898 MW). ERCOT's Independent Review shows that its 2021 Regional Transmission Plan ("RTP") cases and October 2021 Steady-State Working Group ("SSWG") cases project load growth in the Delaware Basin area to potentially exceed 4,022 MW much earlier. Specifically, the 2021 RTP cases indicate that the Delaware Basin area load will exceed 4.022 MW prior to summer of 2026, and the 2021 SSWG cases project load exceeding this level by 2024. Table 8.1 of ERCOT's Independent Review compares the Delaware Basin area load forecasts of the Permian Basin Study, 2021 RTP cases, and 2021 SSWG cases for years 2025 to 2027, and is shown below:

Denumure Dusin men Louis 1 orecuses comparison			
Year	2021 RTP (MW)	Permian Basin Study	October 2021 SSGW
		(MW)	(MW)
2025	n/a*	3,789	4,515
2026	4,347	n/a**	4,543
2027	4,545	n/a**	4,556

Delaware Basin Area Load Forecasts Comparison

*2021 RTP study did not include the case for year 2025.

**The Permian Basin Study only included the cases for years 2025 and 2030. The load level for year 2030 is 4,898.

As this table illustrates, projections vary regarding when the Delaware Basin area's load will exceed 4,022 MW (i.e., the level triggering the Proposed Transmission Line Project's need). This further bolsters the urgent need for the Proposed Transmission Line Project because stronger-than-forecast oil and gas-related load growth could exceed the 4,022 MW trigger point earlier than the 2021 RTP cases and Permian Basin Study project. This uncertainty is also in part why ERCOT deemed the Proposed Transmission Line Project critical to reliability. The Bearkat – North McCamey – Sand Lake Project will address the Delaware Basin area's load growth by increasing the load serving capability in the area to 4,582 MW.

The Proposed Transmission Line Project will also address the above-described reliability and load growth issues by providing additional, new 345 kV outlets to, and improve the capability to import power into, the Delaware Basin area. This project's addition of new 345 kV outlets to the area will improve system strength by reducing overall system impedances and reactive losses, resulting in improved dynamic stability of the existing system in the area around the North McCamey Station.

In addition, the Proposed Transmission Line Project will result in improvements such as: (1) providing increased operational flexibility during emergency conditions; (2) enhancing voltage support for the Applicants' service areas in the Delaware Basin by creating a more integrated 345 kV transmission system; (3) providing transformer redundancy in the area; and (4) allowing for future expansion in the project area.

In sum, the Proposed Transmission Line Project, as part of the Bearkat – North McCamey – Sand Lake Project, is needed to address critical reliability issues resulting from rapid load growth in an area of oil and gas development. The Proposed Transmission Line Project will address reliability violations under NERC Reliability Standards and improve the transmission system's import capability to support future load growth in the area, all of which will improve service for new and existing customers as swift economic expansion occurs in the Delaware Basin 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 Delaware Basin Study prioritized certain alternative project options while considering the Delaware Basin area's estimated load growth and recommended transmission system upgrades in five stages. The trigger levels of these five stages range from Stage 1's trigger level of 3,052 MW to Stage 5's trigger level of 5,972 MW. The Bearkat – North McCamey – Sand Lake Project is ERCOT's recommended Stage 2 upgrade whose need is triggered when the Delaware Basin area load level reaches 4,022 MW.

The Delaware Basin Study's recommended Stage 1 upgrade is the second circuit addition on the existing Big Hill – Bakersfield 345 kV line. The Delaware Basin Study determined that this project alternative was needed before the Proposed Transmission Line Project. In June 2021, ERCOT endorsed, and on March 3, 2022, the Commission approved in Docket No. 52610, the second circuit addition on the existing Big Hill – Bakersfield 345 kV line. As the Delaware Basin Study's recommended Stage 2 upgrade, the Bearkat – North McCamey – Sand Lake Project should be built next because it is the best option to address the reliability issues and load growth in the area.

Another alternative to the Proposed Transmission Line Project is the Faraday – Lamesa – Clearfork – Riverton double-circuit 345 kV line (i.e., the Delaware Basin Study's recommended Stage 5 upgrade). The Proposed Transmission Line Project is needed before this project alternative for multiple reasons. The Bearkat – North McCamey – Sand Lake Project entails acquiring relatively less new right-of-way (28 fewer miles) and was projected to cost \$73 million less compared to the Faraday – Lamesa – Clearfork – Riverton double-circuit 345 kV line. Moreover, the estimated load serving capabilities of these two projects are similar. Therefore, ERCOT proposed the Bearkat – North McCamey – Sand Lake Project as a Stage 2 upgrade to occur before this Stage 5 upgrade in the Delaware Basin Study.

ERCOT's Independent Review also considered alternatives submitted by GP&L and Texas-New Mexico Power Company ("TNMP"). GP&L's proposed alternative would have one of the two new 345 kV circuits originating at the Bearkat station terminating at the King Mountain station rather than the North McCamey station, and it would have made a portion of the other new circuit between the Bearkat and North McCamey stations share the same towers as the existing King Mountain – North McCamey circuit. ERCOT determined that the Bearkat – North McCamey – Sand Lake Project is more reliable than this alternative for the following reasons:

- compared to GP&L's alternative, the Bearkat North McCamey Sand Lake Project provides one more outlet to the North McCamey station where two 800 MVA 345/138 kV transformers are located to serve the load and generation on the 138 kV system in the McCamey area;
- 2) GP&L's alternative would leave only one circuit from the Bearkat station to the North McCamey station under the maintenance outage of the existing North McCamey to King Mountain circuit (ERCOT's steady-state analysis with the maintenance outage condition showed thermal overloads on some of the 138 kV lines in the McCamey area);

- under GP&L's alternative, a NERC Category P7 contingency would remove both the existing North McCamey – King Mountain 345 kV line and new North McCamey – Bearkat double-circuit 345 kV line;
- 4) ERCOT's high-level stability study for GP&L's alternative indicated negative impact on the McCamey GTC limit under the prior outage of the Noelke – Schneeman Draw or Cedar Canyon – Noelke 345 kV double circuits when compared to the Bearkat – North McCamey – Sand Lake Project; and
- 5) extended construction outages or higher energized construction costs may be needed to add a second 345 kV circuit on the existing towers in GP&L's alternative.

TNMP's proposed alternative would loop the new North McCamey – Sand Lake doublecircuit 345 kV line into a new proposed Cedarvale 345 kV station approximately 3.7 miles southeast of the existing Sand Lake station. However, TNMP and Oncor agreed to allow the Bearkat – North McCamey – Sand Lake Project to proceed without delay as submitted to ERCOT, with both transmission service providers committing to addressing new customer loads in the area above and beyond the Delaware Basin Study review, including through ERCOT's Large Flexible Load Task Force.

Distribution alternatives to the Proposed Transmission Line Project are not practical because they would not improve the reliability and operational capability of the transmission system in the area, cannot adequately serve all of the increasing oil and gas load, and cannot address the voltage stability requirements in this area.

Upgrading the voltage of existing facilities, bundling of conductors, and adding transformers would not resolve the reliability issues identified in ERCOT's Independent Review and discussed above. Likewise, these types of alternatives would neither provide the necessary level of service to meet oil and gas customers' needs nor improve the import capability of the transmission system serving many of these loads.

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.

Figure 16-1 below reflects a geographical representation of the new and existing area transmission system.

Figure 16-2 further below is an electrical schematic illustrating the Project.



Figure 16-1 New and Existing Area Transmission System



Figure 16-2 Schematic View of the The Project

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.

LCRA TSC and WETT retained POWER Engineers (POWER) to prepare the Environmental Assessment (EA) and Alternative Route Analysis, included as Attachment 1 to the Application. The objective of the EA was to provide information in support of this Application and to identify and evaluate a number of geographically diverse routes that are in accordance with the requirements of PURA § 37.056 (c)(4)(A)-(D), the Commission's Certificate of Convenience and Necessity (CCN) Application form, Commission Substantive Rule 25.101 (16 Tex. Admin. Code § 25.101 (TAC)), and the preliminary order requirements commonly issued by the Commission for CCN projects. The EA presents the analysis that was conducted by POWER, including land use and environmental data and the effects that could result from the construction, operation, and maintenance of the Project. The EA may also be used in support for any local, state, or federal permitting activities that may be required for the Project.

To assist POWER in its evaluation, LCRA TSC and WETT provided information regarding the Project endpoints, need for the Project, engineering and design requirements, construction practices, and ROW requirements for the Project.

Selecting the Study Area

POWER, with input from LCRA TSC and WETT, delineated the study area that encompassed the Project endpoints with an area sufficient for identifying geographically diverse routes. The study area was defined by the existing Project endpoints, existing ROW (roadways, railroads, and transmission lines), and existing cultural and land use features. The study area is approximately 60 miles long by 19 miles wide and covers an area of approximately 877 square miles (561,280 acres). The study area is shown on Figure 2-1 of the EA.

Routing Constraints

Routing constraints were identified once the study area was defined based on the criteria established in PURA § 37.056(c)(4)(A)-(D), the Commission's CCN Application form, Commission Substantive Rule 25.101, and the preliminary order requirements commonly issued by the Commission for CCN projects. POWER gathered data related to land use, aesthetics, ecology, and cultural resources. Data was collected from a variety of resources including: input from federal, state and local agencies, available maps and recent aerial

imagery, ground reconnaissance surveys and input from the public open house meetings. Following this process allowed for identification of environmental and land use features such as habitable structures, parks, agriculture activities (including pivot irrigation), oil and gas wells, wind turbines and solar farms, designated critical habitat, and known cultural resource sites within the study area.

Selection of Preliminary Alternative Route Segments

Preliminary alternative route segments were identified by evaluating the mapped routing constraints data within the study area; identifying potential routing opportunities by following existing corridors such as existing roads, transmission lines, railroads, and property lines. Field reconnaissance was conducted from public access points, roads and highways to verify the feasibility of route segments. Preliminary alternative route segments were delineated to avoid known environmental and land use constraints to the extent possible. The preliminary alternative route segments were then presented to the public at three open house meetings.

Based on feedback received during and following the open house meetings, further review and input from LCRA TSC and WETT, POWER modified, deleted, and added additional alternative route segments. Ultimately, 50 primary alternative routes were identified for evaluation. Evaluation of each of the primary alternative routes was based on 44 land use and environmental criteria.

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

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

Upon evaluation of the primary alternative routes, LCRA TSC and WETT identified Route 29 as the primary alternative route that the joint applicants believe best addresses the requirements of PURA and the Commission's Substantive Rules. Route 29 was identified, in part, based on the following considerations:

- Is the third lowest estimated cost of the 50 primary alternative routes included in the Application and only \$2.9 million, or 0.9%, more than the lowest cost route (approximately \$326,717,000);
- Has the second highest percentage parallel and adjacent to existing transmission line ROW for approximately 40% of its total estimated length (25.8 miles of 63.7 miles) which will decrease the amount of new disturbance;

- Has the tenth shortest length of the 50 primary alternative routes included in the Application (approximately 63.7 miles) and is only 2.3 miles longer than the shortest route;
- Low habitable structure count of 8 within 500 feet of the route centerline (habitable structures range from 4 to 35);
- Does not cross any recorded cultural resources sites and has no national registerlisted or determined eligible sites within 1,000 feet of route centerline;
- Relatively low overall aesthetic impact.

In addition, the study area has significant continuing oil and gas facility growth, including well sites and pipeline construction. To the extent engineering obstacles are encountered after Commission approval that result from this continued growth, the route may need to be modified to the minimum extent necessary to avoid encountered obstacles. The Applicants will request that the Commission's Final Order provide the ability to address such facility growth consistent with good utility practice.

18. Public Meeting or Public Open House:

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

LCRA TSC and WETT hosted three public open house meetings for the Project on January 17, 18, and 19, 2023, in McCamey, Big Lake, and St. Lawrence, Texas. The open houses were held from 5:00 p.m. to 8:00 p.m. Approximately 745 notices were mailed to owners of land within 500 feet of the centerline for each preliminary alternative route segment. Notices were also mailed to local officials, other interested parties, and the U.S. Department of Defense Military Aviation and Installation Assurance Siting Clearinghouse. This notice included a map of the study area depicting the preliminary alternative route segments and a frequently asked questions document. An example of the notice mailed to local officials in Appendix B of the EA.

Public notice for the open house meetings was also published on January 5, 2023, in *The Crane News*, a newspaper of general circulation within Upton County, *The Big Lake Wildcat*, a newspaper of general circulation within Reagan County, and *The Stanton Martin County Messenger*, a newspaper of general circulation within Glasscock County. The

public notices announced the location, time and purpose of the meetings. An example of the published public notice is located in Appendix B of the EA.

The purpose of the meetings was to solicit comments and input from landowners, public officials, and other interested parties in regard to the purpose, need, and potential impacts and benefits of the Project and to gather a better understanding of community values and concerns. It also provided the opportunity to inform the public of the Commission certification process, routing procedures, schedule, and route approval process.

The meetings were organized as an informal come and go format with information stations that were occupied with representatives from LCRA TSC, WETT, or POWER. The stations consisted of: text displays explaining various topics, topography, segment and notification maps, aerial photography, and a GIS computer station. Upon arrival, attendees were offered a preliminary alternative route segments map, questionnaire, and a frequently asked questions document. This meeting format is typically better for attendees as it allows them the opportunity to gather particular information that is most important to them and focus on topics they are most interested in. This format also allows for more individualized discussions from attendees who otherwise might be hesitant to participate in a formal presentation setting.

A total of 87 individuals signed in as attending the three public open house meetings, with 40 questionnaires submitted in person at the meetings. An additional 21 questionnaires were received via mail or e-mail after the open houses, for a total of 61 questionnaires submitted for the Project.

Additional information concerning the public involvement process and summarized questionnaire results is located in Section 4.2.2.1 of the EA. A representative copy of the questionnaire provided for the Project is included in 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). Provide aerial photographs of the study area displaying the date that the photographs were taken or maps that show (1) the location of each route with each route segment identified, (2) the locations of all major public roads including, as a minimum, all federal and state roadways, (3) the locations of all known habitable structures or groups of habitable structures (see Question 19 below) on properties directly affected by any route, and (4) the boundaries (approximate or estimated according to best available information if required) of all properties directly affected by any route.

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

Base Maps

Figures 4-16a and b of the EA (Appendix D), titled *Primary Alternative Routes with Environmental and Land Use Constraints*, produced at a scale of 1 inch = 4,000 feet, are provided in map pockets in the EA. These maps were produced using a USGS topographic base. They depict the study area for the project, locations of radio transmitters and other electronic installations, airports/airstrips, parks and recreational areas, historical sites, environmentally sensitive areas and other constraints. The maps also contain the alternative routes for the project. For their protection, locations of archaeological sites are not shown on the maps.

Figures 5-1a and b of the EA (Appendix E), titled *Habitable Structures and Other Land Use Features in the Vicinity of the Primary Alternative Routes*, which consists of aerial photography produced at a scale of 1 inch = 4,000 feet, are provided in a map pocket in the EA. The aerial photo-based maps include parcel boundaries identified from a review of the tax appraisal district records and combined, as appropriate, to reflect instances where multiple parcels are owned by a single individual or group in the study area. The locations of all known habitable structures located within 500 feet of the centerline of primary alternative routes on properties directly affected by the project are also identified on Figures 5-1a and b. The habitable structures and other land use features map (Figures 5-1a and b) was produced using aerial imagery flown in September 2022.

Base maps include sufficient cultural and natural features to permit location of the alternative routes in the field, and they depict existing electric transmission lines and substations (based on information available to POWER), and major public roads located within the study area, as applicable.

A map showing the study area and all preliminary route segments in a format similar to EA Figures 4-16a and b, 5-1a and b, were presented at the public open house meetings. Figure 4-1 depicts the preliminary route segments presented at the open house.

Directly Affected Property Maps

Attachment 5 to this application includes 14 maps (utilizing aerial photography) titled *Location of Directly Affected Parcels and Habitable Structures*, that identify directly affected properties, tract IDs, and the location of habitable structures (including labels) within approximately 500 feet of the centerline of the transmission line alternatives and approximate parcel boundary lines (based on tax appraisal district records). These maps show the location of each proposed alternative route with each route segment identified, and the locations of all major public roads including all federal and state roadways.

Attachment 7 to this Application is a list that cross-references each habitable structure, or group of habitable structures, and directly affected properties identified on the maps provided in Attachment 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 Glasscock, Reagan, and Upton 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 proposed transmission line crosses a state-maintained road or highway, LCRA TSC and WETT will obtain a permit from Texas Department of Transportation (TxDOT). If any portion of the transmission line will be accessed from a state-maintained road or highway, LCRA TSC and WETT will obtain a permit from TxDOT.
- Where the transmission line crosses a state-owned riverbed or navigable stream, LCRA TSC and WETT will obtain a Miscellaneous Easement (ME) from the General Land Office (GLO).
- Since more than one acre will be disturbed during construction of the project, a Storm Water Pollution Prevention Plan (SWPPP) will be necessary. Further, because more than five acres will be disturbed, a Notice of Intent (NOI) will be prepared by LCRA TSC and WETT 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 upon the results of these assessments, permits or regulatory approvals may be required from the U.S. Army Corps of Engineers (USACE), USFWS, TCEQ, THC/SHPO or Glasscock, Reagan, and Upton Counties. Such permits or regulatory approvals will be obtained by LCRA TSC and WETT prior to construction.
- After alignments and structure locations/heights are designed and engineered, LCRA TSC and WETT 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, LCRA TSC and WETT could use lowerthan-typical structure heights and could add marking and/or lighting to certain structures to avoid or accommodate FAA requirements.
- LCRA TSC and WETT will report the status of the Project to the PUC on LCRA TSC and WETT's Monthly Construction Progress Report, beginning with the first report following the filing of this 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, LCRA TSC and WETT will submit locational and attribute data for the approved route after it is constructed.

21. Habitable structures:

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

The locations of habitable structures within 500 feet of the centerline of each route segment are listed and described with approximate distance from the route segment centerline in Appendix C, Tables 5-3 through 5-42 of the EA and are shown on Figures 5-1a and b in Appendix E of the EA. The total numbers of habitable structures for the 50 primary alternative routes are provided in the table below.

Primary Alternative Route	Total Number of Habitable Structures within 500 feet of the ROW Centerline
NM01	10
NM02	7
NM03	5
NM04	5
NM05	5
NM06	5
NM07	5
NM08	35
NM09	6
NM10	9
NM11	9
NM12	10
NM13	5
NM14	6
NM15	6
NM16	4
NM17	6
NM18	4
NM19	6
NM20	7
NM21	6
NM22	6
NM23	12
NM24	13
NM25	10
NM26	6
NM27	7
NM28	8
NM29	8

Primary Alternative Route	Total Number of Habitable Structures within 500 feet of the ROW Centerline
NM30	7
NM31	7
NM32	7
NM33	10
NM34	28
NM35	27
NM36	31
NM37	12
NM38	10
NM39	9
NM40	11
NM41	9
NM42	10
NM43	9
NM44	12
NM45	13
NM46	8
NM47	22
NM48	31
NM49	16
NM50	7

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 any of the primary alternative routes. There are 13 known communication towers (FM radio

transmitters, microwave towers, or other similar electronic installations) that are located within 2,000 feet of any of the primary alternative routes.

A listing, description, and approximate distance from the centerline of each of the primary alternative routes are presented in Table 5-44 and Appendix C, Tables 5-3 through 5-42 of the EA, and the locations of these electronic installations are shown on Figures 4-16a and b and 5-1a and b, in Appendix D and E of the EA.

For additional information on electronic installations see Section 2.8.5 and Section 5.2.6 of the EA. None of the routes filed in this Application are anticipated to have any impact on the existing communication towers.

23. Airstrips:

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

POWER's review of federal and state aviation/airport maps and directories, aerial photo interpretation and reconnaissance surveys, identified no FAA-registered airports with runways longer than 3,200 feet identified within 20,000 feet of any primary alternative route, and no public or private-use heliports located within 5,000 feet of the centerline of any alternate routes. There is one FAA registered public airport, the Rankin Airport, with a runway shorter than 3,200 feet identified within 10,000 feet of 17 of the primary alternative routes. The transmission line structures are expected to exceed the 50:1 horizontal slope from the closest point of the runway to the Rankin Airport. Three private airstrips were identified within 10,000 feet of one or more primary alternative routes.

Each airstrip is listed and described with the approximate distance from the centerline of each of the primary alternative routes in Table 5-43 and Appendix C, Tables 5-3 through 5.42 of the EA. These facilities are shown on Figures 4-16a and b and 5-1a and b in Appendix D and E of the EA.

For additional information on airports/airstrips see Section 2.8.4 and Section 5.2.4.2 of the EA. No significant impacts to these airports/airstrips are anticipated from construction of the Proposed Project. Following approval of a route by the PUC, LCRA TSC and WETT 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 POWER's review of aerial photography and field reconnaissance, no primary alternative route for the Proposed Project cross known cropland or pastureland irrigated by traveling irrigation systems, rolling or pivot type.

25. Notice:

Notice is to be provided in accordance with 16 TAC § 22.52.

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

A copy of the written notice, with enclosures, that is being mailed to owners of directly affected land is included as Attachment 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 7 to the Application. LCRA TSC and WETT determined the names of the landowners of record and their mailing addresses based on information obtained from the Glasscock, Reagan, and Upton 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, with enclosures, sent to utilities that are located within five miles of the Project is provided in Attachment 8 to the Application. Additionally, LCRA TSC and WETT sent notice of the Application to owners/operators of pipelines six inches or greater carrying hydrocarbons parallel and adjacent to a primary alternative route included in the Application to the extent such owners/operators could be located and identified. A list of the names and addresses of utilities, pipeline owners/operators to whom written notice was sent are included in Attachment 9 to the Application.

C. Provide a copy of the written notice to county and municipal authorities.

LCRA TSC and WETT additionally sent notice of the Application (Attachment 8) to the Texas Office of Public Utility Counsel, independent school district officials, the Military Aviation and Installation Assurance Siting Clearinghouse (formerly the Department of Defense Siting Clearinghouse), and local, state and federal elected officials identified in Attachment 10).

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 Crane News*, a newspaper of general circulation within Upton County, *The Big Lake Wildcat*, a newspaper of general circulation within Reagan County, and *The Stanton Martin County Messenger*, a newspaper of general circulation within Glasscock County once for one week after the Application is filed with the Commission is included as Attachment 11 to the Application. Publisher's affidavits will be filed with the Commission showing proof of notice as soon as available after filing of the Application.

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

Staff of the alternative notices. Applicant may take into consideration any comments made by Commission staff before the notices are published or sent by mail.

Not applicable.

26. Parks and Recreation Areas:

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

POWER reviewed U.S. Geological Survey topographic maps, TxDOT county highway maps, recent aerial photography, and conducted field reconnaissance to identify parks and recreation areas within the study area. Parks and recreational areas in the study area, and their ownership, are presented in Section 2.8.6 of the EA. Based on this review, POWER did not identify any parks or recreational areas located within 1,000 feet of the centerline of any of the primary alternative routes.

The locations of the parks and recreational areas within the study area are shown on Figures 4-16a and b in Appendix D.

27. Historical and Archeological Sites:

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

POWER conducted a literature review and records search at the Texas Historical Commission and The Texas Archeological Research Laboratory at the University of Texas at Austin to identify known historical and archeological sites located within 1,000 feet of the centerline of each of the primary alternate routes. For more information regarding site descriptions and the evaluation of the historical and archeological sites located within the study area, see Section 2.11 and Section 5.3 of the EA.

Based on POWER's review, 15 recorded archeological sites are located within 1,000 feet of the centerline of one or more of the primary alternative routes. Two identified sites are

crossed by the primary alternative route ROWs. Eleven sites are pre-contact in age, two sites are post-contact, and two sites have both a pre-and post-contact component. These sites are listed and described with the approximate distance from the centerline for each of the primary alternative routes in Table 5-45 and Appendix C, Tables 5-3 through 5-42 of the EA. For the protection of archaeological sites, they are not shown on the routing maps.

28. Coastal Management Program:

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

No part of any primary alternative route is located within the Coastal Management Program boundary, as defined in 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. 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 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.

LCRA TSC and WETT will provide a copy of the EA to TPWD within seven days after the Application is filed. A copy of the letter of transmittal of the EA to TPWD is provided as Attachment 12 to this Application. An affidavit confirming that the letter of transmittal and a copy of the EA were sent to TPWD will be filed with the Commission.

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 from each of LCRA TSC and WETT are provided as Attachment 13.

Attachments:

Attachment 1:	Environmental Assessment and Alternative Route Analysis (EA)
Attachment 2:	Station Schematics
Attachment 3:	Cost Estimates
Attachment 4.a	ERCOT RPG Submittal: Bearkat – North McCamey – Sand Lake 345 kV Transmission Line Addition Project (April 7, 2022)
Attachment 4.b:	ERCOT Independent Review of the Bearkat – North McCamey – Sand Lake 345-kV Transmission Line Addition Project (July 2022) – with Appendices A (Delaware Basin Load Integration Study Report) and B (Permian Basin Load Interconnection Study Report)
Attachment 4.c:	ERCOT Board of Director's Meeting Minutes (August 16, 2022)
Attachment 5:	Location of Directly Affected Parcels and Habitable Structures
Attachment 6:	Copy of Landowner Notice
Attachment 7:	List of Landowners to be Noticed
Attachment 8:	Copy of Utility and Public Official Notice

Attachment 9:	List of Utilities and Pipeline Operators to be Noticed
Attachment 10:	List of Municipal, County, State, and Federal Authorities to be Noticed
Attachment 11:	Copy of Newspaper Notice
Attachment 12:	TPWD Letter of EA Transmittal
Attachment 13:	Affidavits A. LCRA TSC Sworn Affidavit B. WETT Sworn Affidavit