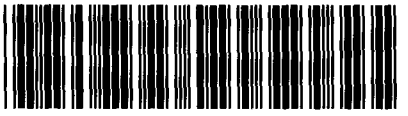

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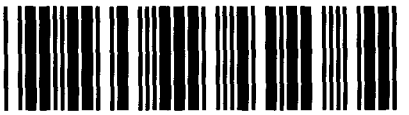

Item Number: 3

Addendum StartPage: 0

PUC DOCKET NO. 48785

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PUBLIC UTILITY COMMISSION
FILING CLERK

JOINT APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC AND AEP TEXAS INC. TO AMEND CERTIFICATES OF CONVENIENCE AND NECESSITY FOR A DOUBLE CIRCUIT 345-KV TRANSMISSION LINE IN PECOS, REEVES, AND WARD COUNTIES (SAND LAKE – SOLSTICE CCN)	§	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

PUC DOCKET NO. 48787

JOINT APPLICATION OF LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS INC. TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR THE PROPOSED BAKERSFIELD TO SOLSTICE 345-KV TRANSMISSION LINE IN PECOS COUNTY, TEXAS	§	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

JOINT MOTION FOR CONSOLIDATION OF DOCKETS, ISSUANCE OF A PROTECTIVE ORDER, AND REFERRAL TO THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

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PUC DOCKET NO. 48785

JOINT APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC AND AEP TEXAS INC. TO AMEND CERTIFICATES OF CONVENIENCE AND NECESSITY FOR A DOUBLE CIRCUIT 345-KV TRANSMISSION LINE IN PECOS, REEVES, AND WARD COUNTIES (SAND LAKE – SOLSTICE CCN)	§	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

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JOINT MOTION FOR CONSOLIDATION OF DOCKETS, ISSUANCE OF A PROTECTIVE ORDER, AND REFERRAL TO THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COME NOW Oncor Electric Delivery Company LLC (Oncor), AEP Texas Inc. (AEP Texas), and LCRA Transmission Services Corporation (LCRA TSC) (collectively the "Utilities") and respectfully move for: (1) consolidation of Docket Nos. 48785 and 48787 pursuant to PURA[1] § 37.0541; (2) issuance of a protective order in the consolidated dockets; and (3) immediate referral to the State Office of Administrative Hearings (SOAH). Also included with this Motion for the convenience of the SOAH judges and parties is a draft procedural schedule for processing the dockets within the 180-day schedule for projects designated by the Electric Reliability Council of Texas (ERCOT) as critical to reliability of the ERCOT system pursuant to 16 Tex. Admin. Code (TAC) § 25.101(b)(3)(D).

[1] Public Utility Regulatory Act, TEX. UTIL. CODE ANN. §§ 11.001-58.302 (West 2016 & Supp. 2017), §§ 59.001-66.016 (West 2007 & Supp. 2017) (PURA).

I. BACKGROUND

On October 15, 2018, Oncor and AEP Texas requested a docket number for the Sand Lake to Solstice 345-kV transmission line project. On the same day, AEP Texas and LCRA TSC requested a docket number for the proposed Bakersfield to Solstice 345-kV transmission line project. Today, on November 7, 2018, Oncor and AEP Texas filed their joint application in Docket No. 48785 to amend their certificates of convenience and necessity (CCNs) for the proposed Sand Lake to Solstice project, and LCRA TSC and AEP Texas filed their joint application in Docket No. 48787 to amend their CCNs for the proposed Bakersfield to Solstice project. (The Bakersfield to Solstice and Sand Lake to Solstice projects will be collectively referred to in this motion as the "Projects.") The Projects are part of a larger group of projects known collectively as the "Far West Texas Project." On June 12, 2018, the Projects were designated by the ERCOT Board of Directors as critical to reliability of the ERCOT system.[2]

II. MOTION TO CONSOLIDATE DOCKETS

The Projects are components of the larger Far West Texas Project and Far West Texas Project 2 that ERCOT reviewed in 2016, 2017 and 2018. On June 12, 2018, the ERCOT Board of Directors designated the Projects as critical to the reliability of the ERCOT system. The existing AEP Texas Solstice Switch Station in Pecos County is a common endpoint for both Projects. Because the Projects share a common point of interconnection, it is appropriate for the Projects to be consolidated pursuant to PURA § 37.0541. Accordingly, the Utilities move for consolidation of Docket Nos. 48785 and 48787.

III. MOTION FOR ENTRY OF A PROTECTIVE ORDER

It is necessary that a Protective Order be issued in order for the Utilities to manage protected and commercially sensitive information associated with both applications. To facilitate the handling of such protected and sensitive information, the Utilities move that the Protective Order attached to this motion be entered in the consolidated dockets. The attached Protective

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[2] ERCOT Board of Directors Resolution Endorsing Sand Lake – Solstice and Bakersfield – Solstice 345 kV Lines as Critical to Reliability (attached).

Order is consistent with and substantially similar to protective orders recently adopted in similar matters before the Commission and SOAH.[3]

IV. MOTION FOR EXPEDITED REFERRAL TO SOAH

Pursuant to 16 TAC § 25.101(b)(3)(D), the Projects were designated by ERCOT as critical to reliability. Therefore, upon filing of the applications, the Projects will be processed under an expedited 180-day schedule. In order to provide the Commission, SOAH, Commission Staff, and any intervening parties as much time as possible to substantively consider the merits of the applications, the Utilities request that, in association with an order addressing the motions set forth above, the consolidated dockets be expeditiously referred to SOAH for assignment of administrative law judges to process the applications in accordance with the Commission's rules.

V. DRAFT PROCEDURAL SCHEDULE

To facilitate the expeditious processing of these dockets upon referral to SOAH, the Utilities have prepared a proposed procedural schedule for the convenience of the SOAH judges and parties that provides for final disposition within the 180-day deadline required by 16 TAC § 25.101(b)(3)(D), based on ERCOT's designation of the Projects as critical to reliability of the ERCOT system.

VI. CONCLUSION

The Utilities respectfully move for expedited approval of the motions herein and for all other relief to which they may be entitled.

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[3] *See e.g., Application of Oncor Electric Delivery Company, LLC to Amend a Certificate of Convenience and Necessity for a 345-kV Transmission Line in Crane, Ector, Loving, Reeves, Ward, and Winkler Counties (Odessa EHV – Riverton and Moss – Riverton CCN)*, Docket No. 48095 (Sept. 17, 2018); *Application of Entergy Texas, Inc. to Amend its Certificate of Convenience and Necessity for a 230-kV Transmission Line in Montgomery and Walker Counties*, Docket No. 47462 (Aug. 31, 2018); *Application of Brazos Electric Power Cooperative, Inc. to Amend its Certificate of Convenience and Necessity for a 138-kV Transmission Line in Collin County*, Docket No. 46429 (Jan. 26, 2018).

Respectfully submitted,

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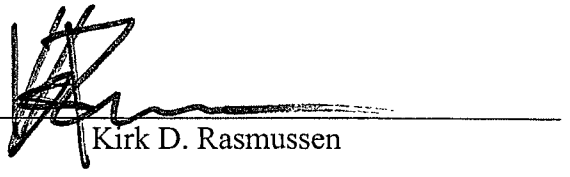
ATTORNEYS FOR ONCOR ELECTRIC DELIVERY COMPANY LLC

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on this date, November 7, 2018, in accordance with 16 TAC § 22.74.



Kirk D. Rasmussen

ATTACHMENT 1

PUC DOCKET NO. 48785

JOINT APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC AND AEP TEXAS INC. TO AMEND CERTIFICATES OF CONVENIENCE AND NECESSITY FOR A DOUBLE CIRCUIT 345-KV TRANSMISSION LINE IN PECOS, REEVES, AND WARD COUNTIES (SAND LAKE – SOLSTICE CCN)	§	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

PUC DOCKET NO. 48787

JOINT APPLICATION OF LCRA TRANSMISSION SERVICES CORPORATION AND AEP TEXAS INC. TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR THE PROPOSED BAKERSFIELD TO SOLSTICE 345-KV TRANSMISSION LINE IN PECOS COUNTY, TEXAS	§	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

PROTECTIVE ORDER

This Protective Order shall govern the use of all information deemed confidential (Protected Materials) or highly confidential (Highly Sensitive Protected Materials), including information whose confidentiality is currently under dispute, by a party providing information to the Public Utility Commission of Texas (Commission) or to any other party to this proceeding.

It is ORDERED that:

1. **Designation of Protected Materials.** Upon producing or filing a document, including, but not limited to, records on a computer disk or other similar electronic storage medium in this proceeding, the producing party may designate that document, or any portion of it, as confidential pursuant to this Protective Order by typing or stamping on its face "PROTECTED PURSUANT TO PROTECTIVE ORDER ISSUED IN PUCT DOCKET NOs. 48785 & 48787" (or words to this effect) and consecutively Bates Stamping each page. Protected Materials and Highly Sensitive Protected Materials include the documents so designated, as well as the substance of the information contained in the

documents and any description, report, summary, or statement about the substance of the information contained in the documents.

2. **Materials Excluded from Protected Materials Designation**. Protected Materials shall not include any information or document contained in the public files of the Commission or any other federal or state agency, court, or local governmental authority subject to the Public Information Act.[1] Protected Materials also shall not include documents or information which at the time of, or prior to disclosure in, a proceeding is or was public knowledge, or which becomes public knowledge other than through disclosure in violation of this Protective Order.

3. **Reviewing Party**. For the purposes of this Protective Order, a "Reviewing Party" is any party to this docket.

4. **Procedures for Designation of Protected Materials**. On or before the date the Protected Materials or Highly Sensitive Protected Materials are provided to the Commission, the producing party shall file with the Commission and deliver to each party to the proceeding a written statement, which may be in the form of an objection, indicating: (a) any exemptions to the Public Information Act claimed to apply to the alleged Protected Materials; (b) the reasons supporting the producing party's claim that the responsive information is exempt from public disclosure under the Public Information Act and subject to treatment as protected materials; and (c) that counsel for the producing party has reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the Public Information Act and merits the Protected Materials designation.

5. **Persons Permitted Access to Protected Materials**. Except as otherwise provided in this Protective Order, a Reviewing Party may access Protected Materials only through its "Reviewing Representatives" who have signed the Protective Order Certification Form (see Attachment A). Reviewing Representatives of a Reviewing Party include its counsel of record in this proceeding and associated attorneys, paralegals, economists, statisticians, accountants, consultants, or other persons employed or retained by the Reviewing Party

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[1] TEX. GOV'T CODE ANN. §§ 552.001-552.353 (West 2012 & Supp. 2016).

and directly engaged in this proceeding. At the request of the PUC Commissioners, copies of Protected Materials may be produced by Commission Staff. The Commissioners and their staff shall be informed of the existence and coverage of this Protective Order and shall observe the restrictions of the Protective Order.

6. **Highly Sensitive Protected Material Described**. The term "Highly Sensitive Protected Materials" is a subset of Protected Materials and refers to documents or information that a producing party claims is of such a highly sensitive nature that making copies of such documents or information or providing access to such documents to employees of the Reviewing Party (except as specified herein) would expose a producing party to unreasonable risk of harm. Highly Sensitive Protected Materials include but are not limited to: (a) customer-specific information protected by § 32.101(c) of the Public Utility Regulatory Act;[2] (b) contractual information pertaining to contracts that specify that their terms are confidential or that are confidential pursuant to an order entered in litigation to which the producing party is a party; (c) market-sensitive fuel price forecasts, wholesale transactions information and/or market-sensitive marketing plans; and (d) business operations or financial information that is commercially sensitive. Documents or information so classified by a producing party shall bear the designation "HIGHLY SENSITIVE PROTECTED MATERIALS PROVIDED PURSUANT TO PROTECTIVE ORDER ISSUED IN PUCT DOCKET NOs. 48785 & 48787" (or words to this effect) and shall be consecutively Bates Stamped. The provisions of this Protective Order pertaining to Protected Materials also apply to Highly Sensitive Protected Materials, except where this Protective Order provides for additional protections for Highly Sensitive Protected Materials. In particular, the procedures herein for challenging the producing party's designation of information as Protected Materials also apply to information that a producing party designates as Highly Sensitive Protected Materials.

7. **Restrictions on Copying and Inspection of Highly Sensitive Protected Material**. Except as expressly provided herein, only one copy may be made of any Highly Sensitive Protected Materials except that additional copies may be made to have sufficient copies

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[2] Public Utility Regulatory Act, TEX. UTIL. CODE ANN. §§ 11.001-66.016 (West 2016 & Supp. 2016) (PURA).

for introduction of the material into the evidentiary record if the material is to be offered for admission into the record. The Reviewing Party shall maintain a record of all copies made of Highly Sensitive Protected Material and shall send a duplicate of the record to the producing party when the copy or copies are made. The record shall specify the location and the person possessing the copy. Highly Sensitive Protected Material shall be made available for inspection only at the location or locations provided by the producing party, except as specified by Paragraph 9. Limited notes may be made of Highly Sensitive Protected Materials, and such notes shall themselves be treated as Highly Sensitive Protected Materials unless such notes are limited to a description of the document and a general characterization of its subject matter in a manner that does not state any substantive information contained in the document.

8. **Restricting Persons Who May Have Access to Highly Sensitive Protected Material**. With the exception of Commission Staff, the Office of the Attorney General (OAG), and the Office of Public Utility Counsel (OPC), and except as provided herein, the Reviewing Representatives for the purpose of access to Highly Sensitive Protected Materials may be persons who are (a) outside counsel for the Reviewing Party, (b) outside consultants for the Reviewing Party working under the direction of Reviewing Party's counsel, or (c) employees of the Reviewing Party working with and under the direction of Reviewing Party's counsel who have been authorized by the producing party or the presiding officer to review Highly Sensitive Protected Materials. The Reviewing Party shall limit the number of Reviewing Representatives that review Highly Sensitive Protected Materials to the minimum number of persons necessary. The Reviewing Party is under a good faith obligation to limit access to each portion of any Highly Sensitive Protected Materials to two Reviewing Representatives whenever possible. Reviewing Representatives for Commission Staff, OAG, and OPC, for the purpose of access to Highly Sensitive Protected Materials, shall consist of their respective counsel of record in this proceeding and associated attorneys, paralegals, economists, statisticians, accountants, consultants, or other persons employed or retained by them and directly engaged in these proceedings.

9. **Copies Provided of Highly Sensitive Protected Material**. A producing party shall provide one copy of Highly Sensitive Protected Materials specifically requested by the

Reviewing Party to the person designated by the Reviewing Party who must be a person authorized to review Highly Sensitive Protected Material under Paragraph 8. Representatives of the Reviewing Party who are authorized to view Highly Sensitive Protected Material may review the copy of Highly Sensitive Protected Materials at the office of the Reviewing Party's representative designated to receive the information. Any Highly Sensitive Protected Materials provided to a Reviewing Party may not be copied except as provided in Paragraph 7. The restrictions contained herein do not apply to Commission Staff, OPC, and the OAG when the OAG is representing a party to the proceeding.

10. **Procedures in Paragraphs 10-14 Apply to Commission Staff, OPC, and the OAG and Control in the Event of Conflict**. The procedures in Paragraphs 10 through 14 apply to responses to requests for documents or information that the producing party designates as Highly Sensitive Protected Materials and provides to Commission Staff, OPC, and the OAG in recognition of their purely public functions. To the extent the requirements of Paragraphs 10 through 14 conflicts with any requirements contained in other paragraphs of this Protective Order, the requirements of these Paragraphs shall control.

11. **Copy of Highly Sensitive Protected Material to be Provided to Commission Staff, OPC and the OAG**. When, in response to a request for information by a Reviewing Party, the producing party makes available for review documents or information claimed to be Highly Sensitive Protected Materials, the producing party shall also deliver one copy of the Highly Sensitive Protected Materials to the Commission Staff, OPC (if OPC is a party), and the OAG (if the OAG is representing a party) in Austin, Texas. Provided however, that in the event such Highly Sensitive Protected Materials are voluminous, the materials will be made available for review by Commission Staff, OPC (if OPC is a party), and the OAG (if the OAG is representing a party) at the designated office in Austin, Texas. The Commission Staff, OPC (if OPC is a party) and the OAG (if the OAG is representing a party) may request such copies as are necessary of such voluminous material under the copying procedures specified herein.

12. **Delivery of the Copy of Highly Sensitive Protected Material to Commission Staff and Outside Consultants**. The Commission Staff, OPC (if OPC is a party), and the OAG (if the OAG is representing a party) may deliver the copy of Highly Sensitive Protected Materials received by them to the appropriate members of their staff for review, provided such staff members first sign the certification specified by Paragraph 15. After obtaining the agreement of the producing party, Commission Staff, OPC (if OPC is a party), and the OAG (if the OAG is representing a party) may deliver the copy of Highly Sensitive Protected Materials received by it to the agreed, appropriate members of their outside consultants for review, provided such outside consultants first sign the certification in Attachment A.

13. **Restriction on Copying by Commission Staff, OPC and the OAG.** Except as allowed by Paragraph 7, Commission Staff, OPC and the OAG may not make additional copies of the Highly Sensitive Protected Materials furnished to them unless the producing party agrees in writing otherwise, or, upon a showing of good cause, the presiding officer directs otherwise. Commission Staff, OPC, and the OAG may make limited notes of Highly Sensitive Protected Materials furnished to them, and all such handwritten notes will be treated as Highly Sensitive Protected Materials as are the materials from which the notes are taken.

14. **Public Information Requests**. In the event of a request for any of the Highly Sensitive Protected Materials under the Public Information Act, an authorized representative of the Commission, OPC, or the OAG may furnish a copy of the requested Highly Sensitive Protected Materials to the Open Records Division at the OAG together with a copy of this Protective Order after notifying the producing party that such documents are being furnished to the OAG. Such notification may be provided simultaneously with the delivery of the Highly Sensitive Protected Materials to the OAG.

15. **Required Certification**. Each person who inspects the Protected Materials shall, before such inspection, agree in writing to the following certification found in Attachment A to this Protective Order:

> I certify my understanding that the Protected Materials are provided to me pursuant to the terms and restrictions of the Protective Order in this

> docket, and that I have been given a copy of it and have read the Protective Order and agree to be bound by it. I understand that the contents of the Protected Materials, any notes, memoranda, or any other form of information regarding or derived from the Protected Materials shall not be disclosed to anyone other than in accordance with the Protective Order and, unless I am an employee of the Commission or OPC, shall be used only for the purpose of the proceedings in Docket Nos. 48785 and 48787. I acknowledge that the obligations imposed by this certification are pursuant to such Protective Order. Provided, however, if the information contained in the Protected Materials is obtained from independent public sources, the understanding stated herein shall not apply.

In addition, Reviewing Representatives who are permitted access to Highly Sensitive Protected Material under the terms of this Protective Order shall, before inspection of such material, agree in writing to the following certification found in Attachment A to this Protective Order:

> I certify that I am eligible to have access to Highly Sensitive Protected Material under the terms of the Protective Order in this docket.

The Reviewing Party shall provide a copy of each signed certification to Counsel for the producing party and serve a copy upon all parties of record.

16. **Disclosures between Reviewing Representatives and Continuation of Disclosure Restrictions after a Person is no Longer Engaged in the Proceeding**. Any Reviewing Representative may disclose Protected Materials, other than Highly Sensitive Protected Materials, to any other person who is a Reviewing Representative provided that, if the person to whom disclosure is to be made has not executed and provided for delivery of a signed certification to the party asserting confidentiality, that certification shall be executed prior to any disclosure. A Reviewing Representative may disclose Highly Sensitive Protected Material to other Reviewing Representatives who are permitted access to such material and have executed the additional certification required for persons who receive access to Highly Sensitive Protected Material. In the event that any Reviewing Representative to whom Protected Materials are disclosed ceases to be engaged in these proceedings, access to Protected Materials by that person shall be terminated and all notes, memoranda, or other information derived from the protected material shall either be destroyed or given to another Reviewing Representative of that

party who is authorized pursuant to this Protective Order to receive the protected materials. Any person who has agreed to the foregoing certification shall continue to be bound by the provisions of this Protective Order so long as it is in effect, even if no longer engaged in these proceedings.

17. **Producing Party to Provide One Copy of Certain Protected Material and Procedures for Making Additional Copies of Such Materials**. Except for Highly Sensitive Protected Materials, which shall be provided to the Reviewing Parties pursuant to Paragraphs 9, and voluminous Protected Materials, the producing party shall provide a Reviewing Party one copy of the Protected Materials upon receipt of the signed certification described in Paragraph 15. Except for Highly Sensitive Protected Materials, a Reviewing Party may make further copies of Protected Materials for use in this proceeding pursuant to this Protective Order, but a record shall be maintained as to the documents reproduced and the number of copies made, and upon request the Reviewing Party shall provide the party asserting confidentiality with a copy of that record.

18. **Procedures Regarding Voluminous Protected Materials**. P.U.C. PROC. R. 22.144(h) will govern production of voluminous Protected Materials. Voluminous Protected Materials will be made available in the producing party's voluminous room, in Austin, Texas, or at a mutually agreed upon location, Monday through Friday, 9:00 a.m. to 5:00 p.m. (except on state or Federal holidays), and at other mutually convenient times upon reasonable request.

19. **Reviewing Period Defined**. The Protected Materials may be reviewed only during the Reviewing Period, which shall commence upon entry of this Protective Order and continue until the expiration of the Commission's plenary jurisdiction. The Reviewing Period shall reopen if the Commission regains jurisdiction due to a remand as provided by law. Protected materials that are admitted into the evidentiary record or accompanying the evidentiary record as offers of proof may be reviewed throughout the pendency of this proceeding and any appeals.

20. **Procedures for Making Copies of Voluminous Protected Materials**. Other than Highly Sensitive Protected Materials, Reviewing Parties may take notes regarding the

information contained in voluminous Protected Materials made available for inspection or they may make photographic, mechanical or electronic copies of the Protected Materials, subject to the conditions in this Protective Order; provided, however, that before photographic, mechanical or electronic copies may be made, the Reviewing Party seeking photographic, mechanical or electronic copies must provide written confirmation of the receipt of copies listed on Attachment B of this Protective Order identifying each piece of Protected Materials or portions thereof the Reviewing Party will need.

21. **Protected Materials to be Used Solely for the Purposes of These Proceedings**. All Protected Materials shall be made available to the Reviewing Parties and their Reviewing Representatives solely for the purposes of these proceedings. Access to the Protected Materials may not be used in the furtherance of any other purpose, including, without limitation: (a) any other pending or potential proceeding involving any claim, complaint, or other grievance of whatever nature, except appellate review proceedings that may arise from or be subject to these proceedings; or (b) any business or competitive endeavor of whatever nature. Because of their statutory regulatory obligations, these restrictions do not apply to Commission Staff or OPC.

22. **Procedures for Confidential Treatment of Protected Materials and Information Derived from Those Materials**. Protected Materials, as well as a Reviewing Party's notes, memoranda, or other information regarding or derived from the Protected Materials are to be treated confidentially by the Reviewing Party and shall not be disclosed or used by the Reviewing Party except as permitted and provided in this Protective Order. Information derived from or describing the Protected Materials shall be maintained in a secure place and shall not be placed in the public or general files of the Reviewing Party except in accordance with the provisions of this Protective Order. A Reviewing Party must take all reasonable precautions to insure that the Protected Materials including notes and analyses made from Protected Materials that disclose Protected Materials are not viewed or taken by any person other than a Reviewing Representative of a Reviewing Party.

23. **Procedures for Submission of Protected Materials**. If a Reviewing Party tenders for filing any Protected Materials, including Highly Sensitive Protected Materials, or any

written testimony, exhibit, brief, motion or other type of pleading or other submission at the Commission or before any other judicial body that quotes from Protected Materials or discloses the content of Protected Materials, the confidential portion of such submission shall be filed and served in sealed envelopes or other appropriate containers endorsed to the effect that they contain Protected Material or Highly Sensitive Protected Material and are sealed pursuant to this Protective Order. If filed at the Commission, such documents shall be marked "PROTECTED MATERIAL" and shall be filed under seal with the presiding officer and served under seal to the counsel of record for the Reviewing Parties. The presiding officer may subsequently, on his/her own motion or on motion of a party, issue a ruling respecting whether or not the inclusion, incorporation or reference to Protected Materials is such that such submission should remain under seal. If filing before a judicial body, the filing party: (a) shall notify the party which provided the information within sufficient time so that the producing party may seek a temporary sealing order; and (b) shall otherwise follow the procedures in Rule 76a, Texas Rules of Civil Procedure.

24. **Maintenance of Protected Status of Materials during Pendency of Appeal of Order Holding Materials are not Protected Materials**. In the event that the presiding officer at any time in the course of this proceeding finds that all or part of the Protected Materials are not confidential or proprietary, by finding, for example, that such materials have entered the public domain or materials claimed to be Highly Sensitive Protected Materials are only Protected Materials, those materials shall nevertheless be subject to the protection afforded by this Protective Order for three (3) full working days, unless otherwise ordered, from the date the party asserting confidentiality receives notice of the presiding officer's order. Such notification will be by written communication. This provision establishes a deadline for appeal of a presiding officer's order to the Commission. In the event an appeal to the Commissioners is filed within those three (3) working days from notice, the Protected Materials shall be afforded the confidential treatment and status provided in this Protective Order during the pendency of such appeal. Neither the party asserting confidentiality nor any Reviewing Party waives its

right to seek additional administrative or judicial remedies after the Commission's denial of any appeal.

25. **Notice of Intent to Use Protected Materials or Change Materials Designation**. Parties intending to use Protected Materials shall notify the other parties prior to offering them into evidence or otherwise disclosing such information into the record of the proceeding. During the pendency of Docket Nos. 48785 and 48787 at the Commission, in the event that a Reviewing Party wishes to disclose Protected Materials to any person to whom disclosure is not authorized by this Protective Order, or wishes to have changed the designation of certain information or material as Protected Materials by alleging, for example, that such information or material has entered the public domain, such Reviewing Party shall first file and serve on all parties written notice of such proposed disclosure or request for change in designation, identifying with particularity each of such Protected Materials. A Reviewing Party shall at any time be able to file a written motion to challenge the designation of information as Protected Materials.

26. **Procedures to Contest Disclosure or Change in Designation**. In the event that the party asserting confidentiality wishes to contest a proposed disclosure or request for change in designation, the party asserting confidentiality shall file with the appropriate presiding officer its objection to a proposal, with supporting affidavits, if any, within five (5) working days after receiving such notice of proposed disclosure or change in designation. Failure of the party asserting confidentiality to file such an objection within this period shall be deemed a waiver of objection to the proposed disclosure or request for change in designation. Within five (5) working days after the party asserting confidentiality files its objection and supporting materials, the party challenging confidentiality may respond. Any such response shall include a statement by counsel for the party challenging such confidentiality that he or she has reviewed all portions of the materials in dispute and, without disclosing the Protected Materials, a statement as to why the Protected Materials should not be held to be confidential under current legal standards, or that the party asserting confidentiality for some reason did not allow such counsel to review such materials. If either party wishes to submit the material in question for in camera

inspection, it shall do so no later than five (5) working days after the party challenging confidentiality has made its written filing.

27. **Procedures for Presiding Officer Determination Regarding Proposed Disclosure or Change in Designation**. If the party asserting confidentiality files an objection, the appropriate presiding officer will determine whether the proposed disclosure or change in designation is appropriate. Upon the request of either the producing or Reviewing Party or upon the presiding officer's own initiative, the presiding officer may conduct a prehearing conference. The burden is on the party asserting confidentiality to show that such proposed disclosure or change in designation should not be made. If the presiding officer determines that such proposed disclosure or change in designation should be made, disclosure shall not take place earlier than three (3) full working days after such determination unless otherwise ordered. No party waives any right to seek additional administrative or judicial remedies concerning such presiding officer's ruling.

28. **Maintenance of Protected Status during Periods Specified for Challenging Various Orders**. Any party electing to challenge, in the courts of this state, a Commission or presiding officer determination allowing disclosure or a change in designation shall have a period of ten (10) days from: (a) the date of an unfavorable Commission order; or (b) if the Commission does not rule on an appeal of an interim order, the date an appeal of an interim order to the Commission is overruled by operation of law, to obtain a favorable ruling in state district court. Any party challenging a state district court determination allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from a state appeals court. Finally, any party challenging a determination of a state appeals court allowing disclosure or a change in designation shall have an additional period of ten (10) days from the date of the order to obtain a favorable ruling from the state supreme court, or other appellate court. All Protected Materials shall be afforded the confidential treatment and status provided for in this Protective Order during the periods for challenging the various orders referenced in this paragraph. For purposes of this paragraph, a favorable ruling of a state district court, state appeals court, Supreme Court or other appellate court includes any order extending the deadlines in this paragraph.

29. **Other Grounds for Objection to Use of Protected Materials Remain Applicable**. Nothing in this Protective Order shall be construed as precluding any party from objecting to the use of Protected Materials on grounds other than confidentiality, including the lack of required relevance. Nothing in this Protective Order constitutes a waiver of the right to argue for more disclosure, provided, however, that unless the Commission or a court orders such additional disclosure, all parties will abide by the restrictions imposed by the Protective Order.

30. **Protection of Materials from Unauthorized Disclosure**. All notices, applications, responses or other correspondence shall be made in a manner which protects Protected Materials from unauthorized disclosure.

31. **Return of Copies of Protected Materials and Destruction of Information Derived from Protected Materials**. Following the conclusion of these proceedings, each Reviewing Party must, no later than thirty (30) days following receipt of the notice described below, return to the party asserting confidentiality all copies of the Protected Materials provided by that party pursuant to this Protective Order and all copies reproduced by a Reviewing Party, and counsel for each Reviewing Party must provide to the party asserting confidentiality a letter by counsel that, to the best of his or her knowledge, information, and belief, all copies of notes, memoranda, and other documents regarding or derived from the Protected Materials (including copies of Protected Materials) that have not been so returned, if any, have been destroyed, other than notes, memoranda, or other documents which contain information in a form which, if made public, would not cause disclosure of the substance of Protected Materials. As used in this Protective Order, "conclusion of these proceedings" refers to the exhaustion of available appeals, or the running of the time for the making of such appeals, as provided by applicable law. If, following any appeal, the Commission conducts a remand proceeding, then the "conclusion of these proceedings" is extended by the remand to the exhaustion of available appeals of the remand, or the running of the time for making such appeals of the remand, as provided by applicable law. Promptly following the conclusion of these proceedings, counsel for the party asserting confidentiality will send a written notice to all other parties, reminding them of their obligations under this Paragraph.

Nothing in this Paragraph shall prohibit counsel for each Reviewing Party from retaining two (2) copies of any filed testimony, brief, application for rehearing, hearing exhibit or other pleading which refers to Protected Materials provided that any such Protected Materials retained by counsel shall remain subject to the provisions of this Protective Order.

32. **Applicability of Other Law**. This Protective Order is subject to the requirements of the Public Information Act, the Open Meetings Act,[3] the Texas Securities Act[4] and any other applicable law, provided that parties subject to those acts will notify the party asserting confidentiality, if possible under those acts, prior to disclosure pursuant to those acts. Such notice shall not be required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.

33. **Procedures for Release of Information under Order**. If required by order of a governmental or judicial body, the Reviewing Party may release to such body the confidential information required by such order; provided, however, that: (a) the Reviewing Party shall notify the producing party of the order requiring the release of such information within five (5) calendar days of the date the Reviewing Party has notice of the order; (b) the Reviewing Party shall notify the producing party at least five (5) calendar days in advance of the release of the information to allow the producing party to contest any release of the confidential information; and (c) the Reviewing Party shall use its best efforts to prevent such materials from being disclosed to the public. The terms of this Protective Order do not preclude the Reviewing Party from complying with any valid and enforceable order of a state or federal court with competent jurisdiction specifically requiring disclosure of Protected Materials earlier than contemplated herein. The notice specified in this section shall not be required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates

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[3] TEX. GOV'T CODE ANN. §§ 551.001 - 551.146 (West 2017).

[4] TEX. REV. CIV. STAT. ANN. arts. 581-1 - 581-43 (West 2010 & Supp. 2016).

to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.

34. **Best Efforts Defined**. The term "best efforts" as used in the preceding paragraph requires that the Reviewing Party attempt to ensure that disclosure is not made unless such disclosure is pursuant to a final order of a Texas governmental or Texas judicial body, the written opinion of the Texas Attorney General sought in compliance with the Public Information Act, or the request of governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials. The Reviewing Party is not required to delay compliance with a lawful order to disclose such information but is simply required to timely notify the party asserting confidentiality, or its counsel, that it has received a challenge to the confidentiality of the information and that the Reviewing Party will either proceed under the provisions of §552.301 of the Public Information Act, or intends to comply with the final governmental or court order. Provided, however, that no notice is required where the Protected Materials are sought by governmental officials authorized to conduct a criminal or civil investigation that relates to or involves the Protected Materials, and those governmental officials aver in writing that such notice could compromise the investigation and that the governmental entity involved will maintain the confidentiality of the Protected Materials.

35. **Notify Defined**. "Notify" for purposes of Paragraphs 32, 33 and 34 means written notice to the party asserting confidentiality at least five (5) calendar days prior to release; including when a Reviewing Party receives a request under the Public Information Act. However, the Commission, OAG, or OPC may provide a copy of Protected Materials to the Open Records Division of the OAG as provided herein.

36. **Requests for Non-Disclosure**. If the producing party asserts that the requested information should not be disclosed at all, or should not be disclosed to certain parties under the protection afforded by this Protective Order, the producing party shall tender the information for in camera review to the presiding officer within ten (10) calendar days of the request. At the same time, the producing party shall file and serve on all parties its argument, including any supporting affidavits, in support of its position of non-

disclosure. The burden is on the producing party to establish that the material should not be disclosed. The producing party shall serve a copy of the information under the classification of Highly Sensitive Protected Material to all parties requesting the information that the producing party has not alleged should be prohibited from reviewing the information.

Parties wishing to respond to the producing party's argument for non-disclosure shall do so within five working days. Responding parties should explain why the information should be disclosed to them, including why disclosure is necessary for a fair adjudication of the case if the material is determined to constitute a trade secret. If the presiding officer finds that the information should be disclosed as Protected Material under the terms of this Protective Order, the presiding officer shall stay the order of disclosure for such period of time as the presiding officer deems necessary to allow the producing party to appeal the ruling to the Commission.

37. **Sanctions Available for Abuse of Designation**. If the presiding officer finds that a producing party unreasonably designated material as Protected Material or as Highly Sensitive Protected Material, or unreasonably attempted to prevent disclosure pursuant to Paragraph 36, the presiding officer may sanction the producing party pursuant to P.U.C. PROC. R. 22.161.

38. **Modification of Protective Order**. Each party shall have the right to seek changes in this Protective Order as appropriate from the presiding officer.

39. **Breach of Protective Order**. In the event of a breach of the provisions of this Protective Order, the producing party, if it sustains its burden of proof required to establish the right to injunctive relief, shall be entitled to an injunction against such breach without any requirements to post bond as a condition of such relief. The producing party shall not be relieved of proof of any element required to establish the right to injunctive relief. In addition to injunctive relief, the producing party shall be entitled to pursue any other form of relief to which it is entitled.

ATTACHMENT A

Protective Order Certification

I certify my understanding that the Protected Materials are provided to me pursuant to the terms and restrictions of the Protective Order in this docket and that I have received a copy of it and have read the Protective Order and agree to be bound by it. I understand that the contents of the Protected Materials, any notes, memoranda, or any other form of information regarding or derived from the Protected Materials shall not be disclosed to anyone other than in accordance with the Protective Order and, unless I am an employee of the Commission or OPC, shall be used only for the purpose of the proceedings in Docket Nos. 48785 and 48787. I acknowledge that the obligations imposed by this certification are pursuant to such Protective Order. Provided, however, if the information contained in the Protected Materials is obtained from independent public sources, the understanding stated here shall not apply.

Signature	Party Represented
Printed Name	Date

I certify that I am eligible to have access to Highly Sensitive Protected Material under the terms of the Protective Order in this docket.

Signature	Party Represented
Printed Name	Date

ATTACHMENT B

I request to view/copy the following documents:

Document Requested	# of Copies	Non-Confidential	Protected Materials and/or Highly Sensitive Protected Materials

Signature

Party Represented

Printed Name

Date

ATTACHMENT 2

ATTACHMENT 2

DRAFT PROCEDURAL SCHEDULE
PUC DOCKET NOs. 48785 & 48787

Date	Deadline
November 7, 2018	Filing Date of Applications*
November 7	Applicants Direct Testimony*
~ November 16	Prehearing Conference
~ November 28	Applicants Affidavits Proving Mailed Notice and Publication Notice
~ December 4	Commission Staff Recommendations/Comments re: Deficiencies/Compliance
~ December 12	Order Regarding Material Deficiencies in the Applications
December 27	Intervention Deadline
December 27	Deadline for Parties to Request a Hearing
January 3, 2019	Objections to Applicant Direct Testimony
January 3, 2019	Deadline for Statement Challenging Adequacy of Routes and Request for Preliminary Hearing on Route Adequacy
January 7	Replies to Objections to Applicant Direct Testimony
January 7	Replies to Statements on Route Adequacy
January 10	Intervenor Direct Testimony/Statement of Position**
January 10	Deadline for Sending Written Discovery on Application and Applicant Direct Testimony*
January 11	Preliminary Hearing on Adequacy of Routes (if necessary)
January 17	Objections to Intervenor Direct Testimony
January 18	Staff Direct Testimony**
January 24	Responses to Objections to Intervenor Direct Testimony
January 24	Intervenor Cross-rebuttal Testimony
January 25	Deadline for Sending Discovery on Staff and Intervenor Direct Testimony**
January 25	Objections to Staff's Direct Testimony
January 25	Applicant Rebuttal Testimony**
January 28	Cross-rebuttal Discovery Ends and Objections to Cross-rebuttal Testimony
January 30	Objections to Applicant Rebuttal Testimony
January 30	Deadline for Sending Written Discovery on Applicant Rebuttal Testimony**

DRAFT PROCEDURAL SCHEDULE
PUC DOCKET NOs. 48785 & 48787

Date	Deadline
February 6	Replies to Objections to Cross-rebuttal Testimony
February 11-15	Hearing on Merits (2 days for Docket No. 48785 routing, 2 days for Docket No. 48787 routing, and 1 day for both projects' need)
~ February 25	Initial Brief Due
~ March 4	Reply Briefs Due
~ March 22, 2019	Proposal for Decision
~ April 8	Exceptions to PFD
~ April 18	Replies to Exceptions
May 6, 2019	Commission Decision Deadline

* Discovery on application and Applicants' direct testimony: 10 days to respond; objections due within 5 working days; motions to compel due within 3 working days of objections; responses to motions to compel due within 3 working days of motion to compel.

** Discovery on Intervenor/Staff direct testimony and Applicants' rebuttal testimony: 7 days to respond: objections due within 3 working days; motions to compel due within 2 working days of objections; responses to motions to compel due within 2 working days of motion to compel.

ATTACHMENT 3

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ATTACHMENT 3

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

WHEREAS, after due consideration of the alternatives, the Board of Directors (Board) of Electric Reliability Council of Texas, Inc. (ERCOT) deems it desirable and in the best interest of ERCOT to accept ERCOT staff's recommendation to (1) endorse the need for the Far West Regional Planning Group (RPG) Projects (Option 3), which ERCOT staff has independently reviewed and which the Technical Advisory Committee (TAC) has voted unanimously to endorse, based on North American Electric Reliability Corporation (NERC) and ERCOT planning reliability criteria, and (2) designate the Riverton-Sand Lake, Sand Lake-Solstice, and Solstice-Bakersfield 345 kV lines as critical to the reliability of the ERCOT System pursuant to Public Utility Commission of Texas (PUCT) Substantive Rule 25.101(b)(3)(D);

THEREFORE, BE IT RESOLVED, that the ERCOT Board hereby (1) endorses the need for the Far West RPG Projects (Option 3), which ERCOT staff has independently reviewed and which TAC has voted unanimously to endorse, based on NERC and ERCOT planning reliability criteria, and (2) designates the Riverton-Sand Lake, Sand Lake-Solstice, and Solstice-Bakersfield 345 kV lines as critical to the reliability of the ERCOT System pursuant to PUCT Substantive Rule 25.101(b)(3)(D).

CORPORATE SECRETARY'S CERTIFICATE

I, Vickie G. Leady, Assistant Corporate Secretary of ERCOT, do hereby certify that, at its June 12, 2018 meeting, the ERCOT Board passed a motion approving the above Resolution by unanimous voice vote with no abstentions.

IN WITNESS WHEREOF, I have hereunto set my hand this 12th day of June, 2018.

Vickie G. Leady
Assistant Corporate Secretary

ERCOT Independent Review of Oncor Far West Texas Project 2 and Dynamic Reactive Devices

Version 1.0

Document Revisions

Date	Version	Description	Author(s)
05/21/2018	1.0	Final Report	Xiaoyu Wang, Ying Li, Priya Ramasubbu
		Reviewed by	Prabhu Gnanam, Shun Hsien (Fred) Huang Jeff Billo

Table of Contents

1. Executive Summary

In June 2017, the ERCOT Board of Directors endorsed the Far West Texas Project (FWTP), a Tier 1 transmission project to address the transmission needs both in the Culberson Loop area and the Barilla Junction area that could reliably serve the Culberson Loop load up to 717 MW. Since the approval of the FWTP project in 2017, Oncor has confirmed that the Culberson Loop has contractually-confirmed load levels that surpass ERCOT's indicated 717 MW limit for the approved Far West Texas Project. Therefore, the endorsed FWTP project was assumed to be in-service in 2020 for the purpose of this study.

In December, 2017, Oncor submitted the Far West Texas Dynamic Reactive Devices (DRD) Project to the Regional Planning Group (RPG) to meet the summer 2019 Culberson Loop load need. The proposed DRD project was estimated to cost $86 million and was classified as Tier 1 project. At the time the DRD project was proposed, the Culberson Loop was projected to have 650 MW by 2019 and 790 MW by 2022 with the inclusion of the existing and confirmed load requests in the area.

In February, 2018, Oncor submitted the Far West Texas Project 2 (FWTP2) to address reliability requirements and ensure the transmission system in the area is able to meet the projected contractually-confirmed load level in the Culberson Loop. The proposed FWTP2 project was estimated to cost $194 million and was classified as a Tier 1 project. At the time the FWTP2 project was proposed, the Culberson Loop was projected to have 775 MW by 2019 and 1013 MW by 2022 with the inclusion of the existing and confirmed load requests in the area.

As of April, 2018, Oncor has confirmed that the Culberson Loop now has contractually-confirmed load levels of 880 MW for 2019 and 1013 MW for 2022. Oncor has also indicated that additional, known potential (not yet contractually-confirmed) load increases in the Culberson Loop may push the total to 1339 MW.

Based on the DRD and FWTP2 proposals, ERCOT completed the combined independent review for both projects together to determine the system needs for both near-term and long-term in a cost effective manner while providing flexibility to meet potential load growth in this region.

Based on the forecasted loads and scenarios analyzed, ERCOT determined that there is a reliability need to improve the transmission system in Far West Texas. After consideration of several project alternatives, ERCOT concluded that the upgrades identified in Option 3 meet the reliability criteria in the most cost effective manner while providing flexibility to accommodate near-term and future load growth in the area of study. Option 3 is estimated to cost $327.5 million and is described as follows:

- Construct a new approximately 40-mile 345 kV line on double-circuit structures with two circuits in place from Sand Lake Switch Station to Solstice Switch Station
- Add two new 600 MVA, 345/138 kV autotransformers at Sand Lake 345 kV Switch Station
- Install a new 345 kV circuit on the planned Riverton – Sand Lake double circuit structures
- Install the second 345 kV circuit on the Odessa EHV – Riverton 345 kV line double circuit structures between Moss and Riverton (creating a Moss – Riverton 345 kV circuit)
- Construct a new Quarry Field 138 kV Switch Station in the Wink – Riverton double-circuit 138 kV line

- Construct a new approximately 20-mile Kyle Ranch – Riverton 138 kV line on double-circuit structures with one circuit in place from Kyle Ranch 138 kV Switch Station to Riverton 138 kV Switch Station
- Construct a new approximately 20-mile Owl Hills – Tunstill – Riverton 138 kV line on double circuit structures with one circuit in place from Owl Hills 138 kV Switch Station to Riverton 138 kV Switch Station
- Install the second 345 kV circuit on the planned Solstice Switch Station – Bakersfield Switch Station double circuit structures
- Install one 250 MVAR STATCOM at Horseshoe Springs 138 kV Switch Station
- Install one 250 MVAR STATCOM at Quarry Field 138 kV Switch Station
- Install 150 MVAR static capacitors at Horseshoe Springs 138 kV Switch Station.
- Install 150 MVAR static capacitors at Quarry Field 138 kV Switch Station

Reactive support components, including the STATCOMs and capacitors, should be implemented by 2019 if feasible to accommodate the projected 880 MW Culberson Loop demand. Remedial operational schemes may be required in the Culberson Loop area to mitigate post-contingency voltage violations in the near-term until all of the recommended transmission upgrades can be put in-service to meet the Culberson Loop area load growth

2. Introduction

Over the past several years the Far West Texas Weather Zone has experienced high load growth. Between 2010 and 2016 the average annual growth rate was roughly 8%. This strong growth rate was primarily driven by increases in oil and natural gas related demand Figure 2.1 shows the total projected load (MW) served from the Culberson Loop as indicated in the Oncor's Far West Texas Project 2 (FWTP2) RPG proposal

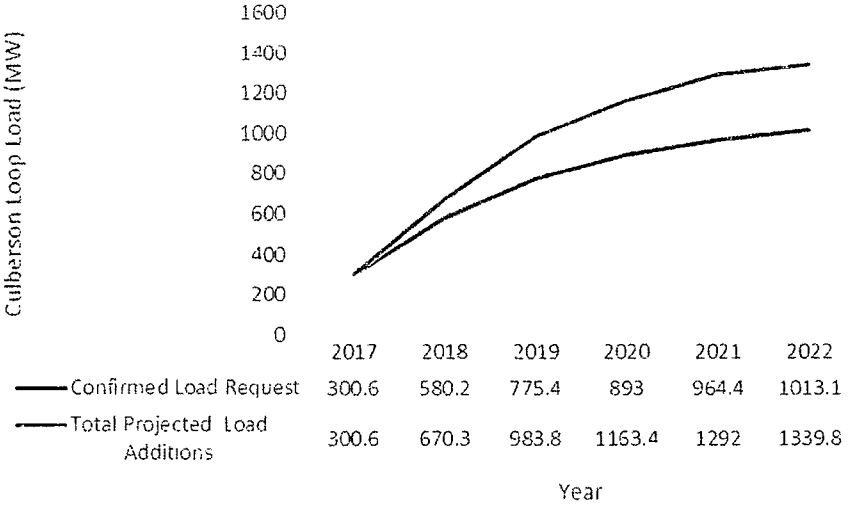

Figure 2.1: Total Projected Load (MW) in the Culberson Loop

Load growth along the Culberson Loop has led to several transmission improvements in the area, including the Far West Texas Project (FWTP) which was endorsed by the ERCOT Board of Directors in June, 2017. The FWTP is expected to be implemented by 2020 and will be able to serve up to 717 MW of Culberson Loop load Significant new load requests to connect to the Culberson Loop have been observed since the approval of FWTP in 2017 due to growth in the oil and gas activity. As of April, 2018, the Permian Basin oil and natural gas rig count addition by county, as shown in Figure 2.2, has increased by 28% compared to April, 2017. Also, more than 70% of newly added rigs since April, 2017 are located in the counties served by the Culberson Loop transmission system (Culberson, Reeves, Ward, Crane, Loving, and Winkler Counties).

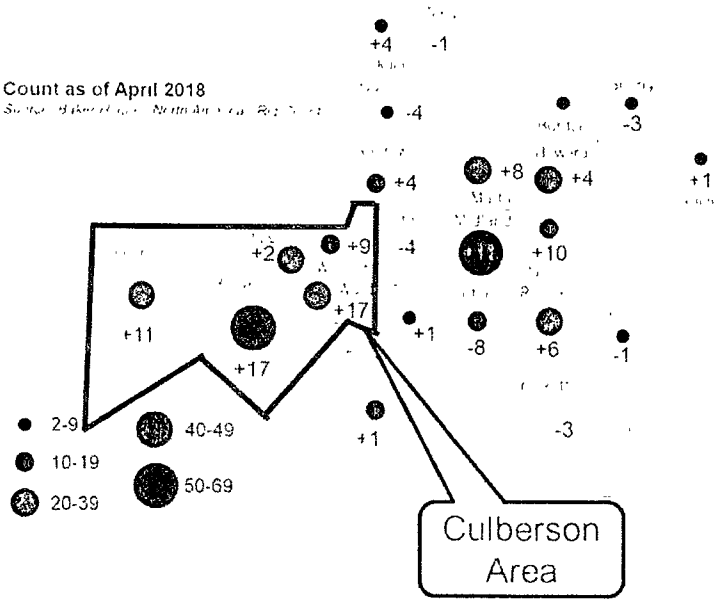

Figure 2.2 Permian Basin Oil and Natural Gas Rig Count Addition since April, 2017

In December, 2017, Oncor submitted to RPG the Far West Texas Dynamic Reactive Devices (DRD) Project, designed to meet the expected summer 2019 Culberson Loop load The proposed DRD project was estimated to cost $86 million and was classified as a Tier 1 project. At the time of the DRD project RPG submittal, the Culberson Loop load, with the inclusion of all contractually confirmed load, was projected to be 650 MW by 2019 and 790 MW by 2022. The major components of DRD project proposal were:

- Construct a new Horseshoe Springs 138 kV Switch Station in the Riverton – Culberson 138 kV Double-circuit line
- Install two 250 MVAR, 138 kV Static Synchronous Compensators (STATCOMs) at Horseshoe Spring 138 kV Switch Station

In February. 2018, Oncor submitted the Far West Texas Project 2 (FWTP2) to address reliability requirements and ensure the transmission system in the area is able to meet the projected load. The proposed FWTP2 project was estimated to cost $194 million and was classified as a Tier 1 project. At the time the FWTP2 project was proposed, the Culberson Loop area load, again based on contractually confirmed load requests, was projected to serve 775 MW by 2019 and 1013 MW by 2022. Figure 2.3 shows the proposed FWTP2. The major components of the FWTP2 project proposal include.

- Construct a new approximately 40-mile 345 kV line on double-circuit structures with one circuit in place from Sand Lake 345 kV Switch Station to Solstice 345 kV Switch Station
- Add two new 600 MVA, 345/138 kV autotransformers at Sand Lake 345 kV Switch Station
- Install a new 345 kV circuit on the planned Riverton – Sand Lake double circuit structures
- Install the second 345 kV circuit on the Odessa EHV – Riverton 345 kV line double circuit structures between Moss and Riverton (creating a Moss – Riverton 345 kV circuit)

- Construct a new Quarry Field 138 kV Switch Station in the Wink – Riverton double-circuit 138 kV line
- Construct a new approximately 20-mile Kyle Ranch – Riverton 138 kV line on double-circuit structures with one circuit in place from Kyle Ranch 138 kV Substation to Riverton 138 kV Switch Station
- Construct a new approximately 20-mile Owl Hills – Tunstill – Riverton 138 kV line on double circuit structures with one circuit in place from Owl Hills 138 kV Switch Station to Riverton 138 kV Switch Station

As of April, 2018, Oncor has updated the contractually confirmed Culberson area load to be 880 MW by summer 2019 and 1013 MW by 2022. Additional load requests could potentially push the load to more than 1300 MW in the Culberson Loop.

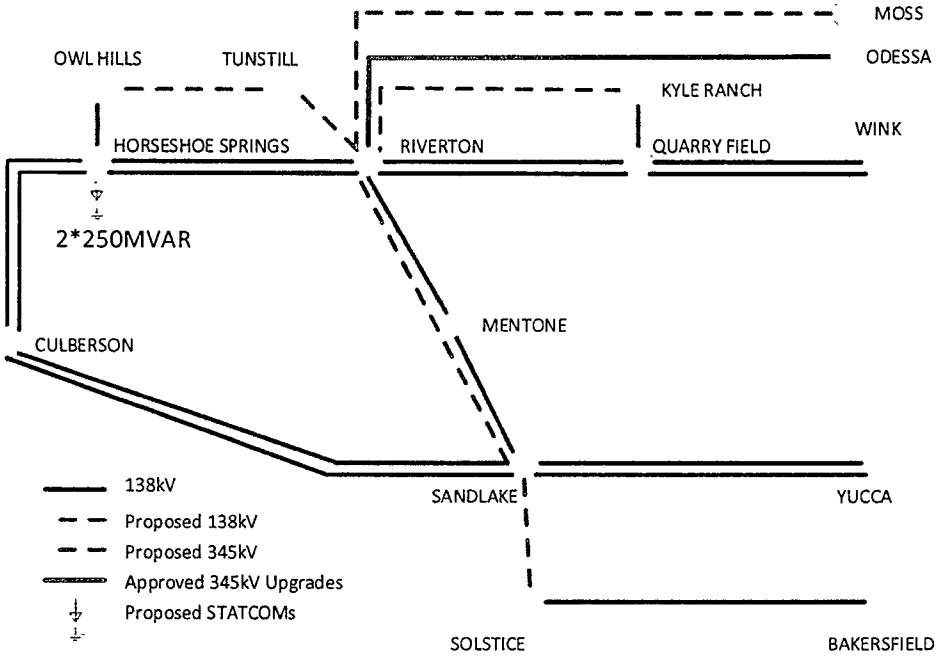

Figure 2.3: Proposed Far West Texas Project 2

Based on both the DRD and the FWTP2 proposals, ERCOT completed this independent review to determine the system needs in the Culberson Loop area and to address those needs in a cost-effective manner while providing the flexibility to meet near-term and potential long-term load growth in this area

3. Study Assumption and Methodology

ERCOT performed studies under various system conditions to evaluate the system need and identify a cost-effective solution to meet those needs in the area. The assumptions and criteria used for this review are described in this section.

3.1. Study Assumption

The primary focus of this review is the Wink – Culberson – Yucca Drive loop transmission system, referred to as the "Culberson Loop " Figure 3 1 shows the system map of the study area

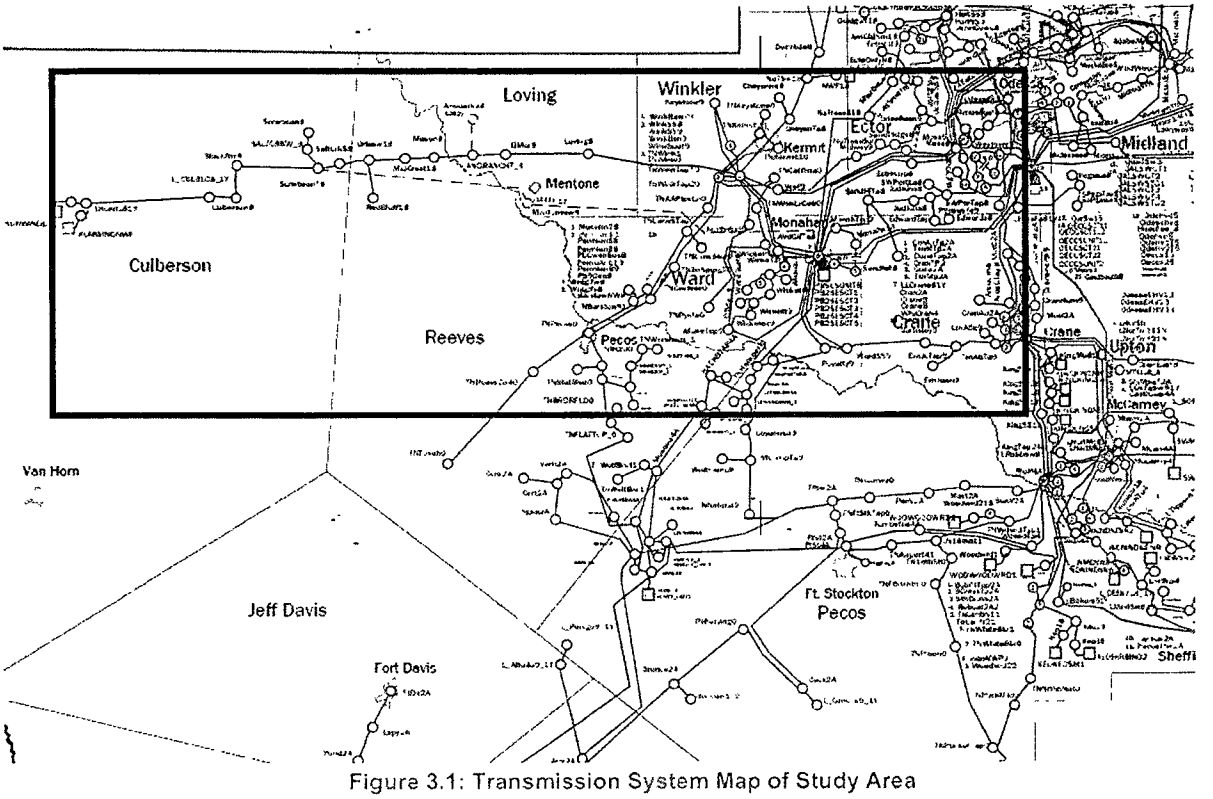

Figure 3.1: Transmission System Map of Study Area

Reliability Cases

The following starting cases were used in the study.

- The 2020 West/Far West (WFW) summer peak case from the 2017 RTP reliability case
- The 2020 Dynamics Working Group summer peak flat start case

Transmission Topology

The starting case was modified based on input from Oncor to include topological changes, switched shunt additions and load additions in the study area for both near-term 2019 summer peak and 2022 summer peak conditions.

Study Case Loads and Potential Loads

Oncor provided data regarding increased load projections in the Culberson Loop area. The most recent Oncor submittal data included 880 MW for 2019 summer peak and 1030 MW for 2022 summer peak in the Culberson Loop area. Oncor met with ERCOT and shared information on the signed customer agreements which confirmed these proposed load additions.

Sensitivity cases were also created to reflect higher potential load projections from Oncor. These cases contained additional customer load requests that did not yet have firm commitment at the time of this independent review. To reflect this "Potential" load growth, the load was increased by 334 MW in the Culberson Loop for 2022 summer peak. The total load in the Potential Load Case was approximately 1347 MW in the Culberson Loop for the Potential Load sensitivity.

Generation

Planned generators in the Far West and West Weather Zones that met Planning Guide Section 6.9 conditions for inclusion in the base cases (according to the 2016 October Generation Interconnection Status report), which were not included in the RTP cases, were added. The added generators are listed in Table 3.1

Table 3.1 Added Generators That Met Planning Guide Section 6.9 Conditions (2018 April GIS report)

GINR Number	Project Name	MW	Fuel	County	Weather Zone
14INR0044	West of Pecos Solar	100	Solar	Reeves	Far West

Key assumptions applied in this study include the following:

- Wind generation in West and Far West weather zones were set to have a maximum dispatch capability of 2.6% of their rated capacity. This assumption was in accordance with the 2016 Regional Transmission Plan Study Scope and Process document[1]
- Solar generation was set at 70% of their rated capacity in accordance with the 2016 Regional Transmission Plan Study Scope and Process document.
- Considering the oil and gas industry load characteristics (flat load), the most stressed system condition is during the night when solar generation is not available To study this condition, no solar generation was dispatched in the study base conditions.

Capital Cost Estimates

Capital cost estimates for transmission facilities were provided by Oncor, AEPSC and LCRA TSC These costs were provided for individual transmission facilities and ERCOT used those values to calculate total project costs for various project options.

3.2. Criteria for Violations

The following criteria were used to identify planning criteria violations.

All 100 kV and above busses, transmission lines, and transformers in the study region were monitored (excluding generator step-up transformers)

- Thermal criteria violations
  - Rate A for Normal Conditions

[1] http //www ercot com/content/wcm/key_documents_lists/77730/2016_RTP_Scope_Process_v1 3_clean pdf

  - Rate B for Emergency Conditions
- Voltage violation criteria
  - 0.95 < V pu < 1.05 Normal
  - 0.90 < V pu < 1.05 Emergency
  - Post Contingency voltage deviations
    - 8% on non-radial load buses
- Dynamic Stability Analysis
  - NERC TPL-001-4 and ERCOT Planning Guide Section 4

3.3. Study Tools

ERCOT utilized the following software tools for the independent review of the Far West Texas Project:

- PSS/e version 33 was used to perform the dynamic stability analysis and in the initial steady-state case creation to incorporate the TSP idvs files
- PowerWorld Simulator version 20 for SCOPF and steady state contingency analysis
- VSAT version 17 was used for voltage stability analysis
- UPLAN version 10.2.0.19928

4. Project Need

The need for a transmission improvement project was evaluated for the Study Case. Table 4.1 summarized the steady state voltage stability (Power-Voltage) assessment results for the 2019 summer peak. The results showed pre-contingency voltage stability issues with no transmission upgrades. Even with the addition of the ERCOT Board of Directors approved Far West Texas Project (FWTP), as shown in Table 4.1 Scenario 2, the results indicated both voltage violations and voltage collapse under certain contingencies for the projected Culberson Loop 2019 summer peak load The project need analysis results are consistent with the finding of the 2017 FWTP ERCOT independent review that identified the need for additional upgrades (beyond the FWTP project endorsed in June 2017) to serve loads greater that 717 MW in the Culberson Loop.

Table 4.1 Steady State Voltage Stability Assessment for the Base Case Condition

Scenario	Load (MW)	Transmission Upgrades	Culberson Load Serving Capability	
			NERC P1, P7	NERC P6
1.	880 (2019 Summer Peak)	None	Pre-contingency Voltage Collapse	
2.	880 (2019 Summer Peak)	FWTP(1)	Voltage Violation Voltage Collapse	Voltage Violation Voltage Collapse

(1) The Far West Texas Project (FWTP) endorsed by ERCOT Board of Directors in June, 2017.

5. Project Options

5.1. Options Considerations

The FWTP, which was endorsed by the ERCOT Board of Directors in June 2017, was designed to allow for a number of different expansion options that could accommodate additional load growth. All project alternatives considered in this study align with the expansion options evaluated as part of the ERCOT FWTP independent review.

In addition, project options considered in this study were limited to alternatives that included adding a second 345 kV circuit to the Odessa EHV – Riverton (between Moss and Riverton) and Solstice – Bakersfield 345 kV lines. This limitation was result of the following considerations:

- The Culberson Loop area has experienced a significant rate of load growth. This evaluation focused on contractually committed load with a sensitivity evaluation which includes new customers that have contacted the TSPs with load requests but have not yet finalized a contract to construct. However, it is possible that more, presently unknown, load requests will materialize before the facilities recommended in this evaluation are in service.
- The Odessa EHV – Riverton and Solstice – Bakersfield 345 kV lines have yet to be constructed. If they were constructed with one circuit in place and a second 345 kV circuit was later deemed necessary, the construction outage to add the second circuit would greatly reduce the load serving capability to the Culberson Loop and reduce the operational flexibility during what would likely be a long duration outage.
- It is approximately 50% less expensive to construct the two circuits in place at the initial build than the cost of coming back to install the second circuit at a later time due to reduced access, environmental and mobilization costs, and construction efficiencies.

In addition, the new 138 kV lines proposed in the FWTP2 project are necessary to strengthen the Culberson Loop and provide operational flexibility under normal and outage conditions.

5.2. Short-Listed Options

Based on the considerations listed above and the results of preliminary analysis, the following "universal" transmission upgrades were included in all of the short-listed options:

- Construct a new approximately 40-mile 345 kV line on double-circuit structures with two circuits in place from Sand Lake 345 kV Switch Station to Solstice 345 kV Switch Station
- Add two new 600 MVA, 345/138 kV autotransformers at Sand Lake 345 kV Switch Station
- Install a new 345 kV circuit on the planned Riverton – Sand Lake double circuit structures
- Install the second 345 kV circuit on the Odessa EHV – Riverton 345 kV line double circuit structures between Moss and Riverton (creating a Moss – Riverton 345 kV circuit)
- Construct a new Quarry Field 138 kV Switch Station in the Wink – Riverton double-circuit 138 kV line
- Construct a new approximately 20-mile Kyle Ranch – Riverton 138 kV line on double-circuit structures with one circuit in place from Kyle Ranch 138 kV Substation to Riverton 138 kV Switch Station

- Construct a new approximately 20-mile Owl Hills – Tunstill – Riverton 138 kV line on double circuit structures with one circuit in place from Owl Hills 138 kV Switch Substation to Riverton 138 kV Switch Station
- Install the second 345 kV circuit on the planned Solstice Switch Station – Bakersfield Switch Station double circuit structures

The following three options were studied further for the reactive support in the Culberson Loop The detailed description of the three short-listed options are provided below and diagrams for these are included in the Appendix.

Option **1**

- Universal transmission upgrades
- Install two 250 MVAR Static Synchronous Compensators (STATCOMs) at Horseshoe Springs 138 kV Switch Station

The total cost estimate for Option 1 is approximately $300.0 Million.

Option **2**

- Universal transmission upgrades
- Install one 250 MVAR Static Synchronous Compensators (STATCOMs) at Horseshoe Springs 138 kV Switch Station
- Install capacitor banks with a total capacity of 150 MVAR at Horseshoe Springs 138 kV Switch Station.
- Install capacitor banks with a total capacity of 150 MVAR at Quarry Field 138 kV Switch Station

The total cost estimate for Option 2 is approximately $292.5 Million.

Option **3**

- Universal transmission upgrades
- Install one 250 MVAR Static Synchronous Compensators (STATCOMs) at Horseshoe Springs 138 kV Switch Station
- Install one 250 MVAR Static Synchronous Compensators (STATCOMs) at Quarry Field 138 kV Switch Station
- Install capacitor banks with a total capacity of 150 MVAR at Horseshoe Springs 138 kV Switch Station
- Install capacitor banks with a total capacity of 150 MVAR at Quarry Field 138 kV Switch Station

The total cost estimate for Option 3 is approximately $327.5 Million.

6. Voltage Stability and Dynamic Stability Analysis

A Power-Voltage (PV) analysis was used in the steady state voltage stability assessment for the Culberson Loop area for all short-listed options for the studied scenarios. A Power-Voltage (PV) analysis was used to proportionally increase the load in the Culberson Loop until a voltage collapse identified the maximum load serving capability for the options. Table 7.1 shows the results of this analysis, indicating the maximum loads in the Culberson Loop area that can be reliably served by the three identified project options. A sensitivity analysis was conducted to evaluate the impact of nearby generators to the Culberson Loop load serving capability. All five generators at the Permian Basin (PBSES) generation station were off-line in the study case. The PV results are in listed in Table 7.1.

Table 7.1 Voltage and Dynamic Stability Assessment of All Options for Culberson Loop Load Serving Capability

	Culberson Loop Load Served (MW)		
Description	Option 1	Option 2	Option 3
PV Voltage Collapse Results (NERC P1, P6, P7, ERCOT Events)	1608	1568	1688
PV Voltage Collapse Results (without PBSES Units) (NERC P1, P6, P7, ERCOT Events)	1508	1468	1648
Dynamic Stability Result (without PBSES Units) (NERC P1, P6, P7, ERCOT Events)(1)	Acceptable	Acceptable	Acceptable
Estimated Capital Cost ($M)	300	292.5	327.5

(1) Dynamic stability was conducted at the Culberson Loop load level identified in the PV voltage collapse results

The majority of the loads in the study area were assumed to be oil and gas customers who employ voltage-sensitive electric equipment in their operations. As specified by Oncor, heavy motor load was assumed to represent the load characteristic in the study area. All three options were tested using time domain dynamic stability simulations including a dynamic load model provided by Oncor to evaluate system stability.

It was assumed that if simulations indicated an acceptable (stable) system response following severe events and/or three-phase faults, the stability response would also be acceptable for the same events with a single-line-to-ground (SLG) fault. If a potential stability issue was observed, the simulation was rerun with SLG faults to ensure a stable system response following a NERC planning event. In this way the analysis demonstrated compliance with NERC planning standards and ERCOT reliability criteria. In these simulations, selected ERCOT transmission buses were monitored for angle and voltage responses.

The dynamic event definitions included the removal of all elements that the protection system and other automatic controls are expected to disconnect for each event. The dynamic simulation results are also listed in Table 7.1.

None of the three options will be fully in-service prior to summer 2019, when the load is projected to reach 880 MW, since the new transmission lines will not be constructed. As a result, a PV analysis was conducted for the 2019 summer condition assuming only the reactive devices in all three options can be implemented to support the Culberson Loop in 2019. The PV analysis results are listed in Table 7.2. The results indicate that for Options 1 and 2 additional operational mitigation measures will be needed to maintain reliability prior to the new transmission lines being put in place. These operational mitigation measures may include (but are not limited to) undervoltage load shed.

Table 7.2 Steady State Voltage Stability Assessment of All Options for Culberson Loop Load Serving Capability with Reactive Devices Only

	Culberson Loop Load Served (MW)		
Description	Option 1	Option 2	Option 3
PV Voltage Collapse Results (reactive devices only[1] (NERC P1, P6, P7, ERCOT Events)	801	821	1001
PV Voltage Collapse Results (without PBSES units) (reactive devices only[1]) (NERC P1 P6 P7, ERCOT Events)	721	741	880[2]

(1) Assuming reactive devices will be in service before new transmission lines

(2) Oncor indicated that the reactive devices identified to be located at Quarry Field 138 kV Switch Station may not be in service by summer 2019 ERCOT performed a PV analysis considering only the reactive devices located at Horseshoe Springs from Option 3 The results showed that without the Quarry Field reactive devices in service Option 3 would have a load serving capability of 721 MW

7. Economic Analysis

Although this RPG project is driven by reliability needs, ERCOT also conducted an economic analysis to identify any potential impact on system congestion related to the addition of the transmission upgrades.

The base case for this economic analysis used the 2023 economic case built for the 2017 RTP as the starting case. The topology changes and generation additions were similar to the steady state base case built. ERCOT modeled each of the three short-listed options and performed production cost simulations for the year 2023. The annual production analysis showed no measurable congestion impact on the ERCOT System with the addition of the transmission upgrades.

8. Subsynchronous Resonance (SSR) Vulnerability Assessment

According to Protocol Section 3.22 1.3(2). ERCOT performed a SSR vulnerability assessment using topology check and the results indicated that all three short-listed options strengthen the transmission network and increase the required transmission circuit outages to have a Generation Resource become radial to series capacitors The SSR assessment results showed no SSR vulnerability for any existing Generation Resources or Generation Resources satisfying Planning Guide Section 6.9 conditions for inclusion in the planning models at the time of this study.

9. Final Options Comparison

As shown in Table 9.1, a comparison of study results for the three options shows that Option 3, shown in Figure 9.1, met the system reliability criteria under the studied load conditions while providing better load serving capability to accommodate both the near-term and potential future load needs in the Culberson Loop area

Table 9.1 Options Comparison

Description	Option 1	Option 2	Option 3
Capital cost ($ Million)	300.0	292.5	327.5
PV Results, Culberson Load Served	1608	1568	1688
PV Results, Culberson Load Served (with only reactive support devices recommended in the options)	801	821	1001
PV Results, Culberson Load Served (without PBSES Units)	1508	1468	1648
PV Results, Culberson Load Served (without PBSES Units) (with only reactive support devices recommended in the options)	721	741	880
Dynamic Stability Results, Culberson Load Served	Acceptable	Acceptable	Acceptable

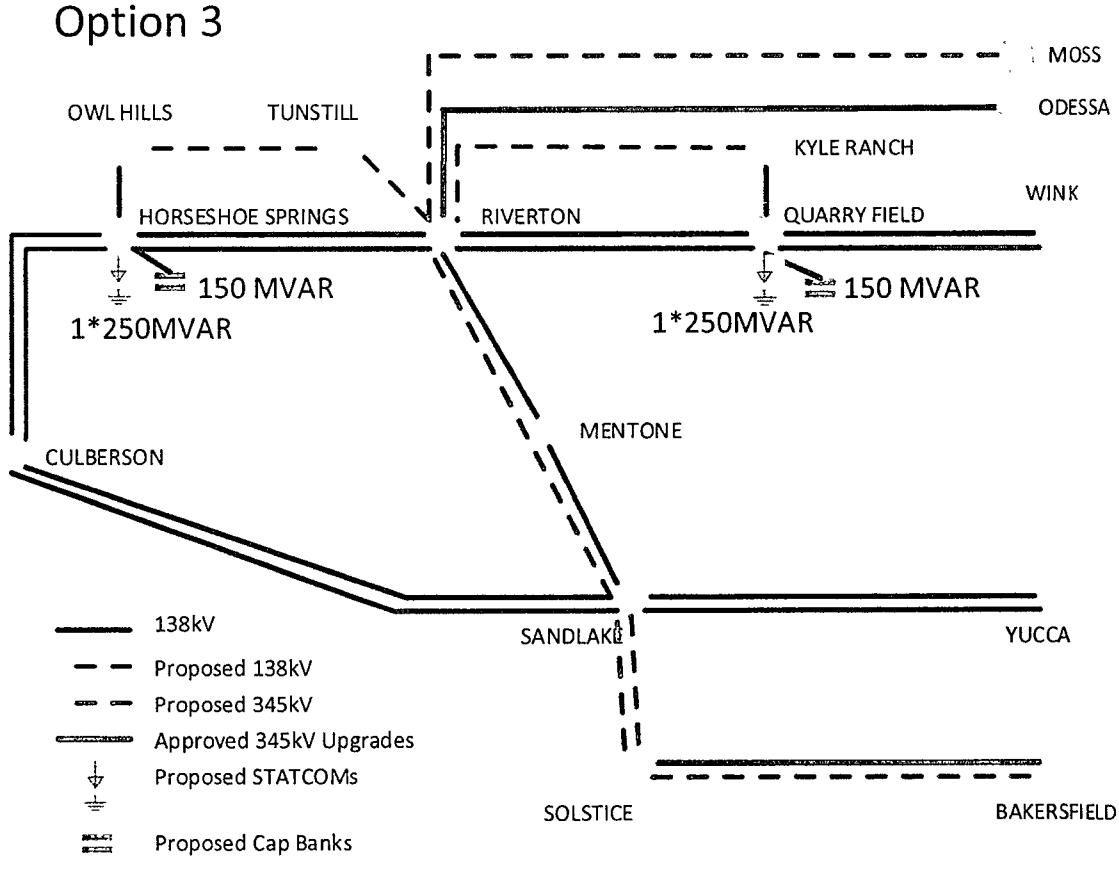

Figure 9.1: Option 3

10. Sensitivity Studies

Sensitivity studies were performed to ensure compliance with Planning Guide requirements.

10.1. Generation Sensitivity Analysis

According to Planning Guide Section 3.1 3(4)(a), the generation sensitivity analysis will evaluate the effect that proposed Generation Resources in or near the study area will have on a recommended transmission project. Based on the 2018 April Generator Interconnection Status report, Table 10.1.1 shows all the generators in the area that met Planning Guide 6.9 and Table 10.1.2 shows all the generators in the area with a signed standard generator interconnection agreement (SGIA) that did not meet Planning Guide 6.9 conditions for inclusion in the planning models Considering the oil and gas industry load characteristics, the most stressed system condition is during the night when solar generation is not available. No solar generation in the Culberson Loop was assumed available in the study base conditions. Therefore, the proposed Generation Resources in the Culberson Loop area will have no impact on the recommended transmission project.

Table 10.1.1 Generators Met Planning Guide Section 6.9 Conditions (2017 March GIS report)

GINR Number	Project Name	MW	Fuel	County	Weather Zone
14INR0044	West of Pecos Solar	100	Solar	Reeves	Far West

Table 10.1.2 Generators with SGIA That Did Not Meet Planning Guide Section 6.9 Conditions (2017 March GIS report)

GINR Number	Project Name	MW	Fuel	County	Weather Zone
18INR0022	Winkler Solar	150	Solar	Winkler	Far West

10.2. Load Scaling Impact Analysis

Planning Guide Section 3.1.3(4) (b) requires evaluation of the impact of various load scaling on the criteria violations seen in the study cases.

Because the voltage violations were observed at load serving buses inside the Culberson Loop, ERCOT assumed that the load scaling in the outside weather zones did not have a material impact on the observed need

11. Conclusion

Based on the forecasted loads and scenarios analyzed, ERCOT determined that there is a reliability need to improve the transmission system in Far West Texas. After consideration of the project alternatives, ERCOT concluded that the upgrades identified in Option 3 meet the reliability criteria in the most cost effective manner and provide needed load serving capability to the rapid oil and gas industry load growth in the Culberson Loop area Option 3 is estimated to cost $327.5 million and is described as follows

- Construct a new approximately 40-mile 345 kV line on double-circuit structures with two circuits in place from Sand Lake 345 kV Switch Station to Solstice 345 kV Switch Station
- Add two new 600 MVA, 345/138 kV autotransformers at Sand Lake 345 kV Switch Station
- Install a new 345 kV circuit on the planned Riverton – Sand Lake double circuit structures
- Install the second 345 kV circuit on the Odessa EHV – Riverton 345 kV line double circuit structures between Moss and Riverton (creating a Moss – Riverton 345 kV circuit)
- Construct a new Quarry Field 138 kV Switch Station in the Wink – Riverton double-circuit 138 kV line
- Construct a new approximately 20-mile Kyle Ranch – Riverton 138 kV line on double-circuit structures with one circuit in place from Kyle Ranch 138 kV Substation to Riverton 138 kV Switch Station
- Construct a new approximately 20-mile Owl Hills – Tunstill – Riverton 138 kV line on double circuit structures with one circuit in place from Owl Hills 138 kV Switch Substation to Riverton 138 kV Switch Station
- Install the second 345 kV circuit on the planned Solstice 345 kV Switch Station – Bakersfield 345 kV Switch Station double circuit structures
- Install one 250 MVAR STATCOM at Horseshoe Springs 138 kV Switch Station
- Install one 250 MVAR STATCOM at Quarry Field 138 kV Switch Station
- Install 150 MVAR static capacitors at Horseshoe Springs 138 kV Switch Station
- Install 150 MVAR static capacitors at Quarry Field 138 kV Switch Station

The reactive support components, including STATCOMs and capacitors, recommended in Option 3 should be implemented by 2019 if feasible to accommodate the projected 880 MW Culberson Loop in summer 2019 Additionally, the sizing of capacitor bank stages should take into account operational considerations. Remedial operational schemes may be required to mitigate post-contingency voltage violations in the Culberson Loop area until the recommended transmission upgrades can be built to reliably serve the increasing load.

12. Designated Provider of Transmission Facilities

In accordance with the ERCOT Nodal Protocols Section 3.11.4.8, ERCOT staff is to designate transmission providers for projects reviewed in the RPG. The default providers will be those that own the end points of the new projects. These providers can agree to provide or delegate the new facilities or inform ERCOT if they do not elect to provide them. If different providers own the two ends of the recommended projects ERCOT will designate them as co-providers and they can decide between themselves what parts of the recommended projects they will each provide.

Oncor owns the Odessa EHV Switch Station, Moss Switch Station and is planning to construct and own the new Riverton Switching Station and therefore is the presumed owner of the Riverton Switching Station. Therefore, ERCOT designates Oncor as the designated provider for the 345 kV Odessa EHV to Riverton and Moss to Riverton transmission facilities along with the two recommended 345/138 kV autotransformers at Riverton.

LCRA TSC owns the Bakersfield Switchyard while AEPSC is constructing and planning to own the new Solstice Substation and therefore is the presumed owner of the Solstice Substation. Therefore, ERCOT designates AEPSC and LCRA TSC as the designated co-providers for the 345 kV Bakersfield to Solstice transmission facilities but AEPSC as the provider of the two recommended 345/138 kV autotransformers at Solstice.

Oncor is planning to construct and own the new Sand Lake Switching Station and therefore is the presumed owner of the Sand Lake Switching Station, while AEPSC is constructing and planning to own the new Solstice Substation and therefore is the presumed owner of the Solstice Substation. ERCOT designates Oncor and AEPSC as the designated co-providers for the 345 kV Sand Lake to Solstice transmission facilities and Oncor as the provider of the two recommended 345/138 kV autotransformers at Sand Lake Switch Station.

Oncor owns all the 138 kV Switch Stations listed in the recommended Option 3. Therefore, ERCOT designates Oncor as the designated provider for all the 138 kV transmission facilities along with the proposed STATCOMs and static capacitor banks.

The designated TSPs have requested critical designation status for the Riverton – Sand Lake 345 kV Line, the Sand Lake – Solstice 345 kV Line, and the Bakersfield – Solstice 345 kV line for multiple operational and reliability needs to address the rapid load growth in the Culberson Loop area. ERCOT designates the project critical to reliability per PUCT Substantive Rule 25.101(b)(3)(D).

13. Appendix

Options Diagrams	 Options_OneLine.p ptx