



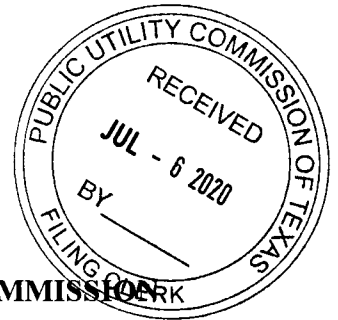
Control Number: 49737



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**PUC DOCKET NO. 49737
SOAH DOCKET NO. 473-19-6862**



**APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
CERTIFICATE OF CONVENIENCE §
AND NECESSITY AUTHORIZATION §
AND RELATED RELIEF FOR THE §
ACQUISITION OF WIND §
GENERATION FACILITIES §**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

ORDER

This Order denies the application of Southwestern Electric Power Company (SWEPCO) to amend its certificate of convenience and necessity (CCN) for authorization and related relief for the acquisition of three wind generation facilities in Oklahoma. The Commission adopts the proposal for decision, including findings of fact and conclusions of law, to the extent provided in this Order.

Because the Commission denies SWEPCO's application to amend its certificate of convenience and necessity, the Commission need not and does not reach the issue of whether Public Utility Regulatory Act (PURA)¹ § 14.101 applies to the proposed acquisition in this proceeding. Accordingly, the Commission does not adopt the administrative law judges' discussion of this issue on pages 108 through 110 of the proposal for decision.

In addition, the Commission modifies finding of fact 102 for completeness, findings of fact 32 and 114 for clarity, and findings of fact 30, 72, 100, and 101 to rephrase them as proper findings of fact. Further, the Commission modifies conclusion of law 1 to accurately identify the statutes applied in this proceeding, and the Commission deletes conclusion of law 8 because it is unnecessary and not standard for the Commission's orders. The Commission also makes other non-substantive changes for such matters as capitalization, spelling, grammar, punctuation, style, correction of numbering, and readability.

¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016.

I. Findings of Fact

The Commission adopts the following findings of fact.

Background and Procedural History

1. SWEPCO is a wholly owned subsidiary of American Electric Power Company (AEP) and is a fully integrated electric utility serving retail and wholesale customers in Texas, Arkansas, and Louisiana.
2. SWEPCO provides electric generation, transmission, and distribution services in Texas under certificate of convenience and necessity (CCN) number 30151.
3. On July 15, 2019, SWEPCO filed an application with the Commission for a CCN to acquire an interest in three wind generation facilities (the wind generation facilities) located in Oklahoma.
4. Through a request for proposal process, SWEPCO and its sister company, Public Service Company of Oklahoma, contracted to acquire project companies owning the following wind facilities: (1) Traverse at 999 megawatts (MW); (2) Maverick at 287 MW; and (3) Sundance at 199 MW, subject to receipt of regulatory approvals and satisfaction of other conditions. Each of the wind generation facilities is owned by an affiliate of Invenergy LLC. SWEPCO contracted to acquire 54.5% of each facility for a total of 810 MW. The total price for the wind generation facilities, including all interconnection and upgrade costs, is \$1.86 billion. Total costs for the wind generation facilities, including purchase and sale agreement price adjustments and owner's costs, are expected to be \$1.996 billion, and SWEPCO's 54.5% share is \$1.088 billion.
5. The Commission referred the application to the State Office of Administrative Hearings (SOAH) on August 22, 2019.
6. SWEPCO provided notice of the application by publication once a week for two consecutive weeks in newspapers having general circulation in each county in SWEPCO's service territory. SWEPCO's notice by newspaper publication was completed on September 5, 2019.

7. SWEPCO's individual notice to its Texas retail customers by bill insert was completed on September 17, 2019.
8. SWEPCO provided individual notice to Commission Staff and the Office of Public Utility Counsel by hand-delivering a copy of SWEPCO's filing to each party's counsel. Individual notice was also provided to the legal representative of all parties in Docket No. 46449,² SWEPCO's most recent base rate case, and Docket No. 47461,³ SWEPCO's CCN application for the Wind Catcher project, by providing each party with a copy of SWEPCO's filing either by hand delivery, courier, or United States first-class mail. This individual notice was completed on July 15, 2020.
9. The following parties intervened and participated in this docket: Texas Industrial Energy Consumers; the Office of Public Utility Counsel; Golden Spread Electric Cooperative; East Texas Electric Cooperative, Inc. and Northeast Texas Electric Cooperative, Inc.; Cities Advocating Reasonable Deregulation; and Walmart Inc. Commission Staff also participated in this docket. The International Brotherhood of Electrical Workers Local Union 738 intervened in this docket but did not participate.
10. On September 12, 2019, the Commission issued its preliminary order identifying the issues to be addressed in this proceeding.
11. In SOAH Order No. 2 filed on September 28, 2019, the SOAH administrative law judges (ALJs) established a procedural schedule and set the time, date, and place for the hearing on the merits.
12. The hearing on the merits commenced on February 24, 2020 and concluded on February 26, 2020.
13. The parties submitted initial post-hearing briefs on March 9, 2020 and reply briefs on March 17, 2020.

² *Application of Southwestern Electric Power Company for Authority to Change Rates*, Docket No. 46449, Order on Rehearing (Mar. 19, 2018).

³ *Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Wind Catcher Energy Connection Project in Oklahoma*, Docket No. 47461, Order (Aug. 13, 2018).

14. On March 11, 2020, SWEPCO filed proposed findings of fact and conclusions of law.
15. On March 17, 2020, the intervenors and Commission Staff individually responded to SWEPCO's proposed findings of fact and conclusions of law.
16. The record closed on March 25, 2020, when Commission Staff and Texas Industrial Energy Consumers filed their joint proposed findings of fact and conclusions of law.

Certificate of Convenience and Necessity Standard of Review

17. The investment in the wind generation facilities will have a significant impact on SWEPCO's finances.
18. The wind generation facilities will not cause adverse effects to other electric utilities serving the proximate area in Texas.
19. Because the wind generation facilities will be located entirely within the state of Oklahoma, there will be no adverse effect on community values, recreational and park areas, historical and aesthetic values, or environmental integrity in Texas.
- 19A. The wind generation facilities are not needed to meet any capacity need, and SWEPCO is projected to have excess capacity until 2026.
20. Because there is no need for the wind generation facilities to serve retail load, the addition of the wind generation facilities will not improve service.
21. Texas has already met its renewable energy goals, so the wind generation facilities will have no effect on those goals.
22. SWEPCO is not currently in the process of implementing customer choice in its service territory.

Request for Proposals Selection Process

23. SWEPCO uses an integrated resource plan to identify resources to serve customers over a 20-year planning period.
24. SWEPCO's 2018 and 2019 integrated resource plans identified wind resources as economical and recommended that they should be added beginning in 2022 to take advantage of the federal production tax credits.

25. SWEPCO resolved to acquire additional wind resources through a competitive request for proposals process.
26. On January 7, 2019, SWEPCO issued a request for proposals for up to 1,200 MW of wind generation resources. SWEPCO sought projects on a turnkey basis in which it individually, or together with its AEP affiliate utility operating company Public Service Company of Oklahoma, would acquire through a purchase service agreement all of the equity interests in the project company whose assets consist solely of the selected project.
27. SWEPCO sought projects that: (a) are physically located in, and interconnected to, the Southwest Power Pool (SPP) in Arkansas, Louisiana, Texas, or Oklahoma; (b) are not currently experiencing, or anticipated to experience, significant congestion or deliverability constraints; and (c) balance project performance and deliverability to AEP's west load zone in the Tulsa area.
28. In addition, SWEPCO sought projects that are either in service or that would be placed in service by December 15, 2021, and thus qualify for at least 80% of the production tax credits value.
29. On March 1, 2019, SWEPCO and Public Service Company of Oklahoma received 35 bids representing 19 unique wind projects totaling 5,896 MW. Fifteen projects were located in Oklahoma and four in Texas.
30. The top three ranked bids were for the Traverse, Maverick and Sundance facilities.
31. Each developer was required to submit an independent assessment of the wind resource and expected energy output. The independent analyses were required to include one-year, five-year, ten-year, 20-year and 30-year production forecast estimates for the various probability of exceedance values (P50, P75, P90, P95, and P99).
32. SWEPCO and Public Service Company of Oklahoma hired Simon Wind Inc. to independently review wind resource assessments and the expected energy output included in each of the proposals submitted in response to the request for proposals and to develop a wind energy resource assessment for each of the wind generation facilities.
33. SWEPCO selected the wind generation facilities through its request for proposals process.

Description of Wind Generation Facilities

34. The wind generation facilities will be located in north central Oklahoma and will total 1,485 MW of installed nameplate capacity, as follows:

	Traverse	Maverick	Sundance
Size (Nameplate)	999 MW	287 MW	199 MW
SWEPSCO Share	544.5 MW	156 MW	108.5 MW
Planned Commercial Operation Date	2021	2021	2020

35. SWEPSCO seeks approval to acquire 54.5% of the wind generation facilities, with Public Service Company of Oklahoma to own the remaining 45.5%.

36. The winning bidders will build the projects, which SWEPSCO and Public Service Company of Oklahoma will then purchase on a turnkey basis.

37. The estimated total installed capital cost for the wind generation facilities is approximately \$1.996 billion (of which SWEPSCO's share is approximately \$1.09 billion). This cost includes (a) each wind project's purchase price under the respective purchase service agreements, (b) purchase service agreement price adjustments, (c) owner's costs, (d) all costs associated with interconnecting the facilities to the SPP transmission system, and (e) any assigned network upgrade costs.

Economic Modeling and Assumptions

38. SWEPSCO modeled the customer savings of the wind generation facilities, using a base case (with and without a carbon tax) along with sensitivities based on higher and lower gas and power price forecasts, a lower level of energy production for the wind generation facilities, and cases based on higher than expected congestion costs that resulted in construction of a generation tie line (gen-tie).

39. Based on SWEPSCO's assumptions, SWEPSCO projected customer savings under all cases modeled.

40. SWEPSCO's assumptions do not reflect a realistic range of possible future conditions.

41. SWEPSCO did not demonstrate that, under a reasonable range of assumptions, SWEPSCO's acquisition of the wind generation facilities will provide benefits to customers.

Natural Gas Prices

42. Future natural gas prices are an essential element of the wind generation facilities' benefits calculation. The higher the expected future natural gas prices, the greater the expected benefits from the wind generation facilities.
43. Natural gas prices are important because fuel prices are a key component in determining the supply stack, or merit order, for the dispatch of generating units.
44. SWEPCO used AEP's long-term North American energy market forecast (the fundamentals forecast) to forecast the expected benefits of the wind generation facilities.
45. The current version of the fundamentals forecast was created in April 2019.
46. The fundamentals forecast contained natural-gas-price projections for a base case, a high case, a low case, and a version of each of those cases that did not include an assumed carbon tax. The base case was the primary case used by SWEPCO to analyze the economics of the wind generation facilities. The base case used a levelized natural gas price of \$5.40 per million British thermal units (MMBtu). SWEPCO's lowest-price natural gas case (the low-gas-price, no-carbon-tax case) used a levelized price of \$4.50 per MMBtu.
47. Each of SWEPCO's past forecasts, dating back to 2007, has been on the high side of actual natural gas prices.
48. Although the fundamentals forecast was weather-normalized, the evidence did not quantify the impact of abnormal weather on prior forecasts.
49. SWEPCO's forecasts start out higher than current prices and have been higher than actual prices for several years.
50. The New York Mercantile Exchange (NYMEX) futures prices represent actual transactions between buyers and sellers who put real money at risk in their day-to-day operations.
51. A gas price forecast created using the methodology used by Southwestern Public Service (SPS) in recent Commission proceedings was significantly lower than SWEPCO's fundamentals forecast. The SPS low-method forecast projected a simple average price of natural gas of \$3.34 per MMBtu.

52. The lowest Energy Information Administration (EIA) case has been the most accurate in recent years.
53. The levelized natural gas price for the 2020 version of EIA's lowest case for the years 2021 to 2051 is approximately \$3.46 per MMBtu.
54. A decrease of \$1 per MMBtu in gas prices would reduce the estimated savings for the wind generation facilities by \$246 million net present value from the no-carbon P50 case.
55. SWEPCO calculated a break-even natural gas price for the wind generation facilities (based on SWEPCO's low/no carbon modeling assumptions) that is \$3.67 per MMBtu levelized.
56. The 2020 version of EIA's lowest case shows natural gas prices that are below SWEPCO's own calculation of a break-even point for the wind generation facilities.
57. The record in this proceeding fails to show that the assumptions made by SWEPCO regarding gas prices will result in a probable lowering of cost to consumers.
58. The natural gas forecasts and futures prices in the record in this proceeding show that the wind generation facilities are unlikely to result in a probable lowering of cost to consumers.

Cost of Carbon

59. SWEPCO evaluated the expected customer benefits of the acquisition of the wind generation facilities both with and without a future enforced carbon emission burden (carbon tax).
60. In all of SWEPCO's cases that include a carbon tax, the tax is \$15 per ton commencing in 2028 and then escalating by 3.5% per annum.
61. SWEPCO assumed that a carbon tax would increase the customer benefits of the wind generation facilities by \$171 million net present value for SWEPCO's base case.
62. Although it is possible that a carbon tax will be imposed in the future, such a tax has not been imposed in the past, there is not one in place now, and it is not reasonable to assume that such a tax will be imposed in the future for purposes of assessing the probable lowering of cost to customers.

63. Including a carbon-tax assumption in the modeling causes the wind generation facilities to appear more economical than they otherwise would.
64. SWEPCO's modeling of the locational marginal prices should not have included the carbon-tax component, and the calculation of the estimated benefits of the wind generation facilities should not include that component.

Renewable Resources

65. SWEPCO modeled locational marginal prices in the SPP by relying on the 2024 and 2029 PROMOD models developed by SPP and stakeholders in the integrated transmission planning process using the future 1 case. The integrated transmission planning future 2 case assumes a higher level of renewable resources and more accurately represents the expected level of future renewable penetration in the SPP.
66. SWEPCO's modeling understated the amount of new renewable generation in SPP.
67. The SPP interconnection queue includes an additional 10,000 MW of projects with pending or completed interconnection agreements, 11,000 MW of additional renewable projects in the SPP facility study stage, and another 70,000 MW in the definitive interconnection system Impact study stage.
68. Additional wind generation would primarily affect power prices during the hours in which wind generation runs, which will also be the same hours during which the wind generation facilities will run.

Capacity Factor

69. A crucial measure of generation output is the wind generation facilities' net capacity factor, which is the ratio of the actual output of a generating unit over a period of time to its potential output at full nameplate capacity.
70. The P50 expected production level of 44.01% was developed by SWEPCO's wind consultant and excluded consideration of force majeure, mechanical defects, and curtailment. The actual median of expected energy production for the wind generation facilities is lower than the P50 level.

71. SWEPCO guaranteed production at the P95 level, which the wind generation facilities are nearly certain to achieve; therefore, it is reasonable to evaluate the economic benefits of the wind generation facilities at the P95 level of energy production.
72. The risk that production could fall below the P95 level because of force majeure or curtailment is material.
73. A 1% reduction in the net capacity factor for SWEPCO's low-gas-price, no-carbon-tax case results in a \$32.8 million net present value reduction in net benefits.
74. It is not reasonable to evaluate the economics of the wind generation facilities at a production level SWEPCO is not willing to guarantee.
75. Evaluating the wind generation facilities using the P95 level of energy production is a reasonable stress-test of the economics of the wind generation facilities.

Useful Life

76. SWEPCO has not shown that the wind generation facilities will have an extended useful life of 30 years.
77. The warranty provided by the turbine manufacturer does not support a 30-year useful life.
78. Extending the useful life beyond 25 years depends on operations and maintenance and capital costs that may outweigh the benefits.
79. SWEPCO's operations and maintenance and capital forecast is unreasonable because it does not recognize the higher level of capital and operations and maintenance expense that will be required to extend the useful lives of the wind generation facilities to 30 years.
80. A significant amount of SWEPCO's projected net benefits is expected to occur during years 26 to 30.
81. The wind generation facilities should be evaluated using a 25-year design or useful life.

Congestion Costs and Gen-tie

82. SWEPCO understated congestion and loss-related costs associated with the delivery of power to the AEP west load zone from the wind generation facilities.

83. There are limitations to the PROMOD model that cause it to understate projected congestion costs.
84. In Docket No. 47461, SWEPCO witness Johannes P. Pfeifenberger included a 5% curtailment adjustment to account for PROMOD's underestimation of congestion costs. Applying that same 5% curtailment calculation to the wind generation facilities in this proceeding would result in a \$72 million net present value reduction in net benefits.
85. SWEPCO modeled base cases assuming high congestion wherein savings drop from \$567 million to \$95 million at a P95 capacity factor without a carbon tax. SWEPCO did not model low gas cases assuming high congestion.
86. Holding congestion costs flat in nominal terms while simultaneously forecasting ever-increasing power prices is an unreasonable assumption. Escalating congestion costs at the level of forward prices for power at the SPP South Hub results in a \$49 million net present value reduction in net benefits.
87. Additional future wind generation creates a significant risk of higher congestion costs.
88. It is not reasonable to hold congestion costs flat in nominal terms based on speculation that SPP would promote additional transmission solutions in the future.
89. It is inconsistent to hold congestion costs flat in nominal terms based on the availability of a gen-tie solution without including the cost of the gen-tie solution in the same model.
90. Although SWEPCO is not proposing in this case to construct a gen-tie, the economic analysis should include a gen-tie to evaluate the risks of higher levels of congestion.
91. SWEPCO assumed that the initial capital cost of a gen-tie would be \$433 million in 2021 dollars. SWEPCO's estimate is not based on any specific route or project timeline.
92. SWEPCO's assumption that a gen-tie built solely to deliver energy from the wind generation facilities to AEP's load would have a 60-year useful life is unreasonable. The gen-tie should be evaluated based on the same useful life as the wind generation facilities.
93. SWEPCO did not demonstrate that the wind generation facilities would benefit customers if SWEPCO builds a gen-tie to mitigate congestion cost increases on the SPP transmission system that are not addressed by the SPP integrated transmission planning process.

Capacity Value

94. SWEPCO calculated capacity value for the wind generation facilities based on capacity addition deferrals starting in 2037.
95. When a generation resource is acquired solely on the basis of the probable lowering of cost to customers, it is not reasonable to include the capacity value in the benefit analysis.
96. SWEPCO did not demonstrate that the wind generation facilities will also provide value by deferring SWEPCO's future capacity needs.

Production Tax Credits and Deferred Tax Asset

97. SWEPCO's economic analysis of the wind generation facilities considered both the amount of production tax credits the wind generation facilities were expected to produce, as well as the carrying charges on the unused production tax credits that would be treated as deferred tax assets for ratemaking purposes.
98. Aside from the eligibility qualification for the production tax credits, the amount of the production tax credits is dependent on the output of the wind generation facilities over their useful life.
99. The energy output expected from the wind generation facilities is based on a wind resource assessment that explicitly excludes consideration of force majeure, mechanical defects, and curtailment.
100. For purposes of the economic evaluation, it is appropriate to calculate the production tax credits using the P95 level of output rather than the P50 level.
101. It is not appropriate to consider the treatment of any deferred tax assets in this proceeding. Rather, it is appropriate to consider any deferred tax assets in a rate proceeding.

Revenue Requirement

102. SWEPCO's forecast of the revenue requirement associated with the wind generation facilities unreasonably assumes flat ongoing capital and operations and maintenance costs, despite statements from the wind turbine manufacturer that operations and maintenance costs are expected to be higher in later years.

SWEPCO's Proposed Conditions

103. SWEPCO proposed a capital cost cap equal to 100% of its share of the aggregate filed capital costs for the wind generation facilities totaling \$1.09 billion. This guarantee is not subject to exceptions.
104. SWEPCO's capital cost cap includes underestimated operations and maintenance expenses that will be needed for continued operation of the wind generation facilities over their expected 30-year life, and it does not include construction costs for a potential gen-tie.
105. SWEPCO proposed that, if production tax credits are not received at the 100% level for Sundance and at the 80% level for Traverse and Maverick, because one or more of the wind generation facilities is determined to be ineligible under current law, SWEPCO will guarantee to make its customers whole for the value of the lost production tax credits based upon actual production.
106. SWEPCO's guarantee related to eligibility for production tax credits is subject to an exception for future legislative changes that would make one or more of the wind generation facilities ineligible for production tax credits.
107. SWEPCO proposed that, beginning in 2022, it would guarantee a minimum production level, in aggregate from the wind generation facilities, of an average of 87% of the expected output of the wind generation facilities (which represents a 38.1% capacity factor and 4,959 GWh per year) for ten years, as averaged over five-year blocks.
108. SWEPCO's minimum production guarantee is subject to exceptions for force majeure events and economic and environmentally based SPP curtailments.
109. SWEPCO and Public Service Company of Oklahoma previously entered into comprehensive settlement agreements associated with the acquisition of the wind generation facilities as filed with the Arkansas Public Service Commission and Oklahoma Corporation Commission, respectively, that contain more enhanced financial safeguards for customers than the guarantees SWEPCO proposed in this case.
110. SWEPCO declined to modify the cost-saving guarantees it proposed in this case to become consistent with any of the guarantees contained within the settlements associated with the

acquisition of the wind generation facilities that SWEPCO and Public Service Company of Oklahoma previously entered into and which were filed with the Arkansas Public Service Commission and Oklahoma Corporation Commission , respectively.

111. SWEPCO did not establish that the acquisition of the wind generation facilities will result in the probable lowering of cost to customers with or without its proposed guarantees.
112. SWEPCO's proposed guarantees are insufficient to protect consumers from the financial risks of the wind generation facilities.

Regulatory Approvals in Other Jurisdictions

113. SWEPCO filed for approval of the acquisition of the wind generation facilities with the Arkansas Public Service Commission in Docket No. 19-035-U on July 15, 2019.
114. A unanimous settlement was filed in Docket No. 19-035-U on January 24, 2020, which includes the option for SWEPCO to acquire a larger share of the wind generation facilities for Arkansas customers if another SWEPCO jurisdiction should deny its respective share.
115. SWEPCO filed for approval of the acquisition of the wind generation facilities in Louisiana before the Louisiana Public Service Commission in Docket No. U-35324 on July 15, 2019.
116. An uncontested settlement of Docket No. U-35324 was filed in April 9, 2020, which includes what SWEPCO refers to as a flex-up" option.
117. SWEPCO expects orders from the Arkansas Public Service Commission and the Louisiana Public Service Commission in May 2020 addressing the settlements filed in those jurisdictions.
118. The Public Service Company of Oklahoma filed for approval related to the acquisition of the wind generation facilities in Oklahoma before the Oklahoma Corporation Commission in Cause No. PUD 201900048 on July 15, 2019.
119. A joint stipulation and settlement agreement was approved by the Oklahoma Corporation Commission in Cause No. PUD 201900048 on February 20, 2020, authorizing Public Service Company of Oklahoma's ownership of 675 MW of the wind generation facilities.

120. SWEPCO and Public Service Company of Oklahoma filed for approvals related to the acquisition of the wind generation facilities before the Federal Energy Regulatory Commission (FERC) in FERC Docket No. EC20-17-000 on November 15, 2019.
121. FERC approved the application in Docket No. EC20-17-000 on February 21, 2020 for the acquisition of the wind generation facilities by SWEPCO and Public Service Company of Oklahoma.

Rate Issues

122. SWEPCO's application addressed a number of rate issues that might apply if the application were approved, including recovery of production tax credits.
- 122A. It is not appropriate to address the rate issues raised by SWEPCO in this proceeding. Rather, it is appropriate to address them in a rate proceeding.

II. Conclusions of Law

The Commission adopts the following conclusions of law.

1. The Commission has authority over this matter under PURA §§ 14.001, 37.051, 37.053, 37.056, and 37.058.
2. SOAH has jurisdiction over this proceeding, including the preparation of this proposal for decision with findings of fact and conclusions of law, under PURA § 14.053 and Texas Government Code § 2003.049.
3. SWEPCO provided notice of the application in compliance with PURA § 37.054 and 16 Texas Administrative Code (TAC) § 22.55.
4. SWEPCO is not implementing customer choice under PURA §§ 39.501(b) and 39.502(b) and 16 TAC § 25.422(e)
5. SWEPCO has not shown that the wind generation facilities will result in the probable lowering of cost to retail customers under PURA § 37.056(c)(4)(e).
6. Texas has met its renewable energy goals under PURA § 39.904(a).

7. SWEPCO did not meet its burden of proof to show that the wind generation facilities are necessary for the service, accommodation, convenience, or safety of the public under PURA § 37.056.
8. DELETED.

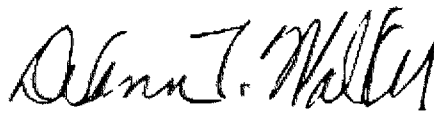
III. Ordering Paragraphs

In accordance with these findings of fact and conclusions of law, the Commission issues the following orders:

1. The Commission adopts the proposal for decision, including findings of fact and conclusions of law, to the extent provided by this Order.
2. The Commission denies the application, as outlined in this Order.
3. The Commission denies all other motions and any other requests for general or specific relief that have not been expressly granted.

Signed at Austin, Texas the 2nd day of July 2020.

PUBLIC UTILITY COMMISSION OF TEXAS



DEANN T. WALKER, CHAIRMAN



ARTHUR C. D'ANDREA, COMMISSIONER



SHELLY BOTKIN, COMMISSIONER