

Exhibit 8
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Table with columns: Tract ID, Segments, District, Structures, Firm Name, First Name, Last Name, Suffix, Second Name, Address Line 1, Address Line 2, City, State, Zip, Acres, Legal Description, Parcel ID, Geo ID. The table lists various tracts and segments with associated details.

Exhibit 8
Page 9 of 9

Tract ID	Segments	Plots	Structure	First Name	Last Name	Suffix	Second Name	Address Line 1	Address Line 2	City	State	Zip	Acreage	Legal Description	Parcel ID	Geo ID
V 055	55	V		Manion State Bank				PO Box 187		Manion	Texas	78124 0187	0.59	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 10 2016 NEW PER PLAT 9694/41 52 FILED 12 17 2015 #J05/2	1218737	04695-109-0100
V 056	55	V		Palma S & Melissa B				227151 Leeward Way		San Antonio	Texas	78255 4837	0.63	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 14 2015 NEW PER PLAT 9684/40 101 FILED 7 2 2014	1209811	04695-109-0100
V 057	55	V		Edie	Hamann	M		58112 Leeward Path		Manion	Texas	78021 4357	0.66	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 15 2015 NEW PER PLAT 9684/40 101 FILED 7 2 2014	1209811	04695-109-0100
V 058	55	V		Carvonia Property Owners Association				210 Brent Crossing Blvd	5 x 100	Spring Branch	Texas	78070 4277	0.63	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 900 BEARINGS 2015 NEW PER PLAT 9664/90 101 FILED 7 2 2014	1209819	04695-109-9911
V 059	55	V		Kathleen Bize	Smith		Valencia Management	10021 Leeward Cyn		San Antonio	Texas	78250 2455	0.55	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 11 2015 NEW PER PLAT 9684/40 101 FILED 7 2 2014	1209819	04695-109-9911
V 060	55	V		Frank M & Kimberly A	Lentocz			2211 Leeward Harbor Ln		Manion	Texas	77365 2079	2.55	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 91 2017 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1252007	04695-109-0110
V 061	55	V		Manion State Bank				PO Box 187		Manion	Texas	78124 0187	0.60	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 11 2016 NEW PER PLAT 9694/41 52 FILED 12 17 2015 #J05/2	1233738	04695-109-0110
V 062	55	V		Matt & Norma	Bjornander			23506 Canals Ln		San Antonio	Texas	78255 2438	0.60	CR 4695A (THE CANYONS AT SCENIC LOOP UT 7) BLOCK 6 LOT 14 2013 REVISED SITES AND SUBDIVISION NAME PER PLAT 9672/36 40 FILED 3 11 16 18/05/16 16	1138370	04695-106-0340
V 063	55	V		Carvonia Property Owners Association				210 Brent Crossing Blvd	Site 200	Spring Branch	Texas	78070 4277	0.68	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 901 (OPEN SPACE) 2017 MARGED ACCT PER 9697/36 40 FILED 3 11 16 18/05/16 16 2016 NEW PER PLAT 9684/41 52 FILED 12 17 2015 #J05/2 1 16	1218737	04695-109-9910
V 064	55	V		Arnold W	Schwartz		Carrie Amberg	16028 Horizon Ln		San Antonio	Texas	78255 2555	0.60	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 10 2018 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16 2016 NEW PER PLAT 9684/41 52 FILED 12 17 2015 #J05/2 1 16	1209814	04695-109-0100
V 065	55	V		Hilera Innovations & Investments LLC				22704 Homestead Noia		San Antonio	Texas	78255 2460	2.78	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 18 2018 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1265358	04695-109-0910
V 066	55	V		Ivan	Soto		Angela Tjerna	3302 Anglin Creek Dr		San Antonio	Texas	78258 2959	1.70	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 11 2018 NEW ACCT CREATED PER PLAT 9719/157 168 FILED 8 11 17 18/05/17 17	1209941	04695-109-0310
V 067	55	V		McNair Custom Homes LP				21712 Gathering Oak	Site 200	San Antonio	Texas	78260	1.73	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 11 2018 NEW ACCT CREATED PER PLAT 9719/157 168 FILED 8 11 17 18/05/17 17	1276980	04695-109-0310
V 068	55	V		Du	Lu		Yu Yan	2409 Scene Mountain Ct		Wingswood	Texas	77249 3386	1.90	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 47 2017 NEW ACCT CREATED PER PLAT 9701/155 157 FILED 7 2 2014	1232008	04695-109-0410
V 069	55	V		McAster Opportunity Fund 2012 LP				2211 Mariposa St	Site 800	Houston	Texas	77098 4090	2.62	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 20 2018 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1207593	04695-106-5911
V 070	55	V		Karen Yvette	Pulley			9333 Strong Box Way		San Antonio	Texas	78254 5330	0.51	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 75 2017 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1247941	04695-109-0210
V 071	55	V		Dino	Nguyen			25311 Blue Birch		San Antonio	Texas	78255 3546	0.52	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 24 2017 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1232540	04695-109-0210
V 072	55	V		Haeje	Cun			156 444 Box 1445		Alto	Armed Forces Pacific	96291 0015	0.63	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 5 2017 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1247947	04695-109-0200
V 073	55	V		Centuryland Holdings #1 LLC				8300 Elexandria Pkwy	Site 350	Greenwood Village	Colorado	80111 1290	0.67	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 11 2015 NEW PER PLAT 9684/40 101 FILED 7 2 2014	1209811	04695-109-0110
V 074	55	V		Steven & Laura Bezer	Sandier			10129 Carter Cyn		San Antonio	Texas	78255 2454	0.59	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 3 2017 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1249245	04695-109-0010
V 075	55	V		Johan	Lombard			9929 Autumn Cyn		San Antonio	Texas	78255 2457	0.71	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 13 2018 NEW PER PLAT 9694/41 52 FILED 12 17 2015 #J05/2 1 16	1238760	04695-109-0310
V 076	55	V		James D & Randee J	Spring			10113 Carter Cyn		San Antonio	Texas	78255 2458	0.55	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 9 2017 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1247951	04695-109-0010
V 077	55	V		Manion State Bank				PO Box 187		Manion	Texas	78124 0187	0.78	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 12 2015 NEW PER PLAT 9694/41 52 FILED 12 17 2015 #J05/2 1 16	1238739	04695-109-0310
V 078	55	V		Hobbyway Custom Homes Inc				2511 N Loop 1604 W	Site 200	San Antonio	Texas	78258 4035	0.58	CR 4695A (THE CANYONS AT SCENIC LOOP UT 68) BLOCK 9 LOT 15 2017 NEW ACCT CREATED PER PLAT 9697/36 40 FILED 3 11 16 18/05/16 16	1247957	04695-109-0110

Attachment 9



July 22, 2020

«Prefix» «Contact»
«FormalTitle»
«Organization»
«Address1»
«City», «State» «Zip»

RE: Application of the City of San Antonio, Acting By and Through City Public Service Board (CPS Energy) to Amend a Certificate of Convenience and Necessity for the Proposed Scenic Loop 138-kV Transmission Line Project in Bexar County, Texas

PUBLIC UTILITY COMMISSION OF TEXAS (PUC) DOCKET NO. 51023

Dear «Formal»:

As part of our efforts to keep you and the public informed about electric transmission projects, we want you to know the City of San Antonio, acting by and through City Public Service Board (CPS Energy) is requesting approval from the Public Utility Commission of Texas (PUC) to amend its Certificate of Convenience and Necessity (CCN) to construct the Scenic Loop 138 kV Transmission Line Project in Bexar County.

The proposed transmission line will connect the existing Ranchtown to Menger Creek 138 kV transmission line in northwest Bexar County to a proposed new Scenic Loop Substation located near the intersection of Scenic Loop Road and Toutant Beauregard Road. The entire project will be about 4.6 to 6.9 miles in length, and is estimated to cost approximately \$38 million to \$58 million (including substation costs), depending upon the final route chosen by the PUC.

If you have questions about the transmission line, you can call Adam Marin at 210-353-2476. The descriptions of the proposed routing alternatives and a map showing the proposed alternative routes are enclosed for your convenience.

The CCN application, including detailed routing maps illustrating the proposed transmission line project, substations, and project area, may be reviewed on the project website at <https://www.cpsenergy.com/en/about-us/new-infrastructure/scenic-loop-project.html> and at:

- CPS Energy, 145 Navarro, San Antonio, Texas 78205
- Fair Oaks Ranch City Office - 7286 Dietz Elkhorn Rd, Fair Oaks Ranch, TX 78015

All routes and route segments included in this notice are available for selection and approval by the Public Utility Commission of Texas.

For your information, the enclosed brochure entitled “Landowners and Transmission Line Cases at the PUC” provides basic information about how landowners may participate in this docket, and how they may contact the PUC. The brochure includes sample forms for making comments and for making a request to intervene as a party in this docket. The only way to fully participate in the PUC’s decision on where to locate the transmission line is to intervene in the docket. It is important for an affected person to intervene because the utility is not obligated to keep affected persons informed of the PUC’s proceedings and cannot predict which route may or may not be approved by the PUC.

Due to the COVID-19 pandemic, requests for intervention should be filed electronically and requestors will be required to serve the request on other parties by email. Therefore, those wishing to intervene should include an email address on the intervention form. Instructions for electronic filing via the “PUC Filer” on the Commission’s website can be found here: <https://interchange.puc.texas.gov/filer>. Instructions for using the PUC Filer are available at http://www.puc.texas.gov/industry/filings/New_PUC_Web_Filer_Presentation.pdf. Once a filer obtains a tracking sheet associated with the filing from the PUC Filer, they may email the tracking sheet and the document they wish to file to: centralrecords@puc.texas.gov. For assistance with electronic filings, please contact the Commission’s Help Desk at (512) 936-7100 or helpdesk@puc.texas.gov. You can review materials filed in this docket on the PUC Interchange at: <http://interchange.puc.texas.gov/>.

In addition to the contacts listed in the brochure, interested persons may call the PUC’s Customer Assistance Hotline at (888) 782-8477. Hearing- and speech-impaired individuals with text telephones (TTY) may contact the PUC’s Customer Assistance Hotline at (512) 936-7136 or toll free at (800) 735-2989. If a person wishes to participate in this proceeding by becoming an intervenor, the deadline for intervention in the proceeding is September 8, 2020, and the PUC should receive an electronic filing or letter requesting intervention by that date.

While the preferred method for requesting intervention is to submit a request electronically, if a person is unable submit an electronic request, they can still request intervention by mailing 10 copies of the request to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, Texas 78711-3326

Persons who wish to intervene in the docket must also mail or email a copy of their request for intervention to all parties in the docket and all persons that have pending motions to intervene, at or before the time the request for intervention is mailed to the PUC. In addition to the intervention deadline, other important deadlines may already exist that affect participation in this docket. The enclosed brochure explains how an interested person can access these filings.

Sincerely,

Adam R. Marin, PE
Regulatory Case Manager
CPS Energy
145 Navarro San Antonio, Texas 78205
210.353.4882
ScenicLoopProject@cpsenergy.com

Enclosures



July 22, 2020

«FirstName» «LastName» «Suffix»
«SecondName»
«Address1» «Address2»
«City», «STATE» «ZIP»

RE: *Application of the City of San Antonio, Acting By and Through City Public Service Board (CPS Energy) to Amend a Certificate of Convenience and Necessity for the Proposed Scenic Loop 138-kV Transmission Line Project in Bexar County, Texas*

PUBLIC UTILITY COMMISSION OF TEXAS (PUC) DOCKET NO. 51023

Tract ID: «Tract_IDs»

Dear Landowner:

This letter is to inform you that the City of San Antonio, acting by and through City Public Service Board (CPS Energy) is requesting approval from the Public Utility Commission of Texas (PUC) to amend its Certificate of Convenience and Necessity (CCN) to construct the proposed Scenic Loop 138-kV Transmission Line Project in Bexar County. The proposed transmission line will connect the existing Ranchtown to Menger Creek 138 kV transmission line in northwest Bexar County to a proposed new Scenic Loop Substation located near the intersection of Scenic Loop Road and Toutant Beauregard Road. The entire project will be about 4.6 to 6.9 miles in length, and is estimated to cost approximately \$38 million to \$58 million (including substation costs), depending upon the final route chosen by the PUC.

Your land may be directly affected in this docket. If one of CPS Energy's routes is approved by the PUC, CPS Energy will have the right to build the facilities, which may directly affect your land. This docket will not determine the value of your land or the value of an easement if one is needed by CPS Energy to build the facilities.

If you have questions about the transmission line or substation sites, please call 210-353-4882. The descriptions of the proposed routing alternatives, proposed substations sites, and a map showing the proposed alternative routes are enclosed for your convenience.

The CCN application, including detailed routing maps illustrating the proposed transmission line project, substations, and project area, may be reviewed on the project website at <https://www.cpsenergy.com/en/about-us/new-infrastructure/scenic-loop-project.html> and at:

- CPS Energy, 145 Navarro, San Antonio, Texas 78205
- Fair Oaks Ranch City Office - 7286 Dietz Elkhorn Rd, Fair Oaks Ranch, TX 78015

All routes and route segments included in this notice are available for selection and approval by the Public Utility Commission of Texas.

The enclosed brochure entitled “Landowners and Transmission Line Cases at the PUC” provides basic information about how you may participate in this docket, and how you may contact the PUC. Please read this brochure carefully. The brochure includes sample forms for making comments and for making a request to intervene as a party in this docket. The only way to fully participate in the PUC’s decision on where to locate the transmission line is to intervene in the docket. It is important for an affected person to intervene because the utility is not obligated to keep affected persons informed of the PUC’s proceedings and cannot predict which route may or may not be approved by the PUC. CPS Energy will place updates on the project site listed above however all affected persons are encouraged to participate in the process.

Due to the COVID-19 pandemic, your request for intervention should be filed electronically and you will be required to serve the request on other parties by email. Therefore, please include your own email address on the intervention form. Instructions for electronic filing via the “PUC Filer” on the Commission’s website can be found here: <https://interchange.puc.texas.gov/filer> Instructions for using the PUC Filer are available at http://www.puc.texas.gov/industry/filings/New_PUC_Web_Filer_Presentation.pdf. Once you obtain a tracking sheet associated with your filing from the PUC Filer, you may email the tracking sheet and the document you wish to file to: centralrecords@puc.texas.gov. For assistance with your electronic filing, please contact the Commission’s Help Desk at (512) 936-7100 or helpdesk@puc.texas.gov. You can review materials filed in this docket on the PUC Interchange at: <http://interchange.puc.texas.gov/>.

In addition to the contacts listed in the brochure, you may call the PUC’s Customer Assistance Hotline at (888) 782-8477. Hearing- and speech-impaired individuals with text telephones (TTY) may contact the PUC’s Customer Assistance Hotline at (512) 936-7136 or toll free at (800) 735-2989. If you wish to participate in this proceeding by becoming an intervenor, the deadline for intervention in the proceeding is September 8, 2020, and the PUC should receive a letter from you requesting intervention by that date.

While the preferred method is for you to submit your request for intervention electronically, if you are unable to do so you may mail 10 copies of the request to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, Texas 78711-3326

Persons who wish to intervene in the docket must also mail or email a copy of their request for intervention to all parties in the docket and all persons that have pending motions to intervene, at or before the time the request for intervention is mailed to the PUC. In addition to the intervention deadline, other important deadlines may already exist that affect your participation in this docket. You should review the orders and other filings already made in the docket. The enclosed brochure explains how you can access these filings.

Sincerely,

Adam R. Marin, PE
Regulatory Case Manager
CPS Energy
145 Navarro San Antonio, Texas 78205
210.353.4882
ScenicLoopProject@cpsenergy.com

Enclosures



22 de julio de 2020

«PrimerNombre» «Apellido» «Sufijo»
«SegundoNombre»
«Dirección1» «Dirección2»
«Ciudad», «ESTADO» «CÓDIGO POSTAL»

EN REFERENCIA A:

Solicitud de la Ciudad de San Antonio, Actuando Por y A Través de la Junta de Servicios Públicos de la Ciudad (CPS Energy) para Enmendar un Certificado de Conveniencia y Necesidad para el Proyecto propuesto de Línea de Transmisión en Scenic Loop de 138 kV en el Condado de Bexar, Texas

COMISIÓN DE SERVICIOS PÚBLICOS DE TEXAS (PUC) EXPEDIENTE No. 51023

ID del Tramo: «IDs_Tramo»

Estimado Propietario:

La presente carta es para informarle que la Ciudad de San Antonio, actuando por y a través de la Junta de Servicios Públicos de la Ciudad (CPS Energy) está solicitando la aprobación de la Comisión de Servicios Públicos de Texas (PUC) para enmendar su Certificado de Conveniencia y Necesidad (CCN) para construir el Proyecto propuesto de Línea de Transmisión en Scenic Loop de 138 kV en el Condado de Bexar. La línea de transmisión propuesta conectará la línea de transmisión existente de Ranchtown a Menger Creek de 138 kV en el noroeste del condado de Bexar a una nueva Subestación en Scenic Loop ubicada cerca de la intersección de Scenic Loop Road y Toutant Beauregard Road. El proyecto completo tendrá una longitud de aproximadamente 4.6 a 6.9 millas, y se estima que costará aproximadamente entre \$38 millones a \$58 millones (incluidos los costos de la subestación), dependiendo de la ruta final elegida por la PUC.

Su terreno puede verse directamente afectado en este expediente. Si la PUC aprueba una de las rutas de CPS Energy, CPS Energy tendrá derecho a construir las instalaciones, lo que puede afectar directamente su terreno. Este expediente no determinará el valor de su terreno o el valor de un derecho de acceso a la propiedad si CPS Energy lo necesita para construir las instalaciones.

Si tiene preguntas sobre la línea de transmisión o los sitios de subestación, llame al 210-353-4882. Las descripciones de las rutas alternativas propuestas, los sitios de subestaciones propuestos y un mapa que muestra las rutas alternativas propuestas se incluyen para su mayor comodidad.

La solicitud CCN, que incluye mapas detallados de rutas que ilustran el proyecto propuesto de línea de transmisión, las subestaciones y el área del proyecto, puede revisarse en el sitio web del proyecto en <https://www.cpsenergy.com/en/about-us/new-infrastructure/scenic-loop-project.html> y en:

- CPS Energy, 145 Navarro, San Antonio, Texas 78205

- Oficina de la Ciudad de Fair Oaks Ranch - 7286 Dietz Elkhorn Rd, Fair Oaks Ranch, TX 78015

Todas las rutas y segmentos de ruta incluidos en esta notificación están disponibles para la selección y aprobación por la Comisión de Servicios Públicos de Texas.

El folleto adjunto titulado “Propietarios de Tierras y Casos de Líneas de Transmisión en la PUC” proporciona información básica sobre cómo puede usted participar en este expediente y cómo puede comunicarse con la PUC. Por favor, lea este folleto detenidamente. El folleto incluye ejemplos de formularios para realizar comentarios y para solicitar una intervención como parte activa en este expediente. La única forma de participar plenamente en la decisión de la PUC sobre dónde ubicar la línea de transmisión es intervenir en el expediente. Es importante que la persona afectada intervenga porque la empresa de servicios públicos no está obligada a mantener informadas a las personas afectadas sobre los procedimientos de la PUC y no puede predecir qué ruta puede o no ser aprobada por la PUC. CPS Energy colocará actualizaciones en el sitio del proyecto mencionado anteriormente, sin embargo, se recomienda a todas las personas afectadas a participar en el proceso.

Debido a la pandemia de COVID-19, su solicitud de intervención debe presentarse electrónicamente y se le solicitará que envíe la solicitud a otras partes por correo electrónico. Por lo tanto, incluya su propia dirección de correo electrónico en el formulario de intervención. Las instrucciones para la presentación electrónica a través del "PUC Filer" en el sitio web de la Comisión se pueden encontrar aquí: <https://interchange.puc.texas.gov/filer> Las instrucciones para utilizar el PUC Filer están disponibles en http://www.puc.texas.gov/industry/filings/New_PUC_Web_Filer_Presentation.pdf. Una vez que obtenga una hoja de seguimiento relacionada con su presentación desde el PUC Filer, puede enviar por correo electrónico la hoja de seguimiento y el documento que desea presentar a: centralrecords@puc.texas.gov. Para obtener ayuda con su presentación electrónica, comuníquese con el Servicio de Asistencia de la Comisión al (512) 936-7100 o helpdesk@puc.texas.gov. Puede revisar los documentos archivados en este expediente en el Intercambio de la PUC en: <http://interchange.puc.texas.gov/>.

Además de los contactos que figuran en el folleto, puede llamar a la Línea Directa de Atención al Cliente de la PUC al (888) 782-8477. Las personas con discapacidades auditivas y del habla con teléfonos de texto (TTY) pueden comunicarse con la Línea Directa de Atención al Cliente de la PUC al (512) 936-7136 o al número gratuito (800) 735-2989. Si desea participar en este procedimiento convirtiéndose en un interventor, la fecha límite para la intervención en el procedimiento es 8 de septiembre de 2020, y la PUC debe recibir una carta suya solicitando la intervención para esa fecha.

Si bien el método preferido es que envíe su solicitud de intervención electrónicamente, si no puede realizarlo, puede enviar 10 copias de la solicitud a:

Comisión de Servicios Públicos de Texas
Archivo Central
Ate.: Auxiliar de Documentación
1701 N. Congress Ave.

P.O. Box 13326
Austin, Texas 78711-3326

Las personas que deseen intervenir en el expediente también deben enviar por correo o correo electrónico una copia de su solicitud de intervención a todas las partes en el expediente y a todas las personas que tengan mociones pendientes para intervenir, en el momento o antes de que la solicitud de intervención se envíe a la PUC. Además del plazo de intervención, es posible que ya existan otros plazos importantes que afecten su participación en este expediente. Debe revisar los pedidos y otras presentaciones ya realizadas en el expediente. El folleto adjunto explica cómo puede acceder a estas presentaciones.

Atentamente,

Adam R. Marin, PE
Administrador Regulador del Caso
CPS Energy
145 Navarro San Antonio, Texas 78205
210.353.4882
ScenicLoopProject@cpsenergy.com

Adjuntos

CPS Energy
Scenic Loop 138 kV Transmission Line and Substation Project
PUC Docket No. 51023
Description of the Primary Alternative Routes

CPS Energy has filed an application with the Public Utility Commission of Texas (PUC) to amend its Certificate of Convenience and Necessity (CCN) to construct the Scenic Loop 138-kV Transmission Line Project in Bexar County, Texas. In its CCN application for this project, CPS Energy has presented 29 alternative routes comprised of 48 segments for consideration by the PUC. The following table lists the segment combinations that make up CPS Energy's 29 alternative routes and the length of each alternative route in miles. All routes and segments are available for selection and approval by the PUC. Only one multi-segment transmission line route and one substation will ultimately be constructed.

Alternative routes are not listed in any order of preference or priority.

PRIMARY ALTERNATIVE ROUTES	SEGMENT COMPOSITION	TOTAL LENGTH IN MILES
A	Sub 1 – 13-14-54-17-28-29-40	6.66
B	Sub 1 – 13-14-54-17-31-42-48-46	6.24
C	Sub 1 – 2-3-4-5-14-54-20-36-35-34-41-46	5.71
D	Sub 2 – 4-5-14-54-20-36-42-48-46	5.27
E	Sub 2 – 4-5-14-54-17-28-30-34-33-40	6.62
F	Sub 2 – 7-8-50-15-26-38-43	5.66
G	Sub 3 – 5-14-54-17-31-42-49	6.08
H	Sub 3 – 5-14-54-17-28-29-40	6.32
I	Sub 3 – 5-14-54-20-36-42-48-46	5.15
J	Sub 3 – 5-14-54-20-36-42-49	5.33
K	Sub 3 – 5-14-54-21-25-37-38-43	5.29
L	Sub 3 – 5-14-54-21-25-37-38-39-53-52-45	6.91
M	Sub 4 – 1-3-4-5-14-54-20-36-42-48-46	5.90
N	Sub 5 – 8-50-15-26-38-43	5.33
O	Sub 5 – 8-50-16-56-57-27-47-53-44	6.83
P	Sub 6 – 50-15-22-25-37-38-43	4.89
Q	Sub 6 – 50-15-26-38-39-44	5.55
R	Sub 6 – 50-15-26-38-43	4.75
S	Sub 6 – 50-16-56-57-27-51-45	6.73
T	Sub 6 – 50-15-22-25-32-36-42-48-46	5.98
U	Sub 6 – 50-15-26-38-39-53-52-45	6.37
V	Sub 6 – 50-16-55-57-27-47-53-44	6.60
W	Sub 6 – 50-16-56-57-27-47-53-44	6.25

CPS Energy
 Scenic Loop 138 kV Transmission Line and Substation Project
 PUC Docket No. 51023
 Description of the Primary Alternative Routes

PRIMARY ALTERNATIVE ROUTES	SEGMENT COMPOSITION	TOTAL LENGTH IN MILES
X	Sub 7 – 54-17-28-30-34-41-46	5.27
Y	Sub 7 – 54-20-36-35-34-33-40	5.23
Z	Sub 7 – 54-20-36-42-48-46	4.58
AA	Sub 7 – 54-20-36-42-49	4.77
BB	Sub 7 – 54-21-25-37-38-43	4.73
CC	Sub 7 - 54-20-32-37-38-43	5.23

Note. All distances listed below are approximate and rounded to the nearest hundredths of a mile. The distances of individual segments below may not sum to the total length of route presented above due to rounding.

Segment 1

Segment 1 begins at Substation 4, located on the south side of Boerne Stage Road (Rd.) approximately 0.60 mile east of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment exits the northwest side of Substation 4 and proceeds west paralleling the south side of Boerne Stage Rd. for approximately 0.60 mile, crossing two local roads, Leon Creek and an unnamed stream. The segment terminates at its intersection with Segments 2 and 3, located on the southeast side of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd.

Segment 2

Segment 2 begins at Substation 1, located on the west side of Boerne Stage Rd. approximately 0.32 miles north of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment exits the southeast side of Substation 1 and proceeds east, immediately crossing Boerne Stage Rd., for approximately 0.10 mile, then angles south-southeast for approximately 0.13 mile, and then angles south for approximately 0.20 mile crossing Boerne Stage Rd. The segment terminates at its intersection with Segments 1 and 3, located on the southeast side of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd.

Segment 3

Segment 3 begins at its intersection with Segments 1 and 2, located on the southeast side of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment proceeds west for approximately 0.03 mile. The segment terminates at its intersection with Segment 4, located on the southeast side of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd.

Segment 4

Segment 4 begins at Substation 2 or at its intersection with Segment 3, located on the southeast side of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment proceeds west, immediately crossing Scenic Loop Rd., paralleling the south side of Toutant Beauregard Rd. for approximately 0.12 mile. The segment terminates at its intersection with Segment 5, located on the southwest side of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd.

Segment 5

Segment 5 begins at Substation 3 or at its intersection with Segment 4, located on the southwest side of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment exits the northwest side of Substation 3 and proceeds west paralleling the south side of Toutant Beauregard Rd. for approximately 0.11 mile. The segment then angles northwest for approximately 0.07 mile crossing Toutant Beauregard Rd. and then angles west for approximately 0.07 mile. The segment terminates at its intersection with Segments 13 and 14, located on the north side of Toutant Beauregard Rd.

There is no segment labeled Segment 6 in this project.

Segment 7

Segment 7 begins at Substation 2, located on the southeast side of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment exits the southwest side of Substation 2 and proceeds south paralleling the east side of Scenic Loop Rd. for approximately 0.33 mile crossing a local road and an unnamed stream. The segment terminates at its intersection with Segment 8 or Substation 5, located on the east side of Scenic Loop Rd.

Segment 8

Segment 8 begins at Substation 5 or at its intersection with Segment 7, located on the east side of Scenic Loop Road approximately 0.34 mile south of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment exits the southwest side of Substation 5 and proceeds south-southwest paralleling the east side of Scenic Loop Rd. for approximately 0.31 mile crossing Leon Creek and a local road. The segment then angles west-northwest for approximately 0.09 mile crossing Scenic Loop Rd. and then angles south-southwest for approximately 0.18 mile. The segment terminates at its intersection with Segment 50 or Substation 6, located west of Scenic Loop Rd.

There are no segments labeled Segment 9, Segment 10, Segment 11, or Segment 12 in this project

Segment 13

Segment 13 begins at Substation 1, located on the west side of Boerne Stage Rd. approximately 0.32 miles north of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment exits the southwest side of Substation 1 and proceeds west for approximately 0.22 mile, then angles south for approximately 0.30 mile, and then angles east for approximately 0.08 mile. The segment terminates at its intersection with Segments 5 and 14, located on the north side of Toutant Beauregard Rd.

Segment 14

Segment 14 begins at its intersection with Segments 5 and 13, located on the north side of Toutant Beauregard Rd. approximately 0.35 mile west of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment proceeds south-southwest for approximately 0.07 mile crossing Toutant Beauregard Rd. then continues south-southwest paralleling the east side of Toutant Beauregard Rd. for approximately 0.24 mile. The segment terminates at its intersection with Segment 54, located on the east side of Toutant Beauregard Rd.

Segment 15

Segment 15 begins at its intersection with Segments 16 and 50, located west of Scenic Loop Rd. The segment proceeds west for approximately 0.33 mile, then angles southwest for approximately 0.20 mile crossing Leon Creek, and then angles south for approximately 0.04 mile. The segment then angles west for approximately 0.30 mile, crossing 4WD Rd. The segment terminates at its intersection with Segments 22 and 26, located north of Leon Creek, south of Huntress Lane (Ln.) and on the west side of 4WD Rd.

Segment 16

Segment 16 begins at its intersection with Segments 15 and 50, located west of Scenic Loop Rd. The segment proceeds east for approximately 0.07 mile and then angles south paralleling the west side of Scenic Loop Rd. for approximately 0.20 mile. The segment then angles east for approximately 0.03 mile crossing Scenic Loop Rd. and then angles south paralleling the east side of Scenic Loop Rd. for approximately 0.32 mile. The segment then continues south for approximately 0.07 mile crossing Scenic Loop Rd. The segment terminates at its intersection with Segments 55 and 56, located on the northwest side of the intersection of Scenic Loop Rd. and Cross Mountain Trail.

Segment 17

Segment 17 begins at its intersection with Segments 20, 21, and 54 located on the southwest side of Toutant Beauregard Rd. The segment proceeds east-northeast, immediately crossing Toutant Beauregard Rd., for approximately 0.07 mile, and then angles northeast for approximately 0.09 mile. The segment then angles north for approximately 0.79 mile, and then angles west for approximately 0.27 mile. The segment terminates at its intersection with Segments 28 and 31.

There are no segments labeled Segment 18 or Segment 19 in this project

Segment 20

Segment 20 begins at its intersection with Segments 17, 21, and 54, located on the southwest side of Toutant Beauregard Rd. The segment proceeds north-northwest for approximately 0.10 mile crossing Toutant Beauregard Rd. and then angles northwest paralleling the northeast side of Toutant Beauregard Rd. for approximately 0.49 mile crossing Pecan Creek. The segment terminates at its intersection with Segments 32 and 36, located on the northeast side of Toutant Beauregard Rd.

Segment 21

Segment 21 begins at its intersection with Segments 17, 20, and 54, located on the southwest side of Toutant Beauregard Rd. The segment proceeds south for approximately 0.46 mile crossing Pecan Creek. The segment terminates at its intersection with Segments 22 and 25.

Segment 22

Segment 22 begins at its intersection with Segments 21 and 25. The segment proceeds south for approximately 0.37 mile crossing Huntress Ln. and then angles south-southwest for approximately 0.04 mile. The segment parallels 4WD Rd. for approximately 0.27 mile of its length. The segment terminates at its intersection with Segments 15 and 26, located north of Leon Creek, south of Huntress Ln., and on the west side of 4WD Rd.

There are no segments labeled Segment 23 or Segment 24 in this project.

Segment 25

Segment 25 begins at its intersection with Segments 21 and 22. The segment proceeds west for approximately 0.50 mile. The segment terminates at its intersection with Segments 32 and 37.

Segment 26

Segment 26 begins at its intersection with Segments 15 and 22, located north of Leon Creek, south of Huntress Ln., and on the west side of 4WD Rd. The segment proceeds west for approximately 0.03 mile, and then curves southwest to west to west-southwest for approximately 0.70 mile crossing Leon Creek and an unnamed stream. The segment then angles in a west for approximately 0.30 mile, and then angles north for approximately 0.34 mile crossing an unnamed stream. The segment terminates at its intersection with Segments 37 and 38.

Segment 27

Segment 27 begins at its intersection with Segment 57. The segment proceeds north paralleling 4WD Rd. for approximately 0.05 mile, then angles west-northwest for approximately 0.32 mile crossing Helotes Creek and an unnamed stream, and then angles northwest for approximately 0.26 mile crossing an unnamed stream and two local roads. The segment then angles north-northwest for approximately 0.23 mile crossing two local roads and Helotes Creek, and then angles west for approximately 0.21 mile paralleling the north side of a local road. The segment then angles northwest for approximately 0.15 mile crossing a local road, then angles southwest for approximately 0.12 mile crossing a local road, and then angles west for approximately 0.17 mile. The segment terminates at its intersection with Segments 47 and 51.

Segment 28

Segment 28 begins at its intersection with Segments 17 and 31. The segment proceeds north for approximately 0.11 mile, then angles west for approximately 0.21 mile, and then angles north for approximately 0.10 mile. The segment then angles west for approximately 0.09 mile, and then angles northwest for approximately 0.05 mile. The segment terminates at its intersection with Segments 29 and 30.

Segment 29

Segment 29 begins at its intersection with Segments 28 and 30. The segment proceeds northwest for approximately 0.08 mile, then angles north for approximately 0.19 mile, and then angles west for approximately 0.27 mile. The segment then angles west-northwest for approximately 0.12 mile, then angles northwest for approximately 0.04 mile crossing Toutant Beauregard Rd. The segment terminates at its intersection with Segments 33 and 40, located on the west side of Toutant Beauregard Rd.

Segment 30

Segment 30 begins at its intersection with Segments 28 and 29. The segment proceeds west for approximately 0.49 mile. The segment terminates at its intersection with Segments 34 and 35, located on the east side of Toutant Beauregard Rd.

Segment 31

Segment 31 begins at its intersection with Segments 17 and 28. The segment proceeds west for approximately 0.37 mile, and then angles southwest for approximately 0.14 mile crossing an unnamed stream. The segment then angles west-southwest for approximately 0.08 mile crossing Toutant Beauregard Rd. The segment terminates at its intersection with Segments 35, 36, and 42, located on the west side of Toutant Beauregard Rd.

Segment 32

Segment 32 begins at its intersection with Segments 20 and 36, located on the northeast side of Toutant Beauregard Rd. The segment proceeds south-southwest for approximately 0.15 mile crossing Toutant Beauregard Rd. and then angles south for approximately 0.72 mile. The segment terminates at its intersection with Segments 25 and 37.

Segment 33

Segment 33 begins at its intersection with Segments 34 and 41, located on the west side of Toutant Beauregard Rd. The segment proceeds north paralleling the west side of Toutant Beauregard Rd. for approximately 0.35 mile. The segment terminates at its intersection with Segments 29 and 40, located on the west side of Toutant Beauregard Rd.

Segment 34

Segment 34 begins at its intersection with Segments 30 and 35, located on the east side of Toutant Beauregard Rd. The segment proceeds west for approximately 0.04 mile crossing Toutant Beauregard Rd. The segment terminates at its intersection with Segments 33 and 41, located on the west side of Toutant Beauregard Rd.

Segment 35

Segment 35 begins at its intersection with Segments 31, 36, and 42, located on the west side of Toutant Beauregard Rd. The segment proceeds northwest paralleling the west side of Toutant Beauregard Rd. for approximately 0.14 mile, then angles north-northwest for approximately 0.10 mile crossing Toutant Beauregard Rd., and then angles northwest paralleling the east side of Toutant Beauregard Rd. for approximately 0.28 mile. The segment terminates at its intersection with Segments 30 and 34, located on the east side of Toutant Beauregard Rd.

Segment 36

Segment 36 begins at its intersection with Segments 20 and 32, located on the northeast side of Toutant Beauregard Rd. The segment proceeds west for approximately 0.06 mile crossing Toutant Beauregard Rd., then angles northwest paralleling the west side of Toutant Beauregard Rd. for approximately 0.41 mile crossing an unnamed stream and Pecan Creek. The segment terminates at its intersection with Segments 31, 35, and 42, located on the west side of Toutant Beauregard Rd.

Segment 37

Segment 37 begins at its intersection with Segments 25 and 32. The segment proceeds southwest for approximately 0.15 mile and then angles northwest for approximately 0.10 mile. The segment then angles west-southwest for approximately 0.34 mile crossing Leon Creek. The segment terminates at its intersection with Segments 26 and 38.

Segment 38

Segment 38 begins at its intersection with Segments 26 and 37. The segment proceeds west-southwest for approximately 0.18 mile and then angles west-northwest for approximately 0.24 mile. The segment terminates at its intersection with Segments 39 and 43.

Segment 39

Segment 39 begins at its intersection with Segments 38 and 43. The segment proceeds south for approximately 0.87 mile crossing an unnamed stream. The segment terminates at its intersection with Segments 44 and 53.

Segment 40

Segment 40 begins at its intersection with Segments 29 and 33, located on the west side of Toutant Beauregard Rd. The segment proceeds north and west paralleling the west and south sides of Toutant Beauregard Rd. for approximately 0.28 mile crossing two local roads. The segment then continues west-northwest for approximately 0.11 mile, then angles west-southwest for approximately 0.13 mile, and then angles north for approximately 0.11 mile. The segment then angles north-northwest for approximately 0.10 mile crossing an unnamed stream, then angles west-southwest for approximately 0.11 mile, and then angles north for approximately 0.16 mile crossing Toutant Beauregard Rd. The segment then angles west paralleling the north side of Toutant Beauregard Rd. for approximately 0.25 mile and then angles south-southwest for approximately 0.05 mile crossing Toutant Beauregard Rd. The segment then angles southwest paralleling the northwest side of Karsch Rd. for approximately 0.15 mile and then angles west-northwest paralleling the north side of Lee Meadows for approximately 0.26 mile. The segment continues west-northwest for approximately 0.86 mile. The segment terminates at its intersection with the existing Ranchtown to Menger Creek 138 kV transmission line.

Segment 41

Segment 41 begins at its intersection with Segments 33 and 34, located on the west side of Toutant Beauregard Rd. The segment proceeds west-northwest for approximately 0.16 mile, then angles west for approximately 0.24 mile, and then angles southwest for approximately 0.06 mile crossing an unnamed stream. The segment terminates at its intersection with segments 46 and 48.

Segment 42

Segment 42 begins at its intersection with Segments 31, 35, and 36, located on the west side of Toutant Beauregard Rd. The segment proceeds west for approximately 0.09 mile, then angles west-southwest for approximately 0.07 mile crossing Pecan Creek, and then angles northwest for approximately 0.50 mile crossing Pecan Creek and an unnamed road. The segment then angles west-southwest for approximately 0.21 mile crossing an unnamed stream. The segment terminates at its intersection with Segments 48 and 49.

Segment 43

Segment 43 begins at its intersection with Segments 38 and 39. The segment proceeds west for approximately 0.13 mile crossing an unnamed stream, then angles southwest for approximately 0.80 mile crossing an unnamed stream and an unnamed road twice, and then angles west for approximately 0.11 mile. The segment then angles northwest for approximately 0.03 mile, then angles west-southwest for approximately 0.04 mile, and then curves from west to northwest to north over 0.44 mile. The segment then angles west for approximately 0.50 mile. The segment terminates at its intersection with the existing Ranchtown to Menger Creek 138 kV transmission line.

Segment 44

Segment 44 begins at its intersection with Segments 39 and 53. The segment proceeds west-northwest paralleling the north side of a local road for approximately 0.46 mile and crossing an unnamed stream and an unnamed local road, then continues west-northwest for approximately 0.41 mile crossing an unnamed local road and an unnamed stream, then angles northwest for approximately 0.20 mile crossing a local road, and then angles southwest for approximately 0.18 mile. The segment then angles west-northwest for approximately 0.10 mile crossing a local road, and then angles northwest for approximately 0.63 mile paralleling the northeast side of a local road and crossing an unnamed stream. The segment terminates at its intersection with the existing Ranchtown to Menger Creek 138 kV transmission line.

Segment 45

Segment 45 begins at its intersection with Segments 51 and 52. The segment proceeds south paralleling the east side of a local road for approximately 0.47 mile, then angles segment southwest for approximately 0.15 mile crossing an unnamed stream, then angles south for approximately 0.14 mile, then angles south-southwest for approximately 0.12 mile, and then angles west-southwest for approximately 0.17 mile crossing a local road. The segment then angles northwest for approximately 0.37 mile crossing Chimenea Creek, then angles southwest for approximately 0.14 mile crossing a local road and an unnamed stream. The segment continues southwest paralleling the northwest side of a local road for approximately 1.03 miles crossing Los Reyes Creek. The segment terminates at its intersection with the existing Ranchtown to Menger Creek 138 kV transmission line.

Segment 46

Segment 46 begins at its intersection with Segments 41 and 48. The segment proceeds west for approximately 0.90 mile crossing Pecan Creek, then angles southwest for approximately 0.16 mile, and then angles northwest for approximately 0.13 mile crossing Karsch Rd. The segment then angles northeast paralleling the northwest side of Karsch Rd. for approximately 0.05 mile and then angles northwest for approximately 0.37 mile. The segment then angles northwest for approximately 0.18 mile crossing Leon Creek and two local roads. The segment terminates at its intersection with the existing Ranchtown to Menger Creek 138 kV transmission line.

Segment 47

Segment 47 begins at its intersection with Segments 27 and 51. The segment proceeds west for approximately 0.19 mile. The segment terminates at its intersection with Segments 52 and 53.

Segment 48

Segment 48 begins at its intersection with Segments 42 and 49. The segment proceeds north for approximately 0.16 mile. The segment terminates at its intersection with Segments 41 and 46.

Segment 49

Segment 49 begins at its intersection with Segments 42 and 48. The segment proceeds southwest for approximately 0.34 mile crossing Pecan Creek, then angles south-southwest for approximately 0.27 mile, and then curves from south-southwest to west to northwest over approximately 0.42 mile crossing an unnamed stream. The segment then curves west to southwest to south over approximately 0.36 mile. The segment then angles west for approximately 0.26 mile crossing an unnamed stream and a local road, and then angles north-northwest paralleling a local road for approximately 0.28 mile. The segment then angles northwest for approximately 0.20 mile crossing a local road. The segment terminates at its intersection with the existing Ranchtown to Menger Creek 138 kV transmission line.

Segment 50

Segment 50 begins at Substation 6 or at its intersection with Segment 8, located on the west side of Scenic Loop Rd. approximately 0.80 mile south of the intersection of Scenic Loop Rd., Boerne Stage Rd., and Toutant Beauregard Rd. The segment exits the southwest side of Substation 6 and proceeds south-southwest for approximately 0.04 mile. The segment terminates at its intersection with Segments 16 and 15, located west of Scenic Loop Rd.

Segment 51

Segment 51 begins at its intersection with Segments 27 and 47. The segment proceeds southwest for approximately 0.15 mile. The segment terminates at its intersection with Segments 45 and 52.

Segment 52

Segment 52 begins at its intersection with Segments 47 and 53. The segment proceeds southeast for approximately 0.10 mile. The segment terminates at its intersection with Segments 45 and 51.

Segment 53

Segment 53 begins at its intersection with Segment 39 and 44. The segment proceeds south for approximately 0.10 mile. The segment terminates at its intersection with Segments 47 and 52.

Segment 54

Segment 54 begins at Substation 7 or at its intersection with Segment 14, located on the east side of Toutant Beauregard Rd. The segment proceeds southwest for approximately 0.03 mile, then angles west for approximately 0.09 mile crossing Toutant Beauregard Rd. then continues west paralleling the north side of Toutant Beauregard Rd. for approximately 0.14 mile. The segment then angles west-southwest for approximately 0.06 mile crossing Toutant Beauregard Rd. and then angles west-northwest paralleling the southwest side of Toutant Beauregard Rd. for approximately 0.38 mile. The segment terminates at its intersection with Segments 17, 20, and 21, located on the southwest side of Toutant Beauregard Rd.

Segment 55

Segment 55 begins at its intersection with Segments 16 and 56, located on the northwest side of the intersection of Scenic Loop Rd. and Cross Mountain Trail. The segment proceeds west for approximately 0.07 mile, then angles west-northwest for approximately 0.38 mile, and then angles south-southwest for approximately 0.08 mile. The segment then angles southwest for approximately 0.21 mile crossing an unnamed stream, and then angles south-southwest for approximately 0.30 mile crossing an unnamed stream. The segment then angles east-southeast for approximately 0.15 mile, then angles south for approximately 0.28 mile crossing an unnamed stream. The segment terminates at its intersection with Segments 56 and 57.

Segment 56

Segment 56 begins at its intersection with Segments 16 and 55, located on the northwest side of the intersection of Scenic Loop Rd. and Cross Mountain Trail. The segment proceeds south, paralleling the west side of Scenic Loop Rd. for approximately 0.46 miles, then angles southeast for approximately 0.04 mile crossing Scenic Loop Rd., and then angles south paralleling the east side of Scenic Loop Rd. for approximately 0.12 mile. The segment then angles west, immediately crossing Scenic Loop Rd., for approximately 0.41 mile, and then angles southwest for approximately 0.10 mile. The segment terminates at its intersection with Segments 55 and 57.

Segment 57

Segment 57 begins at its intersection with Segments 55 and 56. The segment proceeds south for approximately 0.14 mile and then angles east for approximately 0.48 mile crossing two local roads and 4WD Rd. The segment terminates at its intersection with Segment 27 located on the west side of 4WD Rd.

OVERSIZED MAP(s) or DOCUMENT(s)

TO VIEW

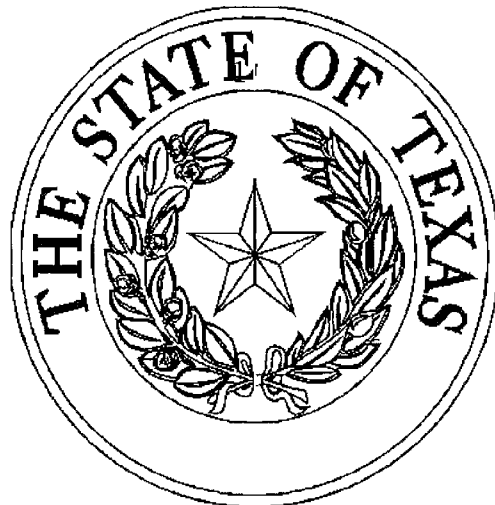
OVERSIZED MAP(s) or DOCUMENT(s)

**PLEASE CONTACT
CENTRAL RECORDS
512.936.7180**

Thank you

Landowners and Transmission Line Cases at the PUC

Public Utility Commission of Texas



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Effective: June 1, 2011

Purpose of This Brochure

This brochure is intended to provide landowners with information about proposed new transmission lines and the Public Utility Commission's ("PUC" or "Commission") process for evaluating these proposals. At the end of the brochure is a list of sources for additional information.

The following topics are covered in this brochure:

- How the PUC evaluates whether a new transmission line should be built,
- How you can participate in the PUC's evaluation of a line, and
- How utilities acquire the right to build a transmission line on private property.

You are receiving the enclosed formal notice because one or more of the routes for a proposed transmission line may require an easement or other property interest across your property, or the centerline of the proposed project may come within 300 feet of a house or other habitable structure on your property. This distance is expanded to 500 feet if the proposed line is greater than 230 kilovolts (kV). For this reason, your property is considered **directly affected land**. This brochure is being included as part of the formal notice process.

If you have questions about the proposed routes for a transmission line, you may contact the applicant. The applicant also has a more detailed map of the proposed routes for the transmission line and nearby habitable structures. The applicant may help you understand the routing of the project and the application approval process in a transmission line case but cannot provide legal advice or represent you. *The applicant cannot predict which route may or may not be approved by the PUC. The PUC decides which route to use for the transmission line, and the applicant is not obligated to keep you informed of the PUC's proceedings. The only way to fully participate in the PUC's decision on where to locate the transmission line is to intervene, which is discussed below.*

The PUC is sensitive to the impact that transmission lines have on private property. At the same time, transmission lines deliver electricity to millions of homes and businesses in Texas, and new lines are sometimes needed so that customers can obtain reliable, economical power.

The PUC's job is to decide whether a transmission line application should be approved and on which route the line should be constructed. The PUC values input from landowners and encourages you to participate in this process by intervening in the docket.

PUC Transmission Line Case

Texas law provides that most utilities must file an application with the PUC to obtain or amend a Certificate of Convenience and Necessity (CCN) in order to build a new transmission line in Texas. The law requires the PUC to consider a number of factors in deciding whether to approve a proposed new transmission line.

The PUC may approve an application to obtain or amend a CCN for a transmission line after considering the following factors:

- Adequacy of existing service;
- Need for additional service,
- The effect of approving the application on the applicant and any utility serving the proximate area;
- Whether the route utilizes existing compatible rights-of-way, including the use of vacant positions on existing multiple-circuit transmission lines;
 - Whether the route parallels existing compatible rights-of-way;
 - Whether the route parallels property lines or other natural or cultural features;
 - Whether the route conforms with the policy of prudent avoidance (which is defined as the limiting of exposures to electric and magnetic fields that can be avoided with reasonable investments of money and effort); and
 - Other factors such as community values, recreational and park areas, historical and aesthetic values, environmental integrity, and the probable improvement of service or lowering of cost to consumers in the area.

If the PUC decides an application should be approved, it will grant to the applicant a CCN or CCN amendment to allow for the construction and operation of the new transmission line.

Application to Obtain or Amend a CCN:

An application to obtain or amend a CCN describes the proposed line and includes a statement from the applicant describing the need for the line and the impact of building it. In addition to the routes proposed by the applicant in its application, the possibility exists that additional routes may be developed, during the course of a CCN case, that could affect property in a different manner than the original routes proposed by the applicant.

The PUC conducts a case to evaluate the impact of the proposed line and to decide which route should be approved. Landowners who would be affected by a new line can:

- informally file a protest, or
- formally participate in the case as an intervenor.

Filing a Protest (informal comments):

If you do not wish to intervene and participate in a hearing in a CCN case, you may file **comments**. An individual or business or a group who files only comments for or against any aspect of the transmission line application is considered a “protestor.”

Protestors make a written or verbal statement in support of or in opposition to the utility’s application and give information to the PUC staff that they believe supports their position.

Protestors are *not* parties to the case, however, and do not have the right to:

- Obtain facts about the case from other parties;
- Receive notice of a hearing, or copies of testimony and other documents that are filed in the case;
- Receive notice of the time and place for negotiations;
- File testimony and/or cross-examine witnesses;
- Submit evidence at the hearing; or
- Appeal P.U.C. decisions to the courts.

If you want to make comments, you may either send written comments stating your position, or you may make a statement on the first day of the hearing. If you have not intervened, however, you will not be able to participate as a party in the hearing. Only parties may submit evidence and ***the PUC must base its decision on the evidence.***

Intervening in a Case:

To become an intervenor, you must file a statement with the PUC, no later than the date specified in the notice letter sent to you with this brochure, requesting intervenor status (also referred to as a party). This statement should describe how the proposed transmission line would affect your property. Typically, intervention is granted only to directly affected landowners. However, any landowner may request to intervene and obtain a ruling on his or her specific fact situation and concerns. A sample form for intervention and the filing address are attached to this brochure, and may be used to make your filing. A letter requesting intervention may also be used in lieu of the sample form for intervention.

If you decide to intervene and become a party in a case, you will be required to follow certain procedural rules:

- You are required to timely respond to requests for information from other parties who seek information.
- If you file testimony, you must appear at a hearing to be cross-examined.
- If you file testimony or any letters or other documents in the case, you must send copies of the documents to every party in the case and you must file multiple copies with the PUC.

If you intend to participate at the hearing and you do not file testimony, you must at least file a statement of position, which is a document that describes your position in the case.

Failure to comply with these procedural rules may serve as grounds for you to be dismissed as an intervenor in the case.

If you wish to participate in the proceedings it is very important to attend any prehearing conferences.

Intervenors may represent themselves or have an attorney to represent them in a CCN case. If you intervene in a case, you may want an attorney to help you understand the PUC’s procedures and the laws and rules that the PUC applies in deciding whether to approve a transmission line. The PUC encourages landowners to intervene and become parties.

Stages of a CCN Case:

If there are persons who intervene in the case and oppose the approval of the line, the PUC may refer the case to an administrative law judge (ALJ) at the State Office of Administrative Hearings (SOAH) to conduct a hearing, or the Commission may elect to conduct a hearing itself. The hearing is a formal proceeding, much like a trial, in which testimony is presented. In the event the case is referred to SOAH, the ALJ makes a recommendation to the PUC on whether the application should be approved and where and how the line should be routed.

There are several stages of a CCN case:

- The ALJ holds a prehearing conference (usually in Austin) to set a schedule for the case.
- Parties to the case have the opportunity to conduct discovery; that is, obtain facts about the case from other parties.
- A hearing is held (usually in Austin), and parties have an opportunity to cross-examine the witnesses.
- Parties file written testimony before the date of the hearing. Parties that do not file written testimony or statements of position by the deadline established by the ALJ may not be allowed to participate in the hearing on the merits. Parties may file written briefs concerning the evidence presented at the hearing, but are not required to do so. In deciding where to locate the transmission line and other issues presented by the application, the ALJ and Commission rely on factual information submitted as evidence at the hearing by the parties in the case. In order to submit factual information as evidence (other than through cross-examination of other parties' witnesses), a party must have intervened in the docket and filed written testimony on or before the deadline set by the ALJ. The ALJ makes a recommendation, called a **proposal for decision**, to the Commission regarding the case. Parties who disagree with the ALJ's recommendation may file exceptions. The Commissioners discuss the case and decide whether to approve the application. The Commission may approve the ALJ's recommendation, approve it with specified changes, send the case back to the ALJ for further consideration, or deny the application. The written decision rendered by the Commission is called a **final order**. Parties who believe that the Commission's decision is in error may file motions for rehearing, asking the Commission to reconsider the decision. After the Commission rule on the motion for rehearing, parties have the right to appeal the decision to district court in Travis County.

Right to Use Private Property

The Commission is responsible for deciding whether to approve a CCN application for a proposed transmission line. If a transmission line route is approved that impacts your property, the electric utility must obtain the right from you to enter your property and to build, operate, and maintain the transmission line. This right is typically called an easement.

Utilities may buy easements through a negotiated agreement, but they also have the power of eminent domain (condemnation) under Texas law. Local courts, not the PUC, decide issues concerning easements for rights-of-way. The PUC does not determine the value of property.

The PUC final order in a transmission case normally requires a utility to take certain steps to minimize the impact of the new transmission line on landowners' property and on the environment. For example, the order normally requires steps to minimize the possibility of erosion during construction and maintenance activities.

HOW TO OBTAIN MORE INFORMATION

The PUC's online filings interchange on the PUC website provides free access to documents that are filed with the Commission in Central Records. The docket number, also called a control number on the PUC website, of a case is a key piece of information used in locating documents in the case. You may access the Interchange by visiting the PUC's website home page at www.puc.state.tx.us and navigate the website as follows:

- Select "Filings."
Select "Filings Search."
Select "Filings Search."
Enter 5-digit Control (Docket) Number. *No other information is necessary.*
Select "Search." *All of the filings in the docket will appear in order of date filed*
Scroll down to select desired filing.
Click on a blue "Item" number at left.
Click on a "Download" icon at left.

Documents may also be purchased from and filed in Central Records. For more information on how to purchase or file documents, call Central Records at the PUC at 512-936-7180.

PUC Substantive Rule 25.101, Certification Criteria, addresses transmission line CCNs and is available on the PUC's website, or you may obtain copies of PUC rules from Central Records.

Always include the docket number on all filings with the PUC. You can find the docket number on the enclosed formal notice. Send documents to the PUC at the following address.

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

The information contained within this brochure is not intended to provide a comprehensive guide to landowner rights and responsibilities in transmission line cases at the PUC. This brochure should neither be regarded as legal advice nor should it be a substitute for the PUC's rules. However, if you have questions about the process in transmission line cases, you may call the PUC's Legal Division at 512-936-7260. The PUC's Legal Division may help you understand the process in a transmission line case but cannot provide legal advice or represent you in a case. You may choose to hire an attorney to decide whether to intervene in a transmission line case, and an attorney may represent you if you choose to intervene.

Communicating with Decision-Makers

Do not contact the ALJ or the Commissioners by telephone or email. They are not allowed to discuss pending cases with you. They may make their recommendations and decisions only by relying on the evidence, written pleadings, and arguments that are presented in the case.

Request to Intervene in PUC Docket No.

The following information must be submitted by the person requesting to intervene in this proceeding. This completed form will be provided to all parties in this docket. **If you DO NOT want to be an intervenor, but still want to file comments, please complete the "Comments" page.**

Mail this completed form and 10 copies to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, TX 78711-3326

First Name: _____ Last Name: _____

Phone Number: _____ Fax Number: _____

Address, City, State: _____

Email Address: _____

I am requesting to intervene in this proceeding. As an INTERVENOR, I understand the following:

- I am a party to the case;
- I am required to respond to all discovery requests from other parties in the case;
- If I file testimony, I may be cross-examined in the hearing;
- If I file any documents in the case, I will have to provide a copy of that document to every other party in the case; and
- I acknowledge that I am bound by the Procedural Rules of the Public Utility Commission of Texas (PUC) and the State Office of Administrative Hearings (SOAH).

Please check one of the following:

- I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.
- One or more of the utility's proposed routes would cross my property.
- Other. Please describe and provide comments. You may attach a separate page, if necessary.

Signature of person requesting intervention:

_____ Date: _____

Comments in Docket No. _____

If you want to be a PROTESTOR only, please complete this form. Although public comments are not treated as evidence, they help inform the PUC and its staff of the public concerns and identify issues to be explored. The PUC welcomes such participation in its proceedings.

Mail this completed form and 10 copies to:

Public Utility Commission of Texas
Central Records
Attn: Filing Clerk
1701 N. Congress Ave.
P.O. Box 13326
Austin, TX 78711-3326

First Name: _____ Last Name: _____

Phone Number: _____ Fax Number: _____

Address, City, State: _____

I am NOT requesting to intervene in this proceeding. As a PROTESTOR, I understand the following:

- I am NOT a party to this case;
- My comments are not considered evidence in this case; and
- I have no further obligation to participate in the proceeding.

Please check one of the following:

- I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.
- One or more of the utility's proposed routes would cross my property.
- Other. Please describe and provide comments. You may attach a separate page, if necessary. _____

Signature of person submitting comments:

_____ Date: _____

Attachment 10

Scenic Loop 138-kV Transmission and Substation Project
Federal, State, and Local Agencies/Officials Contact List

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Ms. Laura Zebehazy
Wildlife Habitat Assessment Program
Wildlife Division
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Scenic Loop 138-kV Transmission and Substation Project
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Scenic Loop 138-kV Transmission and Substation Project
Federal, State, and Local Agencies/Officials Contact List

**MUNICIPALITIES WITHIN FIVE MILES
OF THE REQUESTED FACILITY**

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Scenic Loop 138-kV Transmission and Substation Project
Federal, State, and Local Agencies/Officials Contact List

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7286 Dietz Elkhorn
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Scenic Loop 138-kV Transmission and Substation Project
Federal, State, and Local Agencies/Officials Contact List

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President
Texas Cave Management Association
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San Antonio, TX 78214

Scenic Loop 138-kV Transmission and Substation Project
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**NEIGHBORING UTILITIES PROVIDING
THE SAME UTILITY SERVICE WITHIN
FIVE MILES**

PEDERNALES ELECTRIC COOPERATIVE,
INC.

Pedernales Electric Cooperative Inc.
c/o Bridget Headrick
P.O. Box 1
Johnson City, Texas 78636-0001

BANDERA ELECTRIC COOPERATIVE, INC.

Mr. Bill Hetherington
Chief Executive Officer
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Attachment 11

OVERSIZED MAP(s) or DOCUMENT(s)

TO VIEW

OVERSIZED MAP(s) or DOCUMENT(s)

**PLEASE CONTACT
CENTRAL RECORDS
512.936.7180**

Thank you

Attachment 12

Kirk D. Rasmussen
(512) 236-2310 (Direct Dial)
(512) 391-2120 (Direct Fax)
krasmussen@jw.com

July 22, 2020

Via Hand Delivery

Ms. Laura Zebehazy
Wildlife Habitat Assessment Program
Wildlife Division
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, Texas 78744-3291

RE: Application of the City of San Antonio, Acting By and Through the City Public Service Board (CPS Energy) To Amend its Certificate of Convenience and Necessity for the Proposed Scenic Loop 138-kV Transmission Line Project in Bexar County, Texas

PUBLIC UTILITY COMMISSION OF TEXAS (PUC) DOCKET NO. 51023

Dear Ms. Zebehazy:

On Wednesday, July 22, 2020, the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) filed with the Public Utility Commission of Texas (Commission) the above-referenced application to amend its Certificate of Convenience and Necessity (CCN) to construct the Scenic Loop 138-kV Transmission Line Project in Bexar County, Texas.

As you are aware, the Commission's CCN application requires that CPS Energy provide for review and comment a copy of the project environmental assessment (EA) to Texas Parks and Wildlife Department (TPWD) within seven days after the application is filed. Accordingly, enclosed with this letter is a copy of the EA prepared for the referenced project as well as a complete copy of CPS Energy's CCN application filed at the Commission. The CCN application also requires that a copy of this transmittal letter be included with the project application. You will find a copy of this letter included as Attachment 12 to the filed Application.

Under the traditional CCN process, TPWD typically provides the Commission Staff with comments about the application. CPS Energy would also appreciate receiving a copy of any comments TPWD may choose to provide to Commission Staff. You may send those comments to Adam R. Marin, PE, who is the Regulatory Case Manager for the project at 145 Navarro Street, San Antonio, Texas 78205. Of course, CPS Energy reserves the right to inquire into the basis of any comments or recommendations TPWD may choose to submit in this case, but I am certain the appropriate arrangements can be made for that inquiry if the necessity arises.

Finally, CPS Energy is pleased to offer to provide TPWD staff with a briefing of the CCN application and the accompanying EA. To that end, I would be happy to arrange a visit between

Ms. Zebehazy
July 22, 2020
Page 2

Attachment 12
Page 2 of 2

CPS Energy and you and your staff at your earliest convenience. If you have any questions about the EA, please feel free to contact Adam R. Marin at (210) 353-2476 or me at (512) 236-2310.

Sincerely,

Kirk D. Rasmussen

Cc: Adam R. Marin, CPS Energy
Russell Hooten, TPWD

Attachment 13

Scenic Loop Substation Analysis Report



CPS Energy

7/14/2020



Scenic Loop Substation Analysis Report

prepared for

**CPS Energy
San Antonio, TX**

Project No. 123099

**Final
7/14/2020**

prepared by

**Burns & McDonnell Engineering Company, Inc.
Kansas City, Missouri**

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1. Executive Summary

CPS Energy is experiencing significant load growth in the northwest region of Bexar County, in some areas as high as 4-7 percent annually. Limitations on the existing electrical infrastructure in that area will be challenged by increasing load along the IH-10 corridor north of Loop 1604, including La Cantera, Camp Bullis, and the Rim multiuse shopping development area. Future load from the University of Texas at San Antonio (UTSA) associated with its Main Campus Master Plan (presented in February 2020) will essentially double the current UTSA load. In addition, the UTSA Area is targeted as a regional development center in the City of San Antonio's (City) SA Tomorrow Comprehensive Plan (Comprehensive Plan) and is one of the fastest growing areas of the City.

In conjunction with the significant load growth CPS Energy is experiencing in the northwest Bexar County area, the existing distribution circuits within La Sierra Substation and some of the circuits originating at the Fair Oaks Ranch Substation are very long (up to nearly seven times longer than the average distribution circuit within CPS Energy's system) and serve thousands of customers. These long, heavily loaded circuits have resulted in significant reliability concerns for the area.

Even with planned improvements to the existing distribution system, without a new substation in northwest Bexar County, the existing distribution system will reach its reliability limit within five years.

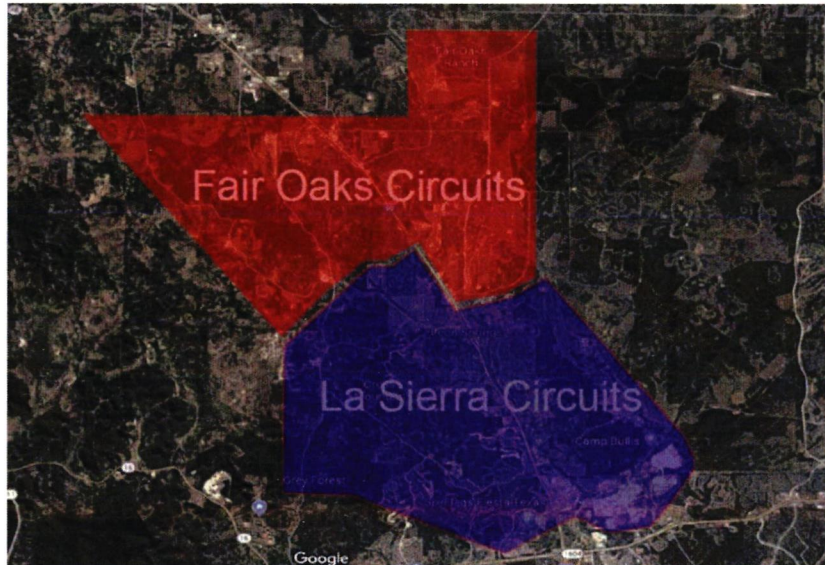
A new proposed Scenic Loop Substation will provide CPS Energy with the infrastructure that it needs to reliably serve the northwest area of Bexar County for many years to come. The new substation will offload existing circuits, thereby enhancing reliability to customers, and enabling additional load growth capability within the region.

2. Existing System Assessment

2.1 Background of System

The load in the northwest region of Bexar County is currently served by long circuits from the La Sierra and Fair Oaks Ranch substations. The long circuits serving a large number of customers have created significant impacts on power reliability in the area. The reliability concerns will increase as load continues to grow in the area.

Figure 1: Geographic area served by Fair Oaks Ranch and La Sierra 35-kV stations



The La Sierra Substation has a total transformer capacity of 200 MVA that includes two 100 MVA transformers. There are three other substations in the vicinity (Hill Country Substation to the East, DeZavala Substation to the South, and Ranchtown Substation to the West) that can help with serving load in the event of the loss of one of the 100 MVA transformers. According to CPS Energy's established planning practice, the total planning capacity of the La Sierra Substation is 75 percent of the nameplate capacity (i.e., 150 MVA). This planning capacity is based on the ability of CPS Energy to shift load to other substations in the event of the loss of one of the two La Sierra transformers.

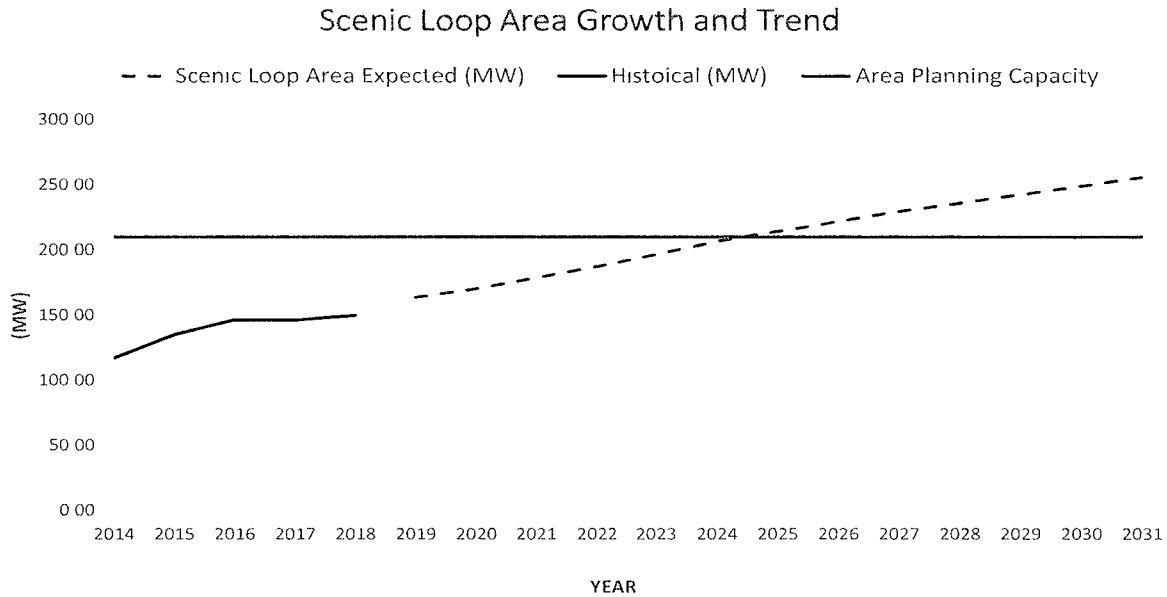
The Fair Oaks Ranch Substation has a total transformer capacity of 100 MVA that includes two 50 MVA transformers. Fair Oaks Ranch has less support from other nearby stations because of the terrain in the area and the CPS Energy service territory boundary. Thus, it is only capable of being supported after a loss of one of the existing transformers from two circuits of the La Sierra Substation. As a result, the total planning capacity of the Fair Oaks Ranch Substation is 60 percent of the nameplate capacity (i.e., 60 MVA).

Thus, the total planning capacity for the area served by the La Sierra and Fair Oaks Ranch substations is 60 percent of 100 MVA from Fair Oaks Ranch and 75 percent of 200 MVA from La Sierra for a total of 210 MVA for the overall area.

The area served by the La Sierra and Fair Oaks Ranch substations has seen significant load growth over the last ten years, which is anticipated to be sustained in the foreseeable future. The following plot describes expected load growth within the region along with the planning capacity based on the current ability of distribution circuits to support load. The demand on the current system is expected to exceed

capacity within the next few years. The area needs an additional substation by 2024 to serve the area demand in a reliable manner.

Figure 2: Historical Load growth and expected load growth for next 10 years¹.



Evidence supporting CPS Energy’s projected future load growth for the area is contained in the City’s SA Tomorrow Comprehensive Plan. As set forth in the plan, the UTSA Area is one of the fastest growing areas of the City. Appendix A of this document describes the 2010-2040 Forecast for Residential Dwelling Units and Jobs and shows the plan’s 30-year forecasts for housing unit and employment growth under two scenarios, (1) the Alamo Area Metropolitan Planning Organization (AAMPO) Baseline, and (2) the Targeted Growth Scenario that assumes investment and market shift that results in denser development patterns supported by high-frequency transit.

The tables in Appendix A describe future land use (acreage) including a forecast of dwelling units, jobs, and commercial/industrial square footage. The data in the Comprehensive Plan compiles information from several different economic and planning system models showing the number of acres designated to each land use category in the adopted UTSA Area Regional Center Plan. The land use map included in Appendix A describes the overall UTSA Area land capacity estimates for residential and commercial/industrial uses (by land use category, and based upon several assumptions and factors that are shown in the table) and the 2040 forecasts for net new (from 2018/2019 levels) residential dwelling units, commercial/industrial jobs, and commercial/industrial building square footage.

¹ The CPS Energy DP Design Manual 2019 (section 3.3 process 8-11) describes the steps followed in the demand forecast. The process includes load normalization to reduce annual variation. Actual recorded demands are statistically adjusted by temperature index relative to 5 year average to find an equivalent base each year. Forecasting individual substation growth is based on information known about the area (Large loads, data centers and other customer load growth) and apply to the base demand calculated for each circuit. Average temperature and not forecast future weather are used for the base demand a single expected average is displayed. Variations in the expected demand for individual substation growth is based on information known about the area (Large loads, data centers and other customer load growth) that is applied to the base demand. Erratic growth rates in some years reflect load switching between stations that are outside the study with temporary excess capacity while investments from contractors is expected to fund local distribution system expansion.

The Comprehensive Plan designated the UTSA Area as one of the fastest growing areas of the City. The amount of forecasted economic activity, jobs, residential/commercial and industrial development equates to a significant increase in load demand on the CPS Energy distribution system and supports and validates the assumptions of load growth included in this study for the circuits originating from the La Sierra and Fair Oaks Ranch substations.

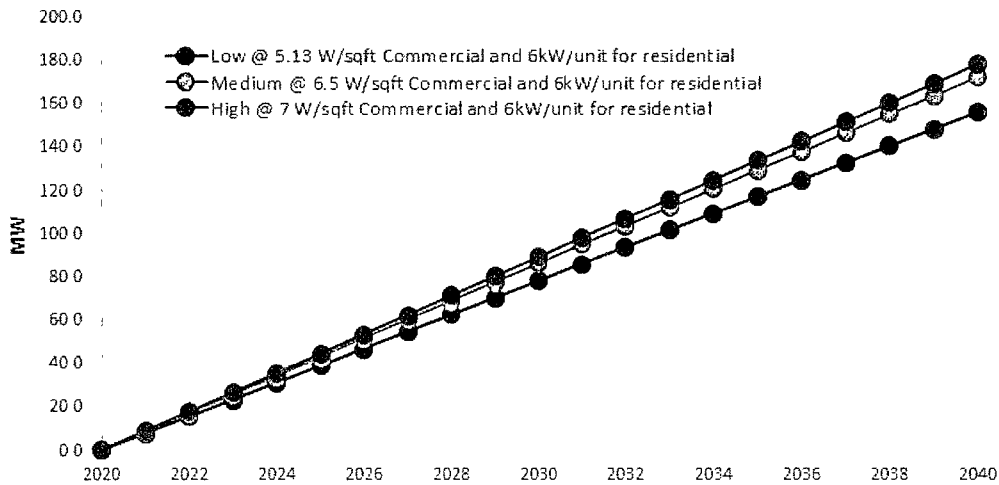
Based on the growth experienced by CPS Energy in the area over the last 10 years and information on the total anticipated residential dwelling units and the amount of square footage of commercial/industrial development from the Comprehensive Plan report, the total additional electrical load reasonably projects to approximately 8-9 MW/year of load growth in the region. Considering the targeted growth scenario, by 2040 this additional load equates to approximately 160-180 MW using the Baseline forecast scenario and could be as high as approximately 300 MW using the Targeted forecast scenario.

- The CPS Energy Distribution Planning Manual describes the electrical load of residential dwelling units at 6 kW for each new dwelling unit. The Comprehensive Plan indicates 15,900 new dwelling units (~95 MW) in this region under the Baseline scenario and 37,500 new residential units (~225 MW) under the Targeted scenario by the year 2040. This additional load growth could very easily be higher considering all the essential service loads that would be necessary to support that level of new residential development in the region. The additional load on the system cannot be accommodated reliably from the existing circuits originating from the La Sierra and Fair Oaks Ranch substations.
- According to the Department of Energy (DOE)², the average number of kilowatt hours per square foot for a commercial building is approximately 22.5 kWh. Some types of commercial loads, such as food service facilities, consume approximately 56 kWh/ft². Retail malls consume approximately 23 kWh/ft² on average. Other loads such as a public assembly buildings and warehouses consume approximately 15 kWh/ft² and 9kWh/ft², respectively. Assuming an average energy use of 22.5 kWh/ft² and a load factor of 0.5, this amounts to approximately 5.13 Watts/ft² for load calculations. A Review of CPS Energy's commercial/industrial load statistics indicates an average of approximately 6.5 Watts/ft².

The following Figure 3 describes the anticipated load growth using the Baseline (minimum) scenario projections in the UTSA Area described in the Comprehensive Plan report. The high, medium, and low growth scenarios are based on assumed load per square foot values described above.

² <https://www.energy.gov/eere/analysis/energy-intensity-indicators>
<https://www.eia.gov/totalenergy/data/annual/>

Figure 3: Load Growth based on SA Tomorrow's forecasted customers – Baseline forecast only.



2.2 Planning Criteria

Distribution planning analysis was conducted on various system conditions to determine the reliability need for the area and to find a robust and cost-effective solution from both near-term and long-term perspectives. The study criteria, assumptions, methodology, and findings from the analysis are presented in this section and are consistent with the CPS Energy Distribution Planning Manual.

According to CPS Energy’s long-standing Distribution Planning Manual, the electric distribution supply to the CPS Energy service territory is deemed adequate when the following criteria are met:

- No substation transformer is loaded above 80% of its Normal Rating during expected peak energy usage conditions.
- No backbone distribution feeder is loaded above 80% of its Normal Rating during expected peak energy usage conditions. A backbone distribution feeder is one within the three phase primary distribution system characterized by having large conductor and most direct path(s) to adjacent substations.
- For the extended outage of any substation transformer, no facility will be loaded in excess of its Emergency Rating.
- Voltages are within the ANSI 84.1 voltage range A limits for normal conditions and range B for emergency conditions on primary distribution lines.
- Power Factors, or the ratio of the real power absorbed by the load to the apparent power flowing in the circuit, are greater than 97% at the secondary breakers on each substation transformer under normal conditions.

In addition to the provisions established in the CPS energy planning manual, and in accordance prudent utility practice, the total transformer capacity of an individual substation is limited by the ability of CPS Energy to sustain the loss of one substation transformer by shifting load to other transformers in that or nearby substations.

2.3 Existing Distribution Circuit Performance

The existing distribution system served out of the La Sierra and Fair Oaks Ranch substations served a peak summer load of approximately 165 MW in 2019. The La Sierra substation has two 100 MVA transformers and currently serves approximately 110 MW (peak summer load in 2019) via seven circuits. The transformers at the substation were peak loaded to 71% and 42% of their capacity rating in 2019. The peak load on one of the transformers was more than 80% in 2018 and near 80% in the other recent years. Thus, the loss of one of the transformers within the station will load the other transformer to near 120% of its emergency rating. The Fair Oaks Ranch Substation has two 50 MVA transformers and serves load connected to four circuits split between the two transformers, with a total peak load of approximately 50 MW served in 2019.

The La Sierra and Fair Oaks Ranch substations have no spare transformers and the circuits served from these stations have only a limited ability to support load growth as the limit is defined by circuit capacity and on how one of the substation transformers gets loaded if the other one is lost as a part of an outage.

**The following
Table 2 and**

Table 3 show the loading on the circuits and the length of the circuits originating from the La Sierra and Fair Oaks Ranch substations. As can be seen in the tables, the loadings on the circuit R034 from Fair Oaks Ranch and U114 from La Sierra exceeded CPS Energy's Distribution Planning Criteria in 2019. The projected 2020 summer peak loads on circuits U112 and U114 will exceed CPS Energy's Distribution Planning Criteria of 80% loading on the U114 circuit (98%) and U112 circuit (80%) this summer.

Of importance to note for this study, CPS Energy reconfigured the circuits out of Fair Oaks Ranch with two on each 35-kV switchgear within the substation in the summer of 2020. As a result of the reconfiguration, the load and circuit R011 moved to the other switchgear and is named circuit R033. A portion of the U114 and R034 circuits shifted to a new circuit R014. Table 1: Scenic Loop Area 34.5kV Distribution Circuits describes the details of the existing circuit lengths connected to La Sierra and Fair Oaks Ranch along with a scenario following the energization of circuit R014. This table also provides details on the final circuit lengths after inclusion of the Scenic Loop Substation (estimated for 2024). As can also be seen in Tables 2 and 3, some of the La Sierra and Fair Oaks Ranch circuits are very long compared to an average CPS Energy distribution circuit (which is approximately 12.8 miles long). The length and loading on these circuits equate to lower reliability to the customers served by these feeders, as will be seen in the reliability metrics presented in the following discussion.

Table 1: Scenic Loop Area 34.5kV Distribution Circuits

Circuit Lengths in Miles				
Circuit Number		Existing Configuration	Existing Configuration +R014 (2020)	Existing Configuration +R014 + Scenic Loop (2024)
La Sierra	U111	2.66	2.66	2.66
	U112	46.37	46.37	46.37
	U113	1.51	1.51	1.51
	U114	85	32.95	8.07
	U132	45.43	45.43	4.58
	U134	34.81	34.81	34.81
Fair Oaks Ranch	R014	-	97.13	31.31
	R034	73.27	28.19	28.19
Scenic Loop Rd	V611	-	-	41.58
	V612	-	-	24.28
	V613	-	-	34.84
	V614	-	-	30.66
TOTAL		289.06	289.06	288.87

Table 2: Fair Oaks Ranch Substation Circuits

Xfrmr #1 50MVA	Length (miles)	Customers	2019 Loads		2020 Loads	
			Load (kW)	% of Nominal	Load (kW)	% of Nominal
R011	27.3	-	9639	36	Not Utilized	-
R012	-	2	Not Utilized	-	Not Utilized	-
R013	25.9	1660	12933	49	11900	45
R014	54.8	3021	New	-	9461	41
Xfrmr #3 50MVA	Length (miles)	Customers	2019 Loads		2020 Loads	
Load (kVA)			% of Nominal	Load (kVA)	% of Nominal	
R031	-	-	Not Utilized	-	Not Utilized	-
R032	-	-	Not Utilized	-	Not Utilized	-
R033	27.3	1256	New	-	9736	44
R034	13.3	3140	22812	105	16807	77

Table 3: La Sierra Substation Circuits

Xfrmr #1 100MVA	Length (miles)	Customers	2019 Loads		2020 Loads	
			load (kW)	% of Nominal	load (kW)	% of Nominal
U111	2.7	1659	18774	60	20488	66
U112	46.4	3222	24250	78	24736	80
U113	1.5	88	8374	28	830	3
U114	85.0*	4095	28514	91	30577	98
Xfrmr #3 100MVA	Length (miles)	Customers	2019 Loads		2020 Loads	
load (kW)			% of Nominal	load (kW)	% of Nominal	
U131	-	-	Not Utilized	-	Not Utilized	-
U132	45.5	2617	13531	39	14644	42
U133	2.0	553	6409	21	14770	48
U134	34.7	3288	15647	50	15990	51

* Circuit will be reduced by approximately 50 miles after the load is being picked up by R014.

Reliability of a distribution system can be evaluated by considering SAIDI (system average interruption duration index), SAIFI (system average interruption frequency index), and CMI (customer minutes of interruption). The Customers Affected (CA) include the number of customers whose outages are included in the calculation of the reliability indices presented in this report. The reliability metrics for the La Sierra and Fair Oaks Ranch substation circuits for the past seven years indicate a much lower reliability as compared to the averages of the CPS Energy system. The La Sierra and Fair Oaks Ranch circuits have 4-6 times higher SAIDI and SAIFI values in comparison to the system average interruption indices for CPS Energy as a whole.

The reliability statistics on the La Sierra and Fair Oaks Ranch circuits indicate that the CMI from these circuits have accounted on average for approximately 11.2 percent of CPS Energy’s total minutes of interruptions (as high as 20% in 2017), even though these circuits serve only approximately 3% of CPS Energy’s entire load. This indicates a much lower reliability for the loads served by these substations.

Notably, from 2013 to 2019 the SAIDI and SAIFI indices have steadily risen (indicating declining reliability). This increase in the frequency and duration of interruptions experienced by customers clearly evidences a steady decline in the reliability and power quality in the area. Table 4: CPS Energy System-wide Average Reliability Indices presents the CPS Energy-wide SAIDI, SAIFI, and CMI in addition to number of customers affected.

Table 4: CPS Energy System-wide Average Reliability Indices

YEAR	CMI	SAIDI	SAIFI	CA
2013	37,465,050	51.39	0.79	575,726
2014	35,449,090	47.55	0.73	547,023
2015	41,562,265	54.62	0.76	580,576
2016	44,120,730	57.4	0.8	616,000
2017	42,443,090	53.97	0.83	654,000
2018	44,311,290	54.49	0.84	686,000
2019	42,464,750	61	0.86	603,000
Total	287,816,265			4,262,325

Table 5 presents the reliability indices for the circuits served from the La Sierra and Fair Oaks Ranch substations. The data clearly show a high CMI. As stated above, in 2017 the interruptions on these circuits contributed nearly 20% of the total CMI for the entire CPS Energy system. Based on the outage data presented below, the customers served from the La Sierra and Fair Oaks Ranch circuits have experienced approximately 8-10 times more outages compared to the entire CPS Energy system average.

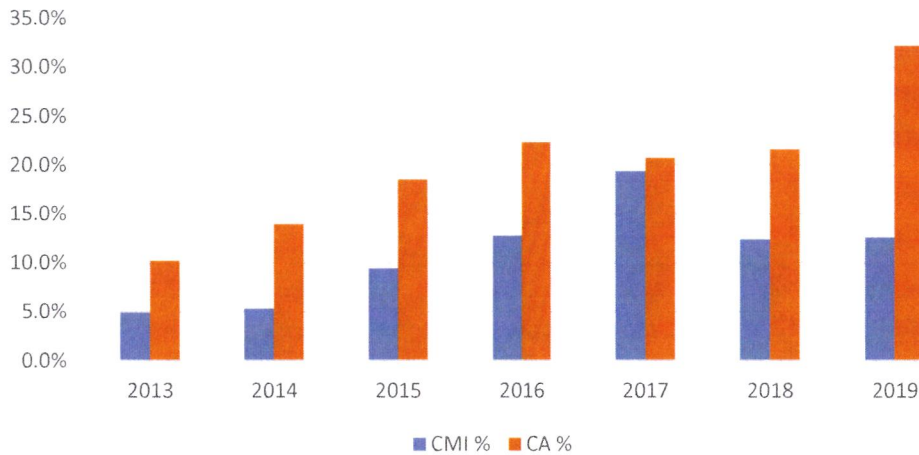
Table 5: La Sierra and Fair Oaks Ranch Circuits Reliability Indices

YEAR	CMI	CMI %	SAIDI	SAIFI	CA
2013	1,842,904	4.90%	83.77	2.67	58,633
2014	1,868,883	5.30%	83.06	3.39	76,259
2015	3,900,198	9.40%	169.57	4.67	107,463
2016	5,614,911	12.70%	238.93	5.85	137,513
2017	8,219,320	19.40%	342.47	5.65	135,583
2018	5,483,364	12.40%	223.81	6.05	148,185
2019	5,345,088	12.60%	215.53	7.82	194,027

Total	32,274,667	11.20%			857,663
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Figure 4 shows the degree to which the low reliability on the La Sierra and Fair Oaks Ranch circuits (comprising approximately 3% of the CPS Energy overall load) contribute to the CPS Energy metrics for reliability in terms of CMI and customers affected (CA). The number of CA for the year 2019 on the loads served on La Sierra and Fair Oaks Ranch circuits is more than 30% of the CA for the whole CPS Energy system.

Figure 4: Fair Oaks Ranch and La Sierra Load Contribution to CPS Reliability Metrics from 2013-2019



The reliability issue with the La Sierra and Fair Oaks Ranch circuits is self-evident. Between 2010 and 2018, some of the La Sierra and Fair Oaks Ranch circuits have made CPS Energy’s poor performing circuits (PPC) list for five different years (based on standards established by the Public Utility Commission of Texas), and a total of 6 of the 11 circuits have been on the list since 2010. Additionally, five circuits from La Sierra and Fair Oaks Ranch were on the PPC list in 2018, the most of any year within the past 10 years. This increase in the number of PPC is shown in Table 6 **Error! Reference source not found.**

Table 6: La Sierra and Fair Oaks Ranch Poor-Performing Circuits

Station	Circuit	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Fair Oaks	R011										
Fair Oaks	R012			PPC						PPC	
Fair Oaks	R013	PPC								PPC	
Fair Oaks	R034			PPC						PPC	
La Sierra	U111									PPC	
La Sierra	U112										
La Sierra	U113										
La Sierra	U114			PPC	PPC				PPC		
La Sierra	U133										
La Sierra	U134										
La Sierra	U132									PPC	PPC

Table 7 and Table 8 demonstrate the severe reliability issues that are occurring on circuits served from the La Sierra and Fair Oaks Ranch substations. As can be seen in the information presented in the tables, in the past year, La Sierra circuit U134 has the most affected customers experiencing momentary operations,³ high frequency interruptions at 593% of system SAIFI, and is ranked one of the PPCs in 2019. Fair Oaks Ranch circuit R012 has high SAIDI and SAIFI values at 240.59 (which exceeds the 300% threshold) and 2.76, respectively. These statistics reveal the urgent need to remediate the reliability issues across La Sierra and Fair Oaks Ranch circuits. In addition to the objective declining reliability metrics presented above, CPS Energy has experienced subjective reliability complaints from customers in the Scenic Loop area. On two occasions in 2019 alone, CPS Energy representatives met with groups of customers in the area to address the frequent and sustained outages.

Table 7: La Sierra and Fair Oaks Frequent Device Operations Sustained & Momentary
(Apr 1, 2019 to Mar 31, 2020)

Circuit	Device	# of Sustained Operations	# of Momentary Operations	Customers Affected	CMI
U114	R3696	6	-	1027	96,502.88
R013	S5106	4	-	150	18,537.30
U132	CBU132	-	7	19344	8930.5
U134	CBU134	-	6	28316	7939.32
U114	CBU114	-	4	21176	30901.67

Table 8: SAIFI Poorest Performing Circuits

Circuit Number	Customers Served as of Last Outage	Last Outage Month	SAIDI	SAIFI	Compared to System SAIFI	Also Exceeds SAIDI 300% Threshold
U134	3288	1-Mar-20	18.33	1	593.37%	NO
R012	1085	1-Jun-19	240.59	2.76	460.03%	YES

One root cause for increased number of outages and duration of the outages on the La Sierra and Fair Oaks Ranch circuits are due to the length of the circuits. As shown above, some of the circuits from these substations are approximately 6-8 times longer than an average circuit length within CPS Energy’s service territory. The length and poor reliability of these circuits today, coupled with the additional load growth these circuits will experience in the next several years, will continue to further erode the reliability on these circuits through an increase in the number and duration of outages along with the number of customers experiencing these outages. Installation and maintenance of adequate numbers of reclosers to detect and interrupt momentary faults will help with reliability but cannot fully address the reliability issues associated with the length and loading of the circuits. Specifically, the La Sierra and Fair Oaks Ranch circuits have adequate automation and sectionalization, but due to the nature of the circuit topology related to the terrain, length, and number of customers, reliability is still an underlying issue to be resolved.

Circuit	# of Reclosers
R014	5
R034	3
U111	1
U114	4
U132	1
U134	5

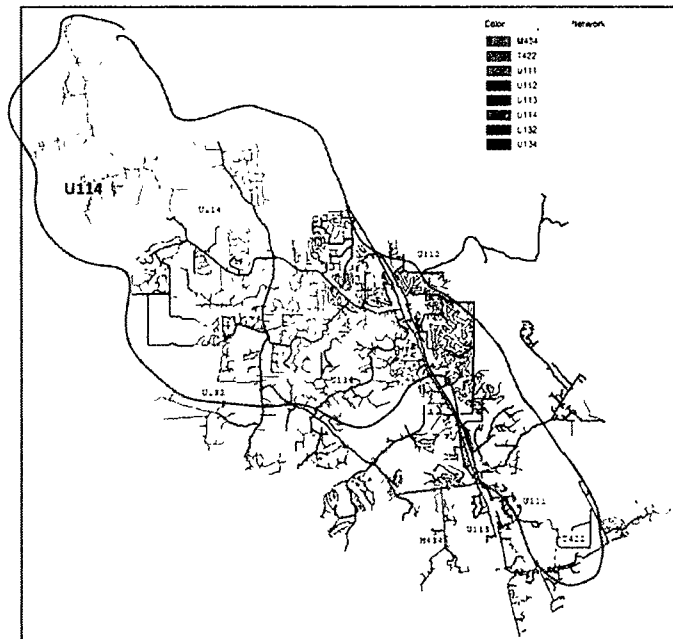
³ A momentary operation is a brief loss of power delivery (less than 5 minutes) caused by the opening and closing operation of an interrupting device (e.g., a circuit breaker or recloser). These momentary operations and the number of customers impacted typically increase with line length, number of customers served.

For example, the longest circuit in the region is La Sierra circuit U114 that serves approximately 30 MW of load and over 4,000 customers. The circuit has four reclosers to help improve reliability, but it traverses heavily wooded areas and a canyon, which greatly impacts reliability. The circuit was flagged as a worst performing circuit more than three times in the last 10 years based on a large number of customer minutes of interruption.

As discussed previously, CPS Energy is not waiting until the construction of a new substation to improve reliability to the region. In order to increase capacity in the region and improve the reliability of circuit U114, during the early summer of 2020 CPS Energy moved a portion of the downstream load of U114 (approximately 6 MW) so it is picked up by another circuit (Fair Oaks Ranch R014). This reduces the length of the U114 circuit and provides some capacity for load growth on it. However, following the transfer, the R014 circuit increased from 52.05 miles to approximately 97 miles in length (which will likely result in decreased reliability on that circuit for those customers). Furthermore, shifting approximately 6 MW from U114 to R014 is only a temporary fix to create a small increase in capacity on the La Sierra circuits to help facilitate load interconnections and load growth around the IH-10 corridor. Capacity on the La Sierra circuits is very much needed to serve load growth around the UTSA area, La Cantera, and loads around IH-10, but the circuits also need to also be able to shift loads between the Hill Country and DeZavala substations. The Hill Country Substation has a single 50 MVA transformer that is expected to have a loading of 50% in 2020. The DeZavala Substation has three 100 MVA transformers and the peak loading on those transformers is expected to be 42%, 61% and 83% in the summer of 2020. Load increases and outages at these stations will need additional capacity from La Sierra to pick up load and to restore service in certain outage conditions.

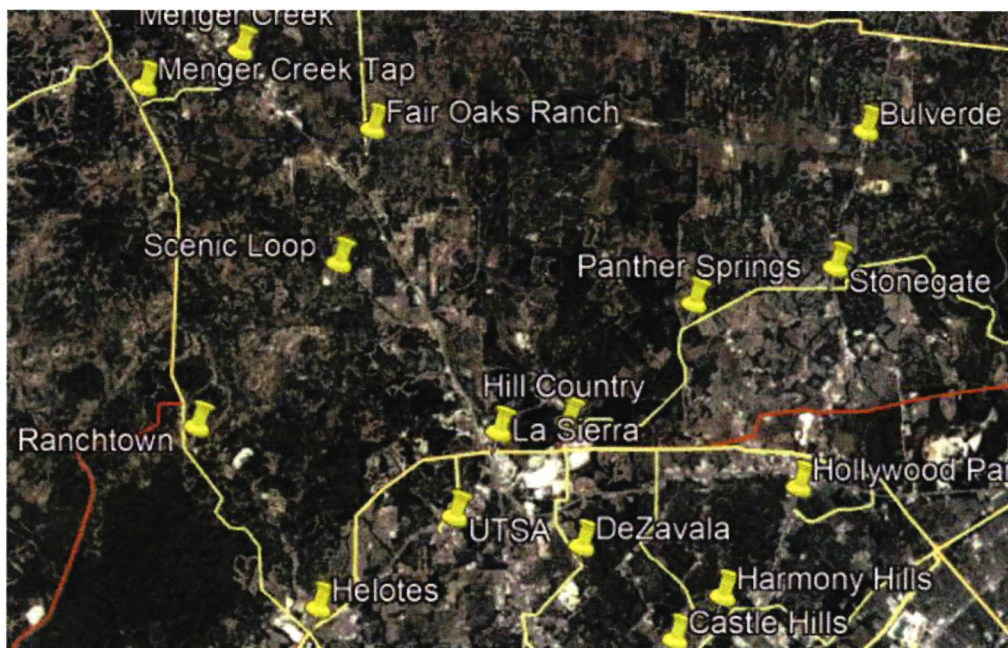
Finally, shifting load to R014 will only reduce the circuit length of U114 by 25 miles. After the transfer, U114 will still be around 60 miles in length, which is still almost 5 times longer than the system average circuit length (resulting in continued reliability challenges for that circuit).

Figure 5: Existing System Configuration of Circuits Served from La Sierra Substation, (U114 is the Longest Circuit)



The aerial image in Figure 6 shows the locations of the distribution substations owned and operated by CPS Energy in this area. The La Sierra, Hill Country, De Zavala, and UTSA substations are all within three miles of each other. Similarly, the Stonegate, Panther Springs, and Bulverde substations are within three to six miles of each other and the circuits between these stations are not very long. In contrast, the La Sierra and Fair Oaks Ranch substations are approximately 11 miles apart and some of the circuits served by these substations are extremely long. Because of the distances, the loads at the downstream portions of the La Sierra and Fair Oaks Ranch circuits (such as U114) cannot be served by any other substations without building significant additional infrastructure from more than 10 miles away through hilly and wooded terrain, which further increases the length of the lines, resulting in a continued possibility of lower reliability to the downstream loads.

Figure 6: CPS Energy Substations in Northwest Region of Bexar County



2.3.1 La Sierra Distribution Circuits Current Configuration – Power Flow Analysis

To evaluate the capacity and reliability of the current system in northwestern Bexar County, a power flow analysis was performed. This initial analysis did not include the load shift from circuit U114 to circuit R014. That configuration is shown in the second modelling provided below. The current CPS Energy distribution system shows loading on the U114 and U112 circuits was higher than CPS Energy planning criteria of 80% of their nominal rating in 2019. The 100 MVA transformers at the La Sierra Substation were loaded beyond 70% and 40% of their nominal rating in 2019. At this loading level, the loss of one of the transformers would result in a shortage of capacity to serve all the feeders out of the substation. In 2019, heavy loading on distribution circuits U114, results in voltage problems on downstream circuits and loads.

Figure 7 shows the La Sierra circuits with overloads and low voltages on a few portions of the U114 circuit.

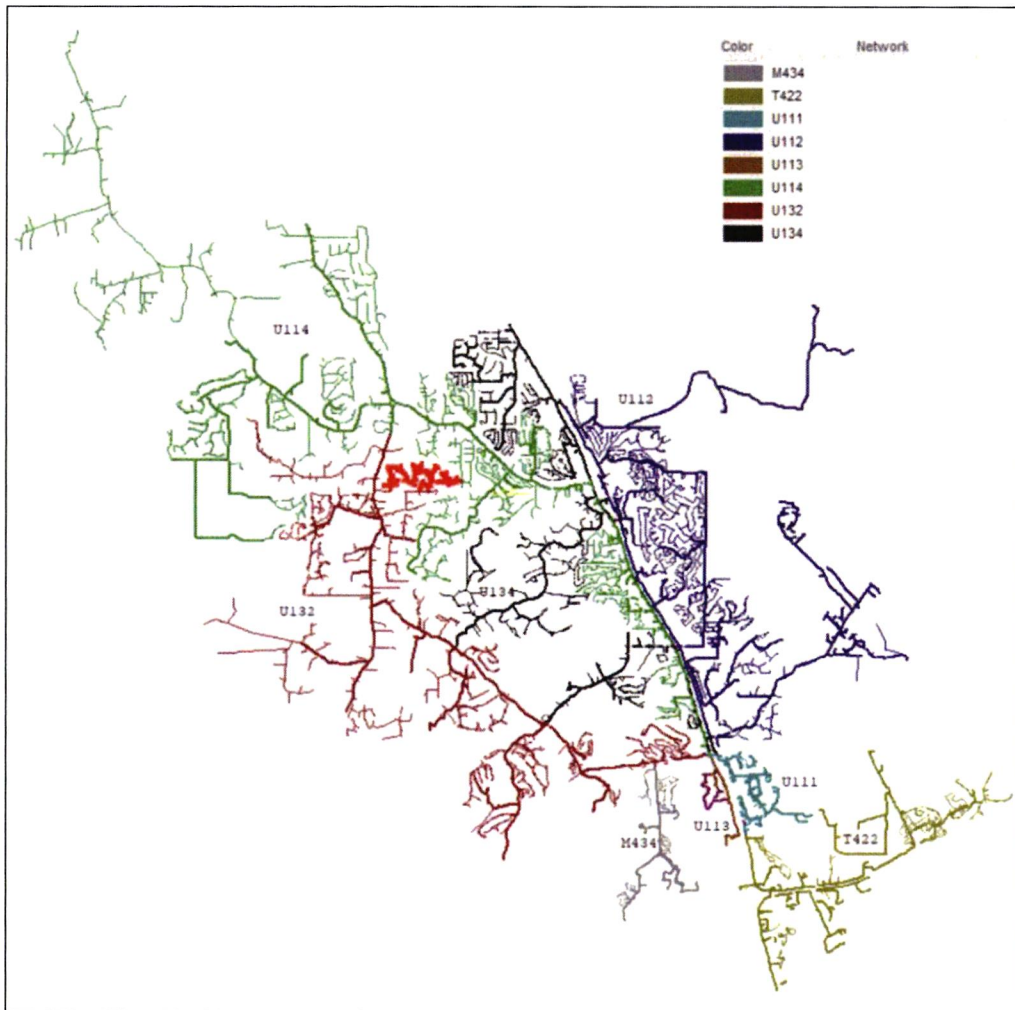
Table 9: La Sierra Distribution Circuit Loadings

La Sierra Distribution Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U111	59.06	18331.07	6702.41	19517.95
U112	79.83*	24682.79	4667.76	25120.27
U113	31.78	8792.21	5324.65	10278.85
U114	87.91*	27428.49	4684.55	27825.65
Total		79234.55	21379.36	82068.21

La Sierra Distribution Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U132	37.79	13178.12	1317.49	13243.81
U134	50.75	15911.63	1727.68	16005.15
Total		29089.75	3045.17	29248.7

* CPS Distribution Planning Criteria violations

Figure 7: N-0 Model of La Sierra Circuits with Peak Loading (Actual FY 2019) Included in the Model



As discussed above, this part of the CPS Energy system has been experiencing above average (4-7%) load growth for the last five years. A model has been simulated to include additional loads to represent the year 2025 assuming a conservative load growth of 4% each year.

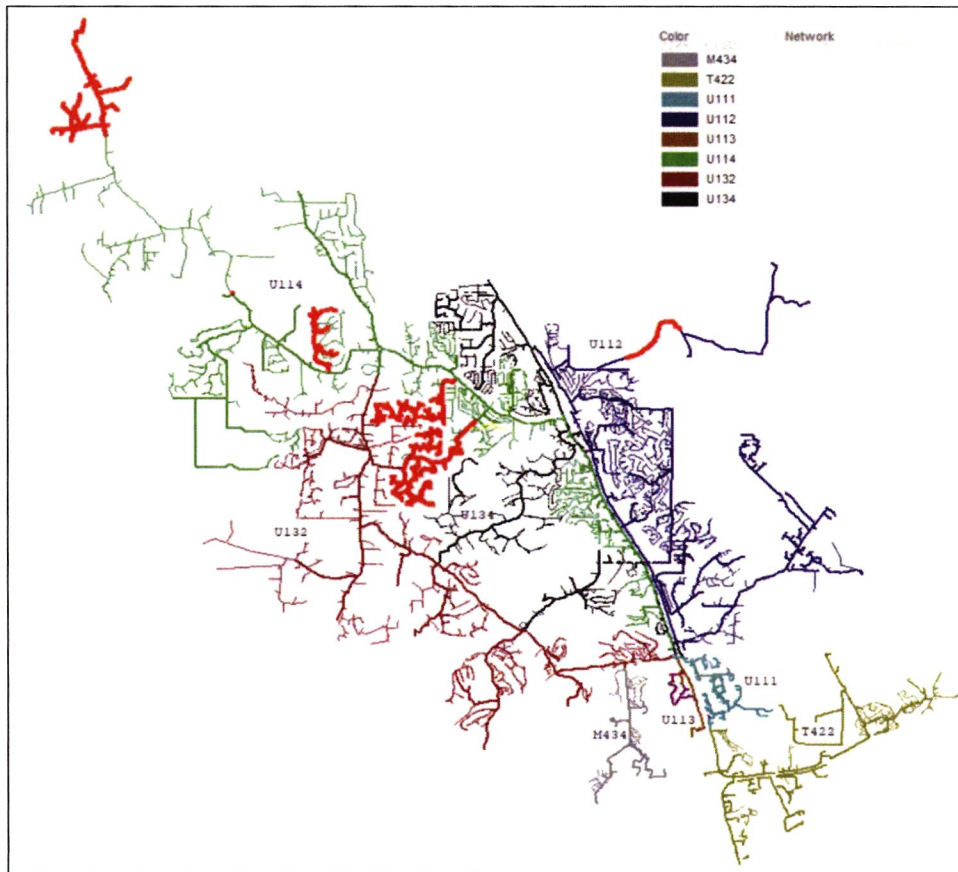
Table 10: La Sierra Distribution Circuit Loadings (FY 2025)

La Sierra Distribution Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U111	77.34	24007.96	10423.74	26173.2
U112	101.28*	31315.61	8081.35	32341.55
U113	43.54	12047.04	7445.16	14161.97
U114	112.23*	35015.09	8658.51	36069.74
Total		102385.7	34608.76	108076.81
La Sierra Distribution Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U132	49.82	17371.29	3324.67	17686.58
U134	64.37	20180.17	4073.32	20587.16
Total		37551.46	7397.99	38273.25

* CPS Distribution Planning Criteria violations

The modelling results indicate that the system problems in the area are exacerbated and voltage issues can be seen on multiple circuits in the region by 2024. Specifically, circuit U114 does not have adequate capacity to support the load and results in thermal and voltage violations as depicted in Figure 8.

Figure 8: N-0 Model of La Sierra Circuits with Peak Loading (Forecast FY 2025 with 4% Growth)



As discussed above, circuit U114 is currently greater than 85 miles long, which decreases reliability. As a result, CPS Energy has planned to shift a portion of the downstream network and load from circuit U114 to circuit R014 that is served from the Fair Oaks Ranch Substation.

2.3.2 La Sierra Distribution Circuits with R014 Energized – Power Flow Analysis

The forecasted peak load on circuit R014 in 2020 is estimated to be approximately 9.46 MW (41% loading of nominal rating). This circuit is served off the Fair Oaks Ranch Substation and serves load on the west side of IH-10. As discussed above, CPS Energy shifted approximately 6 MW of load from circuit U114 to circuit R014 in June of 2020 to reduce the length and loading on circuit U114. The following Table 11 provides the loads on the circuits in the area under this modelling scenario.

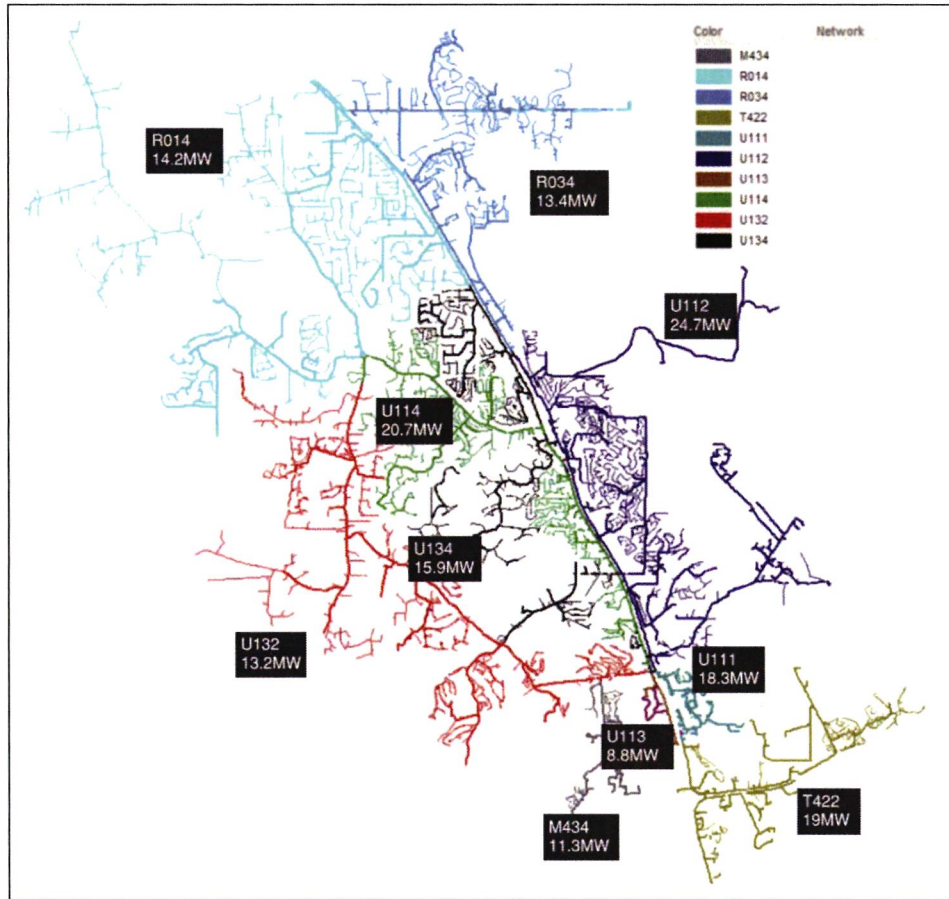
Figure 9 describes the R014 circuit along with other circuits in the region.

Table 11: La Sierra Distribution Circuit Loadings with R014

La Sierra Distribution Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U111	59.06	18331.07	6702.41	19517.95
U112	79.83*	24682.79	4667.76	25120.27
U113	31.78	8792.21	5324.65	10278.85
U114	66.35	20701.81	3878.69	21062.03
Total		72507.86	20573.49	75370.15
La Sierra Distribution Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U132	37.79	13178.12	1317.49	13243.81
U134	50.75	15911.63	1727.68	16005.15
Total		29089.75	3045.17	29248.7
Fair Oaks Ranch Distribution Circuits	Loading	Total Load		
	Network ID	%	kW	kVAr
R014	61.67	14234.66	1791.57	14346.96

* Nearing CPS Distribution Planning Criteria violations

Figure 9: N-0 Model of La Sierra Circuits + Fair Oaks Circuit R014 with Peak Loads (Forecast FY 2020) Included in the Model



As can be seen in the modelling results, shifting a portion of the load from circuit U114 to circuit R014 improves the power flow in the area. Due to the significant lengths of several of the circuits (including reconfigured circuits R014 and U114), the loads will still be subject to reliability concerns resulting from the circuit lengths. After the load shift to R014, an outage of the main feeder of U114 is simulated with the entire load being picked up by R014. Under that scenario, the loading on R014 will violate its ratings in 2020, which will result in an infeasible solution considering future load growth through 2024 and beyond.

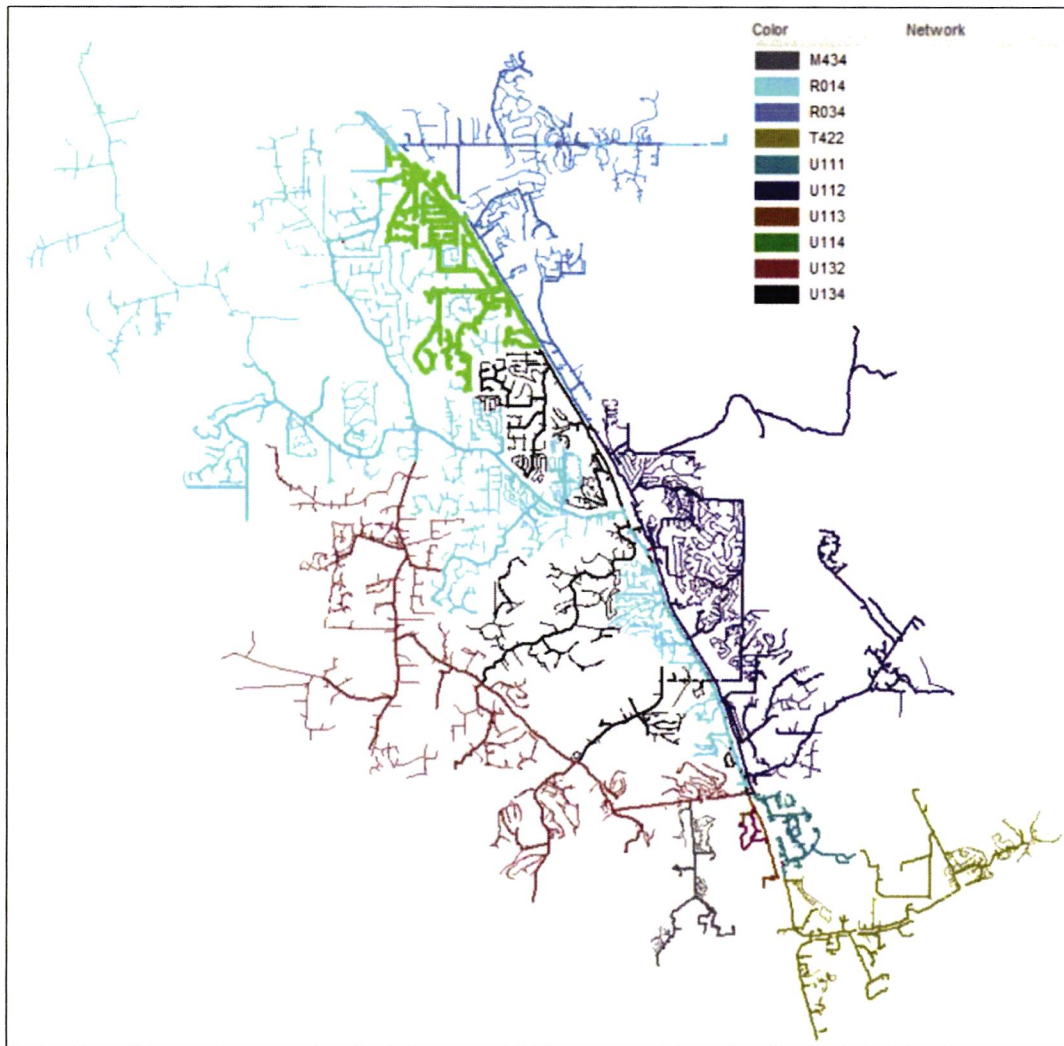
Table 12: La Sierra Distribution Circuit Loadings with R014 (FY 2020 & N-1)

La Sierra Distribution Circuits	Loading %	Total Load		
		kW	kVAr	kVA
U111	59.06	18331.07	6702.41	19517.95
U112	79.82	24682.79	4667.76	25120.27
U113	31.78	8792.21	5324.65	10278.85
U114	0.037	11.59	-9.94	15.27
Total		51817.65	16684.87	54437.61
La Sierra Distribution Circuits	Loading %	Total Load		
		kW	kVAr	kVA
U132	37.79	13178.12	1317.49	13243.81
U134	50.75	15911.63	1727.68	16005.15

Total		29089.75	3045.17	29248.7
Fair Oaks Ranch Distribution Circuits		Total Load		
Network ID	Loading %	kW	kVAr	kVA
R014	155.34*	35861.26	8834.26	36933.37

* CPS Distribution Planning Criteria Violation

Figure 10: Outage of Circuit U114, R014 Included in the Model with Peak Loads (FY 2020)



The reconfigured circuit case (without any outages) was also run to include additional loads to represent the year 2025 (assuming a reasonable average load growth of 4% each year). The following are the modelled loadings on the circuits.

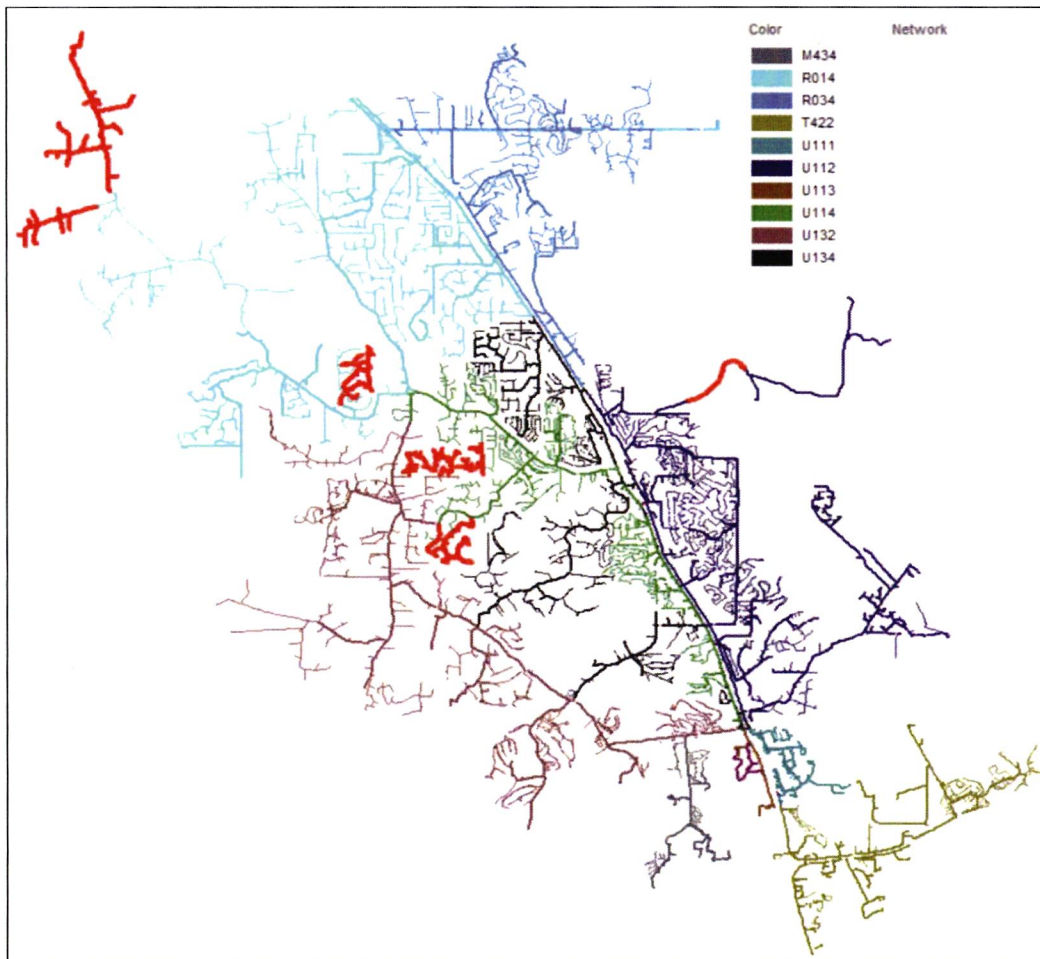
Table 13: La Sierra Distribution Circuit Loadings with R014 (FY 2025)

Substation U1-1	Loading	Total Load		
Network ID	%	kW	kVAr	kVA
U111	77.35	24007.96	10423.74	26173.2
U112	101.28*	31315.61	8081.35	32341.55

U113	43.54	12047.04	7445.16	14161.97
U114	84.41*	26336.08	6519.35	27131
Total		93706.69	32469.6	99172.67
Substation U1-3		Loading		Total Load
Network ID	%	kW	kVAr	kVA
U132	49.832	17371.29	3324.67	17686.58
U134	64.37	20180.17	4073.32	20587.16
Total		37551.46	7397.99	38273.25
Substation R0-1		Loading		Total Load
Network ID	%	kW	kVAr	kVA
R014	102.03*	23547.91	7689.13	24771.49

* CPS Distribution Planning Criteria violations

Figure 11: N-0 Model of La Sierra Circuits + Fair Oaks Circuit R014 with Peak Loads (Forecast FY 2025 with 4% Growth) Included in the Model.



Next, the reconfigured circuit case was modelled with a loading scenario for year 2025 with the outage of circuit U114 where all its load is picked up by circuit R014. There is not adequate capacity available on other La Serra circuits and R014 to be able to pick up this load from U114.

Table 14: La Sierra Distribution Circuit Loadings with R014 (FY 2025 & N-1)

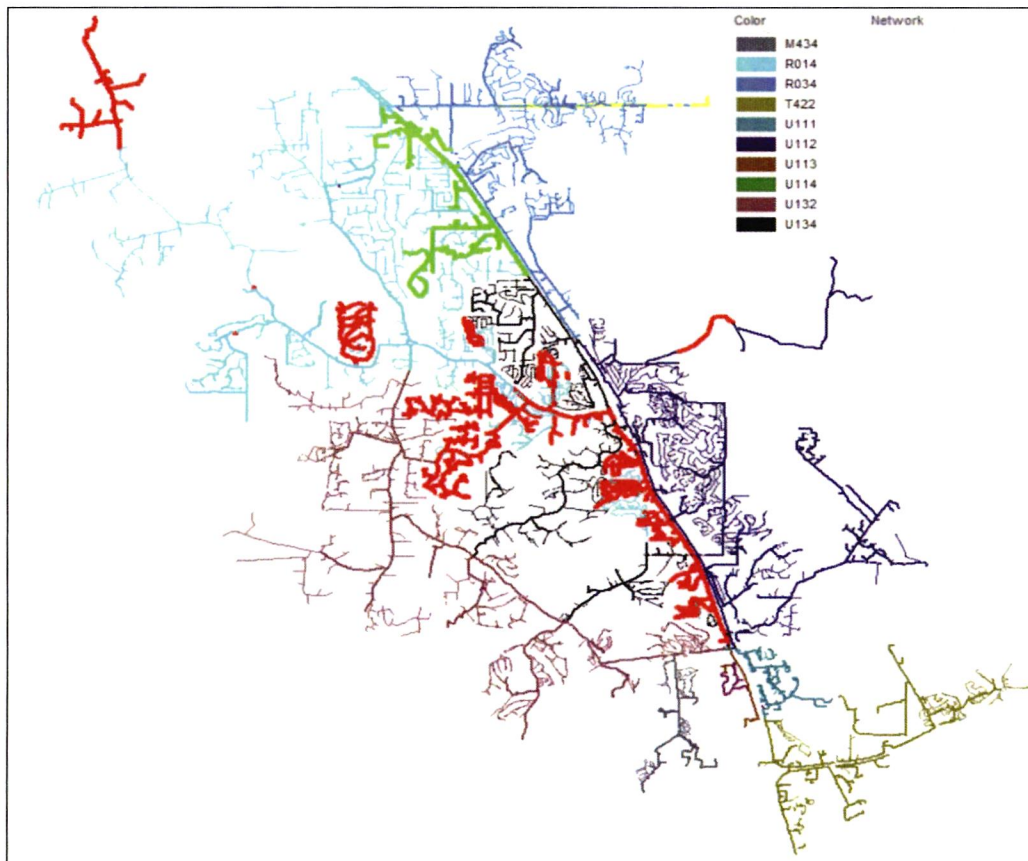
La Sierra Distribution Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U111	77.35	24007.96	10423.74	26173.2
U112	101.28*	31315.61	8081.35	32341.55
U113	43.54	12047.04	7445.16	14161.97
U114	0.047	14.67	-8.99	17.2
Total		67385.28	25941.26	72206.12

La Sierra Distribution Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U132	49.82	17371.29	3324.67	17686.58
U134	64.37	20180.17	4073.32	20587.16
Total		37551.46	7397.99	38273.25

Substation R0-1 Network ID	Loading	Total Load		
	%	kW	kVAr	kVA
R014	224.87*	51900.61	21679.47	56246.54

* CPS Distribution Planning Criteria violations

Figure 12: Outage of Circuit U114 with 4% Load Growth to Simulate a 2025 Case with Circuit R014 Energized



Based on the reasonable growth and expected development described above, the current La Sierra and Fair Oaks substations will exceed capacity and cannot adequately serve the area by 2024.

The modelling reveals low voltages on portions of the system served by circuit U114. These low voltages are within the Scenic Loop Road area. In addition, a loss of circuit U114 results in a voltage collapse in the Scenic Loop Road area (and beyond) as there is not adequate capacity on adjacent feeders to pick the load from circuit U114. Under that circumstance, voltages at the loads drop to a point lower than what a regulator or a capacitor bank can do to push the voltage to a normal operating range. Shifting loads to adjacent circuits only provides additional operation flexibility or near term planning flexibility and would not improve system reliability or overall system capability to support additional load growth within this region.

Importantly, CPS Energy's Distribution Planning Criteria includes limiting the loading on a distribution circuit to 80% of its capacity in order to ensure safe and reliable operation of the circuit and maintain quality service to customers. Circuit U114 recorded a peak loading of approximately 30 MW in 2019, which is approximately 98% of its rating. Circuit R014, which will be energized in summer 2020 will offload circuit U114 to under 70% of the rated capacity for a short time. However, the historical load growth in the region, and especially on circuit U114, is reasonably forecasted to remain at 4% (or higher). Thus, the loading on circuit U114 will again reach its reliable loading limit of 80% within four years. In addition, the load growth on the other circuits (within the entire northwestern region of Bexar County) will reasonably experience similar load growth and will not have adequate capacity on existing circuits by 2024.

3. System Assessment with Scenic Loop Substation

As a result of the limitations on the existing system to reliably serve current and future load, CPS Energy considered reasonable alternatives, including the construction of a new substation near the intersection of Scenic Loop Road and Toutant Beauregard Road. A new Scenic Loop substation within the area will significantly improve reliability for the northwest region of Bexar County by reducing circuit length and loading on each circuit, which will reduce exposure for outages as well as the number of customers affected during an outage. The new circuits out of the proposed Scenic Loop Substation will also create strong backbones and sufficient field ties to adjacent substation circuits (La Sierra and Fair Oaks Ranch) that will prevent major loss of customer load in emergency conditions. The new substation will not create additional circuits initially, but rather will allow for portions of existing circuits in the area to terminate at the new station, essentially shortening circuits and providing a new source to meet load demand. The proposed configuration of the Scenic Loop Substation would connect portions of circuits U114, U132, and R014 to Scenic Loop, thereby creating circuits V611, V612, V613 and V614 as shown in Figure 13 and Figure 14 below.

The new substation will support the development and requirements of existing and future critical load customers. Initially, an estimated 20-25 MW of load will be served by this new substation. If the project is not completed, the distribution system capacity in the Scenic Loop area will be exceeded by 2024 and the La Sierra and Fair Oaks Ranch substations will have increased reliability concerns. Also, some contingency conditions may lead to customer load being at risk of lengthy outages due to exceeding emergency capacity limits.

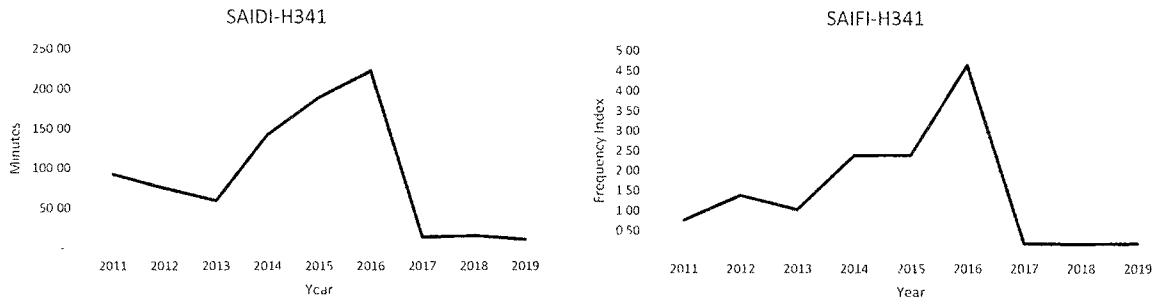
CPS Energy has designed new substations to help loads on circuits showing poor reliability very similar to the loads served from circuits connected to the La Sierra and Fair Oaks Ranch substations. As an example, H341 is a circuit in the nearby Helotes Substation that was serving approximately 4,000 customers and experienced poor reliability. In 2016 it was split into three circuits (K021, K022, K023) with 1,600 customers served off a new transformer in the Ranchtown Substation. When the load was moved onto the new circuits, the remaining customers served from the H341 circuit connected to the Helotes Substation experienced improved reliability and a reduction of CMI by 95% and CA by 97%. The SAIDI and SAIFI values on the circuit H341 shown in Table 15 indicate significant improvement in reliability achieved by splitting a portion of the load from H341 onto three shorter circuits beyond 2016.

The circuit H341 is a good example of the reliability benefits that can be achieved with the Scenic Loop Substation project. H341 is located nearby the Scenic Loop Substation study area and traverses similar terrain. Prior to the reconfiguration that significantly shortened the circuit, for years customers served by H341 experienced outages and poor reliability similar to the circuits served off the La Sierra and Fair Oaks Ranch substations.

Table 15: Helotes H341 Substation Circuit

Year	Customers	CMI	SAIDI	SAIFI	CA
2011	3562	329,619.53	92.55	0.76	2,708
2012	3818	286,261.77	74.98	1.38	5,279
2013	4016	237,979.13	59.25	1.03	4,136
2014	3638	517,724.22	142.32	2.37	8,631
2015	3620	683,906.21	188.95	2.38	8,611
2016	2011	447,157.68	222.37	4.64	9,335
2017	1706	23,537.00	13.80	0.17	298
2018	1704	26,470.12	15.53	0.15	262
2019	1707	18,032.17	10.57	0.17	290

The following plots describe the SAIDI and SAIFI reliability indices on the circuit H341 and it can be clearly seen that after the significant load shift to other circuits described above, there has been a dramatic improvement in reliability to the loads remaining connected to that circuit.



Following the reconfiguration of circuit H341, the reliability on the three new circuits K021, K022, K023 generally experienced reliability similar to the CPS system wide averages with a few exceptions due to extended outages during construction and other planned upgrades on these circuits. Table 16 lists the reliability values on these circuits for the past few years.

Table 16: Reliability values for circuits K021, K022 and K023 after shifting loads from H341

YEAR	K021		K022		K023	
	SAIDI	SAIFI	SAIDI	SAIFI	SAIDI	SAIFI
2016	22.06	2.22	-	-	-	-
2017	1.37	0.01	26.15	0.52	5.3	0.07
2018	490.46	2.34	83.29	2.41	29.88	0.23
2019	128.15	1.82	154.15	1.43	72.23	0.33

A planning analysis was conducted to identify system reliability based on assumed load forecast under no outage and selected outage conditions after inclusion of the Scenic Loop Substation. The analysis shows that a new substation in the Scenic Loop area will improve reliability within the northwestern region of Bexar County and will provide additional capacity for the significant forecasted load growth for the area. The proposed project configuration does not add additional circuits initially, but rather terminates existing circuits at the new substation, thereby directly contributing to improvement of reliability to the loads connected to the new substation as well as the shorter and less loaded circuits that remain connected to the La Sierra and Fair Oaks Ranch substations.

It is anticipated that by shifting portions of circuits U114, U132, and R014 to the Scenic Loop Substation (thereby creating four circuits V611, V612, V613 and V614), would provide an improvement on the reliability to the loads on the underlying circuits and would improve the overall reliability within this region.

The following circuit loadings described in the Table 17 represent a scenario that models the year 2024 in the region with Scenic Loop substation and inclusion of V611, V612, V613, and V614 circuits.

Table 17: Loading on Circuits in the Area after Including the New Scenic Loop Substation.

Scenic Loop Substation Circuits		Loading	Total Load		
		%	kW	kVAr	kVA
V611		30.80%	10925.01	-112.47	10925.59
V612		41.30%	12956.41	1945.47	13101.66
V613		19.62%	6516.88	1735.68	6744.06
V614		19.13%	6229.53	2104.14	6575.29
Total			36627.83	5672.82	37064.53
La Sierra Substation Circuits		Loading	Total Load		
		%	kW	kVAr	kVA
U111		74.10%	23076.39	9806.55	25073.66
U112		97.1%*	30089.77	7438.95	30995.68
U113		41.80%	11581.9	7140.82	13606.31
U114		38.70%	11844.05	3255.19	12283.23
Total			76592.11	27641.52	81427.3
La Sierra Substation Circuits		Loading	Total Load		
		%	kW	kVAr	kVA
U132		17.40%	5942.39	1697.92	6180.2
U134		61.70%	19393.11	3634.74	19730.79
Total			25335.5	5332.65	25890.63
Fair Oaks Ranch Substation Circuits		Loading	Total Load		
Network ID		%	kW	kVAr	kVA
R014		39.44	9572.99	2324.3	9851.12

* loads on this circuit can be easily switched on to other circuits on La Sierra and this is not considered a violation for this planning analysis

Figure 13: Ariel Imagery of Scenic Loop Region Indicating Boundaries of Circuits Serving Loads

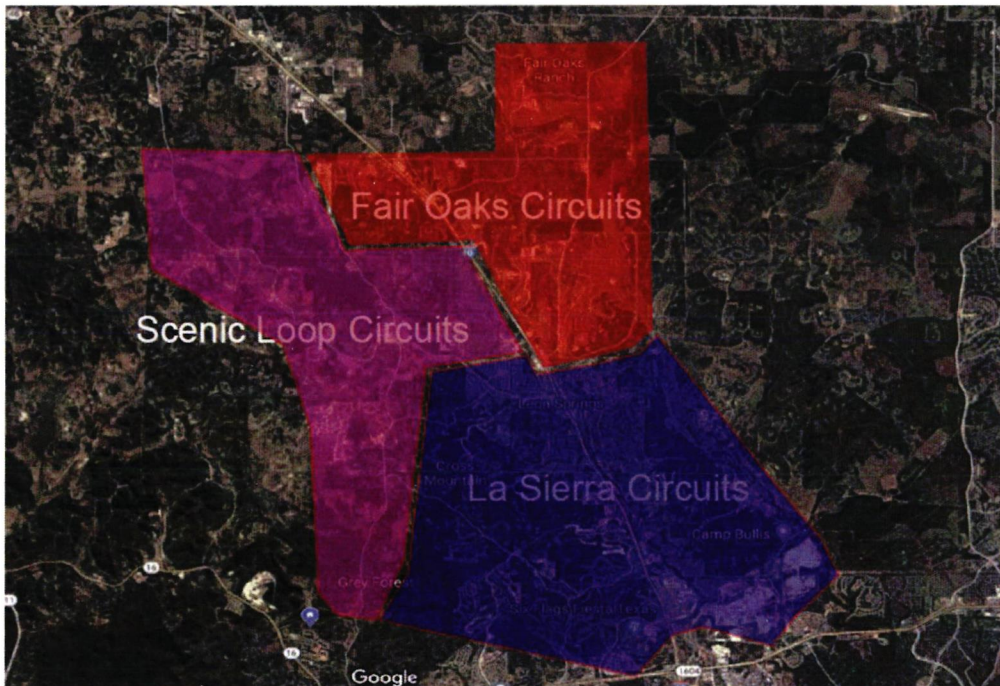
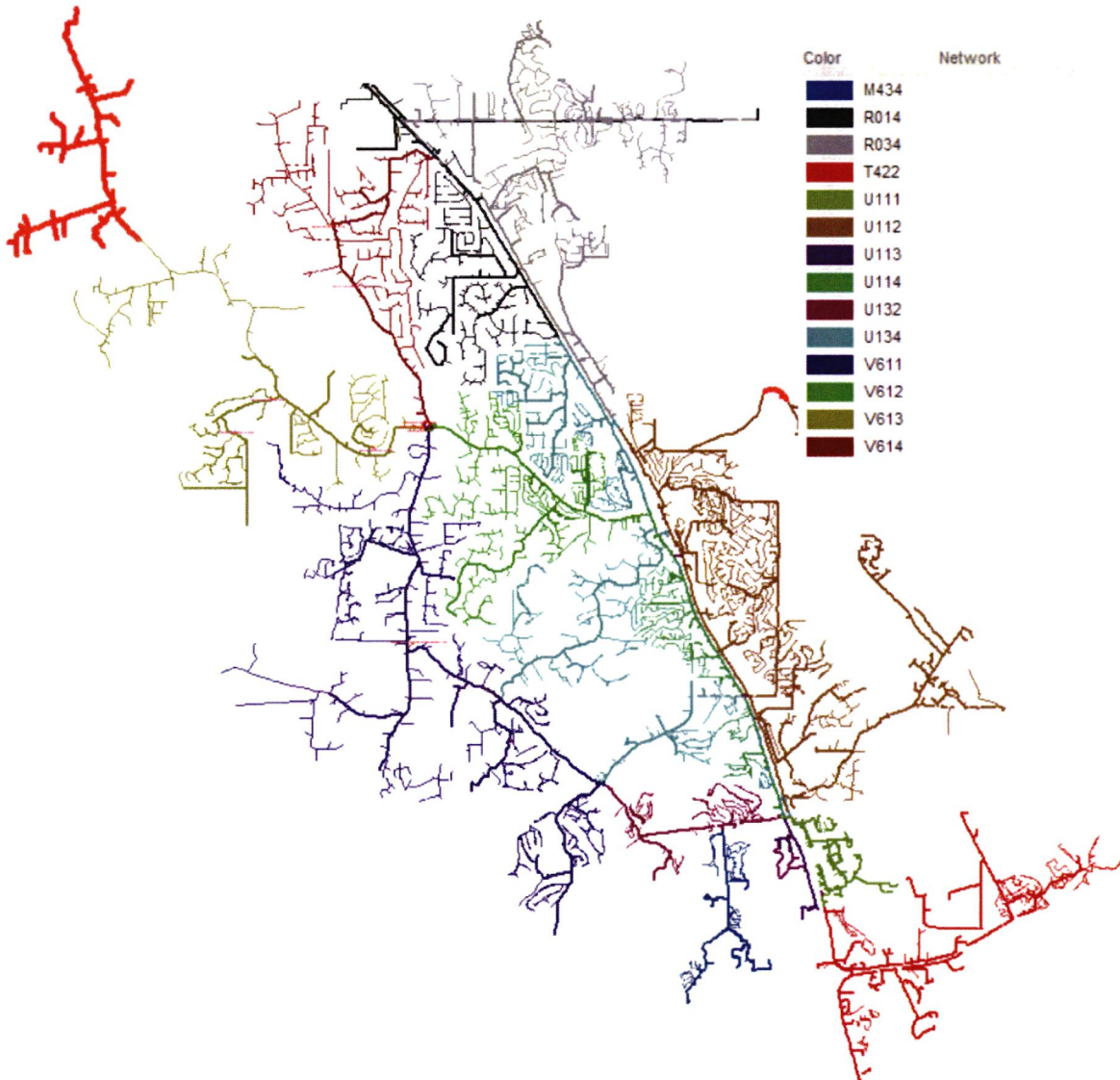


Figure 14 : Performance Under Peak Load (Forecast Summer 2024 Peak Loads with 4% Growth) – No Outage Conditions



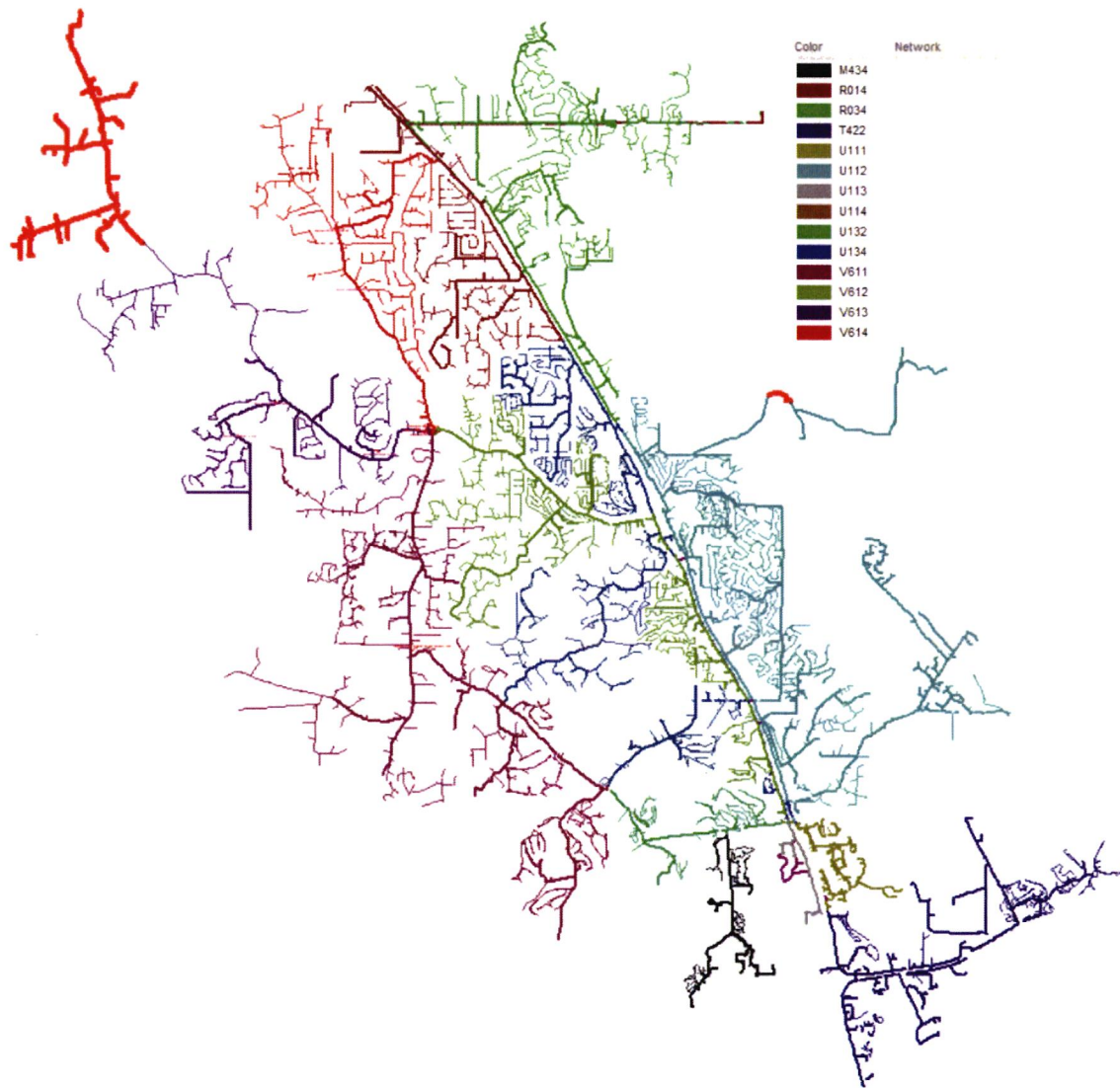
Additional analysis was conducted on the case with the Scenic Loop Substation in service under a severe outage that results in a loss of the main feed to circuit U114. The modelling tested the ability of Scenic Loop to pick up the service to loads connected to U114. The results indicate a feasible solution with acceptable thermal and voltage performance.

Table 18: Outage of Circuit U114 and Loads Getting Picked Up by Circuit V612

Scenic Loop Substation Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
V611	30.86%	10925.01	-112.47	10925.59
V612	80.08%	24953.43	5839.71	25627.64
V613	19.66%	6516.88	1735.68	6744.06
V614	19.16%	6229.53	2104.14	6575.29
Total		48624.86	9567.06	49557.09
La Sierra Substation Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U111	74.10%	23076.39	9806.55	25073.66
U112	97.1%*	30089.77	7438.95	30995.68
U113	41.80%	11581.90	7140.82	13606.31
U114	-	14.10	-9.16	16.82
Total		64762.16	24377.16	69198.15
La Sierra Substation Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
U132	17.40%	5942.39	1697.92	6180.2
U134	61.70%	19393.11	3634.74	19730.79
Total		25335.5	5332.65	25890.63
Fair Oaks Ranch Substation Circuits	Loading	Total Load		
	%	kW	kVAr	kVA
R014	9.44	9572.99	2324.3	9851.12

* loads on this circuit can be easily switched on to other circuits on La Sierra and this is not considered a violation for this planning analysis

Figure 15: Circuit Loadings on a Case that Models Outage of Circuit U114 in Forecast Summer 2024 with 4% Growth and Scenic Loop Substation in Service



The distribution planning cases, and analysis indicate that the existing and planned system can be further optimized and circuit loadings can be well balanced by shifting loads onto other circuits such that the existing infrastructure will be well utilized under such outage conditions.

4. Transmission Interconnection

CPS Energy evaluated potential transmission options that are best capable to serve the proposed Scenic Loop Substation. CPS Energy’s standard practice is to loop in 138-kV transmission lines for CPS Energy owned load serving stations and has arrived at three potential transmission options that connect the proposed Scenic Loop Substation to the existing interconnected transmission grid. Although there are 345-kV transmission lines in the vicinity of the proposed Scenic Loop Substation, because CPS Energy does not serve the distribution system load from 345 kV system, interconnection with such lines was not considered a viable alternative option. Figure 16 Transmission lines in the area surrounding the proposed Scenic Loop Substation provides an overview of the available transmission lines in the area, including substations within the region.

Figure 16 Transmission lines in the area surrounding the proposed Scenic Loop Substation



To determine the best option to serve and connect to the proposed Scenic Loop Substation, additional power flow analysis was conducted. This analysis coupled with the cost estimates to construct a looped 138-kV transmission circuit on mono pole structures determined the preferred transmission option. Figure 17 shows the three options considered and their possible connection to the area proposed for the Scenic Loop Substation. Table 19 provides the high level cost estimate considered in the analysis. To estimate the length of ROW, a straight line length with a 30% adder was used. For purposes of this

analysis, CPS Energy’s estimated cost per mile for double circuit 138-kV structure for the study area of \$ 6.9 million/mile was assumed for this analysis.

The following are the three options considered for the analysis:

- Option 1: Looping the Ranchtown to Menger Creek 138-kV transmission line into the Scenic Loop Substation.
- Option 2: Looping the La Sierra to UTSA B Tap 138-kV transmission line into Scenic Loop Substation.
- Option 3: Looping Fair Oaks to Esperanza 138-kV transmission line into Scenic Loop Substation.

Figure 17 Transmission Options considered for analysis.

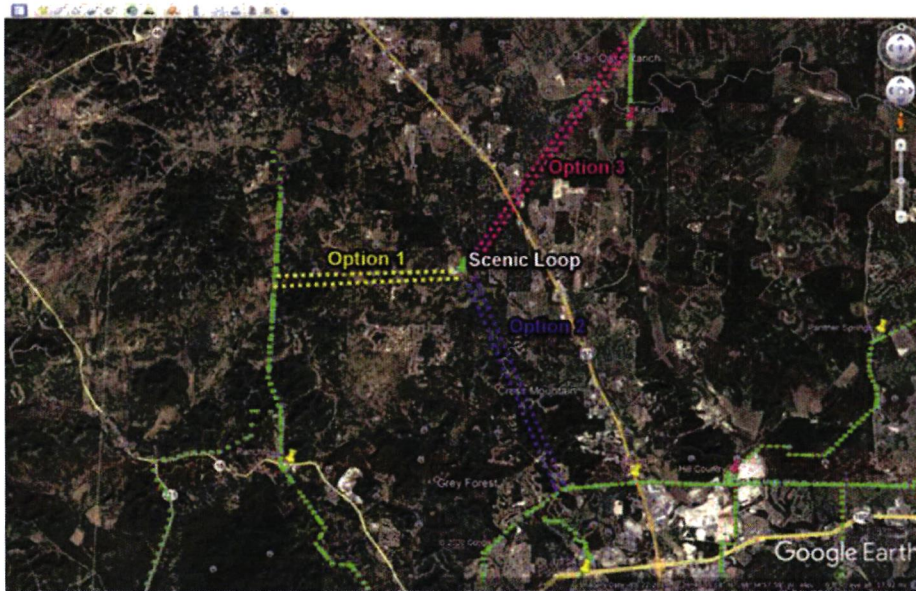


Table 19: Transmission options cost estimates

Study Options	Description	Conductor Type Modeled	Mileage (miles)	Substation (\$M)	Transmission (\$M)	Total (\$M)
Option 1	Looping Ranchtown to Menger Creek transmission line into Scenic Loop	795 Drake ACSR (2-Bundled)	4.27 Straight line length+ 30% adder= 5.55	\$ 8.0	\$ 38.3	\$ 46.3
Option 2	Looping La Sierra to UTSA B Tap transmission line into Scenic Loop	1272 Narcissus AAC (2-Bundled)	5.28 Straight line length+ 30% adder= 6.86	\$ 8.0	\$ 47.3	\$ 55.3
Option 3	Looping Fair Oaks to Esperanza transmission line into Scenic Loop	795 Drake ACSR (Single)	6.65 Straight line length+ 30% adder= 8.65	\$ 8.0	\$ 59.7	\$ 67.7

Power Flow Analysis:

To evaluate the performance of the considered transmission options, power flow analysis was conducted on a 2024 summer peak case published by ERCOT in March 2020. For this power flow case, the new Scenic Loop Substation was added along with the relevant transmission connections described above.

The following figures describe the power flows on the system based on the transmission options proposed.

Figure 18 Option 1: Looping Ranchtown to Menger Creek transmission line into Scenic Loop

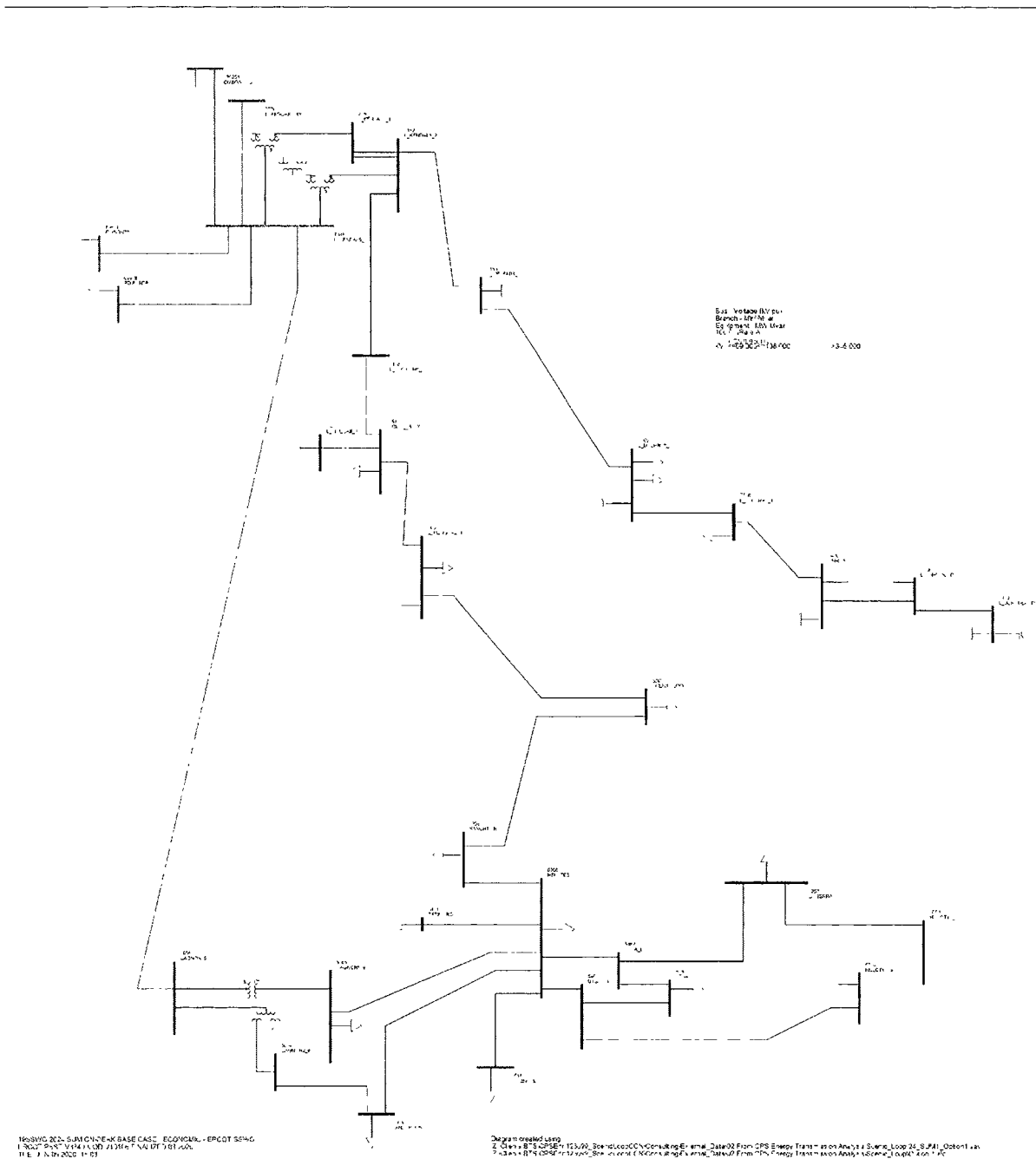


Figure 19 Option 2: Looping La Sierra to UTSA B Tap transmission line into Scenic Loop

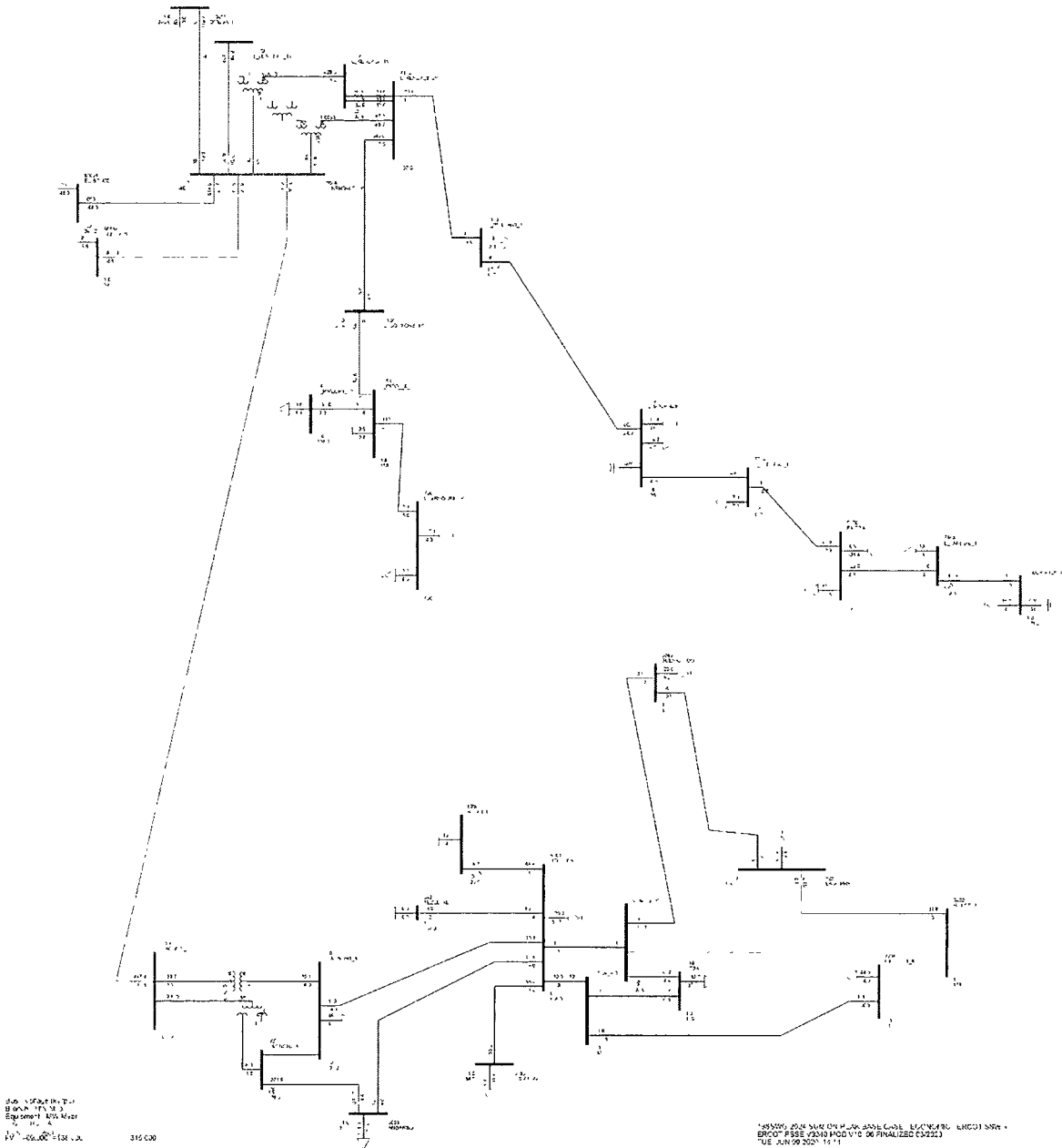


Figure 20 Option 3: Looping Fair Oaks to Esperanza transmission line into Scenic Loop

To evaluate the robustness of the transmission options, power flow contingency analysis was conducted to determine the impact of serving 25 MW from the Scenic Loop Substation. Contingency⁴ analysis based on contingencies within Kendall Zone⁵ for LCRA Transmission Services Corporation along with CPS Energy contingencies and standard single element outage and double element outages along with ERCOT specific outages were simulated for the analysis and compared against ERCOT planning criteria and CPS planning criteria.

The results from the analysis indicate no thermal overloading problems for all the options analyzed. The screening of the voltages (Table 20) following contingency analysis indicate a few outages where Option 3 does not meet the planning criteria. Over all the analysis indicates that Option 1 is a better performing option.

Table 20: Voltage Performance of the Transmission Options

Contingency Type	Bus	Bus	KV	1st Con	Option1		Option2		Option3	
	Number	Name			V Init	V Con	V Init	V Con	V Init	V Con
P1	5363	SCENIC_LOOP	138	7169 L_FAIROA8_1Y - 7170 L_BERGHE8_1Y - 1*	0.987	0.986	0.997	0.996	0.993	0.933
	5470	FAIRRA	138	7169 L_FAIROA8_1Y - 7170 L_BERGHE8_1Y - 1*	1.001	0.977	1.001	0.978	0.997	0.931
P2	5363	SCENIC_LOOP	138	5470 - CAP* 5470 FAIRRA - 7169 L_FAIROA8_1Y - 1	0.987	0.986	0.997	0.996	0.993	0.919
	5470	FAIRRA	138	5470 - CAP* 5470 FAIRRA - 7169 L_FAIROA8_1Y - 1	1.001	0.957	1.001	0.957	0.997	0.912
ERCOT3	5363	SCENIC_LOOP	138	7770 L_BERGHE5_1Y - 7170 L_BERGHE8_1Y - 7771 L_BERGHE1_1Y - 1 Followed by	0.987	0.989	0.997	0.997	0.993	0.879
	5470	FAIRRA	138	7152 L_KENDAL8_2Y - 7153 L_WELFAR8_1Y - 1 7770 L_BERGHE5_1Y - 7046 L_KENDALS_1Y - 1	1.001	0.935	1.001	0.935	0.997	0.892

Based on the cost and power flow analysis described above, connection of the Scenic Loop Substation to the existing interconnected transmission grid is most viable and less impacting to the community from a tie point on the Ranchtown to Menger Creek 138-kV transmission line located approximately five miles west of the area proposed for the Scenic Loop Substation.

⁴ NERC TPL-001-4 P1 through P7 type contingencies

⁵ submitted by LCRA published on 03/19/2020

5. Alternatives Considered

Six options were considered to address the reliability and capacity concerns associated with the CPS Energy distribution system in northwestern Bexar County. Option A involves shifting load from existing circuits identified as overloaded. Option B involves the construction of a new Scenic Loop Substation. Option C involves adding a distributed generation power source as a non-wire solution for the area. Option D describes an alternative with inclusion of a simple cycle gas generating station within the footprint to relieve loadings on the transformers. Option E involves adding new circuits into the Fair Oaks Ranch Substation to pick up additional loads in the Scenic Loop region. Option F describes rebuilding existing low reliable circuits as underground circuits. These six options are described and analyzed below.

- **Option A**

Option A involves designing tie points and shifting load from the La Sierra Substation to surrounding available circuits to create greater capacity on the La Sierra circuits to pick up growing loads in the Scenic Loop area. Because of the geographic relief and the existing CPS Energy service territory boundary, the Fair Oaks Ranch circuits can only shift load with La Sierra circuits, which would not enhance the capacity in the Scenic Loop area. Specifically, as shown in Table 21, Option A would involve shifting approximately 14.24 MW of load from La Sierra circuit U114 and Fair Oaks Ranch circuit R034 onto Fair Oaks Ranch R014 to provide loading relief on those circuits. This would result in 13.22 MW of capacity on circuits U114 and R034. Of this additional capacity that is available, only 2.7 MW can be useful for planning purposes as per the CPS Energy planning criteria to maintain circuit loadings under 80% of their nominal rating. After load shifts, the circuit R014 will have a loading of 62% and can additionally accommodate 4 MW to keep the circuit loading under 80%. Option A would result in approximately 6.7 MW of additional capacity available for future load growth in the Scenic Loop area. Based on CPS Energy's current load forecasts, Option A would provide sufficient capacity for the area until approximately 2021. The cost for Option A is minimal as no additional equipment upgrades are needed but will not provide the desired capacity to meet the load forecast beyond 2021. The R014 circuit has been energized in June of 2020 and the Table 21 describes the loading on circuits and the shift in loads on to R014 circuit.

Although Option A would provide some temporary additional load serving capacity from the La Sierra Substation and possibly some short term reliability improvement, it will not significantly improve the reliability issues experienced in the Scenic Loop area (described in Section 2.3) over the longer planning horizon. Under the Option A scenario, the circuit lengths originating from the La Sierra and Fair Oaks Ranch substations will be the same or in some cases lengthened based on load shifts chosen. Further, Option A would not add additional capacity to the Scenic Loop area and any benefit provided by this is only operational flexibility and has a minor benefit in short term planning.

The La Sierra circuits currently serving the Scenic Loop area loads (current U114 circuit is an example) are already extremely long and heavily loaded. The length and loading configuration of these circuits has resulted in decreasing reliability performance. Although Option A is a low cost alternative, it will only temporarily decrease some of the circuit loading in the area and will not notably reduce circuit line length. Within a short period of time, Option A will exacerbate the poor reliability performance of the CPS Energy distribution system in the Scenic Loop area and will not be able to accommodate load growth beyond the next few years. Regardless of cost, Option A is not a viable alternative to address the significant reliability and capacity problems CPS Energy is experiencing in northwest Bexar County.

Table 21: Load Shift Design.

CKT 1	From			To				Load Shift				
	CKT 1- kW	CKT 1- Nominal kW	CKT 1- %	CKT 2	CKT 2- kW	CKT 2- Nominal kW	CKT 2- %	Load Shift- kW	CKT 1 Adjusted- kW	CKT 1 New - %	CKT 2 Adjusted- kW	CKT 2 New - %
U114	28514	30577	93.25	R014	0	22806	0	7812	22765	74	14235	62
R034	22812	21799	110					6423	16389	75		

- **Option B**

Constructing a new Scenic Loop Substation will result in new transformer capacity (at the substation) directly connected to the existing transmission grid in an area where CPS Energy needs to significantly reduce distribution circuit length for reliability and increase overall system capacity (by more than 50 MW) for load growth. As proposed, locating a new substation geographically between the La Sierra and Fair Oaks Ranch substations significantly reduces the length and loading on many of the existing distribution circuits in the area. As discussed in greater detail above, shorter, less loaded distribution circuits will significantly decrease the exposure of the distribution system to potential outage events, which will directly relate to improved reliability. In contrast to Option A, which shifts some load, but cannot alter the distance of many of the distribution circuits in the area due to the geographic distance between La Sierra and Fair Oaks Ranch substations (approximately 11 miles), Option B places a new substation (with dual feed transmission service) geographically central to the area of increasing load growth (compare Figure 1 to Figure 13). Importantly, given the significant new load growth in the area generally, and specifically associated with the UTSA expansion and growth along the IH-10 corridor north of Loop 1604, a new substation in the in the Scenic Loop area will provide much needed operational flexibility that will allow CPS Energy to reliably serve capacity demands from the La Sierra, Fair Oaks Ranch, and Scenic Loop substations well into the future.

The customers connected downstream of the circuits from La Sierra will especially see a benefit from the new station in terms of improvements in reliability, as the additional station will offload circuits connected to La Sierra and Fair Oaks Ranch. The current estimated cost of the Scenic Loop Substation (including the transmission line project to connect the substation to the existing electric grid) is approximately \$46.3M.

- **Option C**

Option C considers non-wire alternatives to traditional transmission and distribution facility investments. The concept behind Distributed Energy Resources (DER) is that these alternatives will ultimately result in savings for ratepayers as utilities are able to develop DER within communities to offset or relieve local grid needs at a potentially lower cost and lower impact to the community than installation of additional distribution or transmission infrastructure. Thus, for DER to be a viable alternative to the Scenic Loop Substation project, it will need to provide similar system improvements at a reasonably similar cost to ratepayers.

To assess the relative costs of DER as an alternative to the Scenic Loop Substation project, Solar photovoltaic (PV) generation operated in conjunction with battery storage (BESS) was compared to the CPS Energy La Sierra Substation facilities as a potential solution to reduce peak and relieve capacity on circuits.

Figure 21: Relative Plots of MWh Comparing Energy Supplied by Source

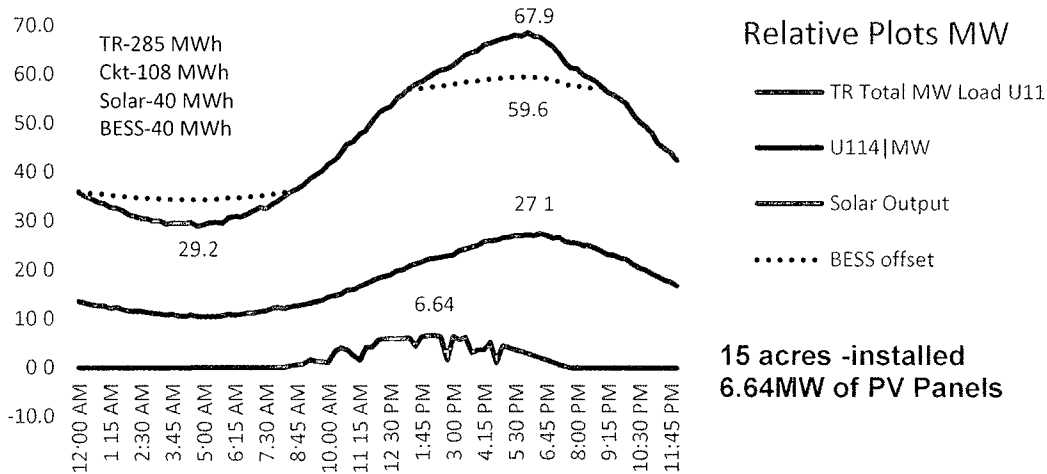


Figure 21 shows August 2019 Peak day demand of a transformer at La Sierra substation and one of the circuits (U114) to study the benefits and costs associated with a reduction of peak that is possible by including Solar PV and BESS as potential means to reduce circuit loadings. The plot shows an output of a 6.64 MW solar site and how including a 40MWh BESS on one of the circuits could perform in reduction of peak load on the transformer and provide adequate demand reduction. In this example, solar provided 40 MWh of energy during the day that is available to reduce the demand on the station. Because the solar PV generates energy in the afternoon rather than at evening peak, energy storage is required to shift the power to the evening when demand is the highest. Storage could perform the demand reduction without solar nearby if the energy is stored using the distribution system available capacity during low demand periods. The NREL study⁶ is used to estimate battery capacity, solar power requirements and the costs. BESS offset illustrates a demand reduction of 8.3 MW with 40MWh of storage and the demand peak that may be flattened by applying a BESS.

Based on the example discussed above, the cost of providing a demand reduction of 8.3 MW is \$15.2M (\$0.38M/MWh (40MWh)). The Scenic Loop Substation is anticipated to provide a system capacity benefit of 20-25 MW initially and the cost of BESS to provide a similar benefit would be approximately \$45.0M. In addition, the typical functional life-span of BESS is currently limited to approximately 15 years (compared to the estimated 40 year lifespan of the proposed substation facilities). BESS also requires higher operating costs to maintain the BESS resource.

The estimated cost of single axis tracking solar panels with the inverters to produce 40MWh on a sunny day is approximately \$7.5M. Replacing the 20-25MW initial capacity of the Scenic Loop Substation would cost approximately three times that amount. In addition, using a conservative estimate of 2.5 acres per MW of solar, such a facility would require approximately 50-60 acres of available property for operation of the solar PV facility. Thus, the total cost of the installation of a 25 MW PV resource would be approximately \$25 - \$30M and would require at least ten times the acreage of the proposed substation. In addition to the significant total cost of resources nearly \$75M (\$45M for BESS and \$25M for PV), it is also important to note that this solution will require additional station costs to interconnect the DER

⁶ <https://www.nrel.gov/docs/fy19osti/71714.pdf>

resources to the distribution system and will not fully alleviate existing reliability issues that are directly associated with line length and overhead line length through significant terrain and vegetation since the existing distribution circuits would remain unchanged.

- **Option D**

Another DER option considered was construction and operation of gas-fired generation within the project area to replace the capacity of the proposed Scenic Loop Substation. The nearest available gas pipeline to the Scenic Loop area capable of serving a gas-fired generating station is approximately 5.0 miles away. In addition, any new fossil-fueled generation would require significant water usage and environmental permits.

Based on the review of the load growth in the region, a new substation is needed in the Scenic Loop area by 2025. It is highly unlikely that any new fossil-fueled generation could be permitted and constructed in order to address the need for the area within this time frame.

Also, it should be noted that adding a generation resource to the existing circuits will still require additional switchgear and transformers and the cost would be considerably similar to the cost of developing a new Scenic Loop Substation (in addition to the cost of the generation facility).

The cost to develop a new 50 MW peaking plant (aeroderivative engine) would be approximately \$60M without considering the costs to develop a pipeline to the plant and the costs to mitigate other constraints to make this option a viable alternative to the Scenic Loop Substation. In addition to the significant cost of more than \$60M (plus the Pipeline costs and interconnection costs), and depending on the location of the generation facility, it is also important to note that this solution may not fully alleviate existing reliability issues that are directly associated with distribution circuit line length and overhead line length through significant terrain and vegetation since the existing distribution circuits would remain unchanged if the new generator is not constructed in the area proposed for the new Scenic Loop Substation.

- **Option E**

An alternative to construction of the Scenic Loop Substation that was evaluated involves upgrading the existing transformers at the Fair Oaks Ranch Substation for 100 MVA operation and the construction of two new distribution circuits from that substation. The Ranchtown Substation is further west to Scenic Loop area it was determined that building new circuits from that substation was not a reasonable alternative to the project.

The Fair Oaks Ranch Substation is located on the east side of the I-10 with more than a mile of underground conduit to terminate cables into the station. The distribution corridor in the Scenic Loop area is very limited and would require converting the existing single circuit structures to double circuit structures and terminating the new circuits into Fair Oaks Ranch with additional undergrounding and utilizing existing trenching. The length of a new circuit is anticipated to be 30 miles long to pick up portions of the Scenic Loop area load and is anticipated to have a cost of more than \$20M. Expansion of the capacity of the Fair Oaks Ranch Substation will provide some additional capacity for the distribution system in the Scenic Loop area. However, as can be seen on Figures 1 and 13, expansion of Fair Oaks Ranch will still leave the Scenic Loop area served by long distribution circuits many miles from the substation transformers at Fair Oaks Ranch and La Sierra. Thus, while there may be some benefit in the short term to some aspects of reliability and capacity expansion, the reliability to the Scenic Loop area will continue to deteriorate due to the distance from a strong substation in the vicinity. Further, at a total estimated cost of \$45M (2 circuits with transformer and station upgrades), this option is nearly as costly as the Scenic Loop Substation alternative with significantly less improvement to the reliability and capacity flexibility for the area.

- Option F

In order to address reliability of the existing distribution circuits serving the Scenic Loop area, an alternative was evaluated that involved relocation of existing poor performing circuits from overhead to underground. While undergrounding distribution circuits can have a significant improvement on reliability, the cost to underground an entire circuit is typically 8-10 times⁷ more expensive than overhead circuits (approximately \$40M⁸). At least two of the existing circuits from the La Sierra and Fair Oaks Ranch substations (U114, R034) would need to be relocated underground to achieve the reliability benefits anticipated from construction of the proposed Scenic Loop Substation. An estimated cost of such undergrounding is reasonably estimated at approximately \$80M.

In addition, the engineering and maintenance for underground distribution circuits is more complex and expensive and would take many years to complete (resulting in further decreasing reliability in the interim of the conversion). In addition, the expanded capacity on the new underground ground distribution circuits would result in further needed upgrades to equipment at the Fair Oaks Ranch and La Sierra substations, resulting in additional costs for this alternative.

In order to achieve the same reliability and capacity benefits of the Scenic Loop Substation alternative, the undergrounding alternative would cost more than twice the cost of a new substation and will not provide the same operational flexibility as a third substation (Scenic Loop) for the region. This alternative was rejected based on the significant expense of the alternative.

⁷ https://emp.lbl.gov/sites/all/files/lbnl-1006394_pre-publication.pdf

⁸ https://emp.lbl.gov/sites/all/files/lbnl-1006394_pre-publication.pdf - EEI (2013) reported a minimum overhead-to-underground distribution line conversion cost range of \$158,100–\$1,000,000/mile and a maximum conversion cost range of \$1,960,000–\$5,000,000. EEI (2013) also reported that installing new underground distribution lines costs from \$297,200–\$1,141,300/mile (minimum) to \$1,840,000–\$4,500,000/mile (maximum).

6. Conclusion and Recommendation

As residential, commercial, and industrial development and associated electric demand increases in the northwestern region of Bexar County, CPS Energy has identified reliability violations in the Scenic Loop area today. Although few modifications of the existing distribution circuits will provide additional capacity and some short term improvements in reliability, the existing system will be inadequate to reliably serve the area by 2024 in accordance with CPS Energy's Distribution Planning Criteria. If additional capacity is not added to the system, it will become difficult for CPS Energy to provide reliable service, sufficient voltage support for normal summer load, and capacity for load shifts during maintenance or emergency conditions. By 2024 the distribution system will reach a point at which connection of new customers will lead to unacceptable levels of reliability. The addition of the Scenic Loop Substation will support existing, short-term, and long-term load growth in the region, increase system capacity and infrastructure support circuit ties, improve reliability, and decrease outage durations. The new substation will also reduce transformer loading at adjacent substations, providing for additional load growth in the regional area.

The reliability concerns, driven by continued load growth in the area, demonstrate the need for a new substation. Burns McDonnell conducted analysis that supports CPS Energy's recommendation that a new Scenic Loop Substation (Option B) is the preferred solution to address the short-term and long-term system needs of the northwestern Bexar County region.

The proposed new Scenic Loop Substation will meet the forecasted load growth and improve the reliability of the area with shorter circuits, strong backbones, and sufficient field circuit ties that will prevent major loss of customer load in faulted conditions (e.g. equipment failures, tree contact, lightning strikes, or vehicle incidents). The Scenic Loop Substation will be designed as a three unit site to accommodate two transformers and a spare position. An estimated 20-25 MW of load will be served by the new substation initially. The substation will be looped into the existing Ranchtown to Menger Creek 138 kV transmission line approximately five to seven miles to the west.

In addition to accommodating forecasted load growth, the Scenic Loop Substation will improve reliability in the northwestern region of Bexar County. Adding the proposed substation will reduce the total number of customer interruptions and duration of those interruptions.



7. Appendix A: UTSA 2010-2040 Forecast for Residential Dwelling Units and Jobs

SA Tomorrow UTSA Area Regional Center
2010-2040 Forecast for Residential Dwelling Units and Jobs

Forecast, 2010-2040	Baseline Scenario ¹	Targeted Growth Scenario ²
Dwelling Units		
Forecast Total	15,900	37,500
Forecast Annual	530	1,250
Remaining Capacity ³	27,544	5,944
Percent of Capacity ³	37%	86%
Jobs		
Forecast Total	39,700	48,000
Forecast Annual	1,323	1,600
Remaining Capacity ³	67,690	59,390
Percent of Capacity ³	37%	45%

Source: Economic & Planning Systems; City of San Antonio Planning Department

¹ Based on Alamo Area Metropolitan Planning Organization (AAMPO) 2040 1A2' forecasts

² Estimates for future growth in the centers and corridors assuming that dense development patterns can be attracted and supported by high-frequency transit service. The Targeted-Growth numbers assume a significant market shift towards the Regional Centers based on associated infrastructure such as fixed guideway, frequent transit service that facilitates denser, mixed-use development

³ Based on UTSA Land Capacity Analysis totals in Table: Future Land Use Acreage and Forecast Dwelling Units, Jobs, and Commercial/Industrial Square Feet

SA Tomorrow UTSA Area Regional Center
Future Land Use Acreage and Forecast Dwelling Units, Jobs, and Commercial/Industrial Square Feet

Future Land Use Category	Acres ¹	Percent by Use		Acres by Use		Factors			UTSA Land Capacity			Forecast (2040) ³		
		Residential	Non-Residential	Residential	Non-Residential	FAR	DU/Acre ²	Sq. Ft. per Job	Residential Dwelling Units	Commercial / Industrial Bldg Area	Commercial / Industrial Jobs	Residential Dwelling Units	Commercial/Industrial Jobs	Commercial/Industrial Building Area (SF)
Low Density Residential	57.2	100%	0%	57	0	0	5	0	286	0	0	105	-	-
Urban Low Density Residential	135.3	100%	0%	135	0	0	10	0	1,353	0	0	495	-	-
Medium Density Residential	29.4	100%	0%	29	0	0	20	0	587	0	0	215	-	-
High Density Residential	0.0	100%	0%	0	0	0	35	0	0	0	0	-	-	-
Neighborhood Mixed-Use	16.7	25%	75%	4	13	0.5	20	300	83	272,770	909	31	308	92,315
Urban Mixed-Use	295.6	50%	50%	148	148	0.5	35	300	5,172	3,218,730	10,729	1,893	3,631	1,089,335
Regional Mixed-Use	1,369.6	50%	50%	685	685	0.75	50	300	34,241	22,372,880	74,576	12,532	25,239	7,571,796
Employment/Flex Mixed-Use	245.8	20%	80%	49	197	0.5	35	500	1,721	4,283,222	8,566	630	4,832	1,449,598
Business/Innovation Mixed-Use	0.0	20%	80%	0	0	0.5	35	500	0	0	0	-	-	-
Heavy Industrial	1,276.7	0%	0%	0	0	0.3	0	1,000	0	0	0	-	-	-
Community Commercial	323.2	0%	100%	0	323	0.3	0	400	0	4,224,116	10,560	-	4,765	1,429,595
Regional Commercial	62.7	0%	100%	0	63	0.3	0	400	0	819,535	2,049	-	925	277,360
City/State/Federal Government	692.1	0%	0%	0	0	0.3	0	300	0	0	0	-	-	-
Parks/Open Space	560.7	0%	100%	0	561	0	0	0	0	0	0	-	-	-
Agricultural	0	10%	90%	0	0	0	0	0	0	0	0	-	-	-
Total	5,065.1	22%	39%	1,108	1,988				43,444	35,191,252	107,390	15,900	39,700	11,910,000

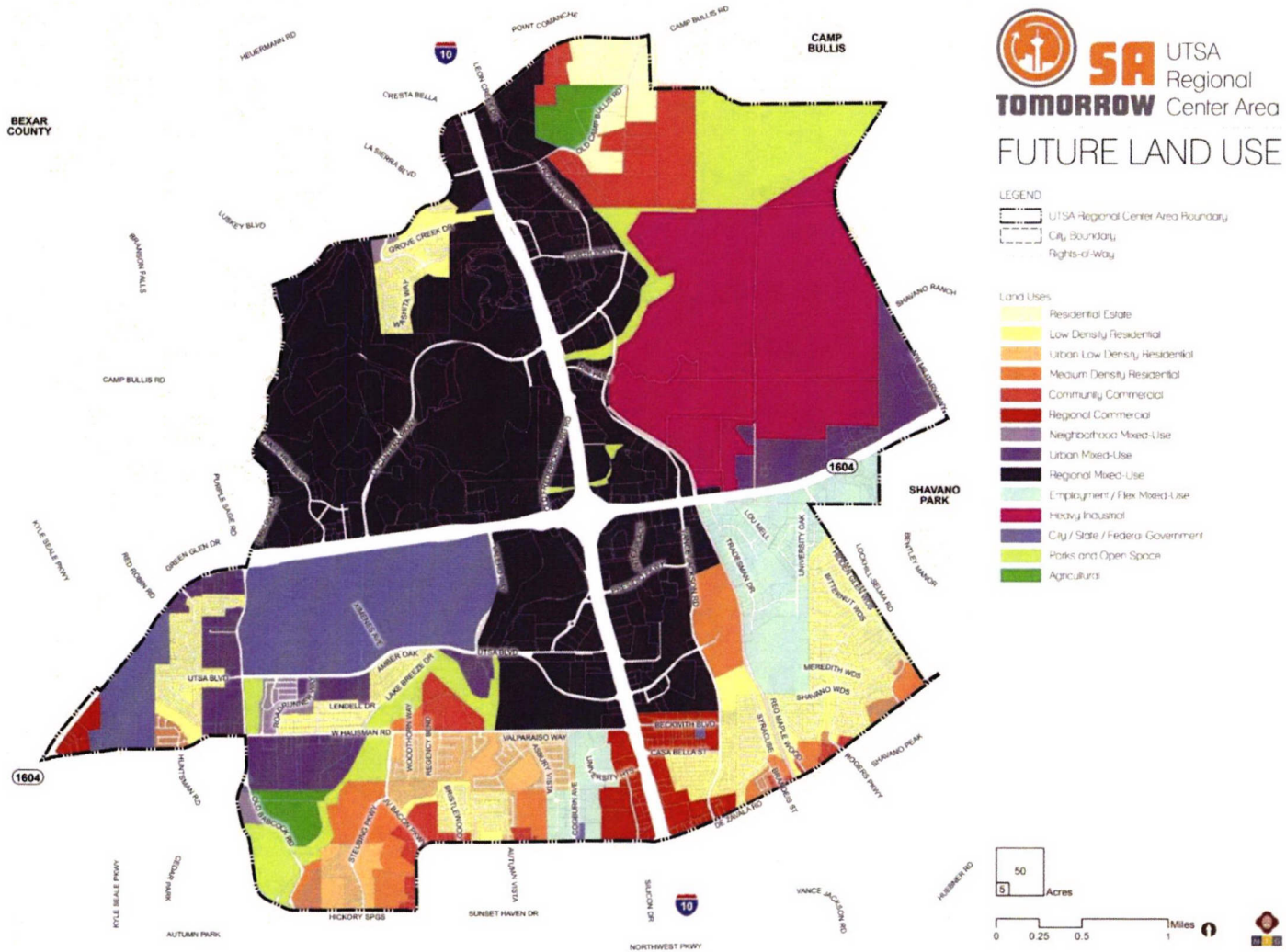
Source: Economic & Planning Systems; City of San Antonio Planning Department

¹ Based on the adopted Future Land Use Map in the UTSA Area Regional Center Plan (<https://utsa-area.sanincplan.com/region/framework/land-use/>)

² Based on the stated range of typical densities for residential land use categories (SA Tomorrow Land Use Classifications (Adopted October 11, 2018) document found at https://www.sanantonio.gov/Planning/Planning/About/Design/Future_Land_Use/)

³ The 2040 Forecast numbers should be considered "Net New" dwelling units, jobs, and building square footage beyond current levels

UTSA Area Regional Center's adopted Future Land Use Map.



OVERSIZED MAP(s) or DOCUMENT(s)

TO VIEW

OVERSIZED MAP(s) or DOCUMENT(s)

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Thank you