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<b>APPLICATION OF EL PASO</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ELECTRIC COMPANY TO AMEND ITS</b>	<b>§</b>	
<b>CERTIFICATE OF CONVENIENCE</b>	<b>§</b>	<b>OF TEXAS</b>
<b>AND NECESSITY FOR THE SEABECK-</b>	<b>§</b>	
<b>TO-SAN FELIPE 115-KV</b>	<b>§</b>	
<b>TRANSMISSION LINE IN EL PASO</b>	<b>§</b>	
<b>COUNTY</b>	<b>§</b>	

**COMMISSION STAFF’S REPLY BRIEF**

On November 16, 2020, El Paso Electric Company (EPE or Applicant) filed its Application to Amend its Certificate of Convenience and Necessity for the Seabeck to San Felipe 115-kv Transmission Line in El Paso County. A deadline was set in this matter requiring the parties to file a reply brief on or before January 18, 2022. Therefore, this pleading is timely filed.

**A. STAFF’S REPLY BRIEF**

Staff respectfully notes that EPE,<sup>1</sup> Hector Aguilar Jr.,<sup>2</sup> and Sylvia Ruvalcaba<sup>3</sup> have all filed initial briefs or statements that support Route 1, which is Staff’s recommended route as outlined in its Initial Brief filed December 17, 2021. In addition, Staff respectfully notes that, as of the date of this filing, Howard Pearlmutter has not filed an initial brief in this matter.

**II. CONCLUSION**

For the reasons stated above, Staff continues to recommend that Route 1 best meets the rules and criterion set by Commission rules.

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<sup>1</sup> *El Paso Electric Company’s Initial Brief*, Docket No. 51480 (Dec. 17, 2021).

<sup>2</sup> *Initial Brief of Hector Aguilar Jr.*, Docket No. 51480 (Dec. 7, 2021).

<sup>3</sup> *Initial Brief Statement of Sylvia Ruvalcaba*, Docket No. 51480 (Dec. 11, 2021)

Dated: January 18, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Rachelle Nicolette Robles  
Division Director

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**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on January 18, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Kevin R. Bartz  
Kevin R. Bartz