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PROJECT NO. 52667

REPORT AND ATTESTATION § PUBLIC UTILITY COMMISSION
DEMONSTRATING COMPLIANCE §
WITH HB 4150 § OF TEXAS

**AEP TEXAS INC. REPORT AND ATTESTATION DEMONSTRATING
COMPLIANCE WITH HOUSE BILL 4150**

AEP Texas Inc. (AEP Texas) files this Report and Attestation in response to the October 4, 2021 memorandum filed in this Project by the Public Utility Commission of Texas, Division of Compliance and Enforcement. The memorandum required the filing of this Report and Attestation demonstrating compliance with House Bill 4150 by January 14, 2021. Therefore, this Report and Attestation is timely filed.

I. Introduction

As noted in the memorandum, Section 6 of House Bill 4150 requires any electric utility, municipally owned utility, or electric cooperative that owns a transmission or distribution line over a lake listed in PURA § 38.004(b) that is not in compliance with the clearance standards of Rule 232 of the National Electrical Safety Code Standard ANSI (c)(2) in effect at the time the line was constructed to bring the line into compliance not later than December 31, 2021. The memorandum filed by the Division of Compliance and Enforcement required utilities, including AEP Texas to file a report in this project with the following information that is provided in Section II below.

- A declaration that each distribution line above 1 kilovolt or transmission line above 60 kilovolts owned by the utility that crosses a lake listed in PURA § 38.004(b) meets the applicable vertical clearance requirements established in Rule 232 of the NESC Standard ANSI (c)(2).
- The date on which the company verified each line’s compliance with the applicable NESC Standard.
- For each utility that self-identified a line that did not meet vertical clearance requirements in an annual report filed in either Project 50596 or Project 51890, a declaration that each line identified in the annual report meets the NESC Standard.
- If a line over a lake listed in PURA § 38.004(b) does not meet the NESC Standard:
 - The name of line;
 - The name of lake and the county or counties in which the lake is located;
 - A narrative description of actions the utility will take to bring the line into compliance with the NESC Standard; and
 - The date by when the line will be brought into compliance.

Additionally, the memorandum required that each affected utility submit with the report an affidavit signed by an officer of the company who has direct responsibility for distribution or transmission service or construction attesting to the veracity of the information provided in the report. The affidavit of Judith E. Talavera, President and Chief Operating Officer of AEP Texas is included as Attachment A to this report. Ms. Talavera is an officer of AEP Texas with direct responsibility for distribution and transmission service and construction for AEP Texas.

II. HB 4150 Report

- 1. A declaration that each distribution line above 1 kilovolt or transmission line above 60 kilovolts owned by the utility that crosses a lake listed in PURA § 38.004(b) meets the applicable vertical clearance requirements established in Rule 232 of the NESC Standard ANSI (c)(2).**

As shown in Attachment B to this report, the distribution lines above 1 kilovolt and transmission lines above 60 kilovolts owned by AEP Texas that cross a lake listed in PURA § 38.004(b) meet the applicable vertical clearance requirements established in Rule 232 of the NESC Standard ANSI (c)(2).

- 2. The date on which the company verified each line's compliance with the applicable NESC Standard.**

The date on which AEP Texas verified each line's compliance with the applicable NESC Standard is shown in Attachment B.

- 3. For each utility that self-identified a line that did not meet vertical clearance requirements in an annual report filed in either Project 50596 or Project 51890, a declaration that each line identified in the annual report meets the NESC Standard.**

In Project No. 50596 and Project No. 51890, AEP Texas self-identified six possible violations, all of which are on the Carver — Maxwell 138 kV line that is approximately 56 miles in length. Although the line was designed according to NESC when it was constructed in the late 1960s, AEP Texas believes the occurrences have come to light as a result of the greater accuracy of modern survey and design tools. The occurrences were identified as part of the planning process for a rebuild of the line, which will begin the engineering and design phase in the coming months. The line is located in a remote area of west Texas, and AEP Texas does not believe the occurrences represent a risk to the public requiring immediate remediation per the NESC. The Carver-Maxwell 138 kV line does not cross a lake listed in PURA § 38.004(b).

- 4. If a line over a lake listed in PURA § 38.004(b) does not meet the NESC Standard:**
- **The name of line;**
 - **The name of lake and the county or counties in which the lake is located;**
 - **A narrative description of actions the utility will take to bring the line into compliance with the NESC Standard; and**
 - **The date by when the line will be brought into compliance.**

As addressed in the responses to 1 and 2 above, all lines over lakes listed in PURA § 38.004(b) meet the NESC Standard. Therefore, this question is not applicable.


AFFIDAVIT OF JUDITH E. TALAVERA

STATE OF TEXAS §
 §
COUNTY OF NUECES §

BEFORE ME, the undersigned authority, on this day personally appeared Judith E. Talavera, whose business address is 539 North Carancahua Street, Corpus Christi, Texas 78401 who being by me first duly sworn, on oath, deposed and said the following:

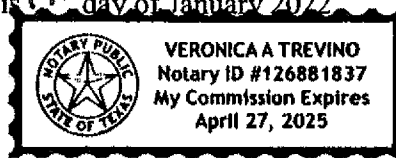
1. My name is Judith E. Talavera. I am over the age of twenty-one years, am of sound mind, have personal knowledge of the statements made herein, and the facts are true and correct to the best of my knowledge.
2. I am currently the President and Chief Operating Officer of AEP Texas.
3. As President and COO of AEP Texas, I am an officer of AEP Texas who has direct responsibility for distribution or transmission service or construction and am attesting to the veracity of the information provided in this report demonstrating compliance with House Bill 4150 (“House Bill 4150 Report”).
4. I swear or affirm that I either have personal knowledge of the facts in this House Bill 4150 Report or have relied on people with personal knowledge of the facts in this House Bill 4150 Report. The information provided in this House Bill 4150 Report is true and correct.
5. I have authority to submit this House Bill 4150 Report on behalf of AEP Texas.

FURTHER, AFFIANT SAYETH NOT.



Judith E. Talavera

SUBSCRIBED AND SWORN TO BEFORE ME on this 14th day of January 2022.



Notary Public State of Texas

Attachment B – List of Lines Over HB 4150 Lakes

Name of Lake	Line Type	Line or Circuit Name	Compliance Verification Date*
Abilene	Distribution	Tuscola 97AB3730	9/23/2021
Amistad	Distribution	Amistad Dam 94LA5450	9/27/2021
Amistad	Distribution	Picacho 94LA590	9/27/2021
Amistad	Distribution	La Pryor 94LA570	11/16/2021
Balmorhea	Distribution	Saragosa 97SA1590	11/30/2021
Casa Blanca	Transmission	Encinal - Wormser 138kV	5/12/2021
Casa Blanca	Transmission	University - Wormser 138kV	2/17/2021
Casa Blanca	Distribution	Gateway 94LA350	9/27/2021
Cisco	Distribution	Cisco 97AB1020	12/21/2021
Coletto Creek	Transmission	Coletto - Kenedy SS 138kV	11/5/2021
Coletto Creek	Transmission	Coletto Creek - Lon Hill 345kV	12/6/2021
Coletto Creek	Transmission	Coletto Creek - Tuleta 138kV	9/27/2021
Coletto Creek	Transmission	Victoria - Coletto (N) 138kV	11/24/2021
Coletto Creek	Transmission	Victoria - Coletto (S) 138kV	10/14/2021
Corpus Christi	Distribution	Mathis 94CS340	9/27/2021
Corpus Christi	Distribution	Mathis 94CS1410	9/27/2021
Corpus Christi	Distribution	Mathis 94CS4170	10/27/2021
Corpus Christi	Distribution	Mathis 94CS5440	9/27/2021
E. V. Spence	Transmission	Oak Creek - Cedar Hill 138kV	12/9/2021
E. V. Spence	Transmission	Sterling City - Robert Lee 69kV	6/30/2021
E. V. Spence	Transmission	Robert Lee - Cedar 138kV	6/30/2021
E. V. Spence	Distribution	Robert Lee 97SA4125	9/23/2021
E. V. Spence	Distribution	Edith Humble 97SA6170	9/23/2021
Falcon	Transmission	Lopeno - Zapata 138kV	7/26/2021
Falcon	Transmission	Rio Bravo - Zapata 138kV	2/22/2021
Falcon	Distribution	Rio Bravo 94LA1130	9/27/2021
Falcon	Distribution	San Ygnacio 94LA1606	9/27/2021
Falcon	Distribution	Zapata 94LA8300	9/27/2021
Falcon	Distribution	Zapata 94LA2710	9/27/2021
Fort Phantom Hill	Transmission	Onyx Tap - Belknap 138kV	2/17/2021
Fort Phantom Hill	Transmission	Abilene Northwest - Fort Phantom Plant 138kV	2/17/2021
Fort Phantom Hill	Transmission	East Abilene - Abilene Northwest 69kV	2/22/2021
Fort Phantom Hill	Transmission	Fort Phantom Plant - East Abilene 138kV	4/6/2021
Fort Phantom Hill	Transmission	Fort Phantom Pump - Rainey Creek 69kV	7/23/2021
Fort Phantom Hill	Transmission	Rainey Creek - Belknap 138kV	2/22/2021
Fort Phantom Hill	Transmission	South Abilene - Fort Phantom Plant 138kV	4/6/2021
Fort Phantom Hill	Distribution	Rainey Creek 97AB4225	11/11/2021

Fort Phantom Hill	Distribution	Rainey Creek 97AB4550	9/23/2021
Fort Phantom Hill	Distribution	Rainey Creek 97AB4220	9/23/2021
Greenbelt	Distribution	Clarendon 96NT4040	11/30/2021
Kirby	Transmission	East Abilene - South Abilene 138kV	2/17/2021
Kirby	Transmission	South Abilene - TU Leon 138kV	4/21/2021
Nasworthy	Transmission	Barnhart - Concho 69kV	5/12/2021
Nasworthy	Transmission	Concho - San Angelo Power 69kV	2/22/2021
Nasworthy	Transmission	Concho - San Angelo Power 138kV	2/22/2021
Nasworthy	Transmission	San Angelo Power - Red Creek 138kV	4/6/2021
Nasworthy	Transmission	Menard - San Angelo Power 138kV	4/6/2021
Nasworthy	Transmission	San Angelo Power - Eldorado Live Oak 138kV	6/3/2021
Nasworthy	Distribution	Southland Hill 97SA5455	12/1/2021
Nasworthy	Distribution	Mathis Field 97SA5100	11/10/2021
Nasworthy	Distribution	Mathis Field 97SA4790	9/24/2021
Oak Creek	Transmission	Oak Creek - Cedar Hill 138kV	12/9/2021
Oak Creek	Distribution	Fort Chadbourne 97SA6520	11/18/2021
O.C. Fisher	Transmission	College Hills West - Burma 138kV	2/22/2021
O.C. Fisher	Transmission	Grape Creek Tap 69kV	2/22/2021
O.C. Fisher	Transmission	North Angelo - Grape Creek 69kV	7/22/2021
O.C. Fisher	Distribution	Grape Creek 97SA5220	9/24/2021
O.C. Fisher	Distribution	Bluffs 97SA7280	9/24/2021
Stamford	Transmission	Fort Phantom - Paint Creek 138kV	6/30/2021
Stamford	Transmission	Aspermont - Paint Creek 138kV	2/17/2021
Stamford	Transmission	Anson - Paint Creek 138kV	7/22/2021
Stamford	Transmission	Abilene Northwest - Paint Creek 138kV	7/23/2021
Stamford	Distribution	Stamford Pump 97AB3930	12/14/2021
Texana	Transmission	Edna - Ganado 138kV	7/23/2021
Texana	Transmission	Ganado - El Campo 138kV	4/6/2021
Texana	Distribution	Edna 94CN5775	10/1/2021
Texana	Distribution	Ganado 94CN5815	9/27/2021
Texana	Distribution	Ganado 94CN5795	9/27/2021
Texana	Distribution	El Campo 94CN2800	9/27/2021
Texana	Distribution	Lolita 94CN6320	10/1/2021
Twin Buttes	Transmission	Mertzon REA - Mathis Field 138kV	12/3/2021
Twin Buttes	Transmission	San Angelo Power - Big Lake 138kV	7/22/2021
Twin Buttes	Distribution	Tankersly 97SA5265	9/24/2021
Twin Buttes	Distribution	Tankersly 97SA5260	9/24/2021

*The Compliance Verification Date is either the date that the company verified compliance or the date the company finished any necessary mitigations to ensure compliance.