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Electric Transmission Texas, LLC
400 West 15th Street, Suite 800
Austin, TX 78701-1677
ETTexas.com
September 20, 2021

Commissioner Lori Cobos
Public Utilities Commission of Texas
PO Box 13326
Austin, Texas 78711-3326

Re: Submission in Project No. 51617

Commissioner Cobos:

Per your request in project number 51617 dated September 14, 2021, Electric Transmission Texas LLC (ETT) submits the following information related to the new second circuit on the double-circuit capable 345-kV transmission line that runs from San Miguel to Palmito and new transmission facilities to close the loop from Palmito to North Edinburg. ETT's portion of the new second circuit runs from \$311 million to \$350 million. ETT should be able to complete the work in 34 months. AEP's portion of the new transmission facilities to close the loop is estimated at \$28.93 million. The schedule to close the loop is 50 months using the practical right of way path rather than the straight line approach which is not feasible.

The second circuit additions allow us to improve the load serving capability of the existing system under some contingency conditions, but is not an alternative to the greenfield options provided by ERCOT as Concept 1 and Concept 2 for the Commission as presented at the RPG meeting on September 15, 2021. What is needed is a new independent source to the Lower Rio Grande Valley (LRGV). The 2nd circuit additions should in no way replace, defer or otherwise impact the development of a "long-term plan" for the LRGV.

In the spreadsheet provided as Attachment A, ETT is providing the estimated timeline and costs required to place into service ETT's portion of the new second circuit. ETT is providing as Attachment B, a list of assumptions associated with ETT's estimates being provided.

If you have any questions, please feel free to contact me at kmfox@aep.com.

Sincerely,

A handwritten signature in cursive script that reads "Kip M Fox".

Kip M Fox
President, Electric Transmission Texas, LLC

Attachment A

Number	Owner	Line Name	Voltage (kV)	Line Mileage	line mileage with 2nd ckt open	Counties	Require outage of the existing 1st ckt to add 2nd ckt?	Require station work to add 2nd ckt?	Affected Stations	Estimated Cost (Millions); (should include all the affected items, e.g., station work, transformer ckt, etc.)	Estimated Implementation Time (Months)	Cor
Request on New second circuit on the double-circuit capable 345-kV transmission line that runs from San Miguel to Palmito												
1	ETT	Del Sol-Pomelo	345	19.45	11.48	Hidalgo, Starr	Yes	Yes	Del Sol, Pomelo, one new 345 kV station at Mig Howard Tap	32.80	28	59% of second circuit open, Requires
2	ETT/STEC	Lobo-San Miguel	345	105.18	105.18	Atascosa, La Salle, McMullen, Webb	Yes	Yes	Lobo, Fowlerton, San Miguel	58.25	34	100% of second circuit open; Fowlerton is on th
3	ETT	Cenizo-Del Sol	345	82.32	55.98	Starr, Webb, Zapata	Yes	Yes	Cenizo, Del Sol, two new 345 kV stations at Cabezon and Reloj Del Sol	91.10	32	68% of second circuit open, Requires (2)
4	ETT	Cenizo - Lobo	345	26.61	0.00	Webb	Yes	Yes	Lobo, Cenizo, Molina	15.00	25	Requires conversion of Lob.
5	ETT	North Edinburg - Pomelo	345	26.54	26.54	Hidalgo	Yes	Yes	North Edinburg, Pomelo	39.50	25	100% of sec
6	ETT/SLU	North Edinburg - Palmito	345	94.80	94.80	Cameron, Hidalgo	Yes	Yes	North Edinburg, Stewart, Palmito	98.60	30	100% of second circuit open, Stewart Road is on this line
									Total Cost	335.25	34	
Request on New transmission facilities to close the loop from Palmito to North Edinburg.												
7	AEP	Close the loop from Palmito to North Edinburg	345	6.86	New Line	Cameron	N/A	Yes	Stewart Road, La Palma, Palmito	28.93	50	Estimate includes La Palma

Attachment B
Assumptions Associated with the Estimates

New Second Circuit on the Double-Circuit Capable 345-kV line from San Miguel to Palmito

1. ETT's CCN in Docket No. 41606 included the second circuit; therefore, these estimates for the new second circuit assume that no significant CCN work or filings will be needed.¹ The estimate assumes that ETT will only need some land purchases for dead end towers. ETT may need additional temporary right of way for conductor pulling.
2. The majority of the work will be required to be under energized conditions ("Hot" Work) due to the congestion issues between San Miguel and North Edinburg. The estimate includes a contingency for any additional cost from ETT's energized work on the Reloj Del Sol portion of the line completed in 2020.
 - a. Note any outages will be for cut-in of new substations and meeting the summer outage moratorium requirements of no outages between May 15 to September 15.
 - b. ERCOT may have time available for longer outages in the Spring and Fall, but the estimate does not assume there will be any available outages for long periods between San Miguel and North Edinburg.
3. The estimates assume that there are available crews and equipment to perform the work. ETT has been in touch with three different contractors with the ability to perform the "hot" work required.
4. Costs are based on ETT's recent work adding the second circuit portions near Del Sol for the Reloj Del Sol project.
5. All sections of the line (6) will be worked at the same time with different crews. Once a crew completes a section, that crew will be reassigned to any section of the line that needs support or is on the critical path of work.
6. Three (3) new substations will be required for Rio Bravo, Relo Del Sol, and Los Vientos III wind farms.
7. Station upgrades will be required at 4 ETT substations (Del Sol, Lobo, Cenizo, and North Edinburg)

New Transmission Facilities to close the loop from Palmito to North Edinburg

- 1) CCN is 8 months for preparation/studies and 6 months for processing as an expedited CCN.

¹ Docket No. 41606, *Joint Application of Electric Transmission Texas, LLC and Sharyland Utilities to Amend Their Certificates of Convenience and Necessity for the North Edinburg to Loma Alta Double-Circuit 345-kV Transmission Line in Hidalgo and Cameron Counties, Texas*