



## Filing Receipt

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**PROJECT NO. 53198**

<b>PROJECT TO IDENTIFY ISSUES</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>PERTAINING TO LUBBOCK</b>	<b>§</b>	
<b>POWER AND LIGHT'S PROPOSAL</b>	<b>§</b>	<b>OF TEXAS</b>
<b>TO TRANSFER EXISTING</b>	<b>§</b>	
<b>FACILITIES AND LOAD INTO THE</b>	<b>§</b>	
<b>ELECTRIC RELIABILITY COUNCIL</b>	<b>§</b>	
<b>FO TEXAS</b>	<b>§</b>	

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S INITIAL COMMENTS IN  
RESPONSE TO ORDER NO. 2**

Electric Reliability Council of Texas, Inc. (ERCOT) submits these Initial Comments pursuant to Order No. 2 requesting comments on issues concerning the processing of this project. Order No. 2 established April 29, 2022 as the deadline for initial comments to be filed. Accordingly, ERCOT's Initial Comments are timely filed.

**I. INTRODUCTION AND BACKGROUND**

On February 8, 2022, the Public Utility Commission of Texas (Commission) initiated Project No. 53198. On February 9, 2022, ERCOT filed a letter in the project explaining that the City of Lubbock, acting by and through Lubbock Power & Light (LP&L), has expressed interest in transferring its remaining approximately 190 megawatts (MW)<sup>1</sup> of load (constituting roughly 30% of LP&L's total load) from the Southwest Power Pool (SPP) system to the ERCOT system. ERCOT's letter provided notice to the Commission of its intent to conduct an independent study to determine what, if any, transmission improvements to the ERCOT transmission grid may be necessary to support the proposed integration of the remainder of LP&L's load, and to identify the most cost-effective transmission options, should upgrades be deemed necessary. The letter also sought the Commission's guidance as to the parameters of the study and the process by which the study would be evaluated. The Commission took comments from Commission Staff and issued Order No. 2 that, among other things, requested comments as recommended by Commission Staff to aid the Commission on guiding the processing of this project.

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<sup>1</sup> LP&L represents in its *Application of the City of Lubbock, acting by and through Lubbock Power & Light, for Authority to Connect the Remaining Portion of its Load with the Electric Reliability Council of Texas and for Approval of Settlement Agreement*, Docket No. 53529 filed on April 27, 2023 that approximately 170 MW of its load in the Southwest Power Pool remains to be transferred into the ERCOT system.

As further addressed below, ERCOT's active independent study to address the remaining load integration into the ERCOT system has identified no further need for additional transmission improvements to support the integration. ERCOT anticipates that its independent study will be finalized and filed with the Commission in the mid-May to early June 2022 timeframe. Further, ERCOT does not believe that any additional studies are needed relative to the remaining load integration, including a coordinated study between ERCOT and the SPP.

## **II. ERCOT'S INITIAL COMMENTS**

### **1. Should the Commission direct ERCOT to conduct a coordinated impact study with the Southwest Power Pool (SPP) or other study in addition to the load integration study? Please explain or why not.**

ERCOT does not believe it is necessary to conduct a coordinated study with the SPP to address LP&L's remaining load<sup>2</sup> integration into the ERCOT system subject of this proceeding. Pursuant to the Commission's determinations in Project No. 45633,<sup>3</sup> which addressed LP&L's first integration of approximately 470 MW of its load into the ERCOT system, ERCOT and SPP coordinated developing a single methodology for determining costs and benefits of the load integration, while conducting individual studies on the separate impacts of the proposed LP&L transition out of SPP and into the ERCOT region. Accordingly, ERCOT worked closely with SPP to determine a common scope and assumptions to guide its study.

ERCOT's *Study of the Integration of the Lubbock Power & Light System into the ERCOT System* filed June 17, 2016 in Project No. 45633,<sup>4</sup> presented ERCOT's findings concerning various issues the Commission identified in the project.<sup>5</sup> ERCOT's load integration study filed in Project

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<sup>2</sup> Prior to its application filing in Docket No. 53529, LP&L informed ERCOT that its total load including the remainder to be integrated into ERCOT was estimated to be approximately 609 MW (Year 2024) - 627 MW (Year 2028). ERCOT utilized this load information in its ongoing independent Load Integration study currently. According to LP&L's *LP&L Remaining Load ERCOT Integration Steady State Study* filed with its Docket No. 53529 application, scenarios for 2023 and 2027 Summer Peak were studied. LP&L's study scenarios represent loads of 604.6 MW in 2023 Summer Peak and 622.7 MW in 2027 Summer Peak.

<sup>3</sup> *Project to Identify Issues Pertaining to Lubbock Power & Light's Proposal to Become Part of the Electric Reliability Council of Texas*, Project No. 45633.

<sup>4</sup> See Project No. 45633, ERCOT's *Study of the Integration of the Lubbock Power & Light System into the ERCOT System*.

<sup>5</sup> See in particular former Chairman Nelson's memorandum filed in Docket No. 45633 on July 19, 2016 as further discussed at the Commission's July 20, 2016 Open Meeting setting forth the parameters of ERCOT's and SPP's studies.

No. 45633 found that transmission improvement plan Option 4ow therein (consisting of new LP&L and Oncor Electric Delivery Company, LLC (Oncor) transmission additions designed, constructed, and placed in service to support the initial LP&L load integration) would sufficiently support not only the initial load integration but future LP&L total system load growth up to 860 MW from a steady-state thermal load deliverability analysis.<sup>6</sup> Thereafter, the Commission in Docket No. 47576 authorized LP&L to integrate the majority of its load into the ERCOT system using Option 4ow.<sup>7</sup> ERCOT's current ongoing LP&L Load Integration study addressing the remaining load continues to reflect that the Option 4ow transmission facilities now in service also adequately supports LP&L's remaining load integration without the need for any further transmission improvements. In sum, as LP&L represents in its Docket No. 53529 application, its anticipated updated forecasted entire load integration into the ERCOT system totals 604.6 MW at 2023 Summer Peak and 622.7 MW at 2027 Summer Peak, which the 860 MW of deliverability enabled by the construction of Option 4ow sufficiently supports.<sup>8</sup>

While ERCOT believes a coordinated planning study with SPP is not necessary and further understands from LP&L that it anticipates integrating the remaining load into the ERCOT system through interconnection of its distribution voltage level facilities without the need for any transmission outages or new transmission facilities construction,<sup>9</sup> ERCOT operations will stand ready to coordinate with SPP operations in the event the integration implicates any transmission level interactions. Such coordination would be arranged through LP&L, and ERCOT will cooperate with LP&L and SPP regarding any necessary operations coordination during the remaining LP&L Load integration.

ERCOT's current LP&L Load Integration study has not revealed any reliability concerns or any other concerns with the remaining load integration, from a planning perspective.

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<sup>6</sup> See Project No. 45633, ERCOT's *Study of the Integration of the Lubbock Power & Light System into the ERCOT System* at p. 20, indicating that Option 4ow provides load deliverability of 860 MW.

<sup>7</sup> *Application of the City of Lubbock through Lubbock Power and Light for Authority to Connect a Portion of its System with the Electric Reliability Council of Texas*, Docket No. 47576, Order (Mar. 15, 2018), Ordering Paragraph 2.

<sup>8</sup> ERCOT's current in progress LP&L Integration Study finds that plan Option 4ow as constructed and in service supports the higher load inputs ERCOT utilized of approximately 609 MW (Year 2024) – 627 MW (Year 2028).

<sup>9</sup> See LP&L's Application in Docket 53529, at pp. 6 and 8-9.

Accordingly, ERCOT does not believe it is necessary to conduct any further studies beyond its current independent Load Integration study.

**2. If the Commission does direct ERCOT to perform a study in addition to a load integration study, what should it entail? Please explain whether it should be the same as or different from studies for recent, prior, permanent, load transfers. If it should be the same, please explain why. If it should differ, please explain why and how.**

As addressed in response to Question 1 above, ERCOT's active independent LP&L Load Integration study has not identified any reliability issues relative to the remaining load integration to the ERCOT system. As also stated above, the LP&L and Oncor transmission additions constructed consistent with Option 4ow and placed in service to support the initial LP&L load integration are also sufficient to support the remaining load integration. Per ERCOT's current independent Load Integration study, no additional transmission improvements are needed in the near-term planning horizon (through 2028). After integration of the remaining load into the ERCOT system, ERCOT's current planning models and annual near-term planning assessment through the Regional Transmission Plan will be used to identify and address any future reliability need.

**3. Should the Commission allow comments on what additional studies, if any, should be conducted by ERCOT after commenters have an opportunity to review ERCOT's load integration study? Please explain why or why not.**

While ERCOT does not foresee a need for additional studies, ERCOT has no objection to the Commission considering whether any additional studies may be necessary after interested persons have had an opportunity to review ERCOT's LP&L Load Integration study, which ERCOT anticipates filing at the Commission in the mid-May to early June 2022 timeframe.

**4. Should studies be conducted of the impact of LP&L's planned load transfer on the SPP system? Please explain why or why not. If such studies should be conducted, please explain what issues those studies should address and why and who should prepare the studies.**

ERCOT has no comments on this question at this time.

**5. Please provide any other comments you have regarding LP&L's planned load transfer.**

ERCOT has no further comments at this time.

### **III. CONCLUSION**

ERCOT appreciates the opportunity to provide its Initial Comments in response to the questions posed in Order No. 2. As addressed above, ERCOT believes that its current LP&L Load Integration study has sufficiently examined the need for transmission improvements to support the remaining load's integration into the ERCOT system. Additionally, the study does not reveal any reliability concerns nor any other concerns with the remaining load integration. Accordingly, ERCOT respectfully requests that the Commission consider the foregoing comments and adopt its recommendations that no further studies are necessary at this time regarding the integration of the remaining load into to the ERCOT region.

Dated: April 29, 2022

Respectfully Submitted,

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