



Filing Receipt

Filing Date - 2024-08-09 01:03:56 PM

Control Number - 55718

Item Number - 22

PROJECT NO. 55718

RELIABILITY PLAN FOR THE	§	PUBLIC UTILITY COMMISSION
PERMIAN BASIN UNDER PURA § 39.167	§	OF TEXAS

**TEXAS PUBLIC POWER ASSOCIATION'S RESPONSE TO
QUESTIONS FOR COMMENT**

The Texas Public Power Association (TPPA) appreciates the opportunity to respond to the questions for comment issued by the Public Utility Commission of Texas (Commission) relating to the Permian Basin Reliability Plan. These comments are submitted on behalf of TPPA and do not necessarily reflect the opinions of any individual TPPA member.

Formed in 1978, TPPA is the statewide association for the 72 municipally owned utilities (MOUs) in Texas. TPPA membership also includes several electric cooperatives and joint action agencies, as well as the Lower Colorado River Authority. TPPA members serve urban, suburban, and rural Texas and vary in size from large, vertically-integrated utilities to relatively small distribution-only systems. We are proud to serve approximately 5.1 million Texans across the state. Most of our members operate within the Electric Reliability Council of Texas (ERCOT) region, though several are located within either the Southwest Power Pool (SPP) or Midcontinent Independent System Operator (MISO) region. MOUs offer a long track record of stability, and we serve an essential role in providing secure and reliable power to the wholesale electricity markets in these regions, including ERCOT. Many of our member systems have been providing stable and reliable electric power to communities in Texas for over 100 years, and collectively, our members provide more than 13,800 MW of generation and maintain more than 8,500 miles of high-voltage transmission assets.

On July 30, 2024, the Commission issued questions for comment, seeking comments by August 9, 2024. Given the 10-day response timeline for comments, TPPA only provides a general overview below, rather than specific answers to the 11 questions posed by Commission Staff. These responses are timely filed.

I. General Comments

HB 5066, which requires the development of the Permian Basin Reliability Plan, also requires reliability plans be developed for other regions within ERCOT that are expected to experience rapid load growth. While the Commission is reviewing the Permian Basin Reliability Plan and other measures underway to harden the grid to ensure reliability and resiliency, it should keep in mind that other regions will also be needing significant transmission investment as well for their planned future load growth.¹ In fact, a number of MOUs have seen this rapid growth first-hand – MOUs like Georgetown and New Braunfels regularly top lists of the fastest-growing cities in Texas, and college campuses like the RELIS Campus, part of the Texas A&M University System, is primed for significant load growth. Meanwhile, the University of Texas and Texas A&M (each located within MOU service territories) are at the forefront of new research into nuclear reactors to meet this demand.

The Commission deserves applause for recognizing insufficient transmission capacity across the state and working to meet those challenges head on. Though many efforts are currently in review at the Commission and ERCOT,² it is important to look at transmission needs across the state to ensure that one part of the state is not overbuilt, leaving other areas fallow. It is equally important for the Commission to review these projects with the entire ERCOT system in mind and in light of other transmission projects underway (including the Permian Basin Reliability Plan, resiliency plans, and other certificate of convenience and necessity [CCN] expansions) to ensure that transmission costs are targeted toward getting the maximum level of reliability improvements for the consumer dollars spent.

II. Conclusion

As always, TPPA looks forward to working with the Commission, its staff, and the stakeholders on these important questions and this broader discussion in the coming months.

¹ For instance, ERCOT is currently tracking enormous potential load growth in the near future, with overall electricity demand potentially reaching 150GW by 2030. See <https://www.dallasnews.com/business/2024/06/28/ercot-ceo-pablo-vegas-speaks-in-dallas-to-address-states-growing-needs/>.

² In addition to the Permian Basin Reliability Plan, the Commission has ordered the construction of significant new transmission capacity in the Rio Grande Valley and is studying the use of extra high voltage lines. See generally, *Project for Commission Ordered Transmission Facilities*, Project No. 52682; and *Regional Transmission Reliability Plans*, Project 55249.

Dated: August 9, 2024

Respectfully,

Mariah Benson

Mariah Benson
Regulatory Affairs Manager
Texas Public Power Association
PO Box 82768
Austin, Texas 78708
(512) 472-5965
mbenson@tpa.com