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**Filing Date - 2025-01-31 04:24:47 PM**

**Control Number - 55718**

**Item Number - 55**

# *Public Utility Commission of Texas*

# Memorandum

**TO:** Interested Parties

**FROM:** Julia Wagner PE, Market Analysis Division
John Poole PE, Infrastructure Division

**DATE:** January 31, 2025

**RE:** Project No. 55718 *Reliability Plan for the Permian Basin Under PURA § 39.167*, **Questions for Stakeholder Comment Related to PUCT's Determination of Extra High Voltage (EHV) in the ERCOT Region**

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On October 7, 2024, the Commission issued an order[1] in Project No. 55718 – *Reliability Plan for the Permian Basin Under PURA § 39.167* in which it approved both the 345 kV and 765 kV transmission import paths proposed in ERCOT's Permian Basin Reliability Plan Study (and addendum).[2] The order specified that by May 1, 2025, the Commission would decide whether "to move forward with allowing TSPs to build 765-kV transmission in the ERCOT region."

On January 24, 2025, ERCOT filed a comparison document[3] which assessed the relative reliability and economic benefits of the 2024 Regional Transmission Plan (RTP) utilizing two different maximum transmission voltages—one with 345 kV (and below) and another with 765 kV (and below).

Commission Staff seeks stakeholder feedback on ERCOT's comparison document to help the Commission make the best policy determinations for the ERCOT region. Responses to the questions posed below may be filed through the Interchange on the Commission's website or by submitting a paper copy to Central Records, Public Utility Commission of Texas, 1701 North Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326. Responses to the questions are due by **February 14, 2025**. All filings should reference Project No. 55718.

**Each set of responses should include a standalone executive summary as the last page of the filing and be no longer than 15 pages excluding the executive summary. This executive summary must be clearly labeled with the submitting entity's name and should list each substantive recommendation made in the comments referencing the specific question number.**

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[1] *See* PUCT's Order Approving the Reliability Plan for the Permian Basin Region, AIS Item No. 52 (Oct. 7, 2024).

[2] *See* ERCOT's Permian Basin Reliability Plan Study Report, AIS Item 17 (Jul. 25, 2024) and Permian Basin Reliability Plan Study – Addendum, AIS Item No. 42 (Sept. 11, 2024).

[3] *See* ERCOT's 2024 Regional Transmission Plan 345-kV Plan and Texas 765-kV Strategic Transmission Expansion Plan Comparison, AIS Item No. 54 (Jan. 24, 2025).

1. In ERCOT's 345 kV-765 kV comparison document, the total capital cost estimates for each voltage's 2024 Regional Transmission Plan are comparatively close.
    a. What other ongoing cost impacts should be given significant weight in this decision?
    b. What economic and reliability benefits in the report should be given significant weight?

2. On September 18, 2024, ERCOT hosted a 765 kV Vendor Workshop which provided information on many aspects of design, construction, and equipment sourcing of 765 kV infrastructure.
    a. Regarding supply chain delays or disruptions, are there any impacts specific to either 765 kV or 345 kV, or are both impacted equally?
    b. Are there any critical 765 kV considerations that were not addressed during that workshop?

3. Regarding the already-approved Permian Basin import paths, please compare the timing of construction buildout-to-energization for the 345 kV and 765 kV imports. Will one take significantly longer than the other? Please explain why.

4. Given that there are uncertainties in long-term load forecasts as well as load and generation types and siting, which plan would provide the most flexibility for ERCOT region?

5. What are the pros and cons of deciding to utilize 765 kV infrastructure in the ERCOT region now versus waiting to implement it in the future?

6. Are there any other benefits or drawbacks that have not been brought up and addressed which are critically important for Commission to consider? Please describe in detail.