



## **Filing Receipt**

**Filing Date - 2025-03-27 02:46:02 PM**

**Control Number - 55718**

**Item Number - 88**

**PROJECT NO. 55718**

**RELIABILITY PLAN FOR THE  
PERMIAN BASIN UNDER PURA  
§ 39.167**

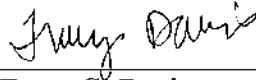
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**PUBLIC UTILITY COMMISSION  
  
OF TEXAS**

**RESPONSE OF LONE STAR TRANSMISSION, LLC TO COMMISSION STAFF  
REQUESTS FOR INFORMATION**

COMES NOW, Lone Star Transmission, LLC (“Lone Star”) and provides the attached responses to Commission Staff’s March 21, 2025 Requests for Information in this proceeding and the attached affidavit of Daniel Madru, President of Lone Star.

Respectfully submitted,



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*Attorney for Lone Star Transmission, LLC*

**RESPONSE OF LONE STAR TRANSMISSION, LLC TO COMMISSION STAFF'S  
REQUEST FOR INFORMATION**

**Staff 1-1** Provide documentation related to cost estimate information for any import path to which the TSP has been assigned. The cost estimate information should be consistent with the format and categories of data provided to ERCOT in March 2025.

**Response:** Lone Star Transmission, LLC ("Lone Star") has been assigned a separate and discrete equal part of the Sam Switch-Comanche Switch 345 kV Transmission Line (identified as Project ID "345-kV Import 2" and Upgrade ID "345\_Import\_2A") (referred to herein as the "Sam Switch-Comanche Switch 345 kV Project"), along with Oncor Electric Delivery Company ("Oncor"). Lone Star has provided ERCOT with high-level planning cost estimates for its portion of the Sam Switch-Comanche Switch 345 kV Project. Lone Star and Oncor are currently undertaking a joint review of routing alternatives, and at this time, Lone Star does not have more detailed cost estimate information or specific documentation than what was previously provided to ERCOT.

Prepared by: Brian Pedersen, Director, Development, Lone Star Transmission, LLC

Sponsored by: Daniel Madru, President, Lone Star Transmission, LLC

**Staff 1-2** To the extent available, provide any vendor commitment letters related to long lead technical equipment, such as autotransformers or circuit breakers, needed to construct and operate the import path.

**Response:** Lone Star, working jointly with Oncor, is in the process of performing a routing analysis for the Sam Switch-Comanche Switch 345 kV Project. Lone Star currently anticipates that a joint certificate of convenience and necessity (“CCN”) application will be submitted to the Commission in the first quarter of 2026.<sup>1</sup> Accordingly, no route has been selected by the Commission for the project at this time, and thus, Lone Star does not have specific vendor commitment letters related to long lead technical equipment needed to construct and operate the Sam Switch-Comanche Switch 345 kV Project at this time.

As a part of the NextEra Energy, Inc. (“NextEra Energy”) corporate organization, Lone Star has access to suppliers of equipment and services that will be required to complete Lone Star’s portion of the Sam Switch-Comanche Switch 345 kV Project. Collectively, NextEra Energy subsidiaries, through the expertise of NextEra Energy’s Integrated Supply Chain (“ISC”) and Engineering & Construction (“E&C”) teams, has constructed a total 457 energy infrastructure projects, worth a total of \$82 billion, on time and on budget since 2003. NextEra Energy subsidiaries successfully procured and constructed over \$20 billion in capital projects in 2024 alone, and ISC procured over \$14 billion of materials and services needs in 2024. ISC’s procurement process prequalifies bidders and assesses the potential supplier’s ability to meet project needs, either as a materials supplier or a services supplier. ISC has long-standing relationships with vendors and significant buying power that allows NextEra Energy affiliates to access better pricing and terms from qualified suppliers, as well as the ability to expedite purchases and deliver materials and services during critical times. Lone Star will utilize these experienced subject-matter experts to procure needed equipment and services for the Sam Switch-Comanche Switch 345 kV Project.

Prepared by: Brian Pedersen, Director, Development, Lone Star Transmission, LLC

Sponsored by: Daniel Madru, President, Lone Star Transmission, LLC

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<sup>1</sup> See *Joint Filing for Planned Permian Basin Reliability Plan CCN Filing Schedule*, filed in Docket No. 57441 (filed Feb. 20, 2025) (anticipated filing date of Q1 2026 for 345\_Import\_2A).

**Staff 1-3** To the extent available, provide any vendor commitment letters related to engineering, procurement, and construction or other labor agreements associated with construction of the import path.

**Response:** As described in the response to Staff 1-2, Lone Star and Oncor are jointly performing a routing analysis for the Sam Switch-Comanche Switch 345 kV Project, and Lone Star currently anticipates that a joint CCN application will be submitted to the Commission in the first quarter of 2026. Accordingly, proposed route alternatives have not been finalized, and no final route has been selected by the Commission for the project at this time. Thus, Lone Star has not yet selected its engineering, procurement, and construction (“EPC”) contractor or executed other labor agreements associated with construction of the Sam Switch-Comanche Switch 345 kV Project at this time. Lone Star has access to and ongoing relationships with qualified EPC contractors that Lone Star expects to utilize to engineer and construct Lone Star’s portion of the Sam Switch-Comanche Switch 345 kV Project.

Prepared by: Brian Pedersen, Director, Development, Lone Star Transmission, LLC

Sponsored by: Daniel Madru, President, Lone Star Transmission, LLC

**Staff 1-4** Provide current import path construction timeline estimates necessary to meet the forecasted load requirements documented in the Permian Basin Reliability Plan. If the TSP intends to construct the import path faster than what would be required under the Permian Basin Reliability Plan, please provide the relevant information.

**Response:** Lone Star is currently developing a detailed project schedule to permit, acquire rights-of-way for, and construct its portion of the Sam Switch-Comanche Switch 345 kV Project, based upon a currently anticipated joint CCN application filing date in the first quarter of 2026, ERCOT's specified need date of 2030 for the Sam Switch-Comanche Switch 345 kV Project, and Oncor's estimated project timeline for its half of the Sam Switch-Comanche Switch 345 kV Project. Lone Star confirms that there is sufficient time for it to permit, acquire rights-of-way for, and construct its portion of the Sam Switch-Comanche Switch 345 kV Project by ERCOT's specified need date of 2030. As it develops its detailed project schedule, and based in part upon the route ultimately selected by the Commission through the CCN process, Lone Star will continue to evaluate whether the project can be constructed faster than ERCOT's specified need date.

Prepared by: Brian Pedersen, Director, Development, Lone Star Transmission, LLC

Sponsored by: Daniel Madru, President, Lone Star Transmission, LLC

**Staff 1-5** If the TSP does not have responsive information to Staff 1-2 through Staff 1-4, provide an affidavit or sworn statement by the TSP's highest level official attesting to the TSP's preparedness to design, build, and energize the import path in time to meet the Permian Basin Reliability Plan load forecast irrespective of voltage level.

**Response:** Please see attached affidavit of Daniel Madru, President of Lone Star.

Prepared by: Legal counsel

Sponsored by: Daniel Madru, President, Lone Star Transmission, LLC

**Staff 1-6** Provide any new data or information related to cost or timelines the TSP believes would assist the Commission's final determination on the Permian Basin import paths.

**Response:** Lone Star does not have any additional information at this time.

Prepared by: Legal counsel

Sponsored by: Daniel Madru, President, Lone Star Transmission, LLC



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§ 39.167**

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§ OF TEXAS**

STATE OF TEXAS

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COUNTY OF TRAVIS

**AFFIDAVIT OF DANIEL MADRU**

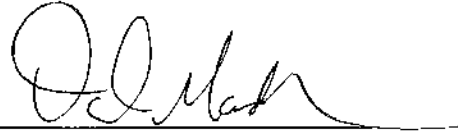
1. My name is Daniel Madru. I am the President of Lone Star Transmission, LLC (“Lone Star”).
2. My business address is 5920 W. William Cannon Dr., Bldg. 2, Austin, TX 78749. I am over the age of 18 years, of sound mind, and am authorized and competent to make this Affidavit on behalf of Lone Star. I swear or affirm that I have personal knowledge of the facts set forth in this Affidavit. Each of these facts set forth in this Affidavit is true and correct to the best of my personal knowledge and belief.
3. Lone Star is a transmission-only electric utility and Transmission Service Provider (“TSP”) operating high-voltage electric transmission facilities within the Electric Reliability Council of Texas (“ERCOT”) region pursuant to Commission Certificate of Convenience and Necessity (“CCN”) No. 30196. Specifically, Lone Star owns, operates, and maintains high-voltage transmission facilities consisting of approximately 360 linear miles of 345 kV transmission lines that run from Scurry County to Navarro County, eleven high-voltage switching stations or substations, and associated transmission facilities.
4. In its report filed in Project No. 57152 (“ERCOT Report”), ERCOT identified Lone Star as the owner of the Sam Switch 345 kV Station and as jointly responsible with Oncor Electric Delivery Company (“Oncor”) for the new 345 kV double-circuit transmission line between the Sam Switch and Comanche Switch stations (the “Sam Switch-Comanche Switch 345 kV Project,” also identified in the ERCOT Report and in Commission Staff’s Petition as Project ID “345-kV Import 2” and Upgrade ID “345\_Import\_2A”).<sup>1</sup>
5. In response to the March 21, 2025 Requests for Information from Commission Staff, I attest that Lone Star is prepared to design, build, and energize its portion of the Sam Switch-Comanche Switch 345 kV Project by ERCOT’s identified need date of 2030. Lone Star will utilize its and its shared affiliates’ experienced subject matter experts and third-party contractors to engineer, design, procure, construct, own, and operate its portion of the Sam

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<sup>1</sup> See Report of the Electric Reliability Council of Texas, Inc. Identifying Transmission Service Providers Responsible for Implementing the Permian Basin Reliability Plan, filed in Project No. 57152 (Oct. 18, 2024), Attachment A, Lines 266-268.

Switch-Comanche Switch 345 kV Project.

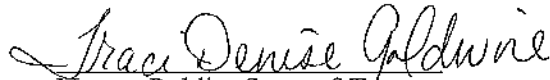
6. This concludes my Affidavit.



Daniel Madru

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 26<sup>th</sup> day of March, 2025, to certify which witness my hand and seal of office.

My Commission Expires:

  
Notary Public, State of Texas