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PROJECT NO. 55974

**CY 2024 ELECTRIC GENERATING
CAPACITY REPORTS
PURSUANT TO 16 TAC § 25.91**

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**BEFORE THE PUBLIC
UTILITY COMMISSION
OF TEXAS**

**LUMINANT'S STATEMENT OF
EXEMPTION FOR PROTECTED MATERIALS**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Brightside Solar LLC, Coletto Creek Power, LLC, Comanche Peak Power Company LLC, DeCordova BESS LLC, Emerald Grove Solar LLC, Ennis Power Company, LLC, Hays Energy, LLC, La Frontera Holdings, LLC, Luminant Generation Company LLC, Midlothian Energy, LLC, Oak Grove Management Company LLC, Upton County Solar 2, LLC, and Wise County Power Company, LLC (collectively reporting as Luminant) file this Statement of Exemption for Protected Materials within the annual Electric Generating Capacity Report for calendar year 2023¹ and respectfully show as follows:

I.

Paragraph No. 3 of the Protective Order applicable to this report² requires a reporting party to file a written statement with the Public Utility Commission of Texas (Commission), on or before the date the reporting party provides Protected Materials to the Commission: (1) specifically identifying the portions of the Generating Capacity Report that are confidential; (2) indicating any and all applicable exemptions from the Texas Public Information Act (TPIA)³; (3) setting forth the reasons supporting the reporting party's claim that the information is exempt from public disclosure under the TPIA and subject to treatment as Protected Materials; and (4) stating that counsel for the reporting party has reviewed the information sufficiently to state in good faith that the information is exempt from public disclosure under the TPIA and merits the Protected Material designation.⁴

¹ As required by Commission rule, this report provides information for the calendar year preceding the year in which the report is filed. See 16 TEX. ADMIN. CODE ("TAC") § 25.91. Luminant is filing the instant report in 2024, with data for calendar year 2023.

² The protective order can be viewed here: <https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.91/21081por.pdf>.

³ TEX. GOV'T CODE, Chapter 552.

⁴ See *In the Matter of Generating Capacity Reports*, Project No. 21081, Protective Order at 2 (Mar. 7, 2001). Consistent with the requirements of Paragraph No. 3, recited above, Paragraph No. 1 defines "Protected Materials" as

For the reasons set forth below, Luminant claims that the redacted information in Tables 1 and 3 of the Generating Capacity Report for calendar year 2023 is Protected Material that is exempt from disclosure under the TPIA.

II.

The relevant exemptions to the TPIA are in Sections 552.101 and 552.110.

Section 552.101 of the TPIA exempts information that is considered “confidential by law, either constitutional, statutory, or by judicial decision.” Section 39.001(b)(4) of the Public Utility Regulatory Act (PURA)⁵ provides that it is in the public interest to “protect the competitive process in a manner that ensures the confidentiality of competitively sensitive information during the transition to a competitive market and after the commencement of customer choice.” Thus, all competitively sensitive information is statutorily exempt from disclosure.

Section 552.110 of the TPIA exempts from disclosure both: (i) “commercial or financial information for which it is demonstrated based on specific factual evidence that disclosure would cause substantial competitive harm to the person from whom the information was obtained,” and (ii) “trade secrets” if “it is demonstrated based on specific factual evidence that the information is a trade secret.”

With respect to “trade secrets,” the TPIA was amended, effective January 1, 2020, to define “trade secret” as “all forms and types of information, including business, scientific, technical, economic, or engineering information, and any formula, design, prototype, pattern, plan, compilation, program device, program, code, device, method, technique, process, procedure, financial data, or list of actual or potential customers or suppliers, whether tangible or intangible and whether or however stored, compiled, or memorialized physically, electronically, graphically, photographically, or in writing if: (1) the owner of the trade secret has taken reasonable measures under the circumstances to keep the information secret; and (2) the information derives independent economic value from the disclosure or use of the information.”

In addition, under the prior version of the statute,⁶ and in recent letter rulings considering whether information satisfies the common law definition of “trade secret” and thus is confidential

“information that is exempt from public disclosure under the [TPIA].”

⁵ Public Utility Regulatory Act, TEX. UTIL. CODE §§ 11.001-66.016 (PURA).

⁶ *E.g.*, Tex. Att’y Gen. ORD-652 (1997); Tex. Att’y Gen. ORD-552 at 2 (1990).

by law under Section 552.101,⁷ the Attorney General’s office has relied on the similar definition of the term “trade secret” found in the Restatement of Torts.⁸ Based on the Restatement definition, Texas courts have held that a trade secret need not be a patentable device or process,⁹ and items such as customer lists, pricing information, client information, customer preferences, and market strategies have all been shown to be trade secrets.¹⁰ When an effort has been made to keep away from competitors material that is important to a particular business, Texas courts have applied the Restatement definition to determine that trade secret protection is warranted.¹¹ Furthermore, while some individual underlying components may be available to the public, a trade secret has been found to exist if the overall compilation is not generally known or readily available.¹²

III.

The redacted information in Tables 1 and 3 of Luminant’s Generating Capacity Report (i.e., the data provided in Lines 2 and 4 through 13 (and note 3) in Table 1 and in column 4 (titled Annual Generation) in Table 3) is Protected Material. These tables include information related to whether Luminant has plans to retire existing capacity; the manner in which Luminant uses its capacity (e.g., the amount available for sale to others, the amount reserved for self-consumption, and the amount under contract to others); Luminant’s sales of energy and capacity to affiliates;

⁷ *E.g.*, Tex. Att’y Gen. OR2021-05335 (Mar. 5, 2021).

⁸ Section 757, comment b, of the Restatement (First) of Torts states that a “trade secret” “may consist of any formula, pattern, device or compilation of information which is used in one’s business, and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.” This section of the Restatement then lists six factors to be considered when determining whether information constitutes a trade secret:

- (1) the extent to which the information is known outside of [the company’s] business;
- (2) the extent to which it is known by employees and others involved in [the company’s] business;
- (3) the extent of the measures taken by [the company] to guard the secrecy of the information;
- (4) the value of the information to [the company] and to [its] competitors;
- (5) the amount of effort or money expended by [the company] in developing the information; and
- (6) the ease or difficulty with which the information could be properly acquired or duplicated by others.

RESTATEMENT (FIRST) OF TORTS § 757 cmt. b. (1939); *see also* RESTATEMENT (THIRD) OF UNFAIR COMPETITION § 39, cmt. d (1995) (setting forth a similar definition of trade secret).

⁹ *K & G Oil Tool & Serv. Co. v. G & G Fishing Tool Serv.*, 314 S.W.2d 782, 789 (Tex. 1958).

¹⁰ *Evan’s World Travel, Inc. v. Adams*, 978 S.W.2d 225, 231 (Tex. App.—Texarkana 1998, no pet.); *T-N-T Motorsports, Inc. v. Hennessey Motorsports, Inc.*, 965 S.W.2d 18, 22 (Tex. App.—Houston [1st Dist.] 1998, pet. dismissed); *Miller Paper Co. v. Roberts Paper Co.*, 901 S.W.2d 593, 601 (Tex. App.—Amarillo 1995, no writ).

¹¹ *Evan’s World Travel*, 978 S.W.2d at 232; *T-N-T Motorsports*, 965 S.W.2d at 22; *Rugen v. Interactive Bus Sys., Inc.*, 864 S.W.2d 548, 552 (Tex. App.—Dallas 1993, no writ).

¹² *See T-N-T Motorsports*, 965 S.W.2d at 22–23 (finding that while individual retail prices and the general notion of upgrading performance were available to the public, trade secret protection existed for the overall process and production of an automotive performance upgrade).

and Luminant's annual energy production and sales. This information is confidential competitively sensitive and proprietary trade secret information of Luminant.

Disclosure of the information described above would provide competitors with an advantage and cause substantial harm to the competitive position of the Luminant companies as they are in direct competition with other electric generation suppliers in Texas. These specific and detailed operating statistics for Luminant's generating units are highly valuable to the Luminant companies and would be highly valuable to their competitors in the electric generation industry. The Luminant companies are actively engaged in the competitive wholesale electricity market in the Electric Reliability Council of Texas (ERCOT). Disclosure of the specific, detailed generating unit operational and sales information described above would put the Luminant companies at a competitive disadvantage in their participation in the ERCOT markets and, accordingly, disclosure would enable the companies' competitors to ascertain how they operate their generating units to offer wholesale energy for sale.

The Luminant companies have taken active measures to protect the redacted information in Tables 1 and 3 to keep it confidential within Luminant. It would be very difficult for others to acquire or duplicate this information, except by Luminant's disclosure of this highly sensitive competitive and proprietary information.

Accordingly, the redacted information is exempt from disclosure under Sections 552.101 and 552.110 of the TPIA and therefore constitutes Protected Material under the Protective Order applicable to Generating Capacity Reports.

IV.

The undersigned counsel has reviewed the information sufficiently to, and hereby does, state in good faith that the designated information is exempt from public disclosure under the TPIA and merits designation as Protected Materials.

Respectfully submitted,

/s/ Jessica Soos

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HOLDINGS, LLC, LUMINANT
GENERATION COMPANY LLC,
MIDLOTHIAN ENERGY, LLC, OAK
GROVE MANAGEMENT COMPANY LLC,
UPTON COUNTY SOLAR 2, LLC, AND
WISE COUNTY POWER COMPANY, LLC**

REPORTING FORM FOR GENERATING CAPACITY REPORTS

Provide the legal name of the party filing this report Brightside Solar LLC, Coletto Creek Power, LLC, Comanche Peak Power Company LLC, DeCordova BESS LLC, Emerald Grove Solar LLC, Ennis Power Company, LLC, Hays Energy, LLC, La Frontera Holdings, LLC, Luminant Generation Company LLC, Midlothian Energy, LLC, Oak Grove Management Company LLC, Upton County Solar 2, LLC, and Wise County Power Company, LLC (collectively reporting as "Luminant")

Provide the name, company, and telephone number of the person who may be contacted for clarification of information contained in this report: Ned Bonskowski, Luminant, (512) 349-6464

The Reporting Form for Generating Capacity Reports consists of this cover sheet, the attached four tables, and an affidavit. Please review the ***Instructions to the Reporting Form for Generating Capacity Reports*** before completing this reporting form.

This reporting form and the instructions may be obtained from the Commission's Central Records Division or downloaded from Commission website at <http://www.puc.state.tx.us>. Information may be inserted in the form electronically. As necessary, reply spaces may be expanded and/or rows may be added to the tables in order to provide the information requested.

The completed report must be filed with the Public Utility Commission of Texas, Attention: Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas, 78711-3326. Submit four (4) copies, including the original.

Generating Capacity Reports – Table 1

	ERCOT	Reliability Council (or Power Region)			
		Name:		Name:	
		Texas Area	Total Rel. Council (or Pwr. Region)	Texas Area	Total Rel. Council (or Pwr. Region)
1. Total capacity of generating facilities that are connected with a transmission or distribution system.	18,403 ¹	0	0	0	0
2. Total capacity of generating facilities used to generate electricity for consumption by the person owning or controlling the facility.					
3. Total capacity of generating facilities that will be connected with a transmission or distribution system and operating within 12 months.	0	0	0	0	0
4. Total affiliate installed generation capacity.					
5. Total amount of capacity available for sale to others.					
6. Total amount of capacity under contract to others.					
7. Total amount of capacity dedicated to own use.					
8. Total amount of capacity that has been subject to auction as approved by the Commission.					
9. Total amount of capacity that will be retired within 12 months.					
10. Annual capacity sales to affiliated retail electric providers (REPs).					
11. Annual wholesale energy sales.					
12. Annual retail energy sales.					
13. Annual energy sales to affiliate REPs.					

¹ In accordance with the instructions to this report, capacity totals in Tables 1, 2, and 3 are based on Luminant's capacity in the previous calendar year (2023). The capacity totals in Tables 1, 2, and 3 do not include a 10 MW battery at the Castle Gap solar facility, because the battery does not increase the total capacity of Castle Gap but enables enhanced output at certain times.

Generating Capacity Reports – Table 2

Generating Facility Name	Facility Capacity	Location (County)	Utility Service Area	Reliability Council	Transmission Congestion Zone (if applicable)
Brightside Solar	50	Bee	AEP	ERCOT	South
Castle Gap ¹	180	Upton	LCRA	ERCOT	West
Coleto Creek	655	Goliad	AEP	ERCOT	South
Comanche Peak Nuclear Power Plant (CPNPP)	2,400	Somervell	Oncor	ERCOT	North
DeCordova SES	275	Hood	Oncor	ERCOT	North
DeCordova BESS	262	Hood	Oncor	ERCOT	North
Emerald Grove Solar	108	Crane	LCRA	ERCOT	West
Forney	1,770	Kaufman	Oncor	ERCOT	North
Graham SES	629	Young	Oncor	ERCOT	West
Hays Energy ²	844	Hays	LCRA	ERCOT	South
Lake Hubbard SES	915	Dallas	Oncor	ERCOT	North
Lamar Power Partners	1,004	Lamar	Oncor	ERCOT	North
Martin Lake SES	2,410	Rusk	Oncor	ERCOT	North
Midlothian ANP ³	1,394	Ellis	Oncor	ERCOT	North
Morgan Creek SES	397	Mitchell	Oncor	ERCOT	West
Oak Grove SES	1,710	Robertson	Oncor	ERCOT	North
Odessa Ector CCS	1,062	Ector	Oncor	ERCOT	West
Permian Basin SES	320	Ward	Oncor	ERCOT	West
Stryker Creek SES	679	Cherokee	Oncor	ERCOT	North
Tractebel (Ennis)	319	Ellis	Oncor	ERCOT	North
Trinidad SES	239	Henderson	Oncor	ERCOT	North
Wise County	781	Wise	Oncor	ERCOT	North
	18,403				

¹ The capacity total for Castle Gap in Table 2 does not include a 10 MW battery added to the facility, which became operational December 31, 2018, because the battery does not increase the total capacity of Castle Gap but enables enhanced output at certain times.

² There are planned uprates for Hays Energy, Units 1, 2, 3, and 4 (~18 MW each). These uprates are not included in the capacity values or total in Table 2. Although the uprate on Hays 3 was completed in spring 2021, Hays 2 was completed in spring 2022, and Hays 3 and Hays 4 were completed in spring 2023, ERCOT has not yet approved or completed the associated interconnection change requests.

³ There are planned uprates for Midlothian ANP, Units 2, 3, and 4 (~18 MW each). These uprates are not included in the capacity values or total in Table 2. Although the uprates at Midlothian 2 and 3 were completed in fall 2021 and the uprate for Midlothian 4 was completed in spring 2022, ERCOT has not yet approved or completed the associated interconnection change requests.

Generating Capacity Reports – Table 3

Generating Facility Name	Generating Unit Name	Unit	Annual Generation	Primary Fuel or Nonfuel	Technology of Natural Gas Generator	Date of Commercial Operation
Brightside Solar	Brightside Solar 1	50		Solar PV	N/A	5/16/2022
Castle Gap ¹	Castle Gap 1	180		Solar PV/Battery	N/A	6/1/2018
Coleto Creek	Coleto Creek 1	655		Coal	N/A	1/1/1980
Comanche Peak NPP	Comanche Peak 1	1,205		Nuclear	N/A	08/13/90
Comanche Peak NPP	Comanche Peak 2	1,195		Nuclear	N/A	08/03/93
DeCordova SES	DeCordova CT 1	69		Natural Gas	CT	03/01/90
DeCordova SES	DeCordova CT 2	69		Natural Gas	CT	03/01/90
DeCordova SES	DeCordova CT 3	68		Natural Gas	CT	03/01/90
DeCordova SES	DeCordova CT 4	69		Natural Gas	CT	03/01/90
DeCordova SES	DeCordova BES1	67		Battery	N/A	7/12/2022
DeCordova SES	DeCordova BES2	67		Battery	N/A	7/12/2022
DeCordova SES	DeCordova BES3	64		Battery	N/A	7/12/2022
DeCordova SES	DeCordova BES4	64		Battery	N/A	7/12/2022
Emerald Grove Solar	Emerald Grove Solar 1	108		Solar PV	N/A	3/10/2023
Forney	Forney 1	885		Natural Gas	Combined Cycle	2/1/2003
Forney	Forney 2	885		Natural Gas	Combined Cycle	2/1/2003
Graham SES	Graham 1	239		Natural Gas	Steam	12/19/60
Graham SES	Graham 2	390		Natural Gas	Steam	06/05/69
Hays Energy ²	Hays 1	210		Natural Gas	Combined Cycle	5/28/2002
Hays Energy ²	Hays 2	211		Natural Gas	Combined Cycle	4/19/2002
Hays Energy ²	Hays 3	210		Natural Gas	Combined Cycle	8/16/2002
Hays Energy ²	Hays 4	213		Natural Gas	Combined Cycle	5/15/2002
Lake Hubbard SES	Lake Hubbard 1	392		Natural Gas	Steam	06/18/70
Lake Hubbard SES	Lake Hubbard 2	523		Natural Gas	Steam	11/20/73
Lamar Power Partners	Lamar 1	502		Natural Gas	Combined Cycle	7/4/2000
Lamar Power Partners	Lamar 2	502		Natural Gas	Combined Cycle	7/4/2000
Martin Lake SES	Martin Lake 1	800		Lignite/Coal	N/A	05/16/77
Martin Lake SES	Martin Lake 2	805		Lignite/Coal	N/A	05/23/78
Martin Lake SES	Martin Lake 3	805		Lignite/Coal	N/A	04/01/79
Midlothian ANP	Midlothian 1	229		Natural Gas	Combined Cycle	3/18/2001
Midlothian ANP ³	Midlothian 2	227		Natural Gas	Combined Cycle	3/15/2001
Midlothian ANP ³	Midlothian 3	227		Natural Gas	Combined Cycle	1/22/2001
Midlothian ANP ³	Midlothian 4	227		Natural Gas	Combined Cycle	2/8/2001
Midlothian ANP	Midlothian 5	241		Natural Gas	Combined Cycle	6/28/2002
Midlothian ANP	Midlothian 6	243		Natural Gas	Combined Cycle	6/7/2002

Generating Facility Name	Generating Unit Name	Unit	Annual Generation	Primary Fuel or Nonfuel	Technology of Natural Gas Generator	Date of Commercial Operation
Morgan Creek SES	Morgan Creek CT 1	66		Natural Gas	CT	07/01/88
Morgan Creek SES	Morgan Creek CT 2	65		Natural Gas	CT	07/01/88
Morgan Creek SES	Morgan Creek CT 3	65		Natural Gas	CT	08/01/88
Morgan Creek SES	Morgan Creek CT 4	67		Natural Gas	CT	07/01/88
Morgan Creek SES	Morgan Creek CT 5	67		Natural Gas	CT	07/01/88
Morgan Creek SES	Morgan Creek CT 6	67		Natural Gas	CT	07/01/88
Oak Grove SES	Oak Grove 1	855		Lignite/Coal	N/A	10/13/10
Oak Grove SES	Oak Grove 2	855		Lignite/Coal	N/A	04/19/11
Odessa Ector CCS	Odessa 1	531		Natural Gas	Combined Cycle	06/01/2001
Odessa Ector CCS	Odessa 2	531		Natural Gas	Combined Cycle	06/01/2001
Permian Basin SES	Permian Basin CT 1	63		Natural Gas	CT	05/01/88
Permian Basin SES	Permian Basin CT 2	64		Natural Gas	CT	05/01/88
Permian Basin SES	Permian Basin CT 3	64		Natural Gas	CT	05/01/88
Permian Basin SES	Permian Basin CT 4	64		Natural Gas	CT	05/01/90
Permian Basin SES	Permian Basin CT 5	65		Natural Gas	CT	05/01/90
Stryker Creek SES	Stryker Creek 1	167		Natural Gas	Steam	06/26/58
Stryker Creek SES	Stryker Creek 2	502		Natural Gas	Steam	12/21/65
Stryker Creek SES	Stryker Creek Diesels 1-5	10		Fuel Oil	N/A	07/30/66
Tractebel (Ennis)	Ennis 1	319		Natural Gas	Combined Cycle	1/4/2002
Trinidad SES	Trinidad 6	235		Natural Gas	Steam	05/26/65
Trinidad SES	Trinidad Diesels 1-2	4		Fuel Oil	N/A	08/20/66
Wise County Power	Wise County 1	781		Natural Gas	Combined Cycle	1/3/2004
	Total	18,403				

¹ The capacity total for Castle Gap in Table 3 does not include a 10 MW battery added to the facility, because the battery does not increase the total capacity of Castle Gap but enables enhanced output at certain times.

² There are planned uprates for Hays Energy, Units 1, 2, 3, and 4 (~18 MW each). These uprates are not included in the capacity values or total in Table 2. Although the uprate on Hays 3 was completed in spring 2021, Hays 2 was completed in spring 2022, and Hays 3 and Hays 4 were completed in spring 2023, ERCOT has not yet approved or completed the associated interconnection change requests.

³ There are planned uprates for Midlothian ANP, Units 2, 3, and 4 (~18 MW each). These uprates are not included in the capacity values or total in Table 2. Although the uprates at Midlothian 2 and 3 were completed in fall 2021 and the uprate for Midlothian 4 was completed in spring 2022, ERCOT has not yet approved or completed the associated interconnection change requests.

Generating Capacity Reports – Table 4

1. Provide the facility name and unit name of each generating unit that is jointly owned. For each such unit provide the names of the joint owners and their respective ownership percentages.

Luminant solely owns all of its generating units, which are listed in Table 3. Luminant does not have a joint ownership interest in any other generating unit.

2. Provide the facility name and unit name of each generating unit that is owned but not controlled. For each such unit, provide the name of the controlling party and briefly describe the nature of the other party's control of the unit.

No Luminant generating unit was owned or controlled by a third party in 2023.

3. Provide the facility and unit name of each generating that is located on the boundary between two power regions (i.e., reliability councils) and able to deliver electricity directly into either power region. For each such unit, provide the total energy sales to each power region during the preceding year.

Luminant does not own any generating units that are located on a boundary between two power regions that are able to deliver electricity directly into either power region.

4. If the reporting party is subject to PURA Sec. 39.154(e), provide the facility name and unit name of each "grandfathered" unit that is located in an ozone non-attainment area. Attach to this report copies of any applications to the Texas Natural Resources Conservation Commission (TNRCC) for a permit for the emission of air contaminants related to the grandfathered units. Also attach a written description of the progress made since the last Generating Capacity Report on achieving approval of each such TNRCC permit.

See Attachment A for a list of Luminant's generating units located in an ozone non-attainment area for which permits have been issued pursuant to PURA § 39.264.

Generating Capacity Reports – Table 4 (continued)

5. For each power region (i.e., reliability council) in Texas in which the reporting party owns generation facilities, identify the amount of transmission import capability that has been reserved and is available to import electricity during the summer peak into the power region from generating facilities that are owned by the reporting party or its affiliate in another power region.

Luminant does not have any import capability reserved to import electricity over the HVDC Ties. Luminant does not have any preemptive rights over the use of the HVDC Ties. To obtain transmission service over the HVDC Ties Luminant would have to make a reservation request on the SPP Oasis, using the Southwest Power Pool (SPP) Open-Access Transmission Tariff (Regional Tariff), and request ERCOT approval of an E-tag, just like any other eligible transmission user. However, Luminant will not make such a request, because it is abiding by its commitment, in Docket No. 47801, to avoid importing any electricity over the North or East HVDC Ties.

ATTACHMENT A

LUMINANT'S GENERATING FACILITIES LOCATED IN AN OZONE NON-ATTAINMENT AREA FOR WHICH
ELECTRIC GENERATING FACILITY PERMITS HAVE BEEN ISSUED PURSUANT TO PURA § 39.264

<u>Facility Name</u>	<u>Unit No.</u>	<u>Summer Net Capacity (MW)</u>	<u>Owner</u>	<u>County</u>	<u>Reliability Council</u>	<u>TCEQ EGFP Permit No.</u>	<u>Permit Issuance Date</u>
Lake Hubbard	1	392	Luminant Generation Company LLC	Dallas	ERCOT	45415	09/06/2002
Lake Hubbard	2	<u>523</u>	Luminant Generation Company LLC	Dallas	ERCOT	45415	09/06/2002
Total		<u>915</u>					

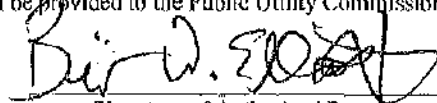
AFFIDAVIT

(Must be notarized by a public notary)

STATE OF TEXAS §
COUNTY OF DALLAS §

BEFORE ME, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, stated on their oath that they are entitled to make this Affidavit, and that the statements contained below and in the foregoing are true and correct.

I swear or affirm that the attached report was prepared under my direction, and that I have the authority to submit this report on behalf of the reporting party. I further swear or affirm that all statements made in the report are true, correct and complete and that any substantial changes in such information will be provided to the Public Utility Commission of Texas in a timely manner.



Signature of Authorized Representative

Ben Elliott

Printed Name

Luminant

Name of Reporting Party

Sworn and subscribed before me this 27th day of February, 2024.
Month Year



Notary Public in and for the State of TX

Revised 12/09

