



Filing Receipt

Filed Date - 2025-05-16 03:02:11 PM

Control Number - 57384

Item Number - 36

**SOAH DOCKET NO. 473-25-14210
PUC DOCKET NO. 57384**

PETITION OF LCRA TRANSMISSION	§	BEFORE THE STATE OFFICE
SERVICES CORPORATION FOR	§	
PERMIAN BASIN RELIABILITY PLAN	§	OF
PROJECT AUTHORIZATION UNDER	§	
PURA § 39.167	§	ADMINISTRATIVE HEARINGS

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S
RESPONSE TO LCRA TRANSMISSION SERVICES CORPORATION'S
FIRST REQUEST FOR INFORMATION**

Electric Reliability Council of Texas, Inc. ("ERCOT") files this Response to LCRA Transmission Services Corporation's ("LCRA") First Request for Information ("RFI") to ERCOT.

I. WRITTEN RESPONSES

ERCOT's written responses to LCRA's First RFIs are attached and incorporated by reference. ERCOT has conferred with LCRA and reached an agreement regarding the scope of LCRA's First RFI. ERCOT provides its responses to LCRA's First RFI in accordance with said agreement. Each response is stated on or attached to a separate page on which the request has been restated. ERCOT's responses are made in the spirit of cooperation without waiving ERCOT's right to contest the admissibility of any of these matters at hearing. Pursuant to P.U.C. PROC.R. 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When ERCOT provides certain information sought by the request while objecting to the provision of other information, it does so without prejudice to its objection in the interests of narrowing discovery disputes pursuant to P.U.C. PROC.R. 22.144(d)(5). Pursuant to P.U.C. PROC.R. 22.144(c)(2)(F), ERCOT stipulates that its responses may be treated by all parties as if they were made under oath.

Respectfully submitted,

/s/ Sidne E. Finke

Chad V. Seely
SVP Regulatory Policy, General Counsel
and Chief Compliance Officer
Texas Bar No. 24037466
(512) 225-7035 (Phone)
chad.seely@ercot.com

Brandon Gleason
Vice President Legal and Compliance
Texas Bar No. 24038679
(512) 275-7442 (Phone)
brandon.gleason@ercot.com

Douglas Fohn
Assistant General Counsel
Texas Bar No. 24036578
(512) 275-7447 (Phone)
douglas.fohn@ercot.com

Sidne E. Finke
Associate Corporate Counsel
Texas Bar No. 24131870
(512) 225-7036 (Phone)
sidne.finke@ercot.com

ERCOT
8000 Metropolis Drive, Bldg. E, Suite 100
Austin, Texas 78744
(512) 225-7079 (Fax)

ATTORNEYS FOR ELECTRIC
RELIABILITY COUNCIL OF TEXAS, INC.

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record to this proceeding on May 16, 2025, by email, in accordance with the Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/ Sidne E. Finke

Sidne E. Finke

RESPONSES

QUESTION NO. LCRA ERCOT 1-1:

Provide the complete Permian Basin Reliability Plan study report, including any amendments or addenda, as referenced in Project No. 55718.

RESPONSE:

The complete Permian Basin Reliability Plan study report was filed in Project No. 55718. Please see the below responsive documents.

Preparer: Counsel

Sponsor: Prabhu Gnanam

Responsive Documents:

57384 ERCOT0001456-1539

QUETSTION NO. LCRA ERCOT 1-2:

Provide all documentation reviewed or relied on to prepare the project Import A1 portion of the Permian Basin Reliability Plan study report.

RESPONSE:

Please see the below responsive documents. The responsive documents are confidential under the terms of the Protective Order and will be provided electronically via a secure file transfer link that will be provided upon request to individuals who have signed the Protective Order Certification.

Preparer: Counsel

Sponsor: Prabhu Gnanam

Responsive Documents:

57384 ERCOT0000002

57384 ERCOT0000149-155

57384 ERCOT0000227-440

57384 ERCOT0000730-985

57384 ERCOT0000988-995

57384 ERCOT0001014-1015

57384 ERCOT0001036-1098

57384 ERCOT0001171-1242

57384 ERCOT0001392-1397

57384 ERCOT0001435-1437

57384 ERCOT0001444

QUESTION NO. LCRA ERCOT 1-3:

Provide all documentation reviewed or relied on to prepare the project Import A1 row in Attachment A to the 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 on October 18, 2024.

RESPONSE:

Please see the below responsive documents.

Preparer: Counsel

Sponsor: Prabhu Gnanam

Responsive Documents:

57384 ERCOT0001398-1409

57384 ERCOT0001435

57384 ERCOT0001442-1143

QUESTION NO. LCRA ERCOT 1-4:

Was ERCOT aware of the Memorandum of Understanding (MOU) between LCRA TSC and ETT when it listed AEP/ETT as the responsible TSP for Project Import A1 in Attachment A to the 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 on October 18, 2024? If yes, provide documentation demonstrating when it became aware of the MOU.

RESPONSE:

Yes. However, it is difficult to determine when ERCOT became aware of the MOU between LCRA TSC and ETT. The earliest date of communication that ERCOT can recall the MOU between LCRA TSC and ETT is October 7, 2024.

Preparer: Counsel
Sponsor: Prabhu Gnanam

Responsive Document:
57384 ERCOT0001403

QUESTION NO. LCRA ERCOT 1-5:

Provide all documentation related to the identification and description of project Import AI, including the bypass of the Edison series capacitors and the addition of new dynamic reactive devices.

RESPONSE:

Please see ERCOT's response to LCRA ERCOT 1-2.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-6:

Will the existing Edison series capacitors be directly interconnected to the project Import A1 dynamic reactive devices?

RESPONSE:

ERCOT anticipates that, dependent on the substation's design, the existing capacitors may not be interconnected to the dynamic devices but rather interconnected to the Edison substation.

ERCOT defers to the TSP for a determination of the most appropriate build out of the project.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-7:

Provide the modeling and analysis conducted by ERCOT related to the recommendation for the construction of dynamic reactive devices as part of project Import A1. Include any assumptions, data inputs, and results.

RESPONSE:

ERCOT's modeling and analysis related to the recommendation for the construction of dynamic reactive devices as part of project Import A1 can be found in the starting case, end case, and public information that LCRA TSC has access to via ERCOT's MIS. Additionally, ERCOT also used information provided from TSPs in its analysis. See ERCOT's response to LCRA ERCOT 1-2.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-8:

Is construction of the dynamic reactive devices electrically required to be at the existing Edison site?

RESPONSE:

ERCOT is not of the opinion that the construction of dynamic reactive devices is electrically required at the existing Edison site. During the development of the project, ERCOT's assessment was that the most reasonable location for reactive devices was at the Edison site.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-9:

Provide all documentation specifying any required station design and land requirements for the dynamic reactive devices in Import A1. Include any site-specific considerations that influenced the design.

RESPONSE:

ERCOT does not possess any documents responsive to 1-9.

Preparer: Counsel

Sponsor: N/A

QUESTION NO. LCRA ERCOT 1-10:

Admit or deny that LCRA TSC owns and operates the existing Big Hill to Kendall 345 kV transmission line.

RESPONSE:

ERCOT does not have sufficient information to state with certainty that LCRA TSC owns and operates the existing Big Hill to Kendall 345 kV transmission line. However, based on ERCOT's GridGeo application and Steady State Working Group (SSWG) model, LCRA TSC is labelled as the owner and operator of the existing Big Hill to Kendall 345 kV transmission line.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-11:

Provide documentation on whether the operation of the new dynamic reactive devices will require a new interconnection to the existing Big Hill to Kendall 345-kV transmission line.

RESPONSE:

ERCOT does not have documents responsive to this request.

Preparer: Counsel

Sponsor: N/A

QUESTION NO. LCRA ERCOT 1-12:

Will the operation of project Import A1 dynamic reactive devices require a new breakered connection to the existing Big Hill to Kendall 345 kV transmission line?

RESPONSE:

ERCOT did not analyze whether the operation of project Import A1 dynamic reactive devices would require a new breakered connection to the existing Big Hill to Kendall 345-kV transmission line. ERCOT is not presently aware of constraints that would require a new breakered connection.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-13:

Does the Permian Basin Reliability Plan study report anticipate the Import A1 dynamic reactive devices be constructed, owned, and operated east or west of Junction, Texas on the existing Big Hill to Kendall 345 kV transmission line?

RESPONSE:

ERCOT anticipates the Import A1 dynamic reactive devices will be located at the Edison substation. Based on ERCOT's modelling systems, the Edison substation is located east of Junction, Texas.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-14:

Provide any documentation related to the coordination between ERCOT and ETT regarding the construction, ownership, and operation of the dynamic reactive devices.

RESPONSE:

Please see the below responsive documents. The responsive documents are confidential under the terms of the Protective Order and will be provided electronically via a secure file transfer link that will be provided upon request to individuals who have signed the Protective Order Certification.

Preparer: Counsel

Sponsor: Prabhu Gnanam

Responsive Documents:

57384 ERCOT0001392-1399

57384 ERCOT0001410-1428

57384 ERCOT0001432-1435

57384 ERCOT0001437-1455

57384 ERCOT0000001

QUESTION NO. LCRA ERCOT 1-15:

Identify any meeting where representatives of ERCOT and ETT communicated regarding project Import A1, including the date, time, and location of any identified meeting, the identification of persons present at any identified meeting, and a description of the topics addressed at any identified meeting. Produce any agenda, documents, or notes related to any identified meeting.

RESPONSE:

ERCOT is not aware of any meetings where representatives of ERCOT and ETT communicated about project Import A1.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-16:

Provide detailed cost estimates for the construction and operation of the Import A1 dynamic reactive devices. Identify who prepared such cost estimates. Provide any workpapers, notes, or other documents related to the production of the Import A1 dynamic reactive devices cost estimates.

RESPONSE:

Please see the below responsive documents. The responsive documents are confidential under the terms of the Protective Order and will be provided electronically via a secure file transfer link that will be provided upon request to individuals who have signed the Protective Order Certification.

Preparer: Counsel

Sponsor: Prabhu Gnanam

Responsive Documents:

57384 ERCOT0001432

57384 ERCOT0001438-1441

57384 ERCOT0001453-1455

57384 ERCOT0000002

QUESTION NO. LCRA ERCOT 1-17:

Provide any documents related to the physical nature of project Import A1, including any assumptions or requirements related to the location, actions required, facilities to be constructed, and any existing facilities required to be removed or replaced.

RESPONSE:

Please see ERCOT's response to LCRA ERCOT 1-2 and LCRA ERCOT 1-3.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-18:

Are the project Import A1 dynamic reactive devices considered series compensation? If so, please provide any documentation clarifying that these devices are series compensation.

RESPONSE:

No.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTION NO. LCRA ERCOT 1-19:

Does construction and operation of project Import A1 require the replacement of facilities at the existing Edison station? If so, please provide all documents related to the anticipated replacement of facilities at the Edison station.

RESPONSE:

ERCOT is unaware of whether construction and operation of project Import A1 requires the replacement of facilities at the existing Edison station.

Preparer: Counsel

Sponsor: Prabhu Gnanam

QUESTON NO. LCRA ERCOT 1-20:

Provide any maps, diagrams, or depictions of project Import A1 that are not otherwise included in the public ERCOT filings associated with the Permian Basin Reliability Plan.

RESPONSE:

Please see below responsive document. The responsive document is confidential under the terms of the Protective Order and will be provided electronically via a secure file transfer link that will be provided upon request to individuals who have signed the Protective Order Certification.

Preparer: Counsel

Sponsor: Prabhu Gnanam

Responsive Documents:

57384 ERCOT0001540

QUESTION NO. LCRA ERCOT 1-21:

Is LCRA TSC qualified and capable of constructing, owning, and operating the Import A1 dynamic reactive devices? If your answer is anything other than an unqualified “yes,” explain in detail why you believe LCRA TSC is not qualified and capable of constructing, owning, and operating the Import A1 dynamic reactive devices.

RESPONSE:

ERCOT is not clear on what the term “qualified” means in the context of this question, but agrees that LCRA TSC is capable of constructing, owning, and operating the Import A1 dynamic reactive devices.

Preparer: Counsel

Sponsor: Prabhu Gnanam