



**APPLICATION OF WIND ENERGY TRANSMISSION
TEXAS, LLC TO AMEND ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY FOR THE
PROPOSED JUNO SOLAR STATION TO LONG DRAW
SWITCHING STATION 138 KV TRANSMISSION LINE
IN BORDEN COUNTY
DOCKET NO. 49973**

Submit seven (7) copies of the application and all attachments supporting the application. If the application is being filed pursuant to 16 Tex. Admin. Code § 25.101(b)(3)(D) (TAC) or 16 TAC § 25.174, include in the application all direct testimony. The application and other necessary documents shall be submitted to:

**Public Utility Commission of Texas
Attn: Filing Clerk
1701 N. Congress Ave.
Austin, Texas 78711-3326**

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Note: As used herein, the term “joint application” refers to an application for proposed transmission facilities for which ownership will be divided. All applications for such facilities should be filed jointly by the proposed owners of the facilities.

1. Applicant (Utility) Name: Wind Energy Transmission Texas, LLC
 (“WETT” or the “Company”)

Certificate Number: 30197

Street Address: 1901 Capital Parkway, Suite 200
 Austin, Texas 78746

Mailing Address: 1901 Capital Parkway, Suite 200
 Austin, Texas 78746

2. Please identify all entities that will hold an ownership interest or an investment interest in the proposed project but which are not subject to the Commission’s jurisdiction.

WETT will hold sole ownership interest in the Juno Solar Station to Long Draw Switching Station Transmission Line Project (the “Project”).

3. Person to Contact: For joint applications, provide all information for each applicant.

Person to Contact: Matt Van Arkel
 Title/Position: Regulatory Manager
 Phone Number: 512-279-7377
 Mailing Address: 1901 Capital Parkway, Suite 200
 Austin, Texas 78746
 Email Address: matt.vanarkel@windenergyoftexas.com

Alternate Contact: Antonio Ansede
 Title/Position: Vice President of Engineering and Construction
 Phone Number: 512-279-7373
 Mailing Address: 1901 Capital Parkway, Suite 200
 Austin, Texas 78746
 Email Address: antonio.ansede@windenergyoftexas.com

Legal Counsel: Dennis W. Donley, Jr.
 Phone Number: 512-479-0300
 Mailing Address: Naman, Howell, Smith & Lee, PLLC
 8310 North Capital of Texas Highway, Suite 490
 Austin, Texas 78731
 Email Address: donley@namanhowell.com

Please contact Dennis W. Donley, Jr. with any inquiries regarding the project.

4. Project Description:

Provide a general description of the project, including the design voltage rating (kV), the operating voltage (kV), the CREZ Zone(s) (if any) where the project is located (all or in part), any substations and/or substation reactive compensation constructed as part of the project, and any series elements such as sectionalizing switching devices, series line compensation, etc. For HVDC transmission lines, the converter stations should be considered to be project components and should be addressed in the project description.

Name or Designation of Project:	Juno Solar Station to Long Draw Switching Station Transmission Line Project
Design Voltage Rating (kV):	138 kV
Operating Voltage Rating (kV):	138 kV
Normal Peak Operating Current (A):	1614 A

The proposed Project is a new, single-circuit, 138 kV, approximately 6-mile transmission line to be built on monopoles between a 138 kV yard of WETT's existing Long Draw switching station (which is located adjacent to Farm-to-Market 1054/Vealmoor Road in Borden County) and the proposed Juno Solar collector substation (which is being developed by a generator, I.P. Juno, LLC ("Juno")) approximately 0.6 miles northeast of the intersection of U.S. Highway 180 and Vealmoor Road, and 11.5 miles west of Gail, also in Borden County, Texas). Juno requested interconnection at 138 kV, and monopoles are appropriate to this Project's voltage, length, and terrain.

The Project's proposed route has the unanimous agreement of impacted landowners, and accordingly WETT is proposing a single Consensus Route. The Consensus Route is forward progressing along a nearly direct path from Juno's facility west to Vealmoor Road, and from there nearly due south paralleling existing right of way used by WETT's 345 kV transmission lines to the pending 138 kV expansion adjacent to WETT's existing Long Draw Switching Station off Vealmoor Road. In an abundance of caution, an area of up to 1000 feet from the proposed transmission line route was studied for purposes of the Environmental Assessment, with said study area expanded up to 2000 feet at certain points to allow for additional routing flexibility.

If the project will be owned by more than one party, briefly explain the ownership arrangements between the parties and provide a description of the portion(s) that will be owned by each party. Provide a description of the responsibilities of each party for implementing the project (design, Right-Of-Way acquisition, material procurement, construction, etc.).

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Not applicable. WETT will own, operate, and maintain all transmission line facilities, including conductors, wires, structures, hardware, and easements. WETT already owns the existing Long Draw Switching Station.

If applicable, identify and explain any deviation in transmission project components from the original transmission specifications as previously approved by the Commission or recommended by a PURA §39.151 organization.

Not applicable. No transmission specifications have been previously approved by the Commission for this Project. Furthermore, the Electric Reliability Council of Texas (ERCOT – the applicable PURA §39.151 organization) Nodal Protocols Section 3.11.4.1(2), 3.11.4.3(e)(iv) and 3.11.4.4(1) relating to Transmission Planning defines a project that is to interconnect new generation as a “neutral project,” and therefore a Tier 4 project, which is not to be submitted for the ERCOT Regional Planning Group’s (RPG) review. For any project classified in Tier 4, ERCOT will not solicit comments from RPG, conduct any independent review, or provide any endorsement for the project.

ERCOT Planning Guide Section 5: Generation Resource Interconnection and Change Request requires new generators to go through the Full Interconnection Study (FIS) process, which includes a Facility Study. The Facility Study describes the transmission facilities and associated costs required to interconnect the new generation. This study is sent for a 10-business day review to ERCOT, and no comments were received back from ERCOT on this study. No deviations have been made in the transmission Project components since the most recent Facility Study was reviewed by ERCOT.

5. Conductor and Structures:

Conductor Size and Type:	959 kcmil ACSS/TW/HS Suwanee
Number of conductors per phase:	One
Continuous Summer Static Current Rating (A):	1614 Amperes
Continuous Summer Static Line Capacity at Operating Voltage (MVA):	386 MVA
Continuous Summer Static Line Capacity at Design Voltage (MVA):	386 MVA
Type and composition of Structures:	Steel Monopoles

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Height of Typical Structures: 80 feet, with local variations

Estimated Maximum Height of Structures: 100 feet

Explain why these structures were selected; include such factors as landowner preference, engineering considerations, and costs comparisons to alternate structures that were considered. Provide dimensional drawings of the typical structures to be used in the project.

Self-supporting single-circuit, steel monopoles were selected as the best structure for constructing the Project, taking into account various factors including cost, technical specifications, footprint, ROW requirements, terrain, and other factors (including other line crossings) associated with this specific project. Monopoles are sufficiently strong for the conductor loads associated with this project and, as compared to other structure types, have a smaller footprint, are cost competitive, and require relatively minimal maintenance. This conductor was selected because of the electrical advantages and cost efficiencies it presents for this size of project.

Although the height of typical structures is expected to be 80 feet, that height may vary at particular locations due to constraints or clearance requirements necessitated by terrain, overhead obstructions, and span lengths.

Please refer to Figure 1-2 in Appendix A of the Environmental Assessment (“EA”) for a dimensional drawing of the typical structures to be used for the Project. The EA is Attachment 1 to this application.

For joint applications, provide and separately identify the above-required information for the portion(s) of the project owned by each applicant.

Not applicable. WETT is the sole applicant and will be the sole owner of the Project.

6. Right-of-Way:

Miles of Right-of-Way: Approximately 6 miles

Miles of Circuit: Approximately 6 miles

Width of Right-of-Way: 100 feet

Percent of Right-of-Way Acquired: 0 percent*

*WETT has not yet acquired this right of way (“ROW”), but the affected landowners support the project and have granted WETT options to purchase 100% of the necessary ROW if the Consensus Route is approved.

For joint applications, provide and separately identify the above-required information for each route for the portion(s) of the project owned by each applicant.

Not applicable; the Project is wholly WETT's, not a joint application.

Provide a brief description of the area traversed by the proposed transmission line. Include a description of the general land uses in the area and the type of terrain crossed by the proposed line.

The Project will traverse approximately 6 miles between WETT's Long Draw Switching Station and a solar array on property approximately five miles due north, all in Borden County in West Texas, approximately 20 miles east of Lamesa. *See* Figure 1-1 in EA Appendix A. This is in the North Central Plains region of Texas; the area traversed is typical Texas High Plains scrubland/rangeland with some ridges. The Project will cross Buck Canyon Creek, Sand Creek, and an unnamed tributary.

7. Substations or Switching Stations:

List the name of all existing HVDC converter stations, substations or switching stations that will be associated with the proposed new transmission line. Provide documentation showing that the owner(s) of the existing HVDC converter stations, substations and/or switching stations have agreed to the installation of the required project facilities.

List the name of all new HVDC converter stations, substations or switching stations that will be associated with the new transmission line. Provide documentation showing that the owner(s) of the new HVDC converter stations, substations and/or switching stations have agreed to the installation of the required project facilities.

The Project is associated with WETT's existing Long Draw Switching Station and the new Juno Solar Station, a collector substation that will be owned and operated by Juno.

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8. Estimated Schedule:

Table 1: Estimated Schedule		
Estimated Dates of:	Start	Completion
Right-of-Way and Land Acquisition	June 2019	May 2020
Engineering and Design	June 2019	January 2020
Material and Equipment Procurement	August 2019	January 2020
Construction of Facilities	November 2019	December 2020
Energize Facilities	--	January 2021

9. Counties: For each route, list all counties in which the route is to be constructed.

The Project will be constructed entirely in Borden County.

10. Municipalities: For each route, list all municipalities in which the route is to be constructed.

No portion of the route will be constructed within any municipal boundaries.

For each applicant, attach a copy of the franchise, permit or other evidence of the city’s consent held by the utility. If franchise, permit, or other evidence of the city’s consent has been previously filed, provide only the docket number of the application in which the consent was filed. Each applicant should provide this information only for the portion(s) of the proposed project which will be owned by the applicant.

Not applicable, given that no portion of the route will be constructed within any municipal boundaries.

11. Affected Utilities:

Identify any other electric utility served by or connected to facilities proposed in this application.

No other electric utility will be served by the Project. WETT’s existing Long Draw Switching Station is connected to Oncor.

Describe how any other electric utility will be affected and the extent of the other utilities’ involvement in the construction of this project. Include any other utilities whose existing facilities will be utilized for the project (vacant circuit positions, ROW, substation sites and/or equipment, etc.) and provide

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documentation showing that the owner(s) of the existing facilities have agreed to the installation of the required project facilities.

No electric utility other than WETT will have existing facilities utilized for the project. However, WETT will coordinate technical considerations of transmission line crossings with utilities whose existing lines WETT’s new line will cross.

12. Financing:

Describe the method of financing this project. For each applicant that is to be reimbursed for all or a portion of this project, identify the source and amount of the reimbursement (actual amount if known, estimated amount otherwise) and the portion(s) of the project for which the reimbursement will be made.

WETT proposes to finance the facilities included in the Project with a combination of debt and equity, which should approximate the capital structure authorized by the PUCT and used in its previous projects. WETT plans to use internally-generated funds for the equity component and proceeds from borrowings for the debt component of such financing. WETT may use short-term construction financing that will later be repaid through long-term financing for the debt component of the project financing, as appropriate. WETT is the sole applicant so no other party will be reimbursed for any portion of the Project.

13. Estimated Costs: Provide cost estimates for each route of the proposed project using the following. Provide a breakdown of “Other” costs by major cost category and amount. Provide the information for each route in an attachment to this application.

The following table provides the cost estimates for the Project and Long Draw Switching Station expansion:

	Transmission Facilities	Substation Facilities
Right-of-way and Land Acquisition	\$720,000	\$0
Engineering and Design (Utility)	\$100,000	\$100,000
Engineering and Design (Contract)	\$550,000	\$205,000
Procurement of Material and Equipment (including stores)	\$1,100,000	\$700,000
Construction of Facilities (Utility)	\$100,000	\$100,000
Construction of Facilities (Contract)	\$2,700,000	\$345,000
Other (all costs not included in the above categories)	\$630,000	\$150,000
Estimated Total Cost	\$5,900,000	\$1,600,000

For joint applications, provide and separately identify the above-required information for the portion(s) of the project owned by each applicant.

Not applicable.

14. Need for the Proposed Project:

For a standard application, describe the need for the construction and state how the proposed project will address the need. Describe the existing transmission system and conditions addressed by this application. For projects that are planned to accommodate load growth, provide historical load data and load projections for at least five years. For projects to accommodate load growth or to address reliability issues, provide a description of the steady state load flow analysis that justifies the project. For interconnection projects, provide any documentation from a transmission service customer, generator, transmission service provider, or other entity to establish that the proposed facilities are needed. For projects related to a Competitive Renewable Energy Zone, the foregoing requirements are not necessary; the applicant need only provide a specific reference to the pertinent portion(s) of an appropriate commission order specifying that the facilities are needed. For all projects, provide any documentation of the review and recommendation of a PURA §39.151 organization.

The Project is needed to connect Juno’s new 300 MW solar generation facility to Texas’ electric transmission system.¹ Juno is installing a new, 300 MW solar generation facility and plans to construct, own, and operate its own collector substation approximately five miles north of WETT’s existing Long Draw Switching Station. As a power generation company, Juno is a transmission service customer under 16 TAC § 25.5(139).

Under applicable Commission rules, WETT is obligated to provide interconnection for new generation when requested: 16 TAC § 25.198(b) states “the TSP will provide transmission service to any transmission service customer” and § 25.191(d)(3) says “A TSP shall interconnect its facilities with new generating sources and construct facilities needed for such an interconnection.” Moreover, 16 TAC § 25.195(c)(1) provides that:

When an eligible transmission service customer requests transmission service for a new generation source that is planned to be interconnected with a TSP’s transmission network, the transmission service customer shall be responsible for the cost of installing step-up transformers to transform the output of the generator to a transmission voltage level and

¹ It is understood that the ultimate purchaser of the power generated by Juno’s solar generation facility will be the Lower Colorado River Authority (LCRA).

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protective devices at the point of interconnection capable of electrically isolating the generation source owned by the transmission service customer. The TSP shall be responsible, pursuant to paragraph (2) of this subsection, for the cost of installing any other interconnection facilities that are designed to operate at a transmission voltage level and any other upgrades on its transmission system that may be necessary to accommodate the requested transmission service.

In order to provide the transmission facilities needed to interconnect Juno's new station and generating facilities to the grid consistent with WETT's obligations, WETT proposes to construct, own, and operate the Project.² WETT and Juno have entered into a Standard Generation Interconnection Agreement executed on December 22, 2018, and amended on September 5, 2019 (the "SGIA," attached hereto as Attachment 2) for WETT to provide transmission service to Juno's new collector substation.³

The Long Draw Switching Station is being expanded and will have the ability to accommodate this 138 kV interconnection request with minimal modifications.

With regards to ERCOT review and recommendations for this project, as previously noted in response to Item 4, ERCOT reviewed the Facility Study associated with the Juno FIS and no comments were received. Therefore, no documentation of an ERCOT recommendation exists.

15. Alternatives to Project:

For a standard application, describe alternatives to the construction of this project (not routing options). Include an analysis of distribution alternatives, upgrading voltage or bundling of conductors of existing facilities, adding transformers, and for utilities that have not unbundled, distributed generation as alternatives to the project. Explain how the project overcomes the insufficiencies of the other options that were considered.

Due to the existing system configuration and location of the surrounding transmission facilities, alternatives to the Project are limited. Interconnections to alternative transmission facilities were considered. However, the next closest substation to Juno's location would be the Faraday (Willow Creek) switching station near Gail, Texas, approximately 10 miles away. Similarly, no other

² The 138 kV line exceeds one mile so WETT is requesting a CCN pursuant to 16 TAC § 25.101(b)(3). 16 TAC §§ 25.101(c)(2) and (c)(5)(A) except the need for a CCN amendment for the substation work, although WETT provides information regarding those components herein.

³ 16 TAC § 25.101(b)(3)(A) specifies that an economic cost-benefit study is not required in this scenario and that "great weight" will be given to written documentation that the transmission line is needed to interconnect a transmission service customer.

transmission lines were significantly closer to Juno’s location than WETT’s. Ultimately, these alternatives would be much less efficient to implement than the Project. The Project involves extension of the transmission facilities nearest to Juno’s generating facility.

In addition, given the Juno project’s final size, it is more cost effective to interconnect at 138 kV than 345 kV. The proposed distance of the transmission line at 138 kV is similar to what the distance would be for a 345-kV line, and because the distances are comparable, the interconnection cost at 138 kV is smaller. Generally speaking, 138-kV equipment is less costly than equivalent 345-kV equipment: lower voltage equipment is smaller, requiring fewer raw materials, lower transportation costs, smaller foundations, and less labor. 138-kV transmission lines not only require smaller equipment (with associated lower equipment and labor costs), but they also require less ROW than 345-kV lines, potentially lowering land acquisition costs and resulting in a smaller environmental footprint.

16. Schematic or Diagram:

For a standard application, provide a schematic or diagram of the applicant’s transmission system in the proximate area of the project. Show the location and voltage of existing transmission lines and substations, and the location of the construction. Locate any taps, ties, meter points, or other facilities involving other utilities on the system schematic.

A schematic of WETT’s transmission system in the proximate area of the Project is attached as Attachment 3.

17. Routing Study:

Provide a brief summary of the routing study that includes a description of the process of selecting the study area, identifying routing constraints, selecting potential line segments, and the selection of the routes. Provide a copy of the complete routing study conducted by the utility or consultant. State which route the applicant believes best addresses the requirements of PURA and P.U.C. Substantive Rules.

WETT retained KP Environmental, Inc. (“KPE”) to prepare the EA for the Project *See* Attachment 1. The objective of the EA was to provide information in support of this Application and to address the requirements of Public Utility Regulatory Act §§ 37.056(c)(4)(A)-(D), the PUCT CCN Application form, and 16 TAC § 25.101 as these apply to the Project.

The EA assesses the environmental effects that could result from the construction, operation, and maintenance of the Project. WETT provided KPE information regarding the project endpoints and potential route, the need for the project, engineering and design requirements, construction practices, and ROW

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requirements. KPE evaluated existing environmental conditions, including the human and natural resources that are located in the Project Study Area, and drafted the EA. Study Area selection, identification of constraints, and route assessment are specifically discussed within Section 2.0 of the attached EA. Ultimately, the route for the proposed line deemed most economical to build was agreed to by WETT and the landowners whose property is crossed by the proposed line; no other landowner approval is necessary, so extensive description of possible alternative routes within the Study Area was not needed. *See* 16 TAC § 25.101(b)(3)(B). As shown in the figures included in Appendix A to the EA, the agreed route runs relatively straight along Vealmoor Road from the Long Draw Switching Station to a point west of the Juno Solar Station, then cuts across country to connect to Juno.

The EA may further be used in support of any additional federal, state, or local permitting activities that may be required for the Project.

To the extent engineering obstacles are encountered after Commission approval, the Project route may be modified to the extent necessary.

18. Public Meeting or Public Open House:

Provide the date and location for each public meeting or public open house that was held in accordance with P.U.C. PROC. R. 22.52. Provide a summary of each public meeting or public open house including the approximate number of attendants, and a copy of any survey provided to attendants and a summary of the responses received. For each public meeting or public open house provide a description of the method of notice, a copy of any notices, and the number of notices that were mailed and/or published.

Not applicable; no public meeting or open house is required for this Project. Under 16 TAC § 22.52(a)(4), a public meeting is only required when 25 or more people are entitled to receive direct notice of the project. Here, there are only four landowners within 300 feet of the Project, and all agree with the proposed route for the project. WETT nonetheless worked with the impacted landowners and performed outreach to county and state officials.

19. Routing Maps:

Base maps should be a full scale (one inch = not more than one mile) highway map of the county or counties involved, or other maps of comparable scale denoting sufficient cultural and natural features to permit location of all routes in the field. Provide a map (or maps) showing the study area, routing constraints, and all routes or line segments that were considered prior to the selection of the routes. Identify the routes and any existing facilities to be interconnected or coordinated with the project. Identify any taps, ties, meter points, or other facilities involving other utilities

on the routing map. Show all existing transmission facilities located in the study area. Include the locations of radio transmitters and other electronic installations, airstrips, irrigated pasture or cropland, parks and recreational areas, historical and archeological sites (subject to the instructions in Question 27), and any environmentally sensitive areas (subject to the instructions in Question 29).

Provide aerial photographs of the study area displaying the date that the photographs were taken or maps that show (1) the location of each route with each route segment identified, (2) the locations of all major public roads including, as a minimum, all federal and state roadways, (3) the locations of all known habitable structures or groups of habitable structures (see Question 19 below) on properties directly affected by any route, and (4) the boundaries (approximate or estimated according to best available information if required) of all properties directly affected by any route.

For each route, cross-reference each habitable structure (or group of habitable structures) and directly affected property identified on the maps or photographs with a list of corresponding landowner names and addresses and indicate which route segment affects each structure/group or property.

The requisite maps and aerial photographs are found at Figures 2-2 and 2-3 in the EA. Specifically, these figures depict over an aerial photograph: (1) the location of the Project, (2) the locations of all major public roads, including all federal and state roadways, (3) the locations of all known habitable structures on properties directly affected by the Project (none), and (4) the boundaries (approximate or estimated according to best available information) of all properties directly affected by the Project. No electronic installations, airstrips, irrigated pasture or cropland, parks and recreational facilities, historical and archeological sites, environmentally sensitive areas, or habitable structures are within relative proximity to the Project.

20. Permits:

List any and all permits and/or approvals required by other governmental agencies for the construction of the proposed project. Indicate whether each permit has been obtained.

Potentially required permits may include: Storm Water Pollution Prevention Plan (“SWPPP”), pedestrian cultural resources survey plan, potential US Army Corps of Engineers (“USACE”) permits determined through consultation to be applicable under Section 401/404 and Section 10 Permit criteria, and U.S. Fish and Wildlife Service (“USFWS”) permits determined to be applicable under the Endangered Species Act (“ESA”). Additional permits may also be required by Borden County. These permits have not yet been obtained, but would be obtained before construction begins, if required. *See* Section 2.2.4 of the EA.

21. Habitable structures:

For each route list all single-family and multi-family dwellings and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, schools, or other structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis within 300 feet of the centerline if the proposed project will be constructed for operation at 230kV or less, or within 500 feet of the centerline if the proposed project will be constructed for operation at greater than 230kV. Provide a general description of each habitable structure and its distance from the centerline of the route. In cities, towns or rural subdivisions, houses can be identified in groups. Provide the number of habitable structures in each group and list the distance from the centerline of the route to the closest and the farthest habitable structure in the group. Locate all listed habitable structures or groups of structures on the routing map.

There are no known habitable structures in the Study Area or within 300 feet of the Project's proposed route. There are only four directly affected property owners apart from WETT.

22. Electronic Installations:

For each route, list all commercial AM radio transmitters located within 10,000 feet of the center line of the route, and all FM radio transmitters, microwave relay stations, or other similar electronic installations located within 2,000 of the center line of the route. Provide a general description of each installation and its distance from the center line of the route. Locate all listed installations on a routing map.

Review of Federal Communications Commission ("FCC") data identified no electronic installation of any kind within 10,000 feet of the Project's centerline. Because of the distance from the Project, no electronic installations are identified on Project maps. See Sections 3.6.6 and 4.6.6 of the EA.

23. Airstrips:

For each route, list all known private airstrips within 10,000 feet of the center line of the project. List all airports registered with the Federal Aviation Administration (FAA) with at least one runway more than 3,200 feet in length that are located within 20,000 feet of the center line of any route. For each such airport, indicate whether any transmission structures will exceed a 100:1 horizontal slope (one foot in height for each 100 feet in distance) from the closest point of the closest runway. List all listed airports registered with the FAA having no runway more than 3,200 feet in length that are located within 10,000 feet of the center line of any

route. For each such airport, indicate whether any transmission structures will exceed a 50:1 horizontal slope from the closest point of the closest runway. List all heliports located within 5,000 feet of the center line of any route. For each such heliport, indicate whether any transmission structures will exceed a 25:1 horizontal slope from the closest point of the closest landing and takeoff area of the heliport. Provide a general description of each listed private airstrip, registered airport, and heliport; and state the distance of each from the center line of each route. Locate and identify all listed airstrips, airports, and heliports on a routing map.

There are no airstrips, airports, or heliports within the indicated distances. Based on review of the aerial photography and data from the FAA and AirNav.com, the nearest airport is the Lamesa Municipal Airport which is approximately 16 miles away. No indirect or direct impacts are anticipated and no slope analysis is required. Because of the distance from the Project, airports, airstrips, and heliports are not identified on Project maps. *See* Sections 3.6.5.2 and 4.6.5.2 of the EA.

KPE sent a consultation letter to FAA about the Project and received a response letter, included in Appendix B of the EA.

24. Irrigation Systems:

For each route identify any pasture or cropland irrigated by traveling irrigation systems (rolling or pivot type) that will be traversed by the route. Provide a description of the irrigated land and state how it will be affected by each route (number and type of structures, etc.). Locate any such irrigated pasture or cropland on a routing map.

Based upon aerial photography interpretation and field observations, there are no traveling irrigation systems within the Study Area, and therefore no descriptions or maps are required. *See* Sections 3.6.3 and 4.6.3 of the EA.

25. Notice:

Notice is to be provided in accordance with P.U.C. PROC. R. 22.52.

A. Provide a copy of the written direct notice to owners of directly affected land. Attach a list of the names and addresses of the owners of directly affected land receiving notice.

A copy of the written direct notice that will be provided to the owners of directly-affected land is included as Attachment 4. There are only four property owners that are directly affected by the Project. WETT has been working with the property owners throughout the development of this process.

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B. Provide a copy of the written notice to utilities that are located within five miles of the proposed transmission line.

A copy of the written notice to utilities, with attached maps, that will be provided to the utilities providing electric service within a five mile radius of the Project is included as Attachment 5. The following utilities will be provided the requisite notice on or before the filing date as required by PUCT rules:

- Big Country Electric Cooperative, Inc.
- Lyntegar Electric Cooperative, Inc.
- Oncor Electric Delivery Company LLC
- Texas Electric Service Co.

C. Provide a copy of the written notice to county and municipal authorities, and the Department of Defense Siting Clearinghouse. Notice to the DoD Siting Clearinghouse should be provided at the email address found at <http://www.acq.osd.mil/dodsc/>.

A representative copy of the written notice that will be provided to county authorities (specifically, Borden County Judge Ross D. Sharp) is included as Attachment 5.

Attachment 5 will also be served on the Office of Public Utility Counsel (“OPUC”) and provided to the Department of Defense (“DoD”) Siting Clearinghouse upon filing of this Application. Notice to the DoD Siting Clearinghouse will be sent to dodsitingclearinghouse@osd.mil.

In addition to these planned notices, KPE has already sent a consultation letter and email to the DoD Siting Clearinghouse. The inquiry was received and the DoD requested GIS data of the Project. Such data was transmitted.

There are no municipalities located within five miles of the Project, so notice will not be sent to any municipal authorities.

KPE also sent consultation letters by mail and email to the following local officials and departments, and state and federal regulatory agencies:

Federal Agencies

- Federal Aviation Administration, Southwest Region (“FAA”)
- Federal Emergency Management Agency (“FEMA”)
- Natural Resources Conservation Service (“NRCS”)
- U.S. Army Corps of Engineers, Fort Worth District (“USACE”)

Application of Wind Energy Transmission Texas, LLC to Amend its Certificate of Convenience and Necessity for the Proposed Juno Solar Station to the Long Draw Switching Station 138 kV Transmission Line in Borden County, Texas

- U.S. Department of Agriculture (“USDA”)
- U.S. Department of Defense (“DoD”)
- U.S. Environmental Protection Agency (“EPA”)
- U.S. Fish and Wildlife Service (“USFWS”)

State Agencies

- Texas Department of Transportation (“TxDOT”)
 - Aviation Division
 - Environmental Affairs Division
 - Abilene District
- Texas General Land Office (“GLO”)
- Texas Historical Commission (“THC”)
- Texas Parks and Wildlife Department (“TPWD”)
- Texas Water Development Board (“TWDB”)
- Texas Commission on Environmental Quality (“TCEQ”)

Regional Agencies

- Colorado River Municipal Water District
- Permian Basin Regional Planning Commission

County Agencies

- Borden County Officials (County Judge, County Commissioners, County Clerk, County Sheriff)

See Appendix B in the EA for copies of all the above correspondence.

- D. Provide a copy of the notice that is to be published in newspapers of general circulation in the counties in which the proposed facilities are to be constructed. Attach a list of the newspapers that will publish the notice for this application. After the notice is published, provide the publisher’s affidavits and tear sheets.**

Notice of this Application will be published in the *Borden Star*, a newspaper of general circulation in Borden County. A representative copy of this notice is included as Attachment 6. Proof of publication will be provided in the form of Publisher’s Affidavits and tear sheets following publication of notice.

For a CREZ application, in addition to the requirements of 16 TAC § 22.52 the applicant shall, not less than twenty-one (21) days before the filing of the application, submit to the Commission staff a “generic” copy of each type of alternative published and written notice for review. Staff’s comments, if any, regarding the alternative notices will be provided to the applicant not later than seven days after receipt by Staff of the alternative notices, Applicant may take

into consideration any comments made by Commission staff before the notices are published or sent by mail.

Not applicable.

26. Parks and Recreation Areas:

For each route, list all parks and recreational areas owned by a governmental body or an organized group, club, or church and located within 1,000 feet of the center line of the route. Provide a general description of each area and its distance from the center line. Identify the owner of the park or recreational area (public agency, church, club, etc.). List the sources used to identify the parks and recreational areas. Locate the listed sites on a routing map.

National Park Service and TPWD data, along with aerial and topographic maps, were reviewed and no parks or recreational areas were located within 1,000 feet of the Proposed Route centerline. See Sections 3.6.2 and 4.6.2 of the EA. Therefore, no impacts to parks or recreational areas are anticipated, and no facilities are shown on maps.

KPE sent a consultation letter to TPWD about the Project and received a response letter. This correspondence is provided in Appendix B of the EA.

27. Historical and Archeological Sites:

For each route, list all historical and archeological sites known to be within 1,000 feet of the center line of the route. Include a description of each site and its distance from the center line. List the sources (national, state or local commission or societies) used to identify the sites. Locate all historical sites on a routing map. For the protection of the sites, archeological sites need not be shown on maps.

A cultural resources review was conducted and found no historical or archeological sites within 1,000 feet of the proposed Route centerline. Therefore, no such sites are included on the maps and not lists have been created. See Sections 3.7.2, 3.7.3, and 4.7.1 of the EA.

KPE sent a consultation letter to the THC about the Project and received a response letter. This letter is provided in Appendix B of the EA. A pedestrian archeological survey will be required following issuance of the CCN and prior to construction to identify any previously unidentified cultural resources.

28. Coastal Management Program:

For each route, indicate whether the route is located, either in whole or in part, within the coastal management program boundary as defined in 31 TAC §503.1. If any route is, either in whole or in part, within the coastal management program boundary, indicate whether any part of the route is

seaward of the Coastal Facilities Designation Line as defined in 31 TAC §19.2(a)(21). Using the designations in 31 TAC §501.3(b), identify the type(s) of Coastal Natural Resource Area(s) impacted by any part of the route and/or facilities.

The Project is not located, either in whole or in part, within the coastal management program boundary as defined in 31 TAC § 503.1.

29. Environmental Impact:

Provide copies of any and all environmental impact studies and/or assessments of the project. If no formal study was conducted for this project, explain how the routing and construction of this project will impact the environment. List the sources used to identify the existence or absence of sensitive environmental areas. Locate any environmentally sensitive areas on a routing map. In some instances, the location of the environmentally sensitive areas or the location of protected or endangered species should not be included on maps to ensure preservation of the areas or species.

The EA is included as Attachment 1. Section 3.4 of the EA, along with any tables and figures included therein, provides discussion of threatened and endangered species, including all information requested in this question. Section 5.0 of the EA provides a description of references and sources utilized to create the EA.

Within seven days after filing the application for the project, provide a copy of each environmental impact study and/or assessment to the Texas Parks and Wildlife Department (TPWD) for its review at the address below. Include with this application a copy of the letter of transmittal with which the studies/assessments were or will be sent to the TPWD.

**Wildlife Habitat Assessment Program
Wildlife Division
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, Texas 78744**

The applicant shall file an affidavit confirming that the letter of transmittal and studies/assessments were sent to TPWD.

As noted above, a consultation letter was provided to TPWD for review prior to filing this Application for the Project to solicit any comments that could be addressed as soon as possible. TPWD provided a response letter. This correspondence is included in Appendix B to the EA.

A copy of the EA will be provided to the TPWD for review within seven days following the filing of this application, as required herein. See Attachment 9 for a

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copy of the relevant letter of transmittal that will be sent to TPWD. An affidavit will be filed at the PUCT confirming that the letter and EA were sent to TPWD.

30. Affidavit

Attach a sworn affidavit from a qualified individual authorized by the applicant to verify and affirm that, to the best of knowledge, all information provided, statements made, and matters set forth in this application and attachments are true and correct.

An affidavit is included as Attachment 8 to this Application.

31. List of Attachments

Attachment 1 – Environmental Assessment

Attachment 2 – Standard Generation Interconnection Agreement between WETT and Juno

Attachment 3 – Schematic of WETT’s Transmission System in the Proximate Area of the Project

Attachment 4 – Landowner Notice

Attachment 5 – Utility, County Authority, OPUC, and DoD Notice

Attachment 6 – Newspaper Notice

Attachment 7 – TPWD Letter of Transmittal

Attachment 8 – Affidavit