



Edwards Plateau Alliance

Preservation. Conservation. Education.

Educational Packet Regarding Proposed 765-kV Transmission Lines
Otherwise known as the Permian Basin Reliability Plan presented by
ERCOT and sometimes referred to as the Strategic Transmission
Expansion Plan (STEP)

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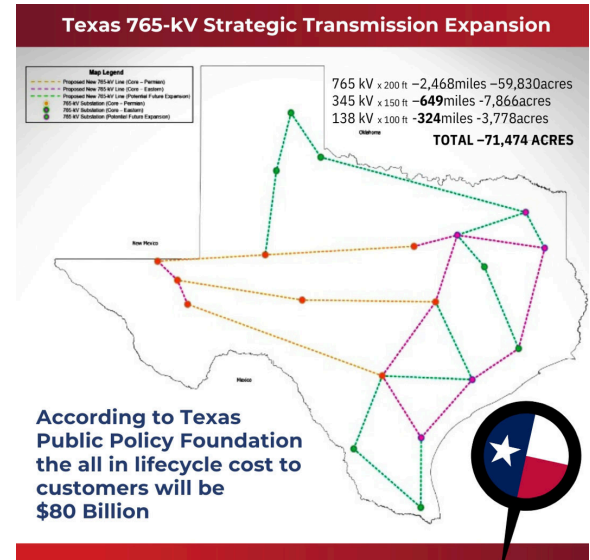
TEXAS 765 POWER LINE GRAB

The State of Texas is embarking on an unprecedented transmission project in both scale and scope. The 765 kV Transmission corridors will take a 200 foot easement across 4,000 linear miles of Texas's private lands.

The power lines can only move electricity. They will not improve Texas failing winter durability, which has dropped from a 17.5% reserve margin to 10%, and is forecasted to be in the negatives by 2030 unless the State changes course.

The project is billed as necessary to power the Permian Basin, but in reality it is to connect data centers and renewable energy projects to the grid - driving up consumer's utility bills.

Texas landowners will have their land condemned, their property values drastically reduced, their businesses disrupted, and their property exposed to new endangered species regulations — all while receiving none of the benefits from the project.



KEY POINTS:

1. The Project Fails Governor Abbott's Charge to Increase Dispatchable Power Connectivity
2. Transmission Lines that Move Wind and Solar will not Fix the Decreasing Winter Durability Reserves
3. Property Value Losses are Estimated at \$8.2 Billion
4. The Utility Companies will Reap Billions, Landowners will be Paid Pennies, and Consumer's Bills will Rise
5. Landowners Intentionally Blindsided
6. Transmission Companies Avoiding Accountability and Federal Oversight
7. Wind and Solar will go Up, Winter Durability will go Down, Utility Bills will Rise
8. Violates Trump Policy

REQUEST:

Call on State leadership to pause the project and conduct interim studies to consider the costs savings of building local dispatchable power.

BACKGROUND:

1. **The Project Fails Governor Abbott's Charge to Increase Dispatchable Power Connectivity**

Over the past 5 years, Texas has added 31 GW of Solar and 17 GW of battery storage at a cost of \$50 Billion. New natural gas generation has increased by only 3 GW. By 2030 an additional 60 GW of new solar, wind and batteries are expected to be added at a cost of \$60 Billion. Texas is doubling down on unreliable generation.

Instead, we should pause the new \$33 billion 765 vK transmission line project and focus on market changes that will attract investment in reliable dispatchable power where it is needed. Abbott specifically called for this action in his July 6, 2021 letter, but this has yet to be achieved. The Governor directed:

"Dispatchable generation, such as natural gas, coal and nuclear power plants, are essential for the reliability and stability of the electric grid because they can be scheduled to provide power to the grid at any time. We must ensure that, at any point in time, ERCOT is utilizing non-renewable electricity in sufficient amounts to maintain reliable power throughout our state."

2. **Transmission Lines that Move Wind and Solar will not Fix the Decreasing Winter Durability Reserves**

Winter demand has increased by 20% since storm Uri, but Texas's planning reserve margin has dropped from 17.5% to 10%, and is on track to be a negative reserve by 2030. The 765 kV Transmission lines will only move energy — they will not generate reliable energy essential for winter reserves.

3. **Property Value Losses are Estimated at \$8.2 Billion**

The majority of the new transmission lines will be 150' to 200' tall 765 kV lines with 200' easements across private property. The new transmission lines will traverse 4,000 miles of Texas land affecting over 5,000,000+ acres of privately owned agricultural and recreational land, resulting in an uncompensated loss of \$8.2 Billion.

4. **The Utility Companies will Reap Billions, Landowners will be Paid Pennies, and Consumer's Bills will Go Up**

ONCOR is guaranteed a 9.6% yield on their capital investment in the infrastructure, while Landowners will be paid the lowest market price for their condemned land. Rate payers will be responsible to pay for the infrastructure regardless of ultimate demand. Already, 40% of Texas consumer's bills are for transmission lines. The 765 kV project will add another \$100-\$200 to every rate payers ~~monthly~~ ^{annual} bill.

5. **Landowners Intentionally Blindsided**

In the first CCN segment filing, ONCOR noticed landowners on December 11, 2025, giving them 30 days to hire an attorney (at \$25k average per case) and file an “intervention.” These notifications were sent regular mail intentionally scheduled to arrive just before the Christmas holidays and expire after the New Year. The timing and short intervention window were deliberately designed to prevent Texan’s from protecting their homes, businesses and land.

6. Transmission Companies Avoiding Accountability and Federal Oversight

The project requires federal permits for the taking of endangered species. However, none of the utility companies, nor ERCOT have noticed the public that a robust analysis through an Environmental Impact Statement will be prepared as required by the National Environmental Policy Act.

The corridors cut directly through pristine river basins and watersheds, and cross major rivers. Large vegetation clearings will occur in flood prone areas, increasing major flood events and habitat destruction. The corridors will fragment habitat of hundreds of “species of greatest conservation need” identified by Texas Parks and Wildlife, potentially causing the listing of additional species and more federal regulation of Texan’s land.

In the first of five CCN applications filed, the applicant acknowledges there are 18 federal and state listed species that may be impacted in this specific segment, which are not covered under the utility companies 2012 (10)j Take Permit. One of these is the Dunes sagebrush lizard.

7. Wind and Solar will go Up, Winter Durability will go Down, Utility Bills will Rise

The project is promoted as necessary to deliver power to the Permian Basin, one of the most abundant natural gas sources in the world. This is akin to hauling water to the sea.

ERCOT is using a Texas law calling for a “Permian Basin Reliability Plan” as the opportunity to export overbuilt wind and solar installations in West Texas back to the population centers on the I-35 corridor. They will also facilitate BESS (Battery Energy Storage Systems) and accommodate data centers. The only benefit to the Permian will be increased connectivity which could be accomplished locally at a fraction of the cost and without disruption of thousands of Texas families.

8 Violates Trump Policy

President Trump’s policies are directed at strengthening the electricity grid with reliable energy sources. He has called on data centers to “pay their own way” by building their own power sources so that Americans do not pay higher electricity bills as a result.

The solution, which has not been analyzed, is to build local dispatchable power. This would improve reliability and reduce consumer prices. This is the preferable path to

the one Texas is currently on — building thousands of miles of transmission lines for future data centers and the overbuilt wind and solar market.

TIMELINE:

CCN applications have been filed on the first two of five segments on the project. The first was filed December 15, 2025. It is to be completed within 180 days at which time the utility company will initiate condemnation proceedings to acquire the easements. They expect to have the necessary approvals and permits from the USFWS by the end of this 180 day period.

ONLINE RESOURCES:

American Stewards of Liberty

<https://americanstewards.us/issues/765-power-lines/>

Texas Public Policy Foundation

Three Part Series

<https://lifepowered.org/fool-me-twice-why-the-texas-grid-is-still-vulnerable-to-winter-storms/>

<https://lifepowered.org/fool-me-twice-why-the-texas-grid-is-still-vulnerable-to-winter-storms-part-2/>

<https://lifepowered.org/fool-me-twice-why-the-texas-grid-is-still-vulnerable-to-winter-storms-part-3/>

One Pager

<https://lifepowered.org/wp-content/uploads/2026/02/Explosion-of-Transmission-Costs.pdf>

CONTACT:

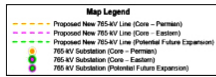
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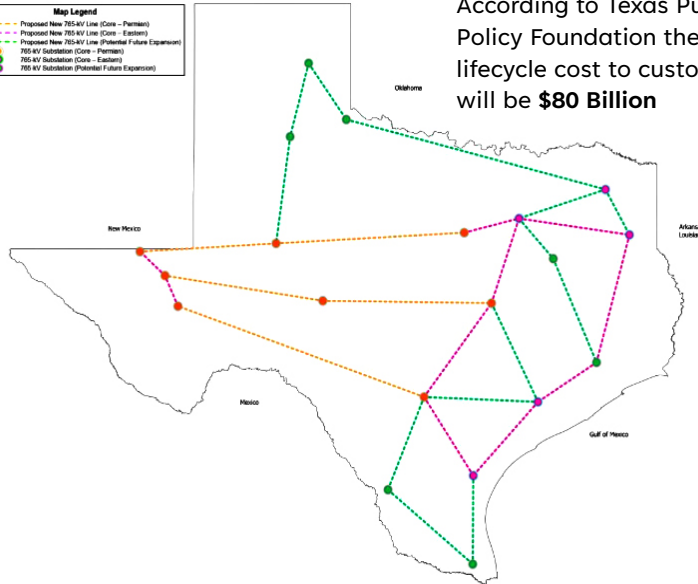
512-663-3826 Cell

~~\$36~~ \$80 BILLION DOLLAR PLAN FOR THE STATE – WE WILL BE PAYING!

ONCOR NOR ERCOT HAVE BEEN CONVINCING YET THAT THIS IS NECESSARY TO TAKE CONTROL OF OUR LAND FROM US



According to Texas Public Policy Foundation the all in lifecycle cost to customers will be **\$80 Billion**



Texas 765-kV Strategic Transmission Expansion Plan (STEP)

765 kV x 200 ft – **2,468** miles – **59,830** acres

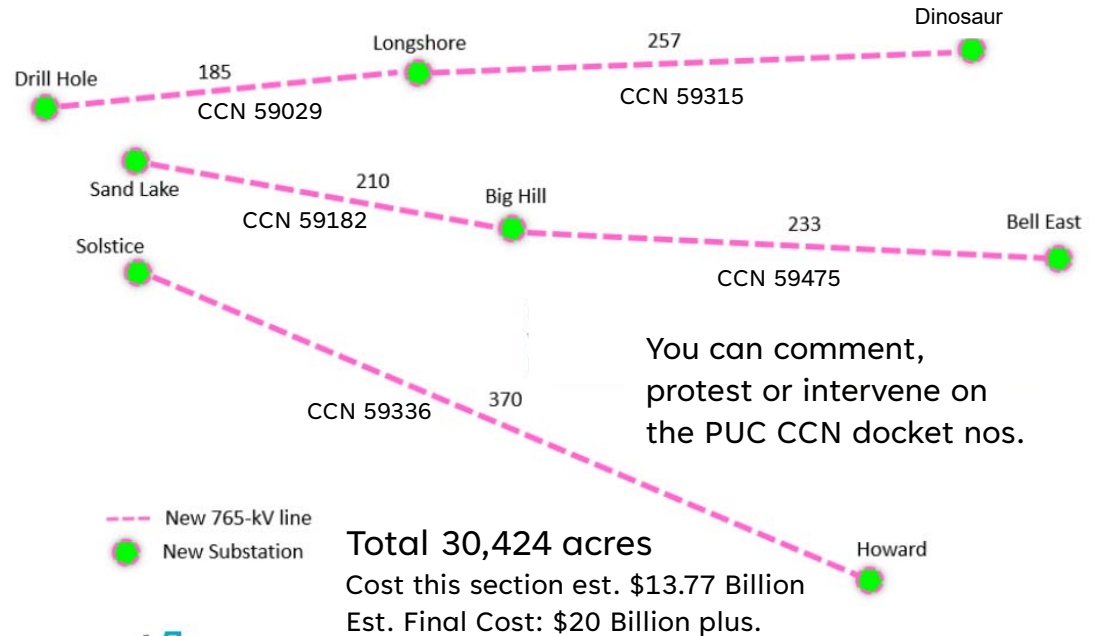
345 kV x 150 ft – **649** miles - **7,866** acres

138 kV x 100 ft - **324** miles - **3,778** acres

TOTAL – 71,474 ACRES

765-kV Import Paths Option for 2038

Total new ROW approximately 1255 miles
20% adder was included for the new lines



All information from ERCOT files

https://interchange.puc.texas.gov/Documents/55718_17_1414013.PDF

https://www.ercot.com/files/docs/2025/01/27/EHV%20765-kV%20ERCOT%20Workshop_01_27_2025.pdf

Graphic by Joanna Friebele

FACT SHEET

New Texas Transmission Lines Are An Expensive Non-Solution

1. Our Grid Problem Is not a Transmission Shortage, It is a Reliability Shortage.

Texas doesn't have a power transportation problem, it has a power reliability problem, and we can't transmit power that doesn't exist.

- Texas has not increased reliable, dispatchable power generation since Winter Storm Uri, even though peak-winter demand has grown roughly 20%.
- The contributions from resources that perform during winter storms—gas, coal, and nuclear—are roughly the same today as they were before Uri.
- Transmission lines *move* electricity, they do not *provide* what we need, which is *reliable* electricity.
- Building more long-distance lines is not useful if the power it transmits is unavailable during cold, windless, and pre-sunrise winter hours when outages occur.

2. Winter Reliability Is Getting Worse, Not Better.

Government officials claim the grid is safer by changing the math, not by fixing the system.

- ERCOT's winter reserve margin has collapsed from around 17.5% in 2021 to about 10% today, and it is heading toward zero in just a few years. Most utilities aim for a 15% winter reserve margin to survive extreme weather.
- This shrinking margin means less safety buffer when things go wrong, even under normal winter conditions.
- Claims that outage risk is reduced rely on *lowered demand assumptions*, not *improvements* in the system.

3. Batteries and Long-Distance Lines Are Being Oversold.

Batteries are band-aids, not life support—we should not rebuild the Texas grid to provide only two-hours of survival during the worst winter storms.

- Texas has added massive amounts of solar and battery capacity, but Solar contributes zero during winter peak demand (which happens before sunrise).
- All ERCOT battery storage combined equals about 1.5 days of output from a single 1-GW gas plant.
- During winter storms, batteries deplete within hours unless there is surplus generation to recharge them, which doesn't exist during cold snaps.

4. Transmission Expansion Shifts Costs While Avoiding Accountability.

New transmission lines make the state look busy while landowners pay the price.

- Tens of billions of dollars have flowed into solar, wind, and storage companies since Uri while reliable energy generators have been underfunded.
- Massive transmission projects allow policymakers and developers to claim action, avoid difficult market reforms, and push costs onto ratepayers and landowners.
- Landowners are being faced with permanent easements on their lands, devalued property, and loss of control, and for what?

5. Texas Is Repeating the Same Mistake That Led to the Uri Disaster.

We already ran this experiment and many Texans froze to death.

- After a major winter storm in 2011, Texas poured money into wind generation instead of improving winter resiliency. When Uri hit in 2021, wind underperformed dramatically and even more power plants failed because they were not prepared.
- States to the north of Texas experienced only minor outages despite much colder temperatures because they invested in reliable energy capacity and winter resiliency measures.
- Today, Texas is again investing to meet summer-only demand, spending over \$50 billion for solar and short-duration batteries and tens of billions on power transmission lines instead of building reliable and energy-dense power generation.

6. Property Rights Are Being Sacrificed for a Strategy That Doesn't Work.

If more transmission lines was the right solution Texans might debate the trade-offs, but it's not.

- Forcing transmission lines onto private lands assumes the power being transmitted is reliable, the routes are essential, and the benefits outweigh the permanent burdens. The data shows those assumptions are false.
- Once an easement is granted, the land is changed forever, while the grid remains exposed.

7. There Is a Better, Right-for-Texas Alternative.

Texas doesn't need more wires across the landscape, it needs power plants that work when Texans are freezing.

- The answer is to enact power generation reforms that result in valuable, reliable, dispatch-able power.
- Reforms require reliability standards for wind and solar power generators.
- Power generation should be developed closer to where it is needed, not hundreds of miles away.
- We should fix market incentives instead of bulldozing land.
- With reforms to ensure reliable generation, ERCOT would be able to guarantee a winter power surplus instead of guaranteed deficits, even during major storms.

8. Questions Citizens Should Ask.

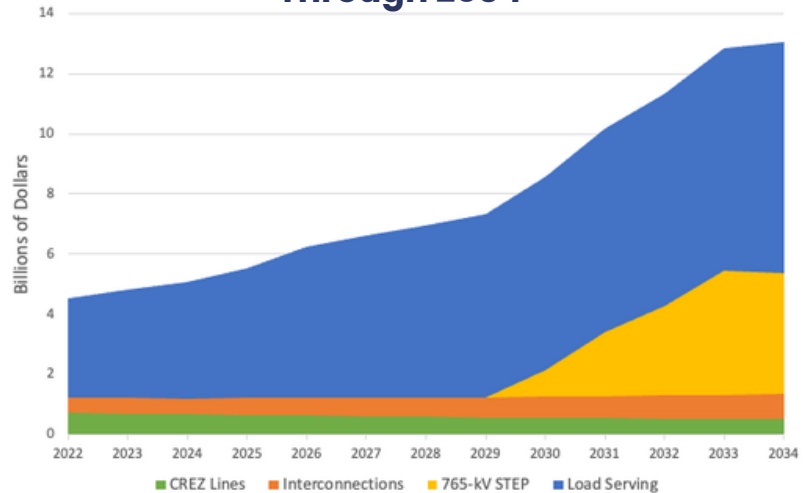
- If transmission lines are the solution, why is winter reliability still deteriorating?
- Why are landowners being asked to sacrifice property before market reforms are implemented?
- How many hours of winter demand can current batteries actually cover?
- Why is reliable generation shrinking while demand grows?
- Who benefits financially from transmission expansion instead of power generation reform?

The Explosion of Transmission Costs in ERCOT: Causes Forecasts, and Policy Solutions

Key Points

- Transmission costs in ERCOT rose from \$1.5 billion in 2010 to over \$5 billion in 2024 and could increase to over \$12 billion per year by 2033.
- After adjusting for inflation and overall rising electricity demand, the average ratepayer in the ERCOT region paid 57% more in transmission charges in 2024 than in 2010.
- Texas ratepayers are paying about \$1 billion per year to support transmission investments for wind and solar and have paid a total of nearly \$15 billion since 2010.
- If current transmission plans are fully executed, the annual cost of transmission in ERCOT will more than double, adding at least \$100 per year to the average residential ratepayer's electric bill.
- Many new transmission projects will primarily serve new data center demand, highlighting the urgent need to revise how transmission costs are allocated among all ratepayers.

Projected Annual Transmission Costs Through 2034



The chart shows historical costs (2022-2024) and projected costs through 2034, broken down by CREZ lines (green), interconnections (orange), new 765-kV STEP projects (yellow), and load-serving transmission (blue). Total annual costs are projected to rise from approximately \$5 billion to over \$13 billion.

What's Driving Costs?

- **CREZ Lines:** \$6.9B project adding ~\$750M/year to ratepayer costs (total: \$20B over 35 years)
- **Wind/Solar Interconnections:** Over \$5 billion in total costs from 2010-2024
- **Data Centers:** New transmission is being planned primarily to serve data centers
- **Equipment Inflation:** Prices up 68% since 2020

The PUC/ERCOT Should Expedite Local Transmission Upgrades While Pausing the 765-kV Projects Until the Following Tasks Are Completed:

- Complete new large load forecasting rule and update ERCOT's forecasts.
- Finalize PGRR 1344 to allow flexible/controllable loads to reduce transmission infrastructure needs.
- Finalize transmission cost allocation assessment to determine the cost of large transmission projects for each class of ratepayers.
- Evaluate whether upgrades to existing transmission and market changes to promote more dipstahcbale generation instead of distant wind and solar could avoid the need to build new transmission.

Summary of Key Issues Raised in SOAH Hearings

Docket No. 59182 – Proposed 765-kV Transmission Line

The following highlights key issues raised during the State Office of Administrative Hearings (SOAH Docket 473-26-10397) proceedings for Docket No. 59182 concerning the proposed 765-kV transmission line.

Summary of case on page 13-14.

I. Lack of Applicant Competency

A. Engineering Qualifications

- *“The engineering underpinning of this Application is being advanced by witnesses who, by their own admissions, have never in their professional careers designed, built, or overseen the construction of a 765-kV transmission line—the very class of facility they are asking the Commission to approve.”*
(pp. 34–35) [059182_422_1615785.PDF](#)
- This concern applies to **Oncor, LCRA, and PUC witnesses**:
 - Oncor’s lead engineer and project manager, **Corin Cooley**, PE reportedly has approximately **eight years of experience**. Professional engineer license obtained on Oct 5, 2021 and began her career at ONCOR July 2017.
- ONCOR/LCRA has generic experience but no specific experience with constructing and operating a 765 KVA over oil and gas pipelines and proximity to equipment.
- (pg. 5) [59182_138_1587979.PDF](#)

B. Incomplete Cost Analysis

- No uncertainty analysis was done, and no confidence intervals were provided in application. Planning cost estimates at this phase of a project without those analyses are less than inadequate and can only be described as highly speculative.
- Costs provided in the Application **did not include tariffs**, resulting in an incomplete cost presentation.
(p. 37) [59182_340_1606119.PDF](#)
- Cost in the application **did not include AC mitigation**, for pipelines, oil and gas infrastructure and other power substations, resulting in an incomplete cost presentation.

- (pg. 6) [59182_138_1587979.PDF](#)

C. Lack of Independent Engineering Review

- No **independent engineering model** reviewed or sealed by a licensed professional engineer was conducted.
- Instead, Applicants relied on the Permian Basin Reliability Plan (PBRP), which is **neither signed nor reviewed** by a professional engineer.
 - (p. 7) [59182_421_1615783.PDF](#)
- ONCOR has not independently reviewed the ERCOT model or the need of the project as part of the application as testified by Mr. Gurley on day 3 of the SOAH Hearings March 27, 2026.
 - The entire foundation of the PBRP (it is not an engineered document) is, at the very least suspect, and potentially bad faith. The absence of a sealed document means the public and the PUC are to rely on a "plan" created in part by benefactors of the plan and for which there is no professional accountability. The largest transmission infrastructure project in the State's history must not rely on a set of authors who bear no legal responsibility for their work.

D. Routing Conflicts and Due Diligence Failures

- Oncor and LCRA routed **Segment T1 of Best Met Route 228** through LCRA's own **permitted Cold Creek Solar and Storage (BESS) facility**.
 - LCRA had full knowledge of this facility, having signed a **Material Transfer Agreement on April 23, 2025** (unless work occurred prior to PUC approval of Docket 756 on April 24, 2025). However, the LCRA/ONCOR routing engineers did not know of the facility and/or the current agreement or check with its own permitting department for new facilities.
 - Even after discovering this conflict, the Oncor/LCRA team **continued to support Route 228** which include T1.
 - (p. 4) [59182_428_1615828.PDF](#)
- Under oath, Oncor and LCRA admitted they **did not review the O-1 Link or Route 228** to determine why the **Scottish Rite Hospital** owns the **Rocker B Ranch**, despite O-1 crossing approximately **13 miles** of the Ranch.
 - (pg. 5) [59182_430_1615862.PDF](#)

E. Failure to Provide Proper Notice

- Of the thousands of landowners and interested parties in this 765-kV transmission line only **35 parties intervened**. This is evidence of a bad faith effort with regard to notices and communication about this project.
 - List of 1,000 plus affected property owners (p 5-70)[59182_280_1602505.PDF](#)
 - List of 35 intervenors (p 2-4) [59182_431_1615868.PDF](#)
- The **Scottish Rite Hospital for Children (TSH)** did **not receive proper notice**.
 - TSH first learned of the project on **February 2, 2026**, when contacted by the McCullough family at Rocker B Ranch.
(p. 31) [59182_430_1615862.PDF](#)
- Of the thousands of landowners and interested parties in this 765-kV transmission line docket only 60 parties attended the three public meeting offered in June 2025 after poorly executed notices. This is evidence of a bad faith effort with regard to notices and communication about this project.
 - Only **28 questionnaires** were completed out of the 1,000 of property owners
 - (Pg 21-22) [59182_431_1615868.PDF](#)
 - (pg 33) [59182_179_1591937.PDF](#)
 - (pg 12) [59182_421_1615783.PDF](#)

F. ONCOR/LCRA Disregard in recognizing economic harm to Rocker B Ranch and TSH and Solar Facility.

- Best Met Route 228 would materially affect oil and gas operations on **Rocker B Ranch**, which generate income for Scottish Rite Hospital for Children.
- A **200-foot right-of-way** would restrict drilling locations and surface operations.
- Approximately **13 miles** of the line crosses Rocker B Ranch, resulting in over **315 acres** of land effectively removed from potential oil and gas production.
- This outcome is **contrary to the stated NEED**, particularly since the line is purported to benefit oil and gas development.
(p. 14) [59182_430_1615862.PDF](#)

- Doral has already invested 50 million with a total of 440 million on the solar facility. If this solar facility is not built Tom Green County will lose tax revenue.
(p. 4) [59182_451_1620091.PDF](#)

G. ONCOR/LCRA disregard and failure in recognizing mistakes and consider reevaluating route recommendations.

- Despite known impacts to:
 - Rocker B Ranch,
 - Multiple intervenors, and
 - A permitted solar facility known to LCRA but unknown to Applicants prior to SOAH proceedings,
- **No route alteration** was proposed by rebuttal or while testifying by Oncor, LCRA, or PUC Staff.

(p. 17) [59182_446_1619986.PDF](#)

(p.43) [59182_431_1615868.PDF](#)

- PUC Staff continued to recommend **Route 46**, ONCOR and LCRA continue to include **Route 228**. ONCOR and LCRA final brief included a mistake on the final routing recommendation again point to incompetence in this proceeding.
(p3-4) [59182_451_1620091.PDF](#)
- **Route 226 utilizes more Public University Lands**, and less impacts to private landowners, however PUC, ONCOR, LCRA continues to push for Route 228 and 46, even though University Lands has stated that routing was welcome on the PUF land. Total length of PUF land on **Route 226 is 81.91 miles** versus **27.55 miles on Route 228**. If the 228 route is selected by the PUC commission over 226 route, which contains publicly held lands that benefit the state university systems, this will continue to point to **serious concerns of private land being prioritized for Takings over public lands**.

(pg 3-4) [59182_250_1596819.PDF](#)

[59182_406_1612122.PDF](#)

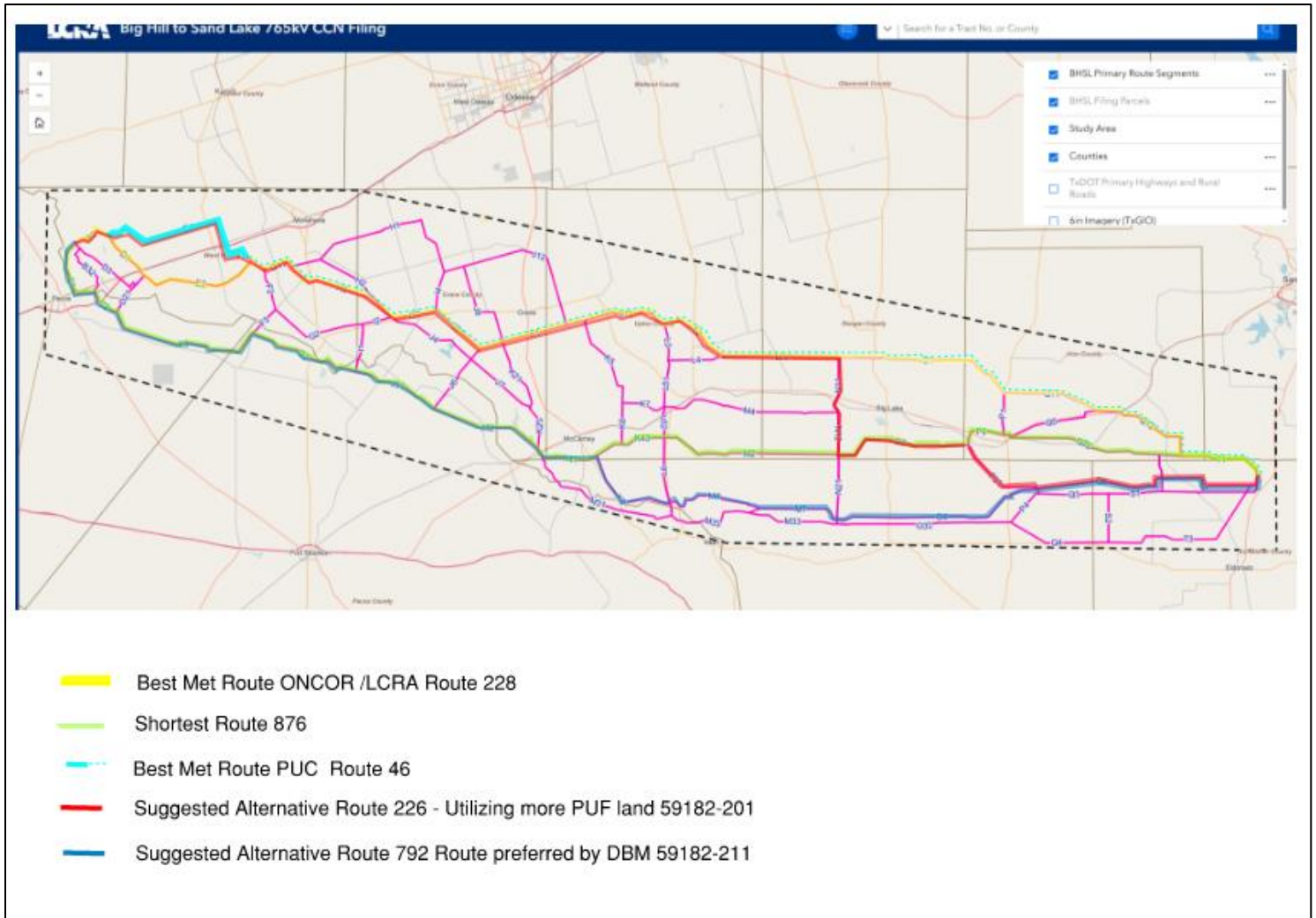


Photo Caption: Map created by Mrs. McCall not the PUC or Applicants

II. Safety and Environmental Protection

A. AC Mitigation and Pipeline Safety

- Oncor and LCRA are seeking **standard PUC ordering language** for AC mitigation that:
 - Addresses **parallel pipelines only**, and
 - Does **not address pipeline crossings**.
- This omission is significant given crossings in the **Matterhorn and Eiger Express pipeline corridors**.

(p. 45) [59182_431_1615868.PDF](#)

[59182_139_1587981.PDF](#)

B. Cathodic Protection and Infrastructure Interaction

- Applicants **did not study** the effects of a 765-kV line on:
 - **Fencing stray currents**, as evidence by Mr. Paxton testimony a 375 KV line will shock you if you are working on fences and metal gates. There are many unknowns on a 765 KVA which present significant safety concerns.
(pg. 4) [59182_191_1592153.PDF](#)
 - Railroad crossing,
 - Adjacent transmission systems,
 - Electrical substations
 - Gas processing plants, or
 - **Cathodic protection of steel infrastructure.**
(p. 4) [59182_454_1620227.PDF](#)
 - Pipelines [59182_212_1592421.PDF](#)

C. Noise Impacts

- Noise levels at the edge of the right-of-way will **exceed EPA guidelines**, which recommend outdoor levels below **55 dBA**.
(p. 4) [59182_454_1620227.PDF](#)

D. Lone Star Infrastructure Protection Act

- Applicants failed to address concerns about compliance with LSIPA. This was brought up Mrs. McCall testimony.
 - (pg. 19) [59182_179_1591937.PDF](#)

E. Environmental Review Deficiencies

- No **environmental impact study** was completed for this project even though ROW width and varied ecozones are within the study area suggest the need.
- The environmental assessment:
 - Was inadequate for a project of this scale,
 - Failed to address **pollinators**, and

- Contained gaps related to **endangered species habitat**.
- Permits have not been obtained
- TPWD comments may not have been included in routing

(pg. 22) [59182_179_1591937.PDF](#)

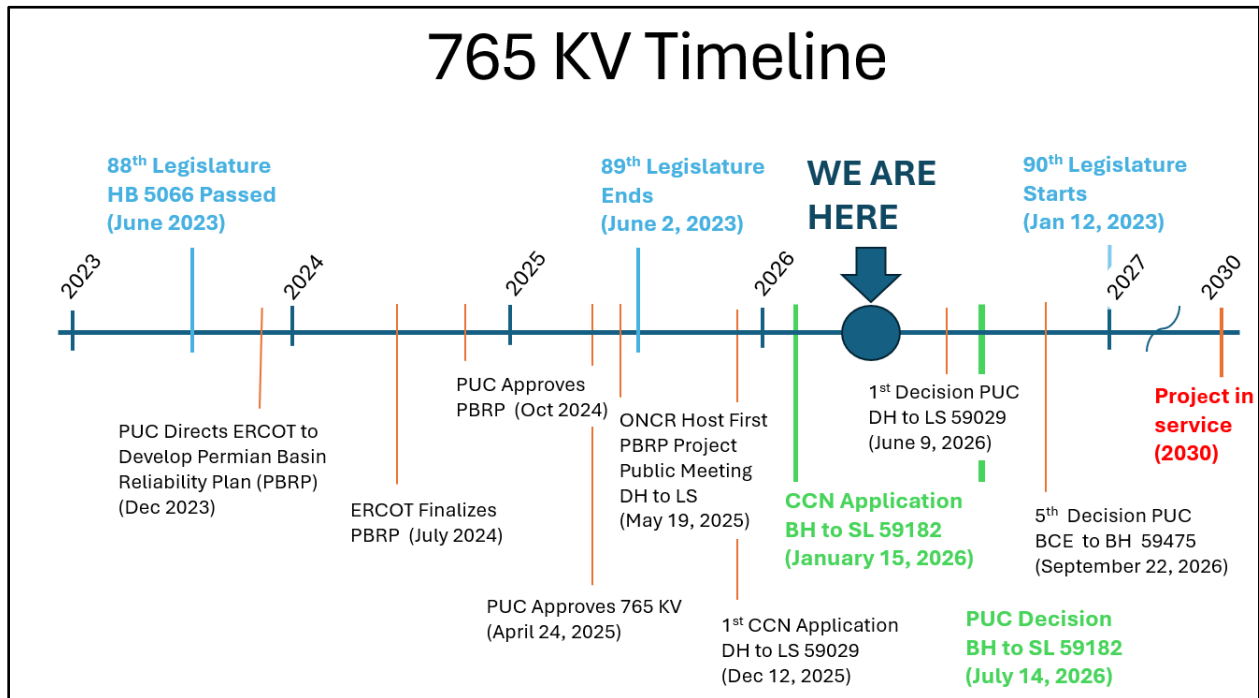
(pg. 13-16) [59182_421_1615783.PDF](#)

III. Procedural Challenges Evidence of Bad Faith Process

A. 180 days is insufficient for landowners to defend property rights.

- **Only 35 intervenors** in a 200 mile project prove that notices were poorly orchestrated. Intervention time period closed before people could make an informed decision. **PUC did not conduct any public meetings** to help people intervene in the process. ONCOR/LCRA did not conduct any workshops to help people to intervene in the project.
- **SB 1076 April 2023** reduced the time for the PUC process to 180-day instead of 365-day review process. Instead of equally removing the time between ALJ review, PUC review and Landowner defense, the Landowner defense time was removed by 6 months. This means that landowners only have 2-3 months to defend their rights instead of the previous 9 months of defense time. The ALJ and PUC review time is still the same under the 180-day process as it was under the 365-day process. Had the time been equally reduced between ALJ, PUC and landowners this would have pointed to a process that represented a fair reduction between the three parties. Instead, the time was taken from the landowner's defense which points to bad faith effort on the process.
- **Lack of applicant mapping.** Once the best meet route was selected, ONCOR/LCRA/PUC did not include any maps in direct testimony to point to the correct route. This made applicants responsible for mapping the best met routes on their own. Landowners have to look through copious amounts of information to find-out the best met-route.
- **RFIs were not answered in time for inclusion in direct testimony.** This made testimony incomplete due to the lack of information.
- **Timing of the PBRP projects points to a corrupt process.** The PUC supplied the approvals for the 765 KVA April 24, 2025, without developing new standards in PURA for this new class of transmission main. The first public meeting on Longshore to

Drill Hole Switch began May 19, 2025. This means ONCOR/LCRA were working in the background to obtain approvals by the PUC for the project. There is no way a project of this size could be advanced that quickly as well as sending out notices to over 1,000 property owners. The project approvals occurred at the end of the 89th legislative session so that the project could advance without the intervention of the Legislature. The PUC approval time was reduced from 365-days to 180-days by SB 1076 which leads to completion of the CCN approvals for this project before the next legislative session can begin. All PBRP projects can and will be approved before the 90th Legislative session begins.



B. Intervenor were repeatedly **removed from the docket, unable to defend their property**, despite demonstrating justifiable interest. Intervenor had proven that despite the applicants ONCOR and LCRA splitting the CCN into two docket 59182 and 59475 the project is one IMPORT PATH 2 and one CCN cannot operate without the other.

- [59182_340_1606119.PDF](#)
- [59182_394_1610306.PDF](#)

C. Independence of SOAH hearings called into question.

- SOAH order 15 ordering the dismissal several intervenors was uploaded to the interchange filer on March 16, 2026 the same day as Applicant Rebuttal testimony

deadline. The actual SOAH 15 order is dated March 13, 2026. The applicant rebuttal testimony did not address any of the intervenors that were dismissed in the case.

- **To the outsider observer it appears that the Applicants already knew that SOAH 15 was signed in the Applicants favor** (because it was dated March 13, but not uploaded until the March 16) but somehow ONCOR/LCRA were able to complete six rebuttal testimonies without addressing any of the intervenors in question challenges on the application within the same day as SOAH 15 posting.

SOAH 15 [59182_282_1603082.PDF](#)

282	3/16/2026	SOAH	PL	SOAH ORDER NO. 15- GRANTING APPLICANTS' MOTION FOR RECONSIDERATION ON RULING TO INTERVENE AND DISMISSING INTERVENORS
283	3/16/2026	SOAH	PL	SOAH ORDER NO. 16- AMENDING HEARING SCHEDULE
284	3/16/2026	ONCOR ELECTRIC DELIVERY COMPANY LLC AND LCRA TRANSMISSION SERVICES CORPORATION	RFI	ONCOR ELECTRIC DELIVERY COMPANY LLC AND LCRA TRANSMISSION SERVICES CORPORATION'S RESPONSE TO LUCIUS SHIPP'S FOURTH REQUEST FOR INFORMATION
285	3/16/2026	LCRA Transmission Services Corporation (LCRA TSC)	RFI	LCRA Transmission Services Corporation's First Set of Requests for Information to Delaware Basin Midstream LLC
286	3/16/2026	ONCOR ELECTRIC DELIVERY COMPANY LLC AND LCRA TRANSMISSION SERVICES CORPORATION	TEST	REBUTTAL TESTIMONY OF CORIN E. COOLEY, P. E.
287	3/16/2026	ONCOR ELECTRIC DELIVERY COMPANY LLC AND LCRA TRANSMISSION SERVICES CORPORATION	TEST	REBUTTAL TESTIMONY AND EXHIBITS OF DR. EDWARD P. GELMANN
288	3/16/2026	ONCOR ELECTRIC DELIVERY COMPANY LLC AND LCRA TRANSMISSION SERVICES CORPORATION	TEST	REBUTTAL TESTIMONY AND EXHIBIT OF JARED GURLEY, P.E.
289	3/16/2026	ONCOR ELECTRIC DELIVERY COMPANY LLC AND LCRA TRANSMISSION SERVICES CORPORATION	TEST	REBUTTAL TESTIMONY OF JULIE JONES
290	3/16/2026	ONCOR ELECTRIC DELIVERY COMPANY LLC AND LCRA TRANSMISSION SERVICES CORPORATION	TEST	REBUTTAL TESTIMONY OF CASEY PETTY, P. E.
291	3/16/2026	ONCOR ELECTRIC DELIVERY COMPANY LLC AND LCRA TRANSMISSION SERVICES CORPORATION	TEST	REBUTTAL TESTIMONY OF KELLY WELLS

IV. Components of the Application Lacking Demonstrated Need

A. Mischaracterization of HB 5066

- **Statutory Language (HB 5066)**
 - HB 5066 requires ERCOT and the Commission to develop a reliability plan that:
 1. **Address** extending transmission service to areas where mineral resources have been found;
 2. **Address** increasing available capacity to meet forecasted load; and
 3. **Provide** available infrastructure to reduce interconnection times in areas without access to transmission service.
 - This language is repeated verbatim in:

- **PURA §39.167**, and
- **Permian Basin Reliability Plan (PBRP)** As required by HB 5066, ERCOT’s reliability plan for the Permian Basin must:
 - Address extending transmission service to areas where mineral resources have been found;
 - Address increasing available capacity to meet forecasted load; and
 - Provide available infrastructure to reduce interconnection times in areas without access to transmission service.
 - (p. ii) [55718_17_1414013.PDF](#)
- **Addition of Language by Oncor to insert “transmission”**
 - Oncor repeatedly inserted the word “**transmission**” when paraphrasing HB 5066, see highlighted below:
 1. 59182-8, Gurley Direct
(pg. 9) [59182_8_1574956.PDF](#)
 2. **59182-288**, Gurley Rebuttal Testimony
(pg.4) [59182_288_1601024.PDF](#) (see below)

7	House Bill (“HB”) 5066 required the Commission to direct ERCOT to
8	establish a reliability plan for the Permian Basin that would: (1) extend
9	transmission service in the Permian Basin region; (2) increase available
10	transmission capacity to meet forecasted load; and (3) make transmission
11	infrastructure available to reduce interconnection times in areas without
12	access to transmission service.

Photo Caption Excerpt from Mr. Gurley Rebuttal Testimony pg. 4

- 2. 59182-431, Oncor Initial Brief
 - (pg. 6) [59182_431_1615868.PDF](#)
 - (p. 24) [59182_431_1615868.PDF](#)
 - These additions improperly narrow legislative intent and exclude non-transmission solutions not prohibited by statute.
- **Deletions of Language by ONCOR to delete the word “Address”**

- *“PURA § 39.167 required the Commission to direct ERCOT to develop a reliability plan for the Permian Basin. The statute required that the reliability plan **“address”** several topics The Legislature’s choice of the word “address” is critical. Under its plain and ordinary meaning, to “address” an issue means to consider, evaluate, or discuss it within a plan or analysis not to mandate a particular outcome. If the Legislature intended to require the construction or extension of transmission facilities, it easily could have used directive language such as **“require”** or **“construct.”** Instead, it required only that the reliability plan consider and evaluate these issues as part of the planning process.” – ASL Final Brief*
- The below excerpts from Mr. Gurley’s testimony show the three directives missing key elements including the word “address”.

7	House Bill (“HB”) 5066 required t	Address	on to direct ERCOT to
8	establish a reliability plan for the Permian Basin that would:		(1) extend
9	transmission service in the Permian Basin region; (2) increase available		
10	transmission capacity to meet forecasted load; and (3) make transmission		
11	infrastructure available to reduce interconnection times in areas without		
12	access to transmission service.		

Photo Caption Excerpt from Mr. Gurley Rebuttal Testimony pg. 4

(pg 6-10) [59182_421_1615783.PDF](#)

(pg.4) [59182_288_1601024.PDF](#)

- **Replacement of Language by ONCOR of “provide” to “make”**
 - According to Merriam-Webster, **make** (verb) primarily means to bring something into being by forming, shaping, or altering materials (e.g., "make a dress") or to construct and compose (e.g., "make a road"). It also means to cause to happen, compel, produce, or constitute
 - According to [Merriam-Webster](#), to **provide** is to supply, make available, or furnish something needed or wanted. It also means to stipulate in a contract or to take advance preparation (e.g., providing for a family). It stems from Middle English, originating from Latin *providere* ("to foresee, prepare")

7 House Bill (“HB”) 5066 required the Commission to direct ERCOT to
8 establish a reliability plan for the Perm **Provide** at would: (1) extend
9 transmission service in the Permian Basin region; (2) increase available
10 transmission capacity to meet forecasted load; and (3) ~~make transmission~~
11 infrastructure available to reduce interconnection times in areas without
12 access to transmission service.

B. Exclusion of Generation Alternatives

- **Ms. McCall**, a licensed professional engineer, testified that it was negligent for the PBRP to exclude consideration of **new gas generation** in the Permian Basin.
(p. 31) [59182_179_1591937.PDF](#)
- In rebuttal, Oncor claimed HB 5066 required a **transmission-only plan**, misrepresenting Ms. McCall’s testimony.
 - Mr. Gurley claims Ms. McCall says "generation with no transmission", when she simply said consider generation in the Permian. Mr. Gurley’s whole response is based on his obvious attempt at mischaracterization of Ms. McCall’s testimony.
(p. 5) [59182_288_1601024.PDF](#)
- ONCOR admitted under oath that **no generation alternative was considered**, despite congestion on the existing 345-kV system.

C. Lack of Independent Review

In rebuttal Testimony Mr. Gurley points that ERCOT is the independent reviewer for the PBRP. However, independent review cannot be conducted by the same “authors” of the original document, that is not the definition of independent review.(pg. 4) [59182_288_1603774.PDF](#)

D. Misrepresentation of the Intent and Operation of the line

Mr. Gurley states several times within direct testimony and Rebuttal that the 765 KVA will provide Bi-Direction flow instead of the stated need to import electricity to the Permian basin from other areas. *“For example, the 765 kV import paths will*

improve bi-directional power flow and transfer capability between West Texas and load centers, which will help to alleviate costly transmission constraints on the 345 kV network and reduce the need to curtail Permian Basin exports of cost-effective renewable generation.” – Mr. Gurley
(pg. 8) [59182_288_1603774.PDF](#)

E. Lack of proof this project fits into the classification of public need

In his rebuttal testimony Mr. Gurley challenged M. McCall’s statement that the transmission main would not serve public needs. There is no indication that a separate population study was completed by ONCOR/LCRA to determine population growth rate in the Permian nor is there an appropriate economic development plan.

However, Mr. Gurley did concede that most of the users would be private entities.

(pg. 8-9) [59182_288_1603774.PDF](#)

V. Summary

Applicants have not demonstrated the qualifications necessary to route, engineer, or construct a 765-kV transmission line. The routing analysis reflects poor attention to detail and a clear lack of interdepartmental coordination between LCRA and Oncor. Given this level of internal misalignment, there is little assurance that either entity can provide the rigor, precision, and oversight required during the design and construction phases to justify a project of this size and scale.

The application’s cost estimates are already demonstrably understated. Critical cost components, including tariffs and financing, were excluded, and Oncor admitted under oath that it did not rely on project-specific data, instead referencing costs from out-of-state projects with materially different conditions. This undermines the reliability of the financial justification presented to the Commission.

Oncor, LCRA, and PUC Staff also lack demonstrated experience with the unique engineering constraints associated with this project. Oncor has pressed the Commission to adopt standard ordering language for AC mitigation that fails to adequately address both paralleling and crossing pipelines, despite the Applicants never having conducted a comprehensive AC mitigation study for a 765-kV facility. It is unlikely that any region in the United States has encountered comparable safety challenges involving AC interference on

a 765-kV line in such a dense oil and gas infrastructure environment as exists in this portion of Texas.

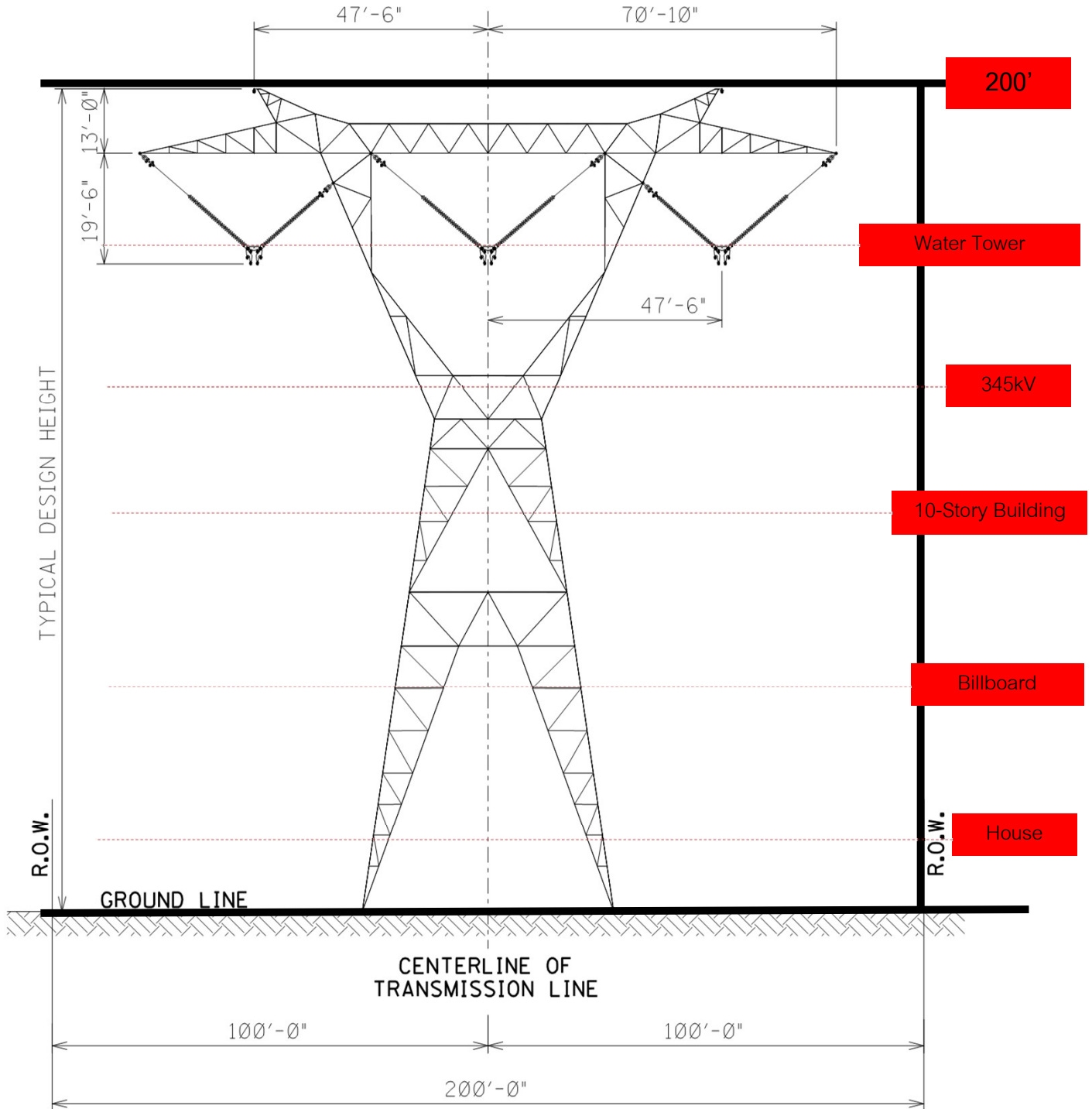
The 180-day PUC process is fundamentally incompatible with providing landowners a meaningful opportunity to defend their property rights. Rather than fostering informed participation, the process pits neighbors against one another over routing decisions. Texas can and should do better. In this docket, only 28 questionnaires were completed following poorly executed public meetings held in summer 2025, despite more than 1,000 affected property owners. Only 35 landowners or stakeholders ultimately intervened in Docket No. 59182, demonstrating a significant lack of awareness and effective notice.

Project timelines associated with the Permian Basin Reliability Plan (PBRP) indicate that substantial work may have occurred prior to formal PUC approval, or alternatively suggest that Applicants received informal assurances that approval was forthcoming outside of the public process. Either scenario undermines transparency and public trust.

Finally, HB 5066 has been materially and, it appears, intentionally misinterpreted to advance a predetermined transmission only agenda. Oncor repeatedly inserts, removes and adds language into the statute that does not exist, framing the legislative directive as requiring a transmission solution. The PBRP evaluated only three alternatives, all of which were variations of transmission. HB 5066 does not mandate construction of transmission infrastructure, nor does it prohibit consideration of other solutions. The exclusion of non-transmission alternatives indicates that Oncor, LCRA, PUC, and ERCOT have improperly narrowed the Legislature's directive.

END

Tower Graphic



TYPICAL 765KV TANGENT TOWER

NOT TO SCALE

Reference Heights:

House: 10'-20' average	345kV Towers: 150' average
Billboard: 40'-50' average	Water Towers: 165' average
10-Story Building: 100' average	765kV Towers: 190' - 230'

EDWARDS PLATEAU ALLIANCE

Filing a Protestor Comment Letter in the PUC Docket

The public may file comments with the PUC expressing their opinion regarding matters of concern. The PUC does not have an obligation to read them. However, when many members of the public file comments, they likely take note of the volume. And the comments are of public record that citizens can see and share with others.

You can file a Protestor Comment from your phone or computer. It takes about two minutes. There is NO excuse not to participate.

1. Print out your thoughts on a piece of paper. Sign it. Take a picture on your phone or scan on your computer. See suggested Protestor Comment Letter following these instructions.
2. Determine which transmission line you want to comment on and determine the correct Docket (or Control) Number. The Control Numbers for all the proposed lines are printed at the end of these instructions.
3. Go to the PUC Filer at interchange.puc.texas.gov/filer.
4. Begin your filing:
 - a. Check the box required to confirm you understand the disclosure and then press “Begin”.
 - b. Enter the correct number in the Control Number box and then press “Next”. A list of Control Numbers is listed at the end of these instructions.
 - c. Enter your contact information and then press “Next”.
 - d. Enter your name (or the group you represent) in the “Filing Party Name” and choose your “Filing Type” and a “Filing Description” and then press “Next”
 - i. Filing Type – “Comments”

- ii. Filing Description – “This is a protest”.
- e. Click “Add Files” and find the picture on your phone or the scanned file on your computer you want to upload, then press “Next”.
- f. Carefully review your information on the screen for accuracy, click the box next to “I’m not a robot”, and press “Submit” when finished.
- g. Your filing has now been submitted, and you will receive a confirmation email to the email address you provided on the “Contact Information” page.

The Control Numbers for each of the five proposed 765-kV transmission paths are as follows per the PUC designated numbers and names. But we include nearby towns to help you identify which line is nearest to you. PLEASE KNOW that you can file Protestor Comment on ALL the lines. Go for it! Tell the PUC what you have learned about these lines!

59315 - "Dinosaur to Longshore" – Cleburne to Big Spring

59029 - "Longshore to Drill Hole" – Big Spring to Midland

59475 - "Bell East to Big Hill" – Belton to Eldorado

59182 - "Big Hill to Sand Lake" – Eldorado to Pecos

59336 - "Howard to Solstice" – San Antonio to Ft. Stockton

Now... use this letter to let all state officials know how you feel. Go to EdwardsPA.Org to Call to Action with all links laid out for you to let lawmakers and agencies know what you have learned. Then let your county and municipal officials know. Let your voice be HEARD!

Name:

Address:

City, State, Zip:

Phone:

Email:

Date:

Public Utility Commission of Texas
William B Travis Building
1701 N Congress Avenue, Suite 7-110
Austin, TX 78701

RE: Protest Letter Against Oncor & LCRA TSC Bell County East to Big Hill 765kV Transmission Project (Docket 59475)

Dear Chairman Gleeson and Commissioners,

Thank you for your service to our state and for your continued commitment to protecting Texas communities from irresponsible infrastructure projects. I am writing today to express my **Protest** against the Bell County East to Big Hill 765kV transmission project proposed by Oncor and LCRA TSC.

As a resident of the area, I can confirm that this project **does not fit our community values**. Our area has intentionally pursued measured, deliberate growth, prioritizing rural character, land stewardship, and community over rapid or infrastructure-driven expansion. And while it brings no benefit to our area, it also poses serious risks, and I would like to highlight several specific concerns:

- Burden of cost to Texas Ratepayers of the fully financed cost of the line.
- Insufficient care giving proper notice to Affected Landowners to have full access to 30-day response time for Intervenor Application.
- Ruination of the scenic and historic quintessential Texas landscape.
- Proximity to homes, parks, livestock and water wells, raising safety, health, and quality-of-life concerns for families who have built their multi-generational lives here.
- Destruction of historic ranches, archaeological sites, and valuable cultural resources that help define the legacy of our region.
 - Economic impacts, decreased property values, decreased hunting revenues, and increased costs from road degradation during construction.
 - Environmental impact to habitat of all types, and impact on karst limestone due to massive pilings under the unprecedented size of the towers.
 - Safety concerns, increased wildfire risk and interaction with natural gas pipelines, and inadequately prepared and economically strapped volunteer fire departments.

Given the magnitude of these concerns, and the overwhelming **lack of public support**, I respectfully request that you **deny** any CCN amendment applications for this project. Thank you for your time and consideration on this urgent matter.

Sincerely,