Ranchers and Landowners Association of Texas

Comments to Texas PUC- Howard-Solstice 765-kV Transmission Line

The Ranchers and Landowners Association of Texas is a grass-roots organization of 68 members (most of whom reside in the Texas Hill Country), whose mission is to address the concerns of rural property owners.

We oppose construction of the line because we believe that it is not in the best interests of Texas rate payers (including our members), and because of the many negative environmental and cultural impacts it will have on landowners and residents the Texas Hill Country, an iconic region that has been cherished by generations of Texans statewide.

The 2023 Texas Legislature passed House Bill 5066, requiring the PUCT to direct the Electric Reliability Council of Texas (ERCOT) to develop a reliability plan for the Permian Basin region. The legislation was supported primarily by the Oil and Gas Industry in order to expedite electrification of field activities, which we support because of the economic and environmental benefits. We believe the intent of the legislation was to expedite the approval of local and regional transmission upgrades to support field electrification. The applicants (CPS and AEP) cite the reliability plan as the justification for the Howard-Solstice transmission line.

The load growth projections used in the plan included non-oil and gas customers, which accounted for about half of the growth. Included are Cryptocurrency (59%), Green Hydrogen (22%), and Data Centers (6%). Cryptocurrency Mining is a large but totally non-productive use of energy that should not be supported by the citizens and rate payers of Texas. In addition, we believe that data centers (Crypto-mining is a specialized data center) should not be located in the semi-arid region of the Permian Basin. Every megawatt of power input requires essentially a megawatt of cooling, which taxes water resources. Data centers can be located anywhere and should be built where there are adequate water resources. Likewise Green Hydrogen, which is typically produced by the electrolysis of water, uses both large amounts of power and water. There are people developing Green Hydrogen in Texas, but much of the focus is in the Eastern Gulf Coast because of the availability of water and access to a robust hydrogen pipeline network.

The ERCOT reliability plan for the Permian Basin region was completed in 2024. Since then, electric utilities and regulators nationwide are increasingly grappling with the issue of proposed data centers since they are large users of power and it is likely that only one in ten will actually be constructed. There has been a flurry of requests for power from developers nationwide that are promoting speculative projects. West Texas is attractive to developers because of the

availability of inexpensive private land. Some may have water rights, but if so it is to the detriment of domestic water supply and landowners. RLAT is well aware of the issues of arcane Texas laws and practices that fail to preserve water resources.

Load growth in the Permian Basin can be better served by adding gas fired generation in the region. The ERCOT reliability plan report noted the lack of firm generating capacity in the Permian Basin. Natural gas is the ideal power plant fuel, particularly for combined cycle units; higher efficiency, lower emissions, reliable and fully dispatchable, and less cooling. Texas has a robust intra-state gas pipeline network, and transporting energy as natural gas is much more efficient than using electric transmission lines. Transporting natural gas from the Permian basin to South Central Texas power plants to generate power that is sent hundreds of miles back to the Permian Basin defies common sense.

Adding reliable generation capacity in ERCOT is vital as demonstrated during the winter storm Uri in 2021. Extended periods of sub-freezing weather that impacted most of the entire ERCOT service territory are rare but not unprecedented. It has occurred on average about once every 30 years, or about a 3% chance each winter. It occurred in late December of both 1983 and 1989. IT WILL HAPPEN AGAIN. To meet that challenge ERCOT needs additional capacity that can function for several days. This is particularly important to the rural residents that are impacted by the proposed transmission line since they have no natural gas service and are totally dependent on power for heat.

The 50% ownership by CPS does not make sense if the purpose of the line, as stated, is to improve reliability in the Permian Basin. We believe that CPS will use Howard-Soltice to expedite transfer of power from additional intermittent renewable resources to San Antonio to align with support from local politicians. Thus about $3 Billion will be added to the billions of transmission rate base that all state ratepayers pay for, while making the transmission system less reliable.

We support the position of the multitudes of affected landowners and associations that have commented and/or intervened in opposition to this project. The large unsightly towers will disrupt the vistas that make the Hill Country and other areas of Southwest Texas so unique. Many landowners have relatively small tracts of land, and the intrusion of the transmission lines will make productive use of the property difficult if not impossible. Other reasons for opposition to this project include:

- Our economy's dependence on tourism which includes seasonal tourists and hunters at all times of the year
- Our pristine river stream segments, among some of the best and last in Texas;
- Delicate contributing and recharge zones of the Edwards aquifer
- Local property values being negatively affected by these enormous lines carving up our canyons

- Our area being a part of the crucial migratory routes for birds and butterflies traversing North and South America
- Our dark skies, which could be marred by lighting on these towers, depending on aerial assets and localized airport runways along the route
- Our historic sites and rich history

In summary, the requirements of the Permian Basin Oil and Gas operators as well as other Commercial and Industrial customers can be met with local transmission projects coupled with additional reliable generation. Installing expensive and intrusive transmission to import power to serve additional mythical load is not good public policy, particularly if it is routed through the Texas Hill Country.

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