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Project No. 38068



**PROJECT FOR SUBMITTING
REPORTS ON INFRASTRUCTURE
IMPROVEMENT AND
MAINTENANCE**

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**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

**WIND ENERGY TRANSMISSION TEXAS LLC'S REPORT ON INFRASTRUCTURE
IMPROVEMENT AND MAINTENANCE PURSUANT TO SUBST. R § 25.94**

NOW COMES Wind Energy Transmission Texas, LLC and files the attached Report on
Infrastructure Improvement and Maintenance pursuant to P.U.C. SUBST. R. §25.94.

Dated: May 1, 2020

Respectfully submitted,

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**REPORT ON INFRASTRUCTURE
IMPROVEMENT AND MAINTENANCE FOR
WIND ENERGY TRANSMISSION TEXAS LLC
PURSUANT TO SUBST. R § 25.94**

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I. INTRODUCTION

Wind Energy Transmission Texas (“WETT” or “Company”) is a transmission-only utility that provides service to customers in the Electric Reliability Council Region of Texas (“ERCOT”). WETT owns and operates transmission facilities in Texas’s Competitive Renewable Energy Zones (“CREZ”).

Section 25.94 of the Public Utility Commission of Texas’ (“PUC”) Substantive Rules requires utilities to submit a report by May 1st of each year with a description of the utility’s activities related to: (1) identifying any service areas susceptible to damage during severe weather and activities related to hardening of its transmission facilities in those areas, (2) vegetation management, and (3) inspecting distribution poles.

WETT does not own or operate any distribution facilities and does not have plans to construct such facilities at this time. Consequently, this Report does not address the inspection of distribution poles required under PUC Substantive Rule 25.94(c)(3).

II. WETT’s Report

A. WETT Areas Susceptible to Damage During Severe Weather (25.94(c)(1))

WETT’s facilities include 375 miles of double-circuit or double-circuit-capable 345 kV transmission facilities and six switching stations. These facilities are located south of the Texas Panhandle near Lubbock, Midland, and Odessa. This area is susceptible to damage from thunderstorms, ice storms, tornadoes, and wildfires.

B. WETT’s Transmission Hardening Activity (25.94(c)(1))

WETT’s transmission lines were designed to withstand damage from thunderstorms, high winds, ice loads, tornadoes, and wildfires, and WETT currently adheres to and carries out a number of hardening activities. Specifically, all its transmission facilities were designed, built, and will

be maintained to meet the current National Electric Safety Code (“NESC”) and other applicable standards established for its particular geographic areas. WETT also adheres to standards set forth by the North American Electric Reliability Corporation (“NERC”) and ERCOT guidelines.

For example, WETT has designed its transmission lines to withstand 90 mile per hour extreme wind speed as well as for 0.5” radial ice thickness with a concurrent wind load of 4 pounds/foot as required by the NESC. WETT has also performed lightning performance studies and has designed its lines with proper shielding and grounding systems to limit system disruptions due to lightning strikes. Additionally, WETT’s transmission line structure types—both lattice structures and monopoles—incorporate steel structures on concrete foundations, which will limit fire damage to structures to less than would be encountered with wood poles.

The NESC and other applicable standards followed by WETT include rules for the practical safeguarding of persons during the installation, operation and maintenance of electric lines and associated equipment. The standards contain the basic provisions that are considered necessary for the safety of employees and the public under the specified conditions.

C. Vegetation Management (25.94(c)(2))

WETT developed and adheres to a Vegetation Management Plan (“VM Plan”), TOWP-9005_Transmission Vegetation Management Plan. The VM Plan requires maintenance of transmission right-of-way (ROW) consistent with NESC and other applicable standards. The VM Plan implements a comprehensive program designed to ensure that ROWs are clear of incompatible vegetation, that low-growing native plants beneficial to wildlife are preserved, that risks from “danger trees” are addressed where appropriate, and that any imminent threats from vegetation conditions are promptly resolved. To achieve these goals, WETT’s appropriately certified and qualified contractors routinely perform a mixture of mowing, hand cutting, and

application of specified herbicides. WETT may procure services from a qualified forestry consultant to assist with vegetation management planning and activities. Additionally, WETT's personnel will inspect its ROW specifically for vegetation routinely in compliance with NERC Standard FAC-003, per WETT TOWP-9005_Transmission Vegetation Management Plan, in addition to other line inspection and patrols.

WETT values landowner relationships and makes great efforts to strike a balance between service reliability and safety, environmental concerns, and the landowner's vegetation preferences. WETT also employs a full-time Real Estate Manager who serves as point person for landowner relations. WETT promptly responds to landowner questions and complaints and requires that its contractors notify landowners and nearby residents in advance of vegetation management activities along its transmission ROWs.

D. Emergency Operations Activities Summary (25.94(d))

WETT filed its Emergency Operations Plan with the PUC on November 24, 2014 as required by Substantive Rule 23.53. WETT provides Emergency Operations Plan orientation training to operating personnel as required by Substantive Rule 25.53(c)(1)(K), and personnel designated to interact with government emergency management officials receive Federal Emergency Management Agency training as required by 25.53(c)(1)(L).

The Emergency Operations Plan addresses response to severe weather and major storms, and details the likelihood of different weather events in the geographical area of WETT's transmission system. Although it is impossible to anticipate all potential emergency situations, WETT is dedicated to minimizing the risk and alleviating the effects of any situation that may arise. WETT's transmission system, given its location, is most at risk from weather events such as tornadoes and ice storms. Accordingly, the procedure for responding to weather events is

centered on ensuring availability of response personnel. WETT maintains a small in-house staff, a reserve of spare parts, and has agreements in place with qualified maintenance contractors if and when service restoration is required. WETT conducts annual emergency response drills according to its Emergency Response Plan.

WETT's operators attend emergency response training and participate in training drills. The operators attend ERCOT's annual Operations Training Seminar and Black Start Training, which contain emergency response training components. WETT's operators also participate in the annual ERCOT Severe Weather Drill as required by the ERCOT Nodal Operating Guide.