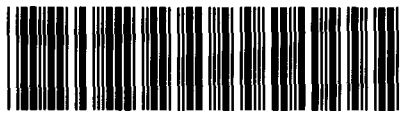

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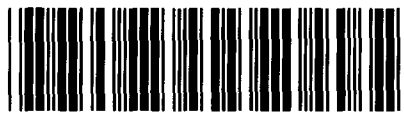

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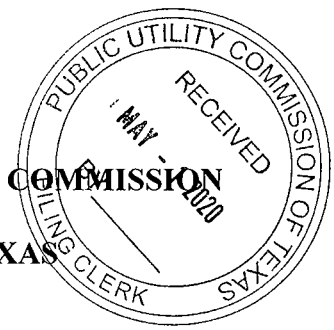

PUC Project No. 38068

REPORT FOR UTILITY INFRASTRUCTURE IMPROVEMENT AND MAINTENANCE REQUIRED BY 16 TAC § 25.94	§ § § § §	**PUBLIC UTILITY COMMISSION OF TEXAS**

ELECTRIC TRANSMISSION TEXAS LLC'S REPORT ON INFRASTRUCTURE IMPROVEMENT AND MAINTENANCE REQUIRED BY 16 TAC § 25.94

NOW COMES Electric Transmission Texas, LLC ("ETT" or "Company") and files the attached Report on Infrastructure Improvement and Maintenance pursuant to 16 TEX. ADMIN. CODE §25.94.

Dated: May 1, 2020

Respectfully submitted,

American Electric Power
400 W. 15th Street, Suite 1520
Austin, Texas 78701
Jerry N. Huerta
State Bar No. 24004709
Telephone: (512) 481-3323
Facsimile: (512) 481-4591
e-mail: jnhuerta@aep.com

By: _____
Jerry N. Huerta

ATTORNEY FOR ELECTRIC TRANSMISSION TEXAS, LLC

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ELECTRIC TRANSMISSION TEXAS LLC'S REPORT ON INFRASTRUCTURE IMPROVEMENT AND MAINTENANCE REQUIRED BY 16 TAC § 25.94

Regulatory Contact: Barry R. Smith
Manager, Regulatory Services
Phone: (512) 391-6340
Facsimile: (512) 481-4591

I. INTRODUCTION

ETT is a utility that provides transmission wires delivery services to transmission service customers currently within the service areas of AEP Texas in the Electric Reliability Council Region of Texas ("ERCOT"). Section 25.94 of the Public Utility Commission of Texas' (PUC or Commission) substantive rules requires that utilities are to submit a report each year identifying any service areas susceptible to damage during severe weather. Additionally, the report must also include the utility's activities towards hardening of the transmission systems as well as its vegetation management program in effect. As a utility subject to the reporting requirements of Section 25.94, ETT addresses in this Report each of the categories of information that are applicable to the Company's transmission wires delivery service operations in ERCOT. As further described in the Report ETT's service areas are geographically diverse and are prone to a variety of weather conditions that can have a severe impact on ETT's transmission system within those areas.

As addressed in this Report, ETT relies on the support of the AEP Service Corporation ("AEPSC") as its service provider to plan and design the Company's transmission system in a manner to sustain the system against severe weather conditions. Additionally, ETT relies on AEPSC personnel along with the field personnel of AEP Texas for the operation and maintenance of the Company's transmission facilities.

II. ETT's REPORT

A. ETT Areas Susceptible to Damage During Severe Weather

ETT provides transmission wires delivery service to its transmission service customers in the services areas of AEP Texas over a wide area of Texas that stretches from the Rio Grande Valley, the southern Gulf Coast through the Hill Country and into North Texas. Terrains include flat lands, rolling hills, mountains, coastal areas and deserts. All of these areas are susceptible to severe weather in one form or another. This includes hurricanes and tornadoes as well as ice storms, violent thunderstorms, and fires.

B. ETT Transmission Hardening

ETT relies on AEPSC as its service provider to take steps to strengthen its transmission system to withstand extreme weather conditions, minimize customer outage time and restoration expense. AEPSC already adheres to and carries out a number of hardening activities. All transmission facilities are designed, built and maintained to meet and/or exceed the current National Electric Safety Code ("NESC") and American National Standard Institute ("ANSI") standards established for its particular geographic areas. AEPSC also adheres to standards set forth through the North American Electric Reliability Corporation and those of ERCOT's guides. These standards establish rules for the practical safeguarding of persons during the installation, operation and maintenance of electric lines and associated equipment. The NESC and ANSI contain the basic provisions that are considered necessary for the safety of employees and the public under the specified conditions and also include provisions for areas susceptible to hurricane force winds. ETT's transmission facilities standards have exceeded the NESC standards by using a 140 mph wind speed criteria on its transmission line designs within approximately 50 miles of the coast.

C. Vegetation Management for Existing Transmission Lines

ETT has adopted the procedures identified by and relies upon the services of the AEPSC Forestry Operations group ("AEPSC Forestry") in carrying out a vegetation program within ETT's transmission Rights-of-Way ("ROW"). In addition to internal forestry personnel, AEPSC also engages several contractors to provide transmission vegetation management for ETT.

AEPSC Forestry conducts a vegetation management program, which is an integrated program utilizing a variety of management techniques. Maintenance of transmission ROW does not occur on a rigid "cycle" basis in which maintenance of transmission ROW is scheduled based on the time since last trimming in the ROW; rather, the maintenance is through the implementation of a comprehensive, systematic integrated vegetation management ("IVM") program designed to insure that the vegetation along each transmission line is managed at the proper time and in the most cost-effective and environmentally sound manner.

Vegetation on ETT's transmission system is managed on a prescriptive basis. Ongoing evaluation of the system through ground and aerial inspections provides the basic information used by AEPSC Forestry to develop its annual plan. Circuit criticality, historical data, line voltage, location, vegetative inventory information and land use are among the items considered when developing the annual vegetation management plan. These plans are dynamic during the year as a result of vegetation patrols and changing conditions. As succession occurs within the plant communities along the ROW, these annual work prescriptions will change based on the sizes and types of vegetation present. Specific annual prescriptions may also address isolated locations requiring "yard tree" trimming and the removal of danger trees outside the maintained ROW or control of fast growing brush before the circuit is again maintained in its entirety. AEPSC's

Forestry Operations staff and its contractors continuously work to insure the appropriate prescription is utilized to maximize effectiveness and efficiency.

AEP Forestry Operations is a centralized organization in both reporting and budgeting. It primarily employs or contracts degreed foresters. Certified utility line clearance contractors provide the labor force for the ground based clearing and herbicide applications. FAA-licensed aerial contractors provide patrol, side trimming and herbicide application services. Contract work is designated and inspected by AEP foresters to ensure that the work is complete, performed in a timely manner to AEP and industry standards, at reasonable cost, and with courtesy to property owners and to the public. Foresters travel throughout their assigned regions of the AEP companies to accomplish these tasks.

AEP Forestry Operations values landowner relationships as much as land owners value their trees. Great efforts are made to strike a balance between service reliability and the landowner's landscape vegetation. Contract personnel utilize face to face communication and door cards to contact resident landowners before routine line clearance work is done. AEP invests time and resources into public education concerning proper tree care and sound environmental practices. AEP Forestry Operations participates in many green organizations such as the National Arbor Day Foundation, the Utility Arborists Association, the International Society for Arboriculture, and various state and local vegetation management organizations.

ETT's Transmission Vegetation Management Program in 2019 inspected and/or performed the following:

- 2,33.46miles of transmission lines patrolled
- 20.64miles of transmission lines trimmed, removed and/or mowed
- 268.12miles of transmission lines where herbicide was utilized.

- Total $ Spent (O&M, capital, hot spot work) $964,491.43

D. Emergency Operations Activities Summary

ETT relies on AEPSC and AEP Texas and its own Emergency Operations Plan in order to prepare for severe weather and major storms. Although it is impossible to anticipate all potential emergency situations, ETT along with AEPSC and AEP Texas is dedicated to minimizing the risk and alleviating the effects of any situation that may arise. Further details of the ETT's Emergency Operations activities are discussed in the AEP Texas Report filing.