

HIGHLIGHTS



- CPS Energy Overview
- MOU Business Model
- ERCOT Role
- FlexPOWER BundleSM RFP
- Legal and Policy Challenges

CPS ENERGY OVERVIEW



Oldest utility company in Texas

Gas system was operating in 1860

San Antonio Public Service Co. (SAPSCo) began operating in 1917

- Owned by American Light and Traction Co.
- Operated electric power plants, gas network and streetcar lines

Purchased by City of San Antonio (CoSA) in 1942

- Sale mandated by PUHCA of 1935
- Transportation division was sold
- o Renamed City Public Service Board of San Antonio
- Rebranded as CPS Energy in 2003

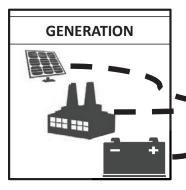


Largest municipally-owned utility in US providing only electric and gas service.

OPERATIONAL SUMMARY



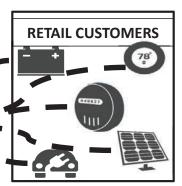
CPS ENERGY IS A FULLY INTEGRATED UTILITY THAT HAS NOT OPTED-IN TO COMPETITION



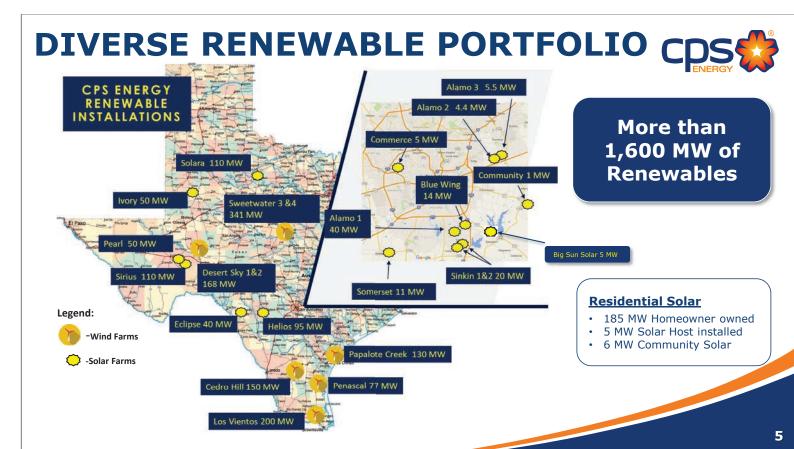
Owned Generation – 5,744 MW Purchased Renewable – 1,631 MW



Transmission (138 kV & 345 kV) - 1,536 miles
Distribution - 14,215 miles



Electric - 861,000 Gas - 358,000



MOU BUSINESS MODEL



- 72 Municipally Owned Utilities (MOUs) operate in Texas.
- MOUs operate as vertically-integrated utilities; they can, and do, own generation, transmission & distribution facilities, and serve retail customers.
- MOU management may be vested in the city's governing body (and operate as a department of the city) or in an independent Board of Trustees. Tex. Gov't. Code §1502.070
- MOUs are authorized to have certificated service areas in which they are the sole providers of retail electric service.
- MOU renewable and energy efficiency goals are guided by customer priorities and City Council or Board decisions.



Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the <u>UT Law CLE eLibrary (utcle.org/elibrary)</u>

Title search: Integration of Renewables: A Utility Roadmap

Also available as part of the eCourse ERCOT and the Changing Landscape for the Renewable Energy Market (2021)

First appeared as part of the conference materials for the $16^{\rm th}$ Annual Renewable Energy Law Institute session "ERCOT Panel"