APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR A PROPOSED 345KV TRANSMISSION LINE WITHIN BRAZORIA, MATAGORDA AND WHARTON COUNTIES

BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

REBUTTAL TESTIMONY OF

ROB R. REID

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EXHIBIT

Exhibit RRR-R1 Proposed Route Tabulation
REBUTTAL TESTIMONY OF

ROB R. REID

I. QUALIFICATIONS AND EXPERIENCE

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Rob R. Reid. My business address is 7600B North Capital of Texas Highway, Suite 320, Austin, Texas 78731.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by POWER Engineers, Inc. (“POWER”) as Vice President/Environmental Division Manager and Senior Project Manager.

Q. WHO ARE YOU APPEARING ON BEHALF OF IN THIS PROCEEDING?

A. I am appearing on behalf of CenterPoint Energy Houston Electric, LLC (“CenterPoint Energy”).

Q. DID YOU PREVIOUSLY SUBMIT DIRECT TESTIMONY ON SEPTEMBER 12, 2018 ON BEHALF OF CENTERPOINT ENERGY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS PROCEEDING?

A. The purpose of my rebuttal testimony is to respond to several issues, arguments and assertions made by Intervenors and Public Utility Commission of Texas (“PUC” or “Commission”) Staff (“Staff”) regarding CenterPoint Energy’s proposal to construct a 54 to 84 mile long (depending on the route approved) 345kV double-circuit transmission line within Wharton, Brazoria and Matagorda Counties between the existing CenterPoint Energy Bailey Substation and the existing Jones Creek Substation (“Proposed Project”). In particular, I will address the following general areas of concerns raised by individual
landowners and landowner groups:

- Aesthetic impacts;
- General environmental impacts;
- Prudent avoidance and impacts to habitable structures;
- Wildlife impacts;
- Aerial spraying;
- Future development; and
- Suggested modified routes.

I will also address specific issues raised by the Texas Parks and Wildlife Department ("TPWD") witnesses related to impacts of specific proposed segments to the Justin Hurst Wildlife Management Area and other impacts to parks and recreational areas.

II. ROUTING

Q. WHAT DO YOU ADDRESS IN THIS SECTION OF YOUR REBUTTAL TESTIMONY?

A. In this section of my rebuttal testimony, I will address the specific routing issues raised by intervenors and Staff in direct testimony.

Q. HAVE YOU REVIEWED THE INTERVENOR AND STAFF TESTIMONY FILED IN THIS PROCEEDING?

A. Yes. I have reviewed all or the relevant portions of the intervenor testimony filed in the proceeding that relate to routing of the transmission line.

Q. PLEASE PROVIDE YOUR GENERAL OBSERVATIONS ABOUT THE NATURE OF THE POSITIONS TAKEN BY INTERVENORS.
The positions taken by intervenors in this case are not surprising. In my many years of experience working on transmission line cases, most landowners will oppose the routing of a proposed transmission line across their property, and this proceeding is no exception. Many of the landowners feel very strongly that they should not be burdened with having the line routed across their property, or within sight of their property. The landowner positions are understandable, but the issues that most landowners have raised could be applied equally among most of the other properties in the study area. Some of the intervenors argue that because of the future plans they have to develop their property, the Proposed Project should not be routed on or near their property. However, the Commission does not typically consider future development in the routing of a transmission line unless the landowner can show concrete plans and ongoing activity, or expenditures related to the development.

Q. WHAT IS YOUR RESPONSE TO INTERVENORS WHO CLAIM THE LINE SHOULD NOT BE ROUTED NEAR OR ON THEIR PROPERTY BECAUSE IT WOULD HARM THE AESTHETICS OF THE AREA.

A. I understand that many landowners do not want to see a transmission line from their home or property. However, the Commission usually considers aesthetic impacts from the perspective of the community or general public, and then balances the impacts with other routing criteria and appropriate considerations. The personal aesthetic preferences of individual landowners do not provide an objective basis for evaluating alternative routing options. This is most clearly the case when almost every intervenor that files testimony argues that their property is aesthetically significant.
Q. THE SWEENY GROUP CLAIMED THAT PRUDENT AVOIDANCE WAS NOT FOLLOWED WITH RESPECT TO SEGMENT AA. WHAT IS YOUR REACTION TO THOSE COMMENTS?

A. This is not accurate. Prudent avoidance is a very important factor that POWER and CenterPoint Energy considered carefully throughout the routing process. However, the concept of prudent avoidance must be reviewed within the concept of the entire Proposed Project. The goal for the project is to minimize the proximity of the line to humans where reasonable. However, given how much of the study area is developed with residential communities, commercial areas, and industrial buildings it was not possible to route all segments to completely avoid developed areas. POWER and CenterPoint Energy therefore sought to route segments minimizing the impacts to habitable structures to the extent reasonable, while considering the other routing considerations set out in PURA and Commission rules including paralleling existing compatible ROW and property boundaries, and impacts on environmental integrity. Unfortunately, it was not possible to avoid impacting all habitable structures, including some of those owned by members of the Sweeny Group.

Q. WHAT IS YOUR RESPONSE TO CLAIMS FROM INTERVENORS THAT PROPOSED ROUTES RUN TOO CLOSE TO HABITABLE STRUCTURES?

A. POWER and CenterPoint Energy not only had to consider impacts to habitable structures but also the other routing considerations included in PURA and Commission rules as well as what may impact the ability for CenterPoint Energy to construct the transmission line within the needed time frame. In addition, CenterPoint Energy must propose a sufficient number of geographically diverse routes for the Commission’s consideration. Therefore,
CenterPoint Energy's application included some segments that were near some habitable structures and in some instances will require the relocation or removal of habitable structures. However, POWER and CenterPoint Energy proposed alternative segments that had different impacts on habitable structures so that the Commission had options to consider.

Q. WERE POTENTIAL IMPACTS TO WILDLIFE TAKEN INTO ACCOUNT WHEN DETERMINING ROUTE OPTIONS FOR THE PROPOSED PROJECT?

A. Yes. PURA requires the consideration of environmental integrity as a factor in considering the approval of a transmission project, and potential impacts to wildlife are a part of environmental integrity. While it is impossible to avoid all impacts to wildlife, POWER and CenterPoint Energy took those potential impacts into consideration in balance with other factors to minimize impacts on wildlife to the extent practicable. For example, helicopter surveys were conducted on select routes that have a high potential for bald eagle nesting habitat in the study area and certain segments were adjusted to maintain appropriate distances from those nests.

Q. PLEASE DESCRIBE ANY MITIGATION MEASURES CENTERPOINT ENERGY TAKES IN CONSTRUCTING TRANSMISSION LINES TO LIMIT THE POTENTIAL IMPACTS TO MIGRATORY BIRDS.

A. Migratory birds are expected to occur as migrants or post-breeding dispersers that pass through the study area and potentially occupy habitats temporarily or seasonally. These seasonal habitats may be spanned or avoided entirely. The Proposed Project is not anticipated to have adverse impacts to these species. CenterPoint Energy will take the necessary steps to be in compliance with the Migratory
Bird Treaty Act and the Endangered Species Act. CenterPoint Energy will also complete
ROW clearing activities during the non-nesting season or review the ROW for active
nests if clearing is completed during the nesting season (March through August). Any
active nests will be marked and avoided until the nestlings have fledged or the nest has
otherwise become inactive.

Q. WHAT IS YOUR RESPONSE TO COMMENTS FROM INTERVENORS REGARDING POTENTIAL IMPACTS TO WILDLIFE HABITAT, INCLUDING BALD EAGLE NESTS, NEAR THE PROPOSED ROUTE?

A. As I described above, POWER and CenterPoint Energy took care to balance concerns for
impacts to wildlife with other important routing considerations in order to minimize those
impacts to the extent practicable. While it is not possible to avoid all impacts, I believe
that the proposed routes in this case successfully account for the factors in PURA and
Commission rules and do minimize impacts. In addition, CenterPoint Energy
implements construction practices designed to further minimize impacts. Once the
transmission line is constructed, most wildlife will not be materially affected by the
presence of the structures in or near their habitat.

Q. IS THE TRANSMISSION LINE’S POTENTIAL EFFECT ON PROPERTY VALUES AN ISSUE TO BE DISCUSSED IN THIS CASE?

A. No.

Q. WHY NOT?

A. The Commission specifically stated in the Order of Referral and Preliminary Order in this
docket that the appropriate compensation for any right-of-way or condemnation of
property was not to be addressed.
In addition, the Commission has long found that future development is not to be considered unless there are concrete plans and ongoing activity (i.e. construction is underway). In past dockets, including Docket No. 29684, the Commission has stated that future land use is not a criterion in a transmission line CCN case. Further, Commission Staff witness John R. Poole also indicates that neither property values nor future development of property should be considered by the Commission in a CCN proceeding.

Q. SEVERAL WITNESSES RAISED COMMENTS RELATED TO AERIAL SPRAYING. IN GENERAL, HOW DO YOU RESPOND?

A. POWER and CenterPoint Energy considered the location of airstrips in the study area that were identified in the Federal Aviation Administration database, as well as those airstrips that were identifiable on aerial maps. To the extent possible, POWER and CenterPoint Energy sought to route segments so not to adversely impact those airstrips. In addition, POWER and CenterPoint Energy were aware of the agricultural uses of property in the area and took those uses into consideration. Even where segments potentially impact property with agricultural uses, in most cases aerial spraying should still be able to occur.

Q. WHAT IS YOUR RESPONSE TO CLAIMS FROM CERTAIN INTERVENORS THAT SOME SEGMENTS DIMINISH THE COLUMBIA BOTTOMLANDS?

A. As Mr. Bayer and I describe in our direct testimony, POWER and CenterPoint Energy carefully considered the impacts to Columbia Bottomlands in developing routes for this project. POWER and CenterPoint Energy minimized crossing of the Columbia Bottomlands, particularly in areas with NWI mapped wetlands or obvious bodies of water. In areas proposed to cross Columbia Bottomlands, the distance can be spanned in
whole or in part. Prior to construction, a field assessment of the PUC approved route will be completed to determine if there would be any potential impacts to possible jurisdictional areas. Additional coordination with the USACE-Galveston District may be required to determine the need for an Individual Permit, but POWER and CenterPoint Energy developed the proposed routes with the intent of avoiding routing through areas that would require an individual permit.

Q. **DID ANY INTERVENORS SUGGEST SEGMENT MODIFICATIONS? IF SO PLEASE DESCRIBE THE PROPOSED MODIFICATIONS.**

A. Yes. Tom Holcomb has requested a modification to Segment Z so that it runs parallel to his northern and eastern property lines and avoids his property boundary near the river. TPWD and Commission Staff, propose a modified Segment JA to parallel existing transmission lines for a longer distance, then turn north at the Justin Hurst Wildlife Management Area ("WMA") western border.

Q. **DOES CENTERPOINT ENERGY APPROVE OF ANY OF THESE SEGMENT MODIFICATIONS?**

A. CenterPoint Energy witness Lesli B. Cummings explains in her rebuttal testimony that CenterPoint Energy is generally willing to entertain these modifications, with some changes or caveats. For example, Mr. Holcomb's proposed modification to Segment Z is acceptable with a small change to avoid an area that is designated as Columbia Bottomland wetlands. As explained in detail in the direct testimony of Mr. Bayer, the U.S. Army Corps of Engineers has identified these areas as requiring an individual permit under the Section 404 of the Clean Water Act. The process to obtain such a permit can be lengthy and as CenterPoint Energy witness Wesley D. Woitt stated in his direct
testimony, the delay caused by that permitting process could negatively impact CenterPoint Energy's ability to complete the project on time, which could have negative impacts on the reliable operation of the transmission grid. In addition, Mr. Holcomb's Modified Segment Z and CenterPoint Energy's proposed adjustment have improved performance compared to the originally proposed Segment Z in relation to the routing criteria such as: length of route paralleling apparent property lines, and length of route across areas of high archaeological/historic site potential.

Modified Segment JA increases the length of Segment JA that parallels existing transmission line ROW and property boundaries, consistent with the preferred criteria in the Commission rules. However, the modification would change the impacts of the segment on a landowner that is not a party to the proceeding and would newly affect a landowner that was not notified of CenterPoint Energy's Application. Both Ms. Cummings and CenterPoint Energy witness Matthew D. Cox state that Modified JA is acceptable to CenterPoint Energy, however without the consent of the affected landowners, this segment cannot be approved as part of a final route. Ms. Cummings further discusses CenterPoint Energy's discussion with those landowners.

Q. **DID ANY PARTIES PROPOSE OTHER ROUTES?**

A. Yes. CBH Farms and Commission Staff proposed or supported varying routes that use one or both of the modified segments discussed above, or created new combinations of previously proposed segments. PUC Staff's proposed Modified Route 2 is made up of the same segments that are in CenterPoint Energy's proposed Route 2 with the exception of Segments F-H which have been replaced with Segment C, Segment AP which have been replaced with Segments BI-BJ, Segments ET-EU-FB-FF-FN which have been
replaced with Segments JF-ER2-EV-EZ-FD-FG-FH-FO. PUC Staff’s proposed Modified Route 5 is made up of the same segments that are in CenterPoint Energy’s proposed Route 5 with the exception of Segment JA which has been replaced with PUC Staff’s proposed Modified Segment JA. CBH Farms proposed Route 31, which is a new route made up of segments that CenterPoint Energy proposed in its initial application, and therefore, the Commission is able to approve that route. PUC Staff recommended using Route 31, or its Modified Route 5 if the newly affected landowners will agree.

Attached as Exhibit RRR-R1 to my rebuttal testimony, is an environmental table that includes the same factors presented in Table 4.1 in the Environmental Assessment and Routing Study included as Attachment 1 to CenterPoint Energy’s Application. This table shows the routes proposed by CBH Farms and Commission Staff, and Routes 5 and 28 with Modified Segment Z as proposed by Mr. Holcomb and adjusted by CenterPoint Energy. The table shows how the routes perform in comparison to the routes in the Application. The costs for the routes are also included in Exhibit MDC-R2 to Mr. Cox’s rebuttal testimony.

Q. DO YOU HAVE ANY RESPONSE TO COMMISSION STAFF’S DISCUSSION OF MODIFICATIONS CENTERPOINT ENERGY MADE TO ROUTES OR SEGMENT PRIOR TO FILING ITS APPLICATION? PLEASE EXPLAIN?

A. Yes. Mr. Poole states that CenterPoint Energy proposed two modified segments prior to filing its application: Modified Z and Modified JA. However, while CenterPoint Energy can support these modifications with some changes or caveats as described above, it did not propose these modified segments. The modified segments were proposed by intervenors during this proceeding. I should point out for clarification that CenterPoint
Energy did modify segments and remove segments prior to filing its application, based on feedback it received from landowners during and after the public meetings. Intervenor David Spencer states in his testimony that CenterPoint Energy did not consider input from landowners and the community. This is not the case. POWER and CenterPoint Energy took information and input from landowners and made adjustments as described in the EA in Section 3.6.3 page 3-23. While POWER and CenterPoint Energy could not accommodate every request from landowners, I believe we did our best to make adjustments where reasonable and appropriate.

III. RESPONSE TO TPWD

Q. WHAT DO YOU ADDRESS IN THIS SECTION OF YOUR REBUTTAL TESTIMONY?

A. In this section of my testimony, I will address the concerns raised by TPWD witness Matt Nelson and Rachel Lange regarding impacts to the Justin Hurst Wildlife Management Area and other environmental impacts throughout the study area.

Q. TPWD WITNESSES MATT NELSON AND RACHEL LANGE OFFER TESTIMONY DESCRIBING THEIR CONCERNS RELATED TO THE IMPACTS OF THE PROPOSED PROJECT. WHAT IS YOUR GENERAL RESPONSE?

A. While I appreciate and understand Mr. Nelson and Ms. Lange’s interests and concerns, some of the impacts they identify may not be as severe as they describe. In addition, while CenterPoint Energy must consider environmental and wildlife impacts, it also must balance those impacts with the other criteria addressed in PURA and the Commission rules.
Q. MR. NELSON AND MS. LANGE EXPRESS PARTICULAR CONCERN ABOUT BOTTOMLANDS AND WETLANDS. HAS POWER AND CENTERPOINT TAKEN STEPS TO MINIMIZE IMPACTS TO THESE AREAS? PLEASE EXPLAIN.

A. During the routing process POWER and CenterPoint Energy gave consideration to avoiding extensive woodland and riparian areas, and to maximize the length of the routes within or parallel to existing linear corridors to further reduce the amount of vegetation clearing.

CenterPoint Energy proposes to span any wetland areas where practical and hand clear any trees located within the wetland area to minimize potential impacts. The use of equipment mats during construction within emergent herbaceous wetland areas minimizes potential impacts by limiting the level of soil disturbance.

Q. BOTH MR. NELSON AND MS. LANGE NOTE THAT A TRANSMISSION LINE THROUGH THE JUSTIN HURST WILDLIFE MANAGEMENT AREA WOULD NEGATIVELY IMPACT VALUABLE HABITAT, INCREASE THE RISK FOR COLLISIONS FOR BIRDS, AND INCREASE THE POTENTIAL INTRODUCTION OF INVASIVE SPECIES. WHAT IS YOUR RESPONSE TO THESE CONCERNS?

A. POWER and CenterPoint Energy worked to reduce potential impacts to habitat fragmentation by utilizing or paralleling existing linear features to the greatest extent reasonable and minimizing the route length within wooded areas.

CenterPoint Energy has an established avian program implemented through CenterPoint Energy’s Environmental Department. CenterPoint Energy’s Environmental Department
will evaluate avian habitats, populations and activities within the final approved route, and work with the Transmission Operations Department to identify and implement appropriate avian protection measures, where necessary.

Finally, while it is possible to introduce invasive species during construction, CenterPoint Energy would endeavor to limit activities that would create this situation.

Q. MS. LANGE RECOMMENDS ROUTE 20 IN HER TESTIMONY. IS ROUTE 20 A VIABLE ROUTE?

A. Yes. All of the routes that CenterPoint Energy proposed in its application are viable and CenterPoint Energy has stated that they are all constructible. POWER and CenterPoint Energy determined that Routes 5 and 28 were the routes that best met PURA for a variety of reasons including total length, amount parallel to existing ROW and property boundaries, impacts to habitable structures, and costs. Route 20 was not chosen for certain reasons, but it is still viable. Route 20 is approximately 13 miles longer, has 266 more habitable structures within 500 feet of the route centerline, and costs approximately $175.5 million more to construct than Route 5. Route 20 is approximately 10 miles longer, has 172 more habitable structures within 500 feet of the route centerline, and costs approximately $81.9 million more to construct than Route 28.

Q. MS. LANGE PROVIDES A LIST OF WAYS CENTERPOINT ENERGY CAN MINIMIZE IMPACTS TO PLANT AND ANIMAL LIFE DURING CONSTRUCTION OF A TRANSMISSION LINE. WHAT IS YOUR RESPONSE TO THESE SUGGESTIONS?

A. TPWD includes comments and recommendations regarding the project and potential impacts on sensitive plant, fish, and wildlife resources, habitats or other sensitive natural
resources. This information provides some sound and reasonable advice. Overall, the testimony includes typical concerns, comments and recommendations that are often provided by TPWD with regard to proposed transmission line projects. POWER and CenterPoint Energy have already taken into consideration several of the recommendations offered by TPWD.

It is important to note that the TPWD testimony does not take into consideration PURA § 37.056 or Commission Substantive Rule § 25.101, two critical regulatory guidelines that POWER and CenterPoint Energy employed throughout the process of developing the alternative routes and while preparing the EA in support of CenterPoint Energy’s CCN Application. The TPWD testimony only considers limited environmental issues.

Q. MS. LANGE STATES THAT CERTAIN PROPOSED ROUTES WOULD CROSS OUTDOOR RECREATIONAL PROPERTIES AND WOULD THEREFORE BE SUBJECT TO A REVIEW AND APPROVAL PROCESS PURSUANT TO SECTION 6(f) OF THE LAND AND WATER CONSERVATION FUND ACT OF 1965. WHAT IS YOUR RESPONSE?

A. In the event that the Commission approves a route that includes a segment which crosses a TPWD property designated as an Outdoor Recreational Property, CenterPoint Energy will work with TPWD to comply with any legal requirements necessary to construct the transmission line. We believe that the property’s designation as an Outdoor Recreational Property does not prevent the construction of the Proposed Project in the event the Commission approves a route across TPWD’s property, particularly given that the Justin Hurst WMA already has a transmission line routed across it as shown in the EA Appendix D.
Q. MR. NELSON AND MS. LANGE BOTH NOTE THAT SEGMENTS EM, EN, EQ, AND EU WOULD RESULT IN HABITAT FRAGMENTATION. DO YOU AGREE?

A. I do not completely agree with that statement because Segments EQ and EU parallel existing ROW along Highway 36 as they cross the Justin Hurst WMA. The construction of the highway created the habitat fragmentation and the proposed segments should minimize the impacts by paralleling that existing feature. Further, while Segment EM, and a portion of Segment EU do not parallel Highway 36, they are paralleling property boundaries and avoiding habitable structures. Segment EN provides an option to cross Highway 36 and is primarily located in an area that was already cleared for the highway or other development and should not result in much if any habitat fragmentation at all.

Q. MS. LANGE ALSO STATES THAT CHAPTER 26 OF THE PARKS AND WILDLIFE CODE WILL BE TRIGGERED IF A TRANSMISSION LINE IS TO BE CONSTRUCTED ON TPWD PROPERTY INCLUDING RIVERSIDE PARK. HOW DO YOU RESPOND?

A. I agree that the crossing of the Justin Hurst WMA would trigger the requirements of Chapter 26 of the Parks and Wildlife Code. This issue has been addressed many times in the context of transmission lines. Regarding Riverside Park, I disagree that it will trigger Chapter 26 of the Parks and Wildlife Code because none of the routes filed in this docket are within a half mile of the park.

IV. CONCLUSION

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.
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Note: All length measurements in feet unless otherwise noted. All measurements were observation versus area-based gauging sources. All measurements were observation versus area-based gauging sources. All measurements were observation versus area-based gauging sources.
STATE OF TEXAS
COUNTY OF TRAVIS

AFFIDAVIT OF ROB R. REID

BEFORE ME, the undersigned authority, on this day personally appeared Rob R. Reid, who being by me first duly sworn, on oath, deposed and said the following:

1. "My name is Rob R. Reid. I am of sound mind and capable of making this affidavit. The facts stated herein are true and correct based on my personal knowledge. My current position is Vice President/Environmental Division Manager and Senior Project Manager for POWER Engineers, Inc.

2. The foregoing rebuttal testimony and the attached exhibits have been prepared by me or under my direct supervision and are true and correct to the best of my knowledge."

Further affiant sayeth not.

Rob R. Reid

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 13th of May, 2019

LESLEI MANSEL
Notary Public, State of Texas
Comm. Expires 05-31-2021
Notary ID 124924360

Notary Public in and for the State of Texas