Control Number: 37448

Item Number: 760

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Comments in Docket No. 37448

If you want to be a PROTESTOR only, please complete this form. Although public comments are not treated as evidence, they help inform the PUC and its staff of the public concerns and identify issues to be explored. The PUC welcomes such participation in its proceedings.

Mail this completed form and 10 copies to:

Public Utility Commission of Texas
Central Records Attn: Filing Clerk
1701 N. Congress Ave.

P.O. Box 13326 Austin,
TX 78711-3326

First Name: _____ Last Name: Save Our Scenic Hill Country Environment, Inc.

Phone Number: 830-685-3063 Fax Number: 830-685-3063

Address, City, State: 10212 Ranch Road 965, Fredericksburg, TX 78624

I am NOT requesting to intervene in this proceeding. As a PROTESTOR, I understand the following:

- I am NOT a party to this case;
- My comments are not considered evidence in this case; and
- I have no further obligation to participate in the proceeding.

Please check one of the following:

- I own property with a habitable structure located near one or more of the utility's proposed routes for a transmission line.
- One or more of the utility's proposed routes would cross my property.
- Other. Please describe and provide comments. You may attach a separate page, if necessary.

Save Our Scenic Hill Country Environment, Inc. (SOSHCE), an organization based in Gillespie and surrounding counties with more than 500 members, continues to strongly protest LCRA TSC's continuing proposed use of lattice tower structures, particularly in light of new information from LCRA TSC that indicates concrete monopoles are likely usable and will have a much smaller incremental cost than steel monopoles. These Comments supplement those submitted by SOSHCE that were posted on the PUC website (Docket #37448-432) on December 28, 2009. LCRA TSC now implies that concrete poles are usable. LCRA TSC information indicates that the cost for concrete poles is significantly less than that for steel monopoles. The lower cost for concrete poles makes it even more imperative that they be used to minimize degradation of the Hill Country. Delays in integrated projects provide the time required to utilize concrete poles in this project. To summarize, there is compelling evidence that the PUC should require LCRA TSC to utilize concrete poles based on the additional information provided by LCRA TSC and the related considerations. Additional information is attached.

Signature of person submitting comments :

R.M. Weatherford Robert M. Weatherford, President Date: 1/20/10

Save Our Scenic Hill Country Environment, Inc.

Supplemental Comments in Docket No. 37448

Additional Information

Save Our Scenic Hill Country Environment, Inc. (SOSHCE) continues to strongly protest LCRA TSC's continuing proposed use of lattice tower structures, particularly in light of new information from LCRA TSC that indicates concrete monopoles are likely usable and will have a much smaller incremental cost than steel monopoles.

SOSHCE's requests should be implemented by the Public Utility Commission of Texas (PUC).

SOSHCE is an organization with more than 500 members. A large number of those members are landowners in Gillespie and Llano Counties, two of the counties that would be seriously impacted by the LCRA TSC Gillespie to Newton project. Some of those landowners are Directly Affected and some of those are Intervenors or have submitted Protests. The organization has been involved in monitoring and communicating developments in this and related dockets to members and others. The organization received a LCRA TSC letter dated March 3, 2009 that requested information pertaining to the study area. SOSHCE also received from LCRA TSC notices of the Public Participation Meetings that were held in May 2009 and the Application to Amend the CCN letter dated October 28, 2009. SOSHCE was recognized as one of the contacted Organizations in the LCRA TSC Public Open House exhibits.

SOSHCE filed Comments in this Docket that were posted on the PUC website (37448-432) on December 28, 2009. In that filing, SOSHCE strongly protested LCRA's planned predominate use of lattice tower structures and continuing ordering of lattice materials. Included in the filing was the statement, with supporting information, that there are precedents that clearly indicate that monopoles can and should be utilized in this area. It was also stated that, even if monopoles are more costly, the price is extremely small compared to the visual impact and accompanying loss in property values caused by the permanent scarring that will occur in the Hill Country.

On January 6, 2010, LCRA TSC's Third Errata was posted on the PUC website (37448-513). It stated (page 3 of 5*) that "As a result of this Errata filing, Mr.Symank's prefiled testimony now contains a discussion regarding the *potential* cost, feasibility, and availability of concrete poles. Mr. Symank's cost analysis does *not* change LCRA TSC's project cost estimates or the preferred structure type, as LCRA TSC believes that (1) concrete pole construction still results in higher project cost estimates over the costs of lattice tower construction, and (2) use of concrete poles presents certain deliverability and construction limitations that reduce the usability of concrete structures."

* page numbers refer to those in LCRA Transmission Services Corporation's Third Errata (Docket No. 37448-513) tracked change version

On January 8, 2010, LCRA released a statement entitled "LCRA TSC files information with Public Utility Commission on potential use of different transmission line structures." A copy of that release is attached (Attachment 1). It is stated by a LCRA representative that "Providing this new information about concrete poles to the PUC illustrates what we have been telling folks about the process of selecting transmission line structures- at this point in time we still recommend using lattice towers in our project because they still cost less, but of course we will build whatever the PUC tells us to build."

LCRA TSC now implies that concrete poles are usable.

In Mr. Symank's original testimony, he stated (page 14) "Prestressed concrete poles would not be feasible for the CREZ 345 kV double circuit capable transmission line." He now implies that concrete poles for spans of up to 600 feet are available by stating (page 14) that "Poles for spans over 600 feet are not yet available." He goes on to state (page 14) that "Poles for 900 feet spans are not yet available. Depending on the supplier's decision to enlarge capacity, supply, and demand, they might be available at the end of 2010."

This admission is more consistent with the statements of Lone Star Transmission, LLC which indicate they plan to use aesthetically pleasing 120 to 140 feet poles for a majority of its CREZ Central A to Central C to Sam Switch to Navarro 345 kV Transmission Line Project. Related information was presented in SOSHCE's earlier Comments.

LCRA TSC information indicates that the cost for concrete poles is significantly less than that for steel monopoles.

In the Errata, LCRA TSC did not show the total cost increase for concrete poles versus lattice towers as they did for steel poles. Rather, they presented the increased cost per mile in three different soil types- sand/limestone/granite. For 130 feet tall, 600 feet span concrete poles, they showed (page 14) increased costs per mile of $160,000/$287,000/ $422,000, respectively, assuming out of state delivery. For the 85.2 mile Preferred Route, these increases translate into additional costs of $13.6 million/$24.5 million/$36.0 million. LCRA TSC did not indicate how many miles of each soil type would apply. Using a simplistic approach of averaging these, the total increase would be $24.7 million.

In Exhibit CDS-1R, they show that in-state delivery would reduce the cost of each 130 feet concrete pole by $6,000. Based on the 650' spans shown in the table, this would reduce the total increase by approximately $4.2 million to $20.5 million.

Even more importantly, LCRA TSC states (page 14) that the increases per mile for 140 feet, 900 feet span poles would be $31,000/$114,000/$278,000. These translate into total project increases of $2.6 million/$9.7 million/$23.7 million. An average of these is $12.0 million.

These increases are significantly less than the $68 million LCRA TSC shows (page 18) for steel poles versus lattice towers.

The lower cost for concrete poles makes it even more imperative that they be used to minimize degradation of the Hill Country.

To put the additional cost of concrete poles versus lattice structures into perspective, the PUC's total estimated cost for all of the CREZ transmission line projects is $4.9 billion. The averaged soil type increase for 600 feet spans of $24.7 million or $20.5 million would equate to increases of 0.5% and 0.4%, respectively. The $12.0 million increase for 900 feet span poles would be 0.2%.

The PUC estimated that in total the CREZ projects would increase costs to residential customers by approximately $4.00 per month. The increases for 600 feet span poles would result in added costs per residential customer of about two cents per month. The increase for 900 feet span poles would equate to less than an additional one cent per month.

Even if the increased costs are extrapolated to the other projects in the Hill Country, it would be a small price to pay to at least partially mitigate the permanent scarring of this pristine area that will occur.

Delays in integrated projects provide the time required to utilize concrete poles in this project.

Even if utilization of concrete poles results in delays, it is immaterial as the McCamey D to Kendall to Gillespie 345 kV project and the related installation of the 138 kV/ 345 kV auto-transformer at the Gillespie substation will have to be completed before this 345 kV project can be put into service. The date for the filing of the CCN application for the McCamey D to Kendall to Gillespie project was extended from October 28, 2009 until July 6, 2010 by the PUC on October 19, 2009.

To summarize, there is compelling evidence that the PUC should require LCRA TSC to utilize concrete poles based on the additional information provided by LCRA TSC and the related considerations.

LCRA TSC files information with Public Utility Commission on potential use of different transmission line structures

For Immediate Release: January 08, 2010 12:30 PM

LCRA Transmission Services Corporation (TSC) recently provided new information to the Public Utility Commission of Texas (PUC) on the potential use of concrete poles in its Gillespie-to-Newton Transmission Line Project, which may be located in portions of Gillespie, Llano, San Saba, Burnet and Lampasas counties.

Since filing PUC Docket No. 37448 direct testimony and exhibits in October, LCRA TSC's concrete pole manufacturer provided information about budgetary, schedule and manufacturing feasibility. As a result, LCRA TSC re-examined the cost projections for concrete poles and compared them with other previously considered structure types.

"LCRA TSC continually monitors and evaluates changes in the market that can impact the cost of construction materials," said Stuart Nelson, LCRA Transmission Asset Development manager. "Providing this new information about concrete poles to the PUC illustrates what we have been telling folks about the process of selecting transmission line structures – at this point in time we still recommend using lattice towers in our project because they still cost less, but of course we will build whatever the PUC tells us to build." The new data shows lattice towers are still less expensive to construct than concrete poles or other single-pole structures.

The Jan. 6 filing can be viewed on PUC's Web site Interchange under Docket No. 37448 titled LCRA TSC's Third Errata. It states that interested persons have expressed the desire to have information about cost and feasibility with regard to the use of concrete poles. The filing provides the latest information known to LCRA TSC on the subject in an effort to maintain a high degree of transparency.

The PUC transmission line criteria are the driving factors behind LCRA TSC's transmission line route recommendations, including transmission structures. Nelson said that compared to lattice towers, concrete poles can only span up to about 900 feet apart, whereas lattice towers can be placed as far as 1,200 to 1,500 feet apart, reducing the number of lattice towers compared to concrete poles.

"Costs are important PUC criteria because the costs of projects are ultimately shared and paid for by the individual ratepayer," Nelson said. "We want to be good stewards of the public's dollars and make our recommendations with that in mind."

To that end, LCRA TSC began ordering a portion of the steel that could be used for lattice towers – about 30 percent of the steel that would be used for all of LCRA TSC's 400 miles of 345-kilovolt-line projects if all those projects would be built with lattice towers. The materials are being stored in about half a dozen laydown yards near different cities.

"We ordered some of the steel for lattice towers because of the potential risk of all the transmission service providers ordering the same material to build 2,300 miles of lines simultaneously," Nelson said. "We continue to evaluate schedules and material needs."

Attachment 1

LCRA TSC is one of several transmission service providers that have been formally ordered by the PUC to construct new transmission lines required to connect Competitive Renewable Energy Zones to areas throughout the state. A CREZ is an area where wind generation facilities will be installed throughout West Texas and the Panhandle and from which transmission facilities will be built to various other areas of the state to deliver mostly renewable power to end-use consumers in the most beneficial and cost-effective manner.

"We don't plan to order more than 30 percent of the steel until the PUC selects our route and structure types for the Gillespie-to-Newton Transmission Line Project," Nelson said. The steel that has already been ordered will continue to arrive over the next few months.

"If the PUC tells us to build something other than lattice towers, then we will use what we already bought on other projects or sell the materials," Nelson said.

About LCRA TSC
LCRA Transmission Services Corporation is a nonprofit corporation created by LCRA to build, own, and operate transmission lines and related facilities throughout Texas. LCRA TSC owns and leases about 4,400 miles of transmission lines and other facilities that are part of the state's electric grid. LCRA TSC pays local and state taxes.

About LCRA
The Lower Colorado River Authority (LCRA) is a nonprofit conservation and reclamation district that provides energy, water, and community services to Texans. Created by the Texas Legislature in 1934, LCRA has no taxing authority and operates solely on utility revenues and service fees. LCRA supplies electricity to more than 1.1 million Texans through more than 40 wholesale customers. LCRA also provides many other services in the region. These services include managing floods, protecting the quality of the lower Colorado River and its tributaries, providing parks and recreational facilities, offering economic development assistance, operating water and wastewater utilities, and providing soil, energy, and water conservation programs.

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