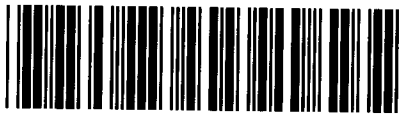
Control Number: 44837



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A unit of American Electric Power

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AEP Texas
AEP Texas Central Company
400 W. 15th Street, Suite 1520
Austin, TX 78701
AEPTexas.com

September 14, 2015

Lisa Clark, Filing Clerk
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Public Utility Commission of Texas
Austin, Texas 78711-3326

RE: PUCT Docket No. 44837; Application of AEP Texas Central Company to Amend its Certificate of Convenience and Necessity for the Proposed Tuleta to Euler to Coleto Creek Double-Circuit 138kV Transmission Line in Bee, and Goliad Counties, Texas

Application Errata

Dear Ms. Clark,

AEP Texas Central Company is filing the enclosed errata of pages of the application and the Environmental Assessment and Alternative Route Analysis, which is Attachment 1 to the application.

Please let me know if you have any questions.

Sincerely,

Mel Eckhoff
Regulatory Consultant
512-391-2979
mleckhoff@aep.com
AEP Texas Central Company
American Electric Power Service Corporation

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APPLICATION OF
AEP TEXAS CENTRAL COMPANY
TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED TULETA TO EULER TO COLETO CREEK DOUBLE-CIRCUIT 138KV TRANSMISSION LINE IN BEE AND GOLIAD COUNTIES, TEXAS

DOCKET NO. 44837
PAGE 6 ERRATA

Submit seven (7) copies of the application and all attachments supporting the application: If the application is being filed pursuant to P.U.C. SUBST. R. 25.101(b)(3)(D) or P.U.C. Subst. R. 25.174, include in the application all direct testimony. The application and other necessary documents shall be submitted to:

Public Utility Commission of Texas
Attn: Filing Clerk
1701 N. Congress Ave.
Austin, Texas 78711-3326

6. Right-of-way:

Miles of Right-of-Way

TE Routes

The number of miles of right-of-way for all 7 TE alternative routes ranges from 10.~~47~~ 74 miles for Route TE-3 to 14.86 miles for Route TE-1.

EC Routes

The number of miles of right-of-way for all 19 EC alternative routes ranges from 34.71 miles for Route EC-15 to 40.07 miles for Route EC-1.

Miles of Circuit

TE Routes

Initially, this segment of the double-circuit line will have one circuit installed and the number of miles of circuit will initially be the same as the number of miles of right-of-way. The potential number of miles of new transmission line circuit for all 7 TE alternative routes ranges from 21.48 miles for Route TE-3 to 29.72 miles for Route TE-1.

EC Routes

Initially, this segment of the double-circuit line will have one circuit installed and the number of miles of circuit will initially be the same as the number of miles of right-of-way. The potential number of miles of new transmission line circuit for all 19 EC alternative routes ranges from 69.42 miles for Route EC-15 to 80.14 miles for Route EC-1.

A table that shows the number of miles of right-of-way and the number of miles of circuit for each route is included as Attachment 2 of this application.

Width of Right-of-Way

The typical right-of-way for the Project will be 100 feet in width.

Percent of Right-of-Way Acquired

None of the right-of-way (0%) has been acquired.

For joint applications, provide and separately identify the above-required information for each route for the portion(s) of the project owned by each applicant.

Not applicable. This is not a joint application.

Provide a brief description of the area traversed by the transmission line Include a description of the general land uses in the area and the type of terrain crossed by the line

The area traversed by the transmission line is in the South Texas Plains and the Tamaulipan biotic province of Texas. The area is dominated by chaparral, or brushlands, and the land use is a mix of rangeland, pasture, and cropland. The topography within this area consists of gently rolling hills. Elevation ranges between 135 and 475 feet above mean sea level. The tributaries of the San Antonio River are the prominent drainage feature in the area.

The area is dissected by U.S. Highway 183/77A from north to south and U.S. Highway 59 from northeast to southwest. The City of Goliad is located at the intersection of these U.S. Highways in the central portion of the study area. The communities of Tuleta and Pettus are located on the western boundary of the study area near the Tuleta Substation. The community of Fannin is located in the eastern portion of the study area near the Coleto Creek Substation.

ENVIRONMENTAL ASSESSMENT AND ALTERNATIVE ROUTE ANALYSIS FOR THE AEP TEXAS CENTRAL COMPANY TULETA – EULER – COLETO CREEK DOUBLE-CIRCUIT 138kV TRANSMISSION LINE IN BEE AND GOLIAD COUNTIES, TEXAS

Prepared for:

AEP Texas Central Company
400 West 15th Street
Austin, Texas 78701

Prepared by:

POWER Engineers, Inc.
509 N. Sam Houston Pkwy., Suite 200
Houston, Texas 77060
and
7600-B N. Capital of Texas Hwy., Suite 320
Austin, Texas 78731

ERRATA PAGES
September 2015

POWER PROJECT NUMBER:
133220

POWER ENGINEERS

All of the alternative routes parallel existing linear features for some portion of their lengths. The percentage of the TE Alternative Routes paralleling existing linear features ranges from ~~44~~ 46 percent for Alternative Route TE-6, to 83 percent for Alternative Route TE-1.

Euler to Coleto Creek Segment

For the EC Segment of the project, Alternative Route EC-15 is the shortest alternative route (approximately 34.7 miles), while Alternative Route EC-1 is the longest alternative route (approximately 40.1 miles). The approximate lengths for each of the EC Alternative Routes are presented in Table 4-2.

None of the EC Alternative Routes utilize existing transmission line ROW; however, all of the alternative routes parallel some length of existing transmission line ROW. The total alternative route lengths parallel and adjacent to existing transmission line ROW vary from approximately 4.0 miles for Alternative Route EC-14, to approximately 19.7 miles for Alternative Route EC-19. The lengths parallel and adjacent to existing transmission line ROW for each of the EC Alternative Routes is presented in Table 4-2.

The alternative routes with lengths paralleling other existing linear features, including roadways and railways range from approximately 1.7 mile for Alternative Route EC-7, to approximately 10.5 miles for Alternative Route EC-12. The lengths paralleling other existing linear features for each of the EC Alternative Routes is presented in Table 4-2.

The alternative routes with lengths paralleling existing pipelines within 500 feet or less of the centerline range from approximately 1.1 mile for Alternative Routes EC-4 and EC-15, to approximately 3.9 miles for Alternative Route EC-19. The lengths paralleling existing pipelines within 500 feet or less of the centerline for each of the EC Alternative Routes is presented in Table 4-2.

All of the alternative routes parallel apparent property boundaries to the extent feasible in the absence of other existing linear features. The length of alternative routes that parallel apparent property boundaries ranges from approximately 5.2 miles for Alternative Route EC-1, to approximately 13.6 miles for Alternative Route EC-14. The lengths paralleling apparent property boundaries for each of the EC Alternative Routes are presented in Table 4-2.

All of the alternative routes parallel existing linear features for some portion of their lengths. The percentage of the EC Alternative Routes paralleling existing linear features ranges from 68 percent for Alternative Route EC-11, to 83 percent for Alternative Route EC-8.

Euler to Coleto Creek Segment

The number of known pipelines crossed by the EC Alternative Routes ranges from ~~19~~ 18 pipeline crossings for Alternative Route EC-10, to 38 pipeline crossings for Alternative Routes EC-1, EC-2, and EC-18. The number of pipeline crossings for each of the EC Alternative Routes is presented in Table 4-2.

4.1.1.5 Impacts on Transportation, Aviation and Utility Features

Transportation

Potential impacts to transportation could include temporary disruption of traffic or conflicts with future proposed roadways and/or utility improvements. Traffic disruptions would include those associated with the movement of equipment and materials to the ROW, and slightly increased traffic flow and/or periodic congestion during the construction phase of the proposed project. In the rural portions of the study area, these impacts are typically considered minor, temporary, and short-term. In the urban portions of the study area, the temporary impacts to traffic flow can be significant during construction; however, none of the alternative routes are located in areas that are considered as urban. AEP TCC will coordinate with the agencies in control of the impacted roadways to address these traffic flow impacts. As mentioned in Section 2.2.2.5, there is one roadway repair project within the study area, at the intersection of US Hwy 59 and US Hwy 183.

Aviation

According to FAA regulations, Title 14 CFR Part 77, the construction of a transmission line requires FAA notification if tower structure heights exceed the height of an imaginary surface extending outward and upward at a slope of 100:1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway of a public or military airport having at least one runway longer than 3,200 feet. The FAA also requires notification if tower structure heights exceed a 50:1 slope for a horizontal distance of 10,000 feet from the nearest runway of a public or military airport where no runway is longer than 3,200 feet in length, and if tower structure heights exceed a 25:1 slope for a horizontal distance of 5,000 feet for heliports.

One military FAA registered airport with at least one runway longer than 3,200 feet is located within 20,000 feet of all of the alternative routes, the Navy Outlying Field Goliad. There are no FAA registered airports where no runway longer than 3,200 feet located within 10,000 feet of any of the alternative routes; and there are no heliports within 5,000 feet of any of the alternative routes.

Following PUC approval of a route for the proposed transmission line, AEP TCC will make a final determination of the need for FAA notification, based on specific route location and structure design of

avoidance and minimization measures typically employed during the construction of transmission lines were also taken into account. For example, natural features identified along the ROW such as streams and open water can be spanned to minimize potential impacts. Alternative Route TE-3 was selected by the POWER project manager as the best-balanced route considering all the evaluation criteria reviewed.

Following the ranking by discipline, the group of POWER evaluators discussed the relative importance and sensitivity of the various criteria as they applied to all of the alternative routes. Based on group discussion of the relative value and importance of each set of criteria (land use, ecology, and cultural resources) for this specific project, it was the consensus of the group that the number of habitable structures located within 300 feet of the proposed ROW centerline, paralleling existing compatible ROW, overall length of the route, and stream crossings were the primary factors in their decision for selecting the recommended route and ranking the remaining alternative routes. Secondary factors included route lengths across HPAs for archeological resources and the lengths across bottomland/riparian woodlands.

The group selected Alternative Route TE-3 as the alternative route that best balances land use, ecology, cultural resources, and certain PUC routing criteria. The next top three, TE Alternative Routes TE-4, TE-5, and TE-2, in order of preference, were determined to have the least potential cumulative impacts. The ranking of the alternative routes is presented in Table 5-1. All the alternative routes are considered viable acceptable routes that provide geographic diversity.

In summary, POWER's decision to recommend Alternative Route TE-3 as the route that best balances the PUC routing criteria related to land use, ecology, and cultural resource, was based primarily on the following evaluation criteria. Alternative Route TE-3:

- is the shortest route, at 10.7 miles;
- is tied with two other routes as having the second fewest habitable structures within 300 feet of the proposed ROW centerline, with 1;
- is tied with two other routes as having the second fewest "newly affected" habitable structures within 300 feet of the proposed ROW centerline, with 1;
- is tied with one other route as having the third highest length of ROW parallel to other existing ROW, at 3.7 miles;
- has the second shortest distance across pastureland/rangeland, at 2.2 miles;

- is tied with one other route as having the third shortest length of ROW within the foreground visual zone of FM roads, at 4.4 miles;
- is tied with one other route as having the third fewest number of stream crossings, with ~~3~~16;
- is tied with two other routes as having the second shortest length of ROW parallel (within 100 feet) to streams and rivers, at 0.1 mile;
- has the third shortest length of ROW across 100-year floodplains, at 1.0 mile; and
- has the second shortest length of ROW across areas of high archaeological site potential, at 7.7 miles.

Alternative Route TE-3:

- crosses no parks/recreational areas;
- has no parks/recreational areas within 1,000 feet of its ROW centerline;
- crosses no land irrigated by traveling systems (rolling or pivot type);
- has no transmission line crossings;
- has no US or State highway crossings;
- has no FAA registered airports with no runway more than 3,200 feet in length within 10,000 feet of the ROW centerline;
- has no private airstrips within 10,000 feet of its ROW centerline;
- has no heliports within 5,000 feet of its ROW centerline;
- has no AM radio transmitters within 10,000 feet of its ROW centerline;
- has no length of ROW within the foreground visual zone of Interstates, US, or State highways;
- has no length of ROW within the foreground visual zone of parks/recreational areas;
- crosses no known/occupied habitat of federally endangered or threatened species;
- crosses no open water (lakes, ponds);
- crosses no rivers;
- crosses no recorded archeological sites and is not located within 1,000 feet of any additional recorded archeological sites; and
- crosses no NRHP sites and is not located within 1,000 feet of any additional NRHP sites.

Therefore, based upon its evaluation of this project and its experience and expertise in the field of transmission line routing, POWER recommends Alternative Route TE-3 from an overall environmental perspective and the remaining routes as alternatives. Considering all pertinent factors, it is POWER's opinion that this TE Alternative Route best addresses the applicable criteria in PURA § 37.056(c)(4) and the PUC Substantive Rules.

The group selected Alternative Route EC-7 as the alternative route that best balances land use, ecology, cultural resources, and certain PUC routing criteria. The next top four, EC Alternative Routes EC-8, EC-19, EC-18, and EC-12, in order of preference, were determined to have the least potential cumulative impacts. The ranking of the alternative routes is presented in Table 5-1. All the EC Alternative Routes are considered viable acceptable routes that provide geographic diversity.

In summary, POWER's decision to recommend Alternative Route EC-7 as the route that best balances the PUC routing criteria related to land use, ecology, and cultural resource, was based primarily on the following evaluation criteria. Alternative Route EC-7:

- is the eighth shortest route, at 37.0 miles;
- is tied with three other routes as having the third fewest habitable structures within 300 feet of the proposed ROW centerline, with 5;
- is tied with four other routes with the second fewest "newly affected" habitable structures within 300 feet of the proposed ROW centerline, with 3;
- is tied with one other route as having the fourth highest length of ROW paralleling existing transmission ROW, at 15.9 miles;
- has the second shortest length of ROW within the foreground visual zone of FM roads, at 3.8 miles;
- ~~has~~ is tied with one other route with the shortest length of ROW across bottomland/riparian woodlands, at 0.7 mile;
- ~~is tied with two other routes as having the fourth fewest~~has the least number of stream crossings, with ~~10~~27;
- has the shortest length of ROW across 100-year floodplains, at 2.2 miles; and
- has the third shortest length of ROW across areas of high archaeological site potential, at 20.6 miles.

Alternative Route EC-7:

- crosses no parks/recreational areas;
- has no parks/recreational areas within 1,000 feet of its ROW centerline;
- crosses no land irrigated by traveling systems (rolling or pivot type);
- has no cemeteries within 1,000 feet of its ROW centerline;
- has no FAA registered airports with no runway more than 3,200 feet in length within 10,000 feet of the ROW centerline;
- has no heliports within 5,000 feet of its ROW centerline;
- has no AM radio transmitters within 10,000 feet of its ROW centerline;
- has no length of ROW within the foreground visual zone of parks/recreational areas;

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