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SOAH DOCKET NO. 473-21-0247
PUC DOCKET NO. 51023

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APPLICATION OF THE CITY OF SAN ANTONIO TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY	§ § § § § §	**BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS**

CPS ENERGY'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Response to the Public Utility Commission of Texas (the Commission) Staff's First Request for Information (RFI). This Response is timely filed pursuant to CPS Energy's agreement with Commission Staff. CPS Energy agrees and stipulates that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,

/s/ Kirk D. Rasmussen

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ATTORNEYS FOR CPS ENERGY

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on this date via the Commission's Interchange in accordance with the Commission's order in Docket No. 50664 suspending PUC Procedural Rule 22.74.

/s/ Kirk D. Rasmussen
Kirk D. Rasmussen

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Staff Question No. 1-1:

Please reference pages 14 and 15 of the Application:

a) On page 14 of the Application, it is stated that the average length of circuit/feeders is approximately 12.8 miles. It is unclear if this average is for all distribution voltages or if this value is specific to the voltage class in the project area. Please provide the average length of the circuits/feeders at the distribution voltage that will be used in this project.
b) Please provide CPS Energy's system wide reliability indices.
c) Please provide CPS Energy's reliability indices for The La Sierra and Fair Oaks Ranch circuits/feeders.

Response No. 1-1:

a) On page 14 of the Application, the distance of 12.8 miles is the average distance of all distribution feeders of all distribution voltages in the CPS Energy system. As stated on page 14 of the Application, The average length of the eight distribution circuits primarily serving the Scenic Loop area from the La Sierra and Fair Oaks Ranch substations is currently 36.13 miles. When two very short circuits (U111 and U113) are removed from the average, the remaining six circuits average 47.48 miles in length, with the longest circuit (R014) at 97.13 miles in length. Upon energization of the new Scenic Loop Substation, the average length of the four initial distribution circuits will be approximately 32.84 miles in length, with the longest circuit being approximately 41.58 miles in length (*see* Page 9 of Attachment 13 to the Application).
b) Please refer to Table 14-3 on page 15 of the Application.
c) Please refer to Table 14-4 on page 16 of the Application. Please also refer to Figure 14-4 on page 16 showing a comparison between the system-wide indices and the feeders from La Sierra and Fair Oaks Ranch. *See also* Table 14-5 presenting the occurrences of the La Sierra and Fair Oaks Ranch circuits on the poor performing circuit list.

Prepared By: George Tamez — Title: Director of Grid Transformation and Planning, CPS Energy

Sponsored By: George Tamez — Title: Director of Grid Transformation and Planning, CPS Energy

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CPS ENERGY'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Staff Question No. 1-2:

Please provide the location of all existing schools in the project area and the distance each school is from the center line. If CPS Energy is aware of any school that has been planned but not yet constructed in the project area (Planned Schools), please provide the location of any Planned Schools and the distance from the centerline of any of the proposed segments.

Response No. 1-2:

During the performance of its routing study for this project, POWER identified one public school within the Study Area, Dr. Sara McAndrew Elementary School, located at 26615 Toutant Beauregard Road (*see* Page 3-36 of the Environmental Assessment), which is a public school operated by the Northside Independent School District (Northside ISD). McAndrew Elementary School is approximately 214 feet from the centerline of Segment 35 (which is located across the road from the school) (*see, e.g.*, Table 4-8 in Appendix C of the Environmental Assessment). The centerline of Segment 42 is approximately 323 feet from the school. The centerline of Segment 41 is approximately 627 feet from the school. All other segments proposed for the Project are further than those three segments from the school.

A private school, Concept Therapy Institute, located at 25550 Boerne Stage Road was also identified within the study area. The Concept Therapy Institute is approximately 832 feet from the centerline of Segment 1 (which is located across the road from the school) (see Figure 2-4 of the EA).

During its routing evaluation, POWER identified property owned by the Northside ISD to the northwest of McAndrew Elementary School. On June 19, 2019, POWER requested information from the Northside ISD concerning land use constraints or other issues of interest to the proposed project. Northside ISD did not respond to POWER's request at that time. CPS Energy has recently been informed by a representative of the Northside ISD that a middle school "out in that general vicinity sometime in the future is a possibility."

Prepared By: Lisa Meaux — Title: Project Manager, POWER Engineers
Sponsored By: Lisa Meaux — Title: Project Manager, POWER Engineers

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CPS ENERGY'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

Staff Question No. 1-3:

Please reference Attachment 3 to the Application. Page 3 of Attachment 3 includes the substation cost estimates. The substation cost estimates appear to be the same in all categories except with regards to right-of way and land acquisition. Please provide a detailed explanation of any and all estimated cost differences between the different proposed substation sites.

Response No. 1-3:

All seven sites will have the same three bay substation footprint. All seven sites have roadway frontage available for access. Based on aerial and roadway reconnaissance, all seven sites exhibit generally level terrain for the substation area and do not have abnormal or extreme topographical conditions. Therefore, the estimated substation site work construction costs were considered to be approximately the same. As a result of the substation footprint and equipment layout being identical for each site, the cost of engineering, materials, foundations, and electrical construction are estimated to be the same at this time.

The only difference in the estimated cost for each of the seven substation sites is associated with estimated real estate costs. CPS Energy's internal real estate professionals evaluated each site. Based on their evaluation of appropriate real estate sale comparisons in the area at the time the cost estimates were prepared and their consultation with external real estate professionals, they provided an estimated cost to acquire each of the seven sites proposed in the application. Any difference in the estimated cost, therefore, is associated with CPS Energy's evaluation of the cost to acquire each of the seven sites.

Prepared By: Scott Lyssy — Title: Manager of Civil Engineering, CPS Energy
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