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SOAH DOCKET NO. 473-21-0247

PUC DOCKET NO. 51023 2021 MAR -1 AM 10:31

APPLICATION OF THE CITY OF	§	BEFORE THE STATE OFFICE
SAN ANTONIO TO AMEND ITS	§	<small>PUBLIC UTILITIES</small>
CERTIFICATE OF CONVENIENCE	§	FILING CLERK
AND NECESSITY FOR THE	§	OF
SCENIC LOOP 138-KV TRANSMISSION	§	ADMINISTRATIVE HEARINGS
LINE IN BEXAR COUNTY	§	

**CPS ENERGY'S RESPONSE TO TOUTANT RANCH, LTD., ASR PARKS, LLC
PINSON INTERESTS LTD. LLP, AND CRIGHTON DEVELOPMENT CO.'S
FIRST REQUESTS FOR INFORMATION TO CPS ENERGY**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Response to the First Request for Information (RFI) of Toutant Ranch, LTD., ASR Parks, LLC Pinson Interests LTD. LLP, and Crighton Development Co.'s (collectively, the Dreico Companies). This Response is timely filed. 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

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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 SOAH Order 3 in this proceeding.

/s/ Kirk D. Rasmussen
Kirk D. Rasmussen

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**APPLICATION OF THE CITY OF § BEFORE THE STATE OFFICE
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FIRST REQUESTS FOR INFORMATION TO CPS ENERGY**

Dreico Companies 1-1:

Please provide updated versions of Attachment 3 to the Amended Application and Amended Environmental Assessment Table 4-1 that incorporate data for the following potential routes:

- Sub 7 –54-17-31-35-34-41-46-49a (Dreico Route 1)
- Sub 7 –54-17-31-35-34-41-46-46b (Dreico Route 2)
- Sub 7 – 54-17-28-30-34-41-46-49a (Dreico Route 3)
- Sub 7 – 54-17-28-30-34-41-46-46b (Dreico Route 4)
- Sub 7 – 54-20-36-35-34-41-46-49a (Dreico Route 5)
- Sub 7 – 54-20-36-35-34-41-46-46b (Dreico Route 6)

Response No. 1-1:

Route	Total Length (miles)	Sub Site	**Estimated Total Cost	ROW & Land Acquisition	Engineering & Design (Utility)	Engineering & Design (Contract)	Procurement of Material & Equipment	Construction of Facilities (Utility)	Construction of Facilities (Contract)	Other
Dreico 1	5.67	7	\$44,720,445	\$5,431,128	\$658,680	\$1,843,325	\$12,567,392	\$3,141,160	\$10,869,343	\$9,281,288
Dreico 2	5.31	7	\$42,745,438	\$5,500,813	\$642,840	\$1,754,225	\$11,864,579	\$3,101,560	\$10,237,128	\$8,767,539
Dreico 3	5.61	7	\$43,829,483	\$5,398,870	\$656,040	\$1,828,475	\$12,025,791	\$3,134,560	\$10,311,344	\$9,522,184
Dreico 4	5.25	7	\$41,670,814	\$5,458,600	\$640,200	\$1,739,375	\$11,189,634	\$3,094,960	\$9,638,767	\$9,008,434
Dreico 5	4.93	7	\$40,113,172	\$4,859,967	\$626,120	\$1,660,175	\$11,649,261	\$3,059,760	\$9,936,328	\$7,565,056
Dreico 6	4.57	7	\$38,815,298	\$4,933,777	\$610,280	\$1,571,075	\$11,302,262	\$3,020,160	\$9,617,954	\$7,054,356

See Attachment.

Attachment:

Attachment Dreico 1-1: Table 4-1 Environmental and Land Use Data for Route Evaluation
Scenic Loop – Dreico RFI 1-1, 1 Page, POWER Engineers, Inc.,
Undated

Prepared By:	Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.
	Scott D. Lyssy	Title: Manager Civil Engineering
Sponsored By:	Lisa B. Meaux	Title: Project Manager, POWER Engineers, Inc.
	Scott D. Lyssy	Title: Manager Civil Engineering

Table 4-1
Environmental and Land Use Data For Route Evaluation
Scenic Loop - Dreico RFI 1-1

Land Use	Dreico Route 1	Dreico Route 2	Dreico Route 3	Dreico Route 4	Dreico Route 5	Dreico Route 6
1 Length of alternative route (miles)	5.67	5.32	5.62	5.27	4.92	4.57
2 Number of habitable structures ¹ within 300 feet of the route centerline	44*	45*	41*	42*	33*	34*
3 Length of ROW using existing transmission line ROW	0	0	0	0	0	0
4 Length of ROW parallel and adjacent to existing transmission line ROW	0	0	0	0	0	0
5 Length of ROW parallel to other existing ROW (roadways, railways, canals, etc.)	1.22	0.97	1.04	0.79	2.13	1.88
6 Length of ROW parallel and adjacent to apparent property lines ²	1.93	2.66	2.03	2.76	0.75	1.48
7 Sum of evaluation criteria 4, 5, and 6	3.15	3.63	3.07	3.55	2.88	3.36
8 Percent of evaluation criteria 4, 5, and 6	56%	68%	55%	67%	58%	74%
9 Length of ROW across parks/recreational areas ³	0	0	0	0	0	0
10 Number of additional parks/recreational areas ³ within 1,000 feet of ROW centerline and substation site	0	0	0	0	0	0
11 Length of ROW across cropland	0	0	0	0	0	0
12 Length of ROW across pasture/rangeland	1.03	1.03	0.59	0.59	1.05	1.05
13 Length of ROW across land irrigated by traveling systems (rolling or pivot type)	0	0	0	0	0	0
14 Length of route across conservation easements and/or mitigation banks (Special Management Area)	0	0	0	0	0	0
15 Length of route across gravel pits, mines, or quarries	0	0	0	0	0	0
16 Length of ROW parallel and adjacent to pipelines ⁴	0	0	0	0	0	0
17 Number of pipeline crossings ⁴	0	0	0	0	0	0
18 Number of transmission line crossings	0	0	0	0	0	0
19 Number of IH, US and state highway crossings	0	0	0	0	0	0
20 Number of FM or RM road crossings	0	0	0	0	0	0
21 Number of cemeteries within 1,000 feet of the ROW centerline and substation site	1	1	0	0	1	1
22 Number of FAA registered airports ⁵ with at least one runway more than 3,200 feet in length located within 20,000 feet of ROW centerline and substation site	1	1	1	1	1	1
23 Number of FAA registered airports ⁵ having no runway more than 3,200 feet in length located within 10,000 feet of ROW centerline and substation site	0	0	0	0	0	0
24 Number of private airstrips within 10,000 feet of the ROW centerline and substation site	0	0	0	0	0	0
25 Number of heliports within 5,000 feet of the ROW centerline and substation site	0	0	0	0	0	0
26 Number of commercial AM radio transmitters within 10,000 feet of the ROW centerline and substation site	0	0	0	0	0	0
27 Number of FM radio transmitters, microwave towers, and other electronic installations within 2,000 feet of ROW centerline and substation site	0	0	0	0	1	1
28 Number of identifiable existing water wells within 200 feet of the ROW centerline and substation site	2	2	2	2	1	1
29 Number of oil and gas wells within 200 feet of the ROW centerline (including dry or plugged wells) and substation site	0	0	0	0	0	0
Aesthetics						
30 Estimated length of ROW within foreground visual zone ⁶ of IH, US and state highways	0	0	0	0	0	0
31 Estimated length of ROW within foreground visual zone ⁶ of FM/RM roads	0	0	0	0	0	0
32 Estimated length of ROW within foreground visual zone ^{6,7,8} of parks/recreational areas ³	0	0	0	0	0	0
Ecology						
33 Length of ROW across upland woodlands/brushlands	4.23	3.95	4.46	4.18	3.33	3.05
34 Length of ROW across bottomland/riparian woodlands	0	0	0	0	0	0
35 Length of ROW across NWI mapped wetlands	0	0	0	0	0	0
36 Length of ROW across critical habitat of federally listed endangered or threatened species	0	0	0	0	0	0
37 Area of ROW across golden-cheeked warbler modeled habitat designated as 3-Moderate High and 4-High Quality (acres) ⁴	10.19	9.50	10.39	9.71	9.22	8.53
38 Area of ROW across golden-cheeked warbler modeled habitat designated as 1-Low and 2-Moderate Low Quality (acres) ⁴	18.09	15.31	16.71	13.93	14.47	11.69
39 Length of ROW across open water (lakes, ponds)	0	0	0	0	0	0
40 Number of stream and river crossings	5	4	4	3	7	6
41 Length of ROW parallel (within 100 feet) to streams or rivers	0.08	0	0.08	0	0.08	0
42 Length of ROW across Edwards Aquifer Contributing Zone	5.67	5.32	5.62	5.27	4.92	4.57
43 Length of ROW across FEMA mapped 100-year floodplain	0	0.03	0	0.03	0.25	0.28
Cultural Resources						
44 Number of recorded cultural resource sites crossed by ROW	0	0	0	0	0	0
45 Number of additional recorded cultural resource sites within 1,000 feet of ROW centerline	2	2	2	2	2	2
46 Number of NRHP listed properties crossed by ROW	0	0	0	0	0	0
47 Number of additional NRHP listed properties within 1,000 feet of ROW centerline	2	2	1	1	1	1
48 Length of ROW across areas of high archeological site potential	2.25	2.06	1.78	1.59	2.67	2.49

¹Single-family and multi-family dwellings, and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, schools, or other structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis within 300 feet of the centerline of a transmission project of 230-kV or less

²Apparent property boundaries created by existing roads, highways, or railroad ROWs are not "double-counted" in the length of ROW parallel to apparent property boundaries criteria

³Defined as parks and recreational areas owned by a governmental body or an organized group, club, or church within 1,000 feet of the centerline of the project

⁴Only steel pipelines six inches and greater in diameter carrying hydrocarbons were quantified in the pipeline crossing and paralleling calculations

⁵As listed in the Chart Supplement South Central US (FAA 2019b) formerly known as the Airport/Facility Directory South Central US) and FAA 2019a

⁶One-half mile, unobstructed. Lengths of ROW within the visual foreground zone of interstates, US and state highway criteria are not "double-counted" in the length of ROW within the visual foreground zone of FM roads criteria

⁷One-half mile, unobstructed. Lengths of ROW within the visual foreground zone of parks/recreational areas may overlap with the total length of ROW within the visual foreground zone of interstates, US and state highway criteria and/or with the total length of ROW within the visual foreground zone of FM roads criteria

⁸From Model C by Diamond et al. 2010

All length measurements are shown in miles unless noted otherwise

* This count includes a habitable structure on parcel A-054 that POWER has identified. This habitable structure will be included on future data tabulations