



Control Number: 51023



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

2021 APR 26 PM 2:43

APPLICATION OF THE CITY OF § BEFORE THE STATE OFFICE
SAN ANTONIO TO AMEND ITS §
CERTIFICATE OF CONVENIENCE § OF
AND NECESSITY FOR THE §
SCENIC LOOP 138-KV TRANSMISSION § ADMINISTRATIVE HEARINGS
LINE IN BEXAR COUNTY §

**CPS ENERGY'S SUPPLEMENTAL RESPONSE TO ANAQUA SPRINGS
HOMEOWNERS' ASSOCIATION'S SECOND REQUEST
FOR INFORMATION QUESTIONS 2-5, 2-7, 2-8, 2-9, 2-10, 2-11, 2-12, AND 2-15**

COMES NOW the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and files this Supplemental Response to the Second Request for Information (RFI) of Anaqua Springs Homeowners' Association (Anaqua Springs HOA), Questions 2-5, 2-7, 2-8, 2-9, 2-10, 2-11, 2-12, and 2-15. 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

766

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

**SOAH DOCKET NO. 473-21-0247
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<p>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</p>	<p>§ § § § § §</p>	<p>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</p>
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**CPS ENERGY’S SUPPLEMENTAL RESPONSE TO ANAQUA SPRINGS
HOMEOWNERS’ ASSOCIATION’S SECOND REQUEST
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Anaqua Springs Question No. 2-5:

Regarding Segment 54, please provide the anticipated distance from the edge of the right-of-way to Habitable Structure Nos. 79, 178, 81, 85, 86, 87, 88 and 89 on the north side of Toutant Beauregard Road (EA Figure 4-1) and Habitable Structure Nos. 70, 72, 78, and 80 on the south side of Toutant Beauregard. Please provide a sketch or drawing showing anticipated ROW easement width, structure spacing and locations for Segment 54 given the need to follow the sharp curve in the road and proximity to housing. Is it accurate that in this stretch of 54, CPS plans to use a 75-foot right-of-way with structures spaced more closely together? If not, how will this segment be constructed?

Supplemental Response No. 2-5 (April 26, 2021):

The approximate distance from the edge of the right-of-way to the habitable structures identified above are as follows:

Habitable Structure No.	Approximate Distance (feet)
70	156
72	154
78	119
79	165
80	152
81	32
85	108
86	112
87	250
88	72
89	84
178	163

As stated in response to Question 6 of the Application and on page 1-1 of the Environmental Assessment, which is Attachment 1 to the Application, it is currently anticipated that the proposed transmission line facilities will be constructed utilizing a right-of-way width of approximately 100 feet.

As can be seen on Sheet 8 of Attachment 6 to the Application (original filing of 7/22/20), for approximately 1,300 feet along Segment 54, less than 100 feet of right of way is proposed on private property in order to maximize the distance to habitable structures and minimize the impact on the private properties in that area. Exhibit SDL-3R to the Rebuttal Testimony of Mr. Scott D. Lyssy shows the centerline and right of way proposed in that area. Along that portion of Segment 54, road right of way will be utilized for the necessary clearances.

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

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Anaqua Springs Question No. 2-7:

How many transmission structures does CPS anticipate will be located on Segment 14? How many structures on Segment 54, 36, and 20? And what will the approximate distance be between each structure, given the 75-foot right-of-way?

Supplemental Response No. 2-7 (April 26, 2021):

As stated in response to Question 6 of the Application and on page 1-1 of the Environmental Assessment, which is Attachment 1 to the Application, it is currently anticipated that the proposed transmission line facilities will be constructed utilizing a right of way width of approximately 100 feet.

As can be seen on Sheet 8 of Attachment 6 to the Application (original filing of 7/22/20), for approximately 1,300 feet along Segment 54, less than 100 feet of right of way is proposed on private property in order to maximize the distance to habitable structures and minimize the impact on the private properties in that area. Exhibit SDL-3R to the Rebuttal Testimony of Mr. Scott D. Lyssy shows the centerline and right of way proposed in that area. Along that portion of Segment 54, road right of way will be utilized for the necessary clearances. Along Segments 14, 20, and 36, less than a full 100 feet of right of way will be required on private property in some locations due to the curvature or the road between pole locations and crossings of Toutant Beauregard Road. Refer to Exhibit SDL-4R to the Rebuttal Testimony of Mr. Lyssy for a depiction of such an occurrence.

The survey, geotechnical, and engineering work necessary to design the proposed transmission line facilities along Segments 14, 20, 36, and 54 have not yet been completed. Thus, CPS Energy cannot yet identify where pole structures will be located or the exact number of poles along those segments. For preliminary estimating, the following structure count and span lengths were used.

Segment	Number of Structures	Estimated Average Span Length
14	4	550 feet
54	9	465 feet
36	6	500 feet
20	6	630 feet

Prepared By: Scott D. Lyssy
Sponsored By: Scott D. Lyssy

Title: Manager Civil Engineering
Title: Manager Civil Engineering

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Anaqua Springs Question No. 2-8:

Please provide the estimated structure heights and conductor arms lengths for the portions of Segments 14, 54, 20, and 36 that are planned to have a 75 foot right-of-way.

Supplemental Response No. 2-8 (April 26, 2021):

As stated in response to Question 6 of the Application and on page 1-1 of the Environmental Assessment, which is Attachment 1 to the Application, it is currently anticipated that the proposed transmission line facilities will be constructed utilizing a right of way width of approximately 100 feet.

As can be seen on Sheet 8 of Attachment 6 to the Application (original filing of 7/22/20), for approximately 1,300 feet along Segment 54, less than 100 feet of right of way is proposed on private property in order to maximize the distance to habitable structures and minimize the impact on the private properties in that area. Exhibit SDL-3R to the Rebuttal Testimony of Mr. Scott D. Lyssy shows the centerline and right of way proposed in that area. Along that portion of Segment 54, road right of way will be utilized for the necessary clearances. Along Segments 14, 20, and 36, less than a full 100 feet of right of way will be required on private property in some locations due to the curvature or the road between pole locations and crossings of Toutant Beauregard Road. Refer to Exhibit SDL-4R to the Rebuttal Testimony of Mr. Lyssy for a depiction of such an occurrence.

The survey, geotechnical, and engineering work necessary to design the proposed transmission line facilities along Segments 14, 20, 36, and 54 have not yet been completed. Thus, CPS Energy cannot yet identify the exact structure heights that may be required in that area. As stated in response to Question 5 of the Application, the heights of typical structures proposed for the Project range from 70 to 130 feet above ground. CPS Energy anticipates that most or all of the poles utilized for Segments 14, 20, 36, and 54 will likely fall within that range.

The length of the arms currently anticipated for use by CPS Energy for the Project (see Application Attachment 1, Figures 1-2 through 1-4) will extend approximately 12-15 feet from the center of the pole. For a single circuit dead end pole, there will not be arms extending from the pole (see Application Attachment 1, Figure 1-5).

Prepared By: Scott D. Lyssy
Sponsored By: Scott D. Lyssy

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Anaqua Springs Question No. 2-9:

If the transmission line were to fail during a storm and fall towards the houses within a 75 foot right-of-way on Segments 14, 54, 36, 20, and any other portions along Toutant Beauregard with 75 foot rights-of-way, are any houses within the fall radius of either the structures or conductors, given due regard to conductor sag being extended towards the houses?

Supplemental Response No. 2-9 (April 26, 2021):

The transmission line proposed in this proceeding will be designed to meet or exceed all safety and clearance requirements applicable to the facilities, including the current version of the National Electrical Safety Code. The transmission line facilities proposed in this Project are not anticipated to ever fail during a storm and fall. However, as a general design principle, the transmission line, if it does fail, it will likely fail within the right of way.

Because the transmission line has not been designed and pole heights and conductor clearances have not yet been determined, CPS Energy cannot determine whether any structures are located within a theoretical fall radius of the proposed facilities.

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	Scott D. Lyssy	Title:	Manager Civil Engineering

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Anaqua Springs Question No. 2-10:

What is the distance between the end of the nearest conductor arm and the closest edge of the houses, including the roof lines, on segments along Toutant Beauregard with 75 foot rights-of-way?

Supplemental Response No. 2-10 (April 26, 2021):

As stated in response to Question 6 of the Application and on page 1-1 of the Environmental Assessment, which is Attachment 1 to the Application, it is currently anticipated that the proposed transmission line facilities will be constructed utilizing a right-of-way width of approximately 100 feet.

As can be seen on Sheet 8 of Attachment 6 to the Application (original filing of 7/22/20), for approximately 1,300 feet along Segment 54, less than 100 feet of right of way is proposed on private property in order to maximize the distance to habitable structures and minimize the impact on the private properties in that area. Exhibit SDL-3R to the Rebuttal Testimony of Mr. Scott D. Lyssy shows the centerline and right of way proposed in that area. Along that portion of Segment 54, road right of way will be utilized for the necessary clearances. Along Segments 14, 20, and 36, less than a full 100 feet of right of way will be required on private property in some locations due to the curvature or the road between pole locations and crossings of Toutant Beauregard Road. Refer to Exhibit SDL-4R to the Rebuttal Testimony of Mr. Lyssy for a depiction of such an occurrence. In all segment locations adjacent to roadways, the proposed segments are identified with 50 feet of right of way on private property opposite of the roadway. Exhibits SDL-3R and SDL-4R to the Rebuttal Testimony of Mr. Lyssy depict such right of way.

For purposes of answering this question, it is presumed that the conductor will extend approximately 15 feet from the pole centerline on conductor arms as described in CPS Energy’s response to Anaqua Springs Question No. 2-8. Subtracting 15 feet (as an average) from the previously reported distances to habitable structures along Toutant Beauregard Road results in the following approximate distances between the end of the nearest conductor arm and the habitable structures along Toutant Beauregard Road:

Habitable Structure No.	Approximate Distance (feet)
17	199
18	147
55	289
58	214
67	217
69	193
70	191
71	236
72	189
73	229
74	213
75	215
76	245
77	252
78	154
79	200
80	187
81	67
82	236
83	192
84	199
85	143
86	147
88	107
89	119
90	269
91	208
92	249
93	185
94	209
95	264
96	265
97	180
98	226
99	226
100	229
101	250
102	251
103	248
104	196
105	240
178	198

Prepared By: Lisa B. Meaux
Scott D. Lyssy
Sponsored By: Lisa B. Meaux
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Anaqua Springs Question No. 2-11:

What is the estimated mid-span height above ground for the lowest conductor along Toutant Beauregard where there are 75-foot rights-of-way?

Supplemental Response No. 2-11 (April 26, 2021):

As stated in response to Question 6 of the Application and on page 1-1 of the Environmental Assessment, which is Attachment 1 to the Application, it is currently anticipated that the proposed transmission line facilities will be constructed utilizing a right-of-way width of approximately 100 feet.

As can be seen on Sheet 8 of Attachment 6 to the Application (original filing of 7/22/20), for approximately 1,300 feet along Segment 54, less than 100 feet of right of way is proposed on private property in order to maximize the distance to habitable structures and minimize the impact on the private properties in that area. Exhibit SDL-3R to the Rebuttal Testimony of Mr. Scott D. Lyssy shows the centerline and right of way proposed in that area. Along that portion of Segment 54, road right of way will be utilized for the necessary clearances. Along Segments 14, 20, and 36, less than a full 100 feet of right of way will be required on private property in some locations due to the curvature or the road between pole locations and crossings of Toutant Beauregard Road.

The survey, geotechnical, and engineering work necessary to design the proposed transmission line facilities along Toutant Beauregard Road has not yet been completed. Thus, CPS Energy cannot yet identify the exact structure heights and clearances that may be required in that area. The transmission line proposed in this proceeding will be designed to meet or exceed all safety and clearance requirements applicable to the facilities, including the current version of the National Electrical Safety Code. At a minimum, the clearances above ground for the proposed transmission line facilities along Toutant Beauregard Road (and for all other proposed segments) will exceed 20.6 feet required by the NESC plus five feet of buffer utilized by CPS Energy in its standard design practices.

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Anaqua Springs Question No. 2-12:

Please advise if homes, playground equipment, fences, metal roofing, gutters and downspouts, etc. along Toutant Beauregard where there is 75 foot right-of-way anticipated, including Segments 14, 54, 20, and 36, or any location where there is a planned 75 foot right-of-way would need cathodic protection grounding systems installed to protect inhabitants from induced currents?

Supplemental Response No. 2-12 (April 26, 2021):

As stated in response to Question 6 of the Application and on page 1-1 of the Environmental Assessment, which is Attachment 1 to the Application, it is currently anticipated that the proposed transmission line facilities will be constructed utilizing a right-of-way width of approximately 100 feet.

As can be seen on Sheet 8 of Attachment 6 to the Application (original filing of 7/22/20), for approximately 1,300 feet along Segment 54, less than 100 feet of right of way is proposed on private property in order to maximize the distance to habitable structures and minimize the impact on the private properties in that area. Exhibit SDL-3R to the Rebuttal Testimony of Mr. Scott D. Lyssy shows the centerline and right of way proposed in that area. Along that portion of Segment 54, road right of way will be utilized for the necessary clearances. Along Segments 14, 20, and 36, less than a full 100 feet of right of way will be required on private property in some locations due to the curvature or the road between pole locations and crossings of Toutant Beauregard Road.

No cathodic protection is required or will be installed to safely operate the proposed transmission line facilities along any segment proposed for the Project, including those identified in this question. As a prudent utility operator, CPS Energy will ensure appropriate grounding, if necessary, for any of the facilities proposed for construction of the Project.

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Anaqua Springs Question No. 2-15:

Regarding CPS Energy’s Response to Statements on Route Adequacy, Page 7, Paragraph No. 3, entitled “Segment 54,” please describe in detail how CPS “avoids habitable structures to the extent reasonable” along Segment 54.

Supplemental Response No. 2-15 (April 26, 2021):

Where possible, CPS Energy and POWER avoided the habitable structures on Segment 54 by identifying the location for the segment across the road from the habitable structures. When necessary to be on the same side of the road as the habitable structures, Segment 54 parallels the roadway as opposed to being directly located over the habitable structures. *As can be seen on Sheet 8 of Attachment 6 to the Application (original filing of 7/22/20), for approximately 1,300 feet along Segment 54, less than 100 feet of right of way is proposed on private property in order to maximize the distance to habitable structures and minimize the impact on the private properties in that area. Exhibit SDL-3R to the Rebuttal Testimony of Mr. Scott D. Lyssy shows the centerline and right of way proposed in that area. Along that portion of Segment 54, road right of way will be utilized for the necessary clearances.*

Prepared By: Lisa B. Meaux Title: Project Manager, POWER Engineers, Inc.
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