



## Filing Receipt

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**APPLICATION OF AEP TEXAS INC.  
TO AMEND ITS CERTIFICATE OF  
CONVENIENCE AND NECESSITY  
FOR THE ANGSTROM-TO-NAISMITH  
DOUBLE-CIRCUIT 345-KV  
TRANSMISSION LINE IN SAN  
PATRICIO COUNTY**

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**BEFORE THE  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS**

**INITIAL BRIEF OF BETH PRIDAY**

**TABLE OF CONTENTS**

**I. Introduction and Summary**

On October 15, 2021, AEP Texas Inc. filed an application to amend its certificate of convenience and necessity (CCN) for the proposed Angstrom-to-Naismith Double-Circuit 345-kilovolt transmission line in San Patricio County, Texas. The same day notice was sent to landowners, including myself, whose property is directly affected by this project. I, Beth Priday, on behalf of the Q.M. Priday, Jr. Estate and Joan McCroskey Priday Trust am in support of AEP's application along Route 16 or Route 16-Mod subject to the use of monopoles structures particularly as it pertains to Link AL of Route 16 in order to minimize the transmission line footprint and preserve the environment as much as possible.

**II. Procedural History**

Not addressed.

**III. Jurisdiction**

Not addressed.

**IV. Preliminary Order Issues**

**A. Preliminary Order Issue No. 1**

Not addressed.

**B. Preliminary Order Issue No. 2**

Not addressed.

**C. Preliminary Order Issue No. 3**

Not addressed.

**D. Preliminary Order Issue No. 4**

Not addressed.

**E. Preliminary Order Issue No. 5**

1. How does the proposed facility support the reliability and adequacy of the interconnected transmission system?

Not addressed.

2. Does the proposed facility facilitate robust wholesale competition?

Not addressed.

3. What recommendation, if any, has an independent organization, as defined in PURA § 39.151, made regarding the proposed facility?

Not addressed.

4. Is the proposed facility needed to interconnect a new transmission service customer?

Not addressed.

F. Preliminary Order Issue No. 6

Not addressed.

G. Preliminary Order Issue No. 7

1. Effect of Granting Certificate on AEP Texas and Any Electric Utility Serving the Proximate Area

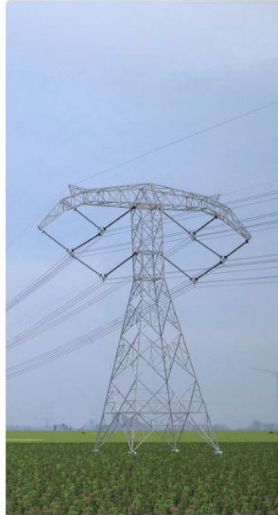
Not addressed.

2. Community Values

Most of the land which will be needed for the transmission line right-of-way (including ours affected by Link AL) is currently used for productive agricultural operations. In order to reduce the negative impact on farming, it is important that the transmission line structures have the smallest footprint possible and this would be achieved by using primarily monopole structures.

Mr. Krause mentioned in his Hearing On The Merits (HOM) testimony (page 101 lines 19-25 and page 102 lines 1-9) that AEP has previously used monopole structures on a project due to “strong landowner opposition” of lattice structures. For this project, it appears AEP has already chosen to use steel lattice structures before the Public Utility Commission has been given a chance to consider or approve the preferred monopole structures as shown in the following image of AEP’s Angstrom-Naismith webpage:

## STRUCTURES



STRUCTURE TYPE A

AEP Texas plans to use steel lattice structures.

Typical Distance Between Structures: 1250 feet\*

Typical Structure Height: 130-160 feet\*

Typical Right-of-Way Width: 150 feet\*

\* Exact structure height will vary based on topography and other constraints (for instance, crossing other transmission lines). Right-of-way requirements can vary, but will typically be 150 feet.

3. Recreational Park Areas

Not addressed.

4. Cultural, Aesthetic, and Historical Values

Monopoles are visibly more aesthetically pleasing. They are shorter with less surface area. The monopole is similar to a tree with one solid trunk. Monopoles have a smaller earthly footprint than steel lattice structures as seen in the following image taken from AEP's website:



STEEL LATTICE

Typical Distance Between Structures: 1,250 feet\*  
Typical Structure Height: 130 feet\*  
Typical Right-of-Way Width: 150 feet\*



STEEL MONOPOLE

Typical Distance Between Structures: 1,000 feet\*  
Typical Structure Height: 115 feet\*  
Typical Right-of-Way Width: 150 feet\*

5. Environmental Integrity

Selection of solely steel lattice structures for the entire Angstrom-Naismith project is at odds with AEP's corporate goals of promoting a reduced carbon footprint. In fact Mr. Krause in his HOM testimony (page 133 lines 9-10) states that the large base of steel lattice structure ranges anywhere from 35 ft square to 50 ft square as compared to the smaller footprint of the monopoles with a diameter ranging from only 5 to 7 ft (page 133 lines 16-17). Additionally (on page 132 lines 5-10) Mr. Krause describes the steel lattice structures as having 4 legs that are each anchored in concrete with a reinforced concrete shaft, again demonstrating their larger footprint than the single concrete structure required for a monopole.

In his HOM testimony (page 131 lines 4-24) Mr. Krause states that AEP plans to control interfering weeds around the transmission line structures by spraying harmful chemicals even if they are in the vicinity of food crops. He said it is up to the farmers to control the remaining weeds however they choose. This is neither environmentally sensitive to the native wild vegetation nor safe or kind to the farmer who is left with potentially contaminated crops and an additional burden of cleaning up around AEP's property especially if it is a 4-legged large footprint steel lattice structure.

6. Engineering Constraints

Not addressed.

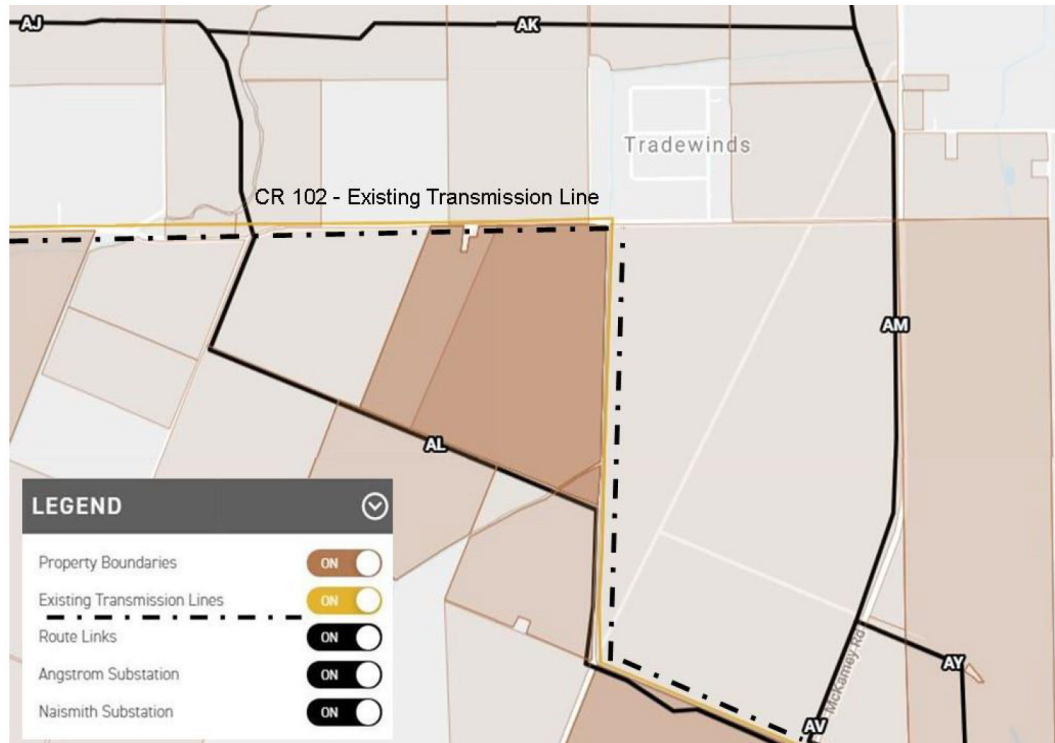
7. Costs

It is disheartening to hear repetitively throughout the testimony how AEP is focused mainly on the cheapest cost of routes and tower structures placing less emphasis on community values, the environment and safety.

During the Hearing on the Merits, Mr. Krause testified that BOLD lattice structures are recommended for this project because they are the cheapest option (page 41 lines 7-10). Mr. Armstrong asked Mr. Krause for the cost estimate of a single monopole comparable to what was given for a single lattice structure. Mr. Krause said he could provide that information but AEP's attorney objected to the question thus no value was provided giving the impression that AEP is trying to hide the true cost of each monopole (page 117 lines 16-25 & page 118 lines 1-11).

8. Use of Existing Corridors

By incorporating into its design the Link AL, AEP's Route 16 and 16-MOD are not following the use of existing corridors. County Road 102 has an existing right-of-way with poles and transmission line just 2000 ft to the north of Link AL as shown in the following map:



## 9. Prudent Avoidance

At odds with prudent avoidance, Link AL comes within 1600 ft of a pre-existing wind turbine lease agreement as shown on the following map:



## 10. Additional Routing Concerns

As increasing climate change continues to produce more violent weather patterns including high winds, freezing conditions, hurricanes and tornadoes like we have recently experienced in San Patricio County, the type of structure used in construction of the transmission line route becomes a greater concern. Very little, if any, documented factual information was provided regarding the integrity of each type of structure yet a brief internet search revealed a multitude of images showing storm damaged steel lattice structures. It appears the relatively smaller waist of the lattice tower serves as a weak inflection point whereby the larger tower top is folded over hitting the ground during severe weather events as shown in the following image of Missouri's recent disaster:



Monopole structures have one tubular uniform sized supporting pole. They are more compact with less surface area to be damaged during severe weather events. Mr. Krause states in his direct testimony (page 6 lines 17-18) that construction of monopoles requires the use of more steel than lattice structures which implies that they are stronger and more resilient than lattice structures especially during severe storms as frequently occur here along the Texas Gulf Coast.



11. Summary of Routing Recommendation

In summary, given AEP's preferred choice of Route 16 or 16-MOD for the new Angstrom to Naismith transmission line the use of primarily steel monopole structures is best.

H. Preliminary Order Issue No. 8

Not addressed.

I. Preliminary Order Issue No. 9

Not addressed.

J. Preliminary Order Issue No. 10

Not addressed.

K. Preliminary Order Issue No. 11

Not addressed.

L. Preliminary Order Issue No. 12

Not addressed.

M. Preliminary Order Issue No. 13

Not addressed.

N. Preliminary Order Issue No. 14

Not addressed.

O. Preliminary Order Issue No. 15

Not addressed.

V. Conclusion

Initially as stated in my Statement of Position, I was opposed to AEP's Route 16 or 16-MOD since it included Link AL directly affecting our property but since it is the preferred route of the majority, I do not want to stand in the way and can support it as long as every effort is made to minimize environmental damage, maintain safety and reduce the structural footprint via the use of monopole structures.

Respectfully submitted,

  
Beth Priddy