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PROJECT NO. 52667

FILING OF ATTESTATIONS	§	PUBLIC UTILITY COMMISSION
DEMONSTRATING COMPLIANCE	§	
WITH HB 4150	§	OF TEXAS

PEDERNALES ELECTRIC COOPERATIVE, INC.'S PROGRESS REPORT

Pedernales Electric Cooperative, Inc. (PEC) hereby files this progress report regarding compliance with House Bill 4150 (Utilities Code §38.004), providing information regarding distribution line adjustments PEC referenced in its Supplemental Report and Attestation Regarding Compliance With House Bill 4150 (“Supplemental Report”) filed on July 29, 2022. By informal request on December 21, 2022, the Division of Compliance and Enforcement of the Public Utility Commission of Texas (“Division”) requested a progress report and monthly filings with additional information. This is PEC’s first progress report.

I. Introduction

In response to the Division's memorandum issued on October 4, 2021, PEC’s initial report¹ certified with respect to those requirements as to its transmission lines above 60 kilovolts and described PEC’s ongoing efforts to implement a process to inspect its distribution facilities greater than 1 kV. Given the amount of time required to process the much larger number of distribution line crossings, PEC filed the Supplemental Report on July 29, 2022 with respect to PEC’s distribution line inspection results.

As required by PURA § 38.004(a), it is PEC’s general practice that a distribution line owned by PEC be constructed, operated, and maintained, as to clearances, in the manner described by the National Electrical Safety Code Standard ANSI (c)(2), as adopted by the American National Safety Institute, and in effect at the time of construction.

As required by PURA § 38.004(b), an electric cooperative must meet the minimum clearance requirements specified in Rule 232 of the National Electrical Safety Code Standard ANSI (c)(2) in

¹ *Pedernales Electric Cooperative, Inc. ’s Report and Attestation Regarding Compliance with House Bill 4150*, Project No. 52667 (January 13, 2022).

the construction of any distribution line.

Additionally, Section 6 of HB 4150 required that an electric cooperative that owns a distribution line over a lake listed in PURA § 38.004(b) that is not in compliance with the clearance standards of Rule 232 of the National Electrical Safety Code Standard ANSI (c)(2) in effect at the time the line was constructed bring the line into compliance not later than December 31, 2021.


PEC believes that its applicable distribution lines were constructed in accordance with NESC standards in effect at the time of construction. As noted in PEC's Supplemental Report, PEC regularly inspects its distribution system and over 1,500 spans of distribution line greater than 1 kV in proximity to lakes. PEC identified 84 spans of distribution line greater than 1 kV in proximity to lakes that are subject to the Division's memorandum. Desktop review of current, third-party engineering assessments indicated that 37 spans listed on the Supplemental Report would be adjusted based on current minimum clearance requirements in NESC. PEC conducted additional field inspections and on-site engineering reviews since filing the Supplemental Report and some locations require further review. The inspections found that several of the initially indicated 37 span locations may not be sailable or accessible by sailboat.

II. Progress Report

Progress Report Table 1 includes additional information for the 37 spans of distribution lines greater than 1 kV with respect to lines over lakes identified in PEC's Supplemental Report. The table includes the line identifier, county, status, estimated completion date, and additional notes.

Respectfully Submitted,

PEDERNALES ELECTRIC COOPERATIVE, INC.



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Progress Report Table 1

USACE Canyon Lake

Line Identification		County	Status	Estimated Completion Date	Mitigation Notes
CAN-016	1	Comal	In-Progress	December 2023	Line will be removed after the alternate route is completed. A developer is currently installing the underground infrastructure which will allow PEC to proceed.
CAN-017	3	Comal	In-Progress	December 2023	Line will be removed after an easement is obtained.

Lake Buchanan

Line Identification		County	Status	Estimated Completion Date	Mitigation
BUC-066	2	Burnet	In-Progress	July 2023	Design work complete. Construction to begin in February 2023.
BUC-067	1	Burnet	In-Progress	December 2023	In design phase; construction to be completed by 12/23
BUC-067	2	Burnet	Complete		Line was removed.
BUC-068	1	Burnet	In-Progress	December 2023	In design phase; construction to be completed by 12/23
BUC-071	1	Burnet	In-Progress	December 2023	In design phase; BUC-073-1 and BUC-074-1 & 71-1 are being worked together
BUC-072	2	Burnet	Complete		Switches installed.
BUC-073	1	Burnet	In-Progress	December 2023	In design phase; BUC-073-1 and BUC-074-1 & 71-1 are being worked together
BUC-074	1	Burnet	In-Progress	December 2023	In design phase; BUC-073-1 and BUC-074-1 & 71-1 are being worked together

Inks Lake

Line Identification		County	Status	Estimated Completion Date	Mitigation
INK-088	1	Burnet	Complete		Line was removed.
INK-089	2	Burnet	In-Progress	December 2023	In design phase; construction to be completed by 12/23
INK-090	1	Burnet	Complete		Increased pole height for required clearance.

Lyndon B. Johnson Lake

Line Identification		County	Status	Estimated Completion Date	Mitigation
LBJ-093	1	Burnet	Complete		No NESC Violation - PEC deems crossing to be non-sailable due to its proximity to a bridge. The portion of the lake on the crossing side is between 20-200 acres, which only requires 28.5' of clearance for the primary and 25.5' for the neutral. Line meets the required clearances.
LBJ-094	1	Burnet	Complete		Increased pole height for required clearance.
LBJ-095	1	Burnet	In-Review*		
LBJ-096	1	Burnet	In-Review*		
LBJ-097	1	Burnet	In-Review*		
LBJ-097	2	Burnet	In-Review*		
LBJ-098	1	Burnet	In-Progress	December 2023	Work order created, meeting with member to negotiate re-route.
LBJ-099	1	Burnet	In-Review*		
LBJ-100	1	Burnet	Complete		Increased pole height for required clearance.
LBJ-101	1	Burnet	Complete		Crossing was removed.
LBJ-105	1	Llano	In-Review*		

LBJ-105	2	Llano	In-Progress	July 2023	Work order created. The design was completed on 1/6/23. Will be installing taller poles that will provide the required clearance. We need a 60', a 65', and a 70' pole, which have a lead time of 6-8 weeks (around March 1st). Construction will take place as soon as the poles are delivered.
LBJ-105	3	Llano	In-Progress	July 2023	Work order created. The design was completed on 1/6/23. Will be installing taller poles that will provide the required clearance. We need a 60', a 65', and a 70' pole, which have a lead time of 6-8 weeks (around March 1st). Construction will take place as soon as the poles are delivered.
LBJ-106	1	Burnet	In-Review*		
LBJ-108	1	Burnet	In-Review*		
LBJ-109	1	Burnet	In-Review*		

Marble Falls Lake

Line Identification	County	Status	Estimated Completion Date	Mitigation
MRB-112	1	Burnet	Complete	Increased pole height for required clearance.

Lake Travis

Line Identification	County	Status	Estimated Completion Date	Mitigation
TRV-116	3	Burnet	In-Review*	
TRV-118	2	Burnet	In-Review*	
TRV-119	1	Burnet	In-Review*	
TRV-119	2	Burnet	In-Review*	
TRV-137	6	Travis	Complete	Completed. Line was raised.
TRV-140	3	Travis	In-Progress	December 2023 In design phase; construction to be completed by 12/23
TRV-144	6	Travis	In-Progress	December 2023 In design phase; construction to be completed by 12/23

* PEC will continue to use third party engineering review criteria and field inspections to assess any span as non-sailable in consideration of NESC 232. NESC does not include criteria for determination of whether a water area is suitable for sailboats.