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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 SUPPLEMENTAL REPORT AND
ATTESTATION REGARDING COMPLIANCE WITH HOUSE BILL 4150**

Pedernales Electric Cooperative, Inc. (PEC) hereby files this Supplemental Report and Attestation Regarding Compliance with House Bill 4150 in accordance with the October 4, 2021 memorandum filed in this project by Barksdale English, Division of Compliance and Enforcement of the Public Utility Commission of Texas (Division's memorandum).

I. Introduction

The Division's memorandum required each electric utility, municipally owned utility, or electric cooperative meeting the requirements of Section 6 of House Bill 4150¹ to file in this project a report with the following information:

- A declaration that each distribution line above 1 kilovolt or transmission line above 60 kilovolts owned by the utility that crosses a lake listed in PURA § 38.004(b) meets the applicable vertical clearance requirements established in Rule 232 of the NESC Standard ANSI (c)(2).
- The date on which the company verified each line's compliance with the applicable NESC Standard.
- For each utility that self-identified a line that did not meet vertical clearance requirements in an annual report filed in either Project No. 50596 or Project No. 51890, a declaration that each line identified in the annual report meets the NESC Standard.
- If a line over a lake listed in PURA § 38.004(b) does not meet the NESC Standard:
 - The name of the line;
 - The name of the lake and the county or counties in which the lake is located;
 - A narrative description of actions the utility will take to bring the line into compliance with the NESC Standard;
 - The date by when the line will be brought into compliance.

¹ Acts of 2019, 86th Leg., R.S., ch. 1320 (HB 4150). Section 6 was uncodified.

The Division's memorandum further required each affected utility to submit with the report an affidavit signed by an officer of the company who has direct responsibility for distribution or transmission service or construction attesting to the veracity of the information provided in the report. Accordingly, included with this report is the Affidavit of Eddie Dauterive, Chief Operations Officer for PEC. Mr. Dauterive is an officer of PEC who has direct responsibility for distribution and transmission service and construction, and he attests to the veracity of the information provided in this report.

In response to the Division's memorandum issued on October 4, 2021, PEC's initial report² 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. This filing supplements the initial report with respect to PEC's distribution lines.

PEC identified over 1,500 spans of distribution line greater than 1 kV in proximity to lakes that are potentially subject to the Division's memorandum. As part of this process, PEC completed LiDAR surveys and contracted with a third-party engineering firm to use that LiDAR data for calculating the power line clearances to design high-water levels as provided by the respective lake operators.

PEC timely files this supplement with respect to the Division's memorandum addressing PURA § 38.004(b) as to the minimum clearance requirements in Rule 232 of NESC Standard for lines over lakes.

II. Report

PEC is a not-for-profit electric cooperative serving an area of 8,100 square miles in Central Texas through approximately 304 miles of transmission lines and approximately 23,698 miles of distribution line.³ PEC's service territory includes areas around the following lakes listed in PURA § 38.004(b): Buchanan, Canyon, Georgetown, Inks, Lyndon B. Johnson, Marble Falls, and Travis. These lakes are located in Burnet, Comal, Llano, Travis, and Williamson Counties.

² *Pedernales Electric Cooperative, Inc.'s Report and Attestation Regarding Compliance with House Bill 4150*, Project No. 52667 (January 13, 2022).

³ Miles of line as of October 1, 2021.

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. Additionally, PEC regularly inspects its distribution system.

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 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; however, as noted PEC identified and inspected over 1,500 spans of distribution line greater than 1 kV in proximity to lakes that are potentially subject to the Division's memorandum. PEC provides the following information to supplement its initial report.⁴

- a. A declaration that each distribution line above 1 kilovolt owned by the utility that crosses a lake listed in PURA § 38.004(b) meets the applicable vertical clearance requirements established in Rule 232 of the NESC Standard ANSI (c)(2).**

PEC identified 84 spans of distribution line greater than 1 kV in proximity to lakes that are subject to the Division's memorandum. Review of the aforementioned LiDAR information and third-party engineering assessment and field inspections indicates that the 37 spans listed on Supplemental Report Table 1 are in need of adjustment at this time based on the minimum clearance requirements in NESC.

- b. The date on which the company verified each line's compliance with the applicable NESC Standard.**

⁴ *Pedernales Electric Cooperative, Inc.'s Report and Attestation Regarding Compliance with House Bill 4150*, Project No. 52667 (January 13, 2022).

PEC completed LiDAR surveys on all distribution lines greater than 1 kV that are potentially subject to the Division's memorandum due to proximity to the named lakes in December 2021 and completed verifying clearances for the applicable lines over lakes in July 2022. PEC will continue to evaluate all lines in proximity to the lakes listed in PURA § 38.004(b) and will supplement this report if any applicable lines are found to not meet the NESC Standard.

c. If a line over a lake listed in PURA§ 38.004(b) does not meet the NESC Standard:

- **The name of the line;**
- **The name of the lake and the county or counties in which the lake is located;**
- **A narrative description of actions the utility will take to bring the line into compliance with the NESC Standard; and**
- **The date by when the line will be brought into compliance.**

Supplemental Report Table 1 includes the requested information for distribution lines greater than 1 kV with respect to lines over lakes identified to not meet the minimum applicable NESC standard clearances.

III. Attestation

Please see the attached Affidavit of Eddie Dauterive.

Respectfully Submitted,

PEDERNALES ELECTRIC COOPERATIVE, INC.



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Supplemental Report Table 1

USACE Canyon Lake			
Line Identification	County	Expected Completion Date	Notes
CAN-016	Comal	December 2023	Line being removed
CAN-017	Comal	December 2023	Line being removed

Lake Buchanan			
Line Identification	County	Expected Completion Date	Notes
BUC-066	Burnet	December 2023	Line being raised or rerouted
BUC-067	Burnet	December 2023	Line being raised or rerouted
BUC-067	Burnet	December 2023	Line being raised or rerouted
BUC-068	Burnet	December 2023	Line being raised or rerouted
BUC-071	Burnet	December 2023	Line being raised or rerouted
BUC-072	Burnet	December 2023	Line being raised or rerouted
BUC-073	Burnet	December 2023	Line being raised or rerouted
BUC-074	Burnet	December 2023	Line being raised or rerouted

Inks Lake			
Line Identification	County	Expected Completion Date	Notes
INK-088	Burnet	December 2023	Line being raised or rerouted
INK-089	Burnet	December 2023	Line being raised or rerouted
INK-090	Burnet	December 2022	Line being raised or rerouted

Lyndon B. Johnson Lake			
Line Identification	County	Expected Completion Date	Notes
LBJ-093	Burnet	December 2022	Line being raised or rerouted
LBJ-094	Burnet	December 2022	Line being raised or rerouted
LBJ-095	Burnet	December 2022	Line being raised or rerouted
LBJ-096	Burnet	December 2022	Line being raised or rerouted
LBJ-097	Burnet	December 2023	Line being raised or rerouted
LBJ-097	Burnet	December 2023	Line being raised or rerouted
LBJ-097	Burnet	December 2023	Line being raised or rerouted
LBJ-098	Burnet	December 2022	Line being raised or rerouted
LBJ-099	Burnet	December 2022	Line being raised or rerouted
LBJ-100	Burnet	December 2022	Line being raised or rerouted
LBJ-101	Burnet	December 2022	Line being removed
LBJ-105	Llano	December 2023	Line being raised or rerouted
LBJ-105	Llano	December 2022	Line being raised or rerouted
LBJ-105	Llano	December 2022	Line being raised or rerouted
LBJ-105	Llano	December 2022	Line being raised or rerouted
LBJ-106	Burnet	December 2022	Line being raised or rerouted
LBJ-108	Burnet	December 2022	Line being raised or rerouted
LBJ-109	Burnet	December 2022	Line being raised or rerouted

Marble Falls Lake			
Line Identification	County	Expected Completion Date	Notes
MRF-112	Burnet	December 2022	Line being raised or rerouted


Lake Travis			
Line Identification	County	Expected Completion Date	Notes
TRV-116	Burnet	December 2022	Line being raised or rerouted
TRV-118	Burnet	December 2022	Line being raised or rerouted
TRV-119	Burnet	December 2022	Line being raised or rerouted
TRV-119	Burnet	December 2022	Line being raised or rerouted
TRV-137	Travis	December 2023	Line being raised or rerouted
TRV-140	Travis	December 2023	Line being raised or rerouted
TRV-144	Travis	December 2023	Line being raised or rerouted

AFFIDAVIT OF EDDIE DAUTERIVE

STATE OF TEXAS §
COUNTY OF BLANCO §

BEFORE ME, the undersigned authority, personally appeared Eddie Dauterive, known to me to be the person whose name is subscribed below who, upon oath deposed and stated as follows:

1. "My name is Eddie Dauterive. My business address is 201 S. Avenue F, Johnson City, Texas 78636. I am over eighteen (18) years of age and have personal knowledge of the facts contained herein.
2. I am currently the Chief Operations Officer for Pedernales Electric Cooperative, Inc. (PEC). As Chief Operations Officer, I am an officer of PEC who has responsibility for distribution and transmission service and construction, or who oversees those with responsibility for distribution and transmission service and construction.
3. I can attest to the veracity of the information provided in PEC's Supplemental Report and Attestation Regarding Compliance with House Bill 4150 (Report) filed at the Public Utility Commission of Texas in Project No. 52667.
4. I swear or affirm that I have personal knowledge of the facts stated in this Report or am relying on people with personal knowledge, that I am competent to testify to them, and that I have the authority to submit this Report on behalf of PEC. I further swear or affirm that all statements made in this Report are true, correct, and complete to the best of my knowledge and belief."


Eddie Dauterive
Chief Operations Officer of PEC

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public in and for the State of Texas,
this 27th day of July, 2022.



