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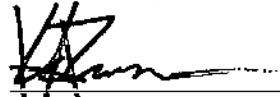
**SOAH DOCKET NO. 473-25-02531
PUC DOCKET NO. 57115**

JOINT APPLICATION OF THE CITY OF SAN ANTONIO, ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY), AND SOUTH TEXAS ELECTRIC COOPERATIVE, INC. (STEC) TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR THE PROPOSED HOWARD ROAD-TO- SAN MIGUEL 345-KV TRANSMISSION LINE IN BEXAR AND ATASCOSA COUNTIES	§ § § § § § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD'S
FIRST REQUEST FOR INFORMATION**

COMES NOW, the City of San Antonio, acting by and through the City Public Service Board (CPS Energy) and South Texas Electric Cooperative, Inc. (STEC) (Joint Applicants) and files this Response to Capitol Aggregates, Ltd.'s (Capitol Aggregates) First Request for Information (RFI). In accordance with 16 Texas Administrative Code (TAC) § 22.144(c)(1), these responses are timely filed. Joint Applicants agree and stipulate that all parties may treat these responses as if the answers were filed under oath.

Respectfully submitted,



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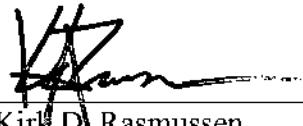
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Attorneys for STEC

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 the Commission's Second Order in Docket No. 50664 suspending the PUC Procedural Rule 22.74.



Kirk D. Rasmussen

JOINT APPLICATION OF THE CITY	§	BEFORE THE STATE OFFICE
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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
FIRST REQUEST FOR INFORMATION**

CAPITOL AGGREGATES 1-1:

Please provide a complete electronic copy of the Geographical Information System ("GIS") Shapefiles/Geodatabase used by the Applicants and/or their consultant Power Engineers to perform the Environmental Assessment and Routing Study filed with the Application as Attachment 1.

RESPONSE:

Please refer to CPS Energy's and STEC's response to Frank Allen Ranch Question No. 1-1. The requested information is being provided to the requesting party in its native format at the time of this response.

Sponsored By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

Prepared By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-2:

Please provide a Google Earth .kmz file that has the links, link labels, routes, habitable structures, and substation locations of the proposed project.

RESPONSE:

Please refer to CPS Energy's and STEC's response to Frank Allen Ranch Question No. 1-2. The requested information is being provided to the requesting party in its native format at the time of this response.

Sponsored By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

Prepared By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-3:

Please provide Table 4-1, the Land Use and Environmental Data for Route Evaluation, of Application Attachment 1 Environmental Assessment and Routing Study, in Microsoft Excel format.

RESPONSE:

Please refer to CPS Energy's and STEC's response to Frank Allen Ranch Question No. 1-7. The requested information is being provided to the requesting party in its native format at the time of this response.

Sponsored By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

Prepared By:
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Title:
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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-4:

Please provide Table 4-2, the Land Use and Environmental Data for Segment Evaluation, of Application Attachment 1 Environmental Assessment and Routing Study, in Microsoft Excel format.

RESPONSE:

Please refer to CPS Energy's and STEC's response to Frank Allen Ranch Question No. 1-7. The requested information is being provided to the requesting party in its native format at the time of this response.

Sponsored By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

Prepared By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-5:

Please provide all workpapers, in complete electronic format, with all formulas and links intact that support the cost estimates for each route as presented in Application Attachment 2.

RESPONSE:

CPS Energy

Please refer to CPS Energy's response to Frank Allen Ranch Question No. 1-3.

STEC

Please refer to STEC's response to Frank Allen Ranch Question No. 1-3. Portions of the information responsive to this request are considered Highly Sensitive Protected Material (HSPM). STEC has conferred with the requesting party regarding production of HSPM, and the requesting party has agreed that, for ease of use in this proceeding, STEC may exclude the HSPM from its production of responsive material. A version of the information requested with the non-HSPM information is being provided to the requesting party in its native Excel format at the time of this response.

Sponsored By:

Scott D. Lyssy
Paul Person
Ethan J. Fholer

Title:

Manager of Civil Engineering, CPS Energy
Manager of Engineering, South Texas Electric Cooperative, Inc.
Senior Project Engineer, POWER Engineers, Inc.

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Prepared By:

Scott D. Lyssy

Arthur H. Gifford

Title:

Manager of Civil Engineering, CPS Energy

Transmission Project Coordinator, South Texas Electric
Cooperative, Inc.

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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-6:

Please provide, in electronic format, the type (e.g., tangent, angle, dead-end, etc. for steel monopole, h-frame, lattice, etc. type construction) of structures used on each route and the quantity of each structure type used on the proposed routes. Also, for each structure type provided, please provide a cost estimate of a single structure.

RESPONSE:

Please refer to CPS Energy's and STEC's response to Frank Allen Ranch Question No. 1-4.

Sponsored By:

Scott D. Lyssy
Paul Person
Ethan J. Fholer

Title:

Manager of Civil Engineering, CPS Energy
Manager of Engineering, South Texas Electric Cooperative, Inc.
Senior Project Engineer, POWER Engineers, Inc.

Prepared By:

Scott D. Lyssy
Arthur H. Gifford

Title:

Manager of Civil Engineering, CPS Energy
Transmission Project Coordinator, South Texas Electric
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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-7:

Please provide, in electronic format, the type (e.g., tangent, angle, dead-end, etc. for steel monopole, h-frame, lattice, etc. type construction) of structures used on each segment and the quantity of each structure type used on the proposed segments. Also, for each structure type provided, please provide a cost estimate of a single structure.

RESPONSE:

Neither CPS Energy nor STEC determined estimated costs for their respective portions of the proposed Project by segment. There is no additional data responsive to this request beyond that provided in response to Capital Aggregates Question Nos. 1-5 and 1-6.

Sponsored By:

Scott D. Lyssy
Paul Person
Ethan J. Fholer

Title:

Manager of Civil Engineering, CPS Energy
Manager of Engineering, South Texas Electric Cooperative, Inc.
Senior Project Engineer, POWER Engineers, Inc.

Prepared By:

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Arthur H. Gifford

Title:

Manager of Civil Engineering, CPS Energy
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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-8:

Provide the data found by route in Table 1 of Attachment 2, Estimated Costs for Transmission Line Facilities, by Segment, for each line segment in the Application, in Microsoft Excel format.

RESPONSE:

Neither CPS Energy nor STEC determined estimated costs for their respective portions of the proposed Project by segment. There is no additional data responsive to this request beyond that provided in response to Capital Aggregates Question Nos. 1-5 and 1-6.

Sponsored By:

Scott D. Lyssy
Paul Person
Ethan J. Fholer

Title:

Manager of Civil Engineering, CPS Energy
Manager of Engineering, South Texas Electric Cooperative, Inc.
Senior Project Engineer, POWER Engineers, Inc.

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Scott D. Lyssy
Arthur H. Gifford

Title:

Manager of Civil Engineering, CPS Energy
Transmission Project Coordinator, South Texas Electric
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RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-9:

Did you adjust the cost estimates for the different routes for known factors, such as road crossings, that may cause increases in costs? If so, identify the conditions that you expect may or will cause cost increases and state how much you estimate each condition may or will increase costs.

RESPONSE:

Please refer to CPS Energy's and STEC's response to Frank Allen Ranch Question No. 1-6.

Sponsored By:

Scott D. Lyssy
Paul Person
Ethan J. Fholer

Title:

Manager of Civil Engineering, CPS Energy
Manager of Engineering, South Texas Electric Cooperative, Inc.
Senior Project Engineer, POWER Engineers, Inc.

Prepared By:

Scott D. Lyssy
Arthur H. Gifford

Title:

Manager of Civil Engineering, CPS Energy
Transmission Project Coordinator, South Texas Electric
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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-10:

Please provide the standard easement language to be used in transmission line easements between CPS/STEC and affected landowners.

RESPONSE:

CPS Energy

Documents responsive to this request are attached.

STEC

STEC has no information responsive to this request at this time.

ATTACHMENT:

CPS TRANSMISSION EASEMENT SAMPLE, 2018, 2 pages.

Sponsored By:

Scott D. Lyssy
Paul Person

Title:

Manager of Civil Engineering, CPS Energy
Manager of Engineering, South Texas Electric Cooperative, Inc.

Prepared By:

Scott D. Lyssy
Arthur H. Gifford

Title:

Manager of Civil Engineering, CPS Energy
Transmission Project Coordinator, South Texas Electric
Cooperative, Inc.

NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OR ALL OF THE FOLLOWING INFORMATION FROM ANY INSTRUMENT THAT TRANSFERS ANY INTEREST IN REAL PROPERTY BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.

EASEMENT AND RIGHT-OF-WAY

STATE OF TEXAS §
 § KNOW ALL MEN BY THESE PRESENTS:
 COUNTY OF BEXAR §

That, **LANDOWNER**, for and in consideration of Ten Dollars (\$10.00) and other good and valuable consideration to us in hand paid by the CITY PUBLIC SERVICE BOARD OF SAN ANTONIO, a Municipal Board of the CITY OF SAN ANTONIO, created pursuant to the authority contained in Section 1502.070 of the Government Code, and its predecessor statute; the receipt and sufficiency of which is hereby acknowledged and confessed, has granted, sold and conveyed and by these presents does grant, sell and convey unto the CITY OF SAN ANTONIO in Bexar County, Texas, as part of its electric and gas system, ("Grantee"), a one hundred foot wide permanent easement and right-of-way for overhead electric transmission lines and electric distribution lines, each line to consist of a variable number of wires and cables, conduits, and all necessary or desirable appurtenances (including towers and/or poles made of wood, metal or other materials, props and guys), and a communication system at or near the location, and along the general course now located and staked out by Grantee, over, across, upon, and under the following described lands located in Bexar County, Texas, to-wit:

[Property Description]

Said easement and right-of-way being more particularly described and shown by field notes and drawings marked Exhibits "A" and "B", respectively, attached hereto and made a part hereof for all purposes.

Together with the right of ingress and egress over, across and along said easement and right-of-way, for the purpose of inspecting, patrolling, constructing, reconstructing, installing, maintaining, removing and replacing said lines and appurtenances, including poles, towers and wires; the right to relocate said lines and appurtenances within said right-of-way, the right to remove from said lands by standard industry practices employed in vegetation management, all trees, and parts thereof, and any vegetation or obstructions which endanger or may interfere with the efficiency of said lines or their appurtenances; and Grantor agrees that no building or structure of any kind will hereafter be erected or placed by Grantor, Grantor's heirs, successors, assigns and legal representatives, on said easement and right-of-way herein granted, so long as this easement remains in effect; and the right of exercising all other rights hereby granted.

Grantee shall have the full right to determine when, and which trees are to be removed from the right-of-way above described, to the extent that all of the trees and parts thereof situated on such right-of-way may be removed under the terms of this instrument.

TO HAVE AND TO HOLD the above described easement and rights unto Grantee, its successors and assigns, until the use of said easement and right-of-way is abandoned.

And Grantor does hereby bind herself, her heirs, successors, assigns and legal representatives to warrant and forever defend all and singular the above described easement and rights unto Grantee, its successors and assigns, against every person whomsoever lawfully claiming or to claim the same or any part thereof.

SIGNED to be EFFECTIVE this _____ day of _____, 20____.

LANDOWNER

STATE OF _____ §

COUNTY OF _____ §

This instrument was acknowledged before me on this _____ day of _____, 20____, by LANDOWNER.

 Notary Public, State of _____

PARCEL #/AGENT INITIALS/ PROJECT NAME/ADDRESS

AFTER RECORDING, RETURN TO:

CPS ENERGY

ATTN: AGENT NAME

MAIL DROP 10 05 04

P. O. BOX 1771

SAN ANTONIO, TX 78296-1771

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**RESPONSE OF CPS ENERGY AND STEC TO CAPITOL AGGREGATES, LTD.'S
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CAPITOL AGGREGATES 1-11:

Please provide the following information regarding CPS/STEC's cost estimates in Attachment 2 of the Application:

- a. For right-of-way and land acquisition costs, please provide for each route:
 1. The assumed value per acre of right-of-way (or per linear foot, as applicable) and identify the value that was assumed for each segment of each route;
 2. The amount of ROW per link for which an easement will be required;
 3. Any incidental costs included in the total cost estimate, such as legal fees;
 4. Any assumptions concerning what percentage of ROW will be acquired through condemnation;
 5. The back-up documentation for each component included in the total cost for each route;
- b. For the Engineering and Design Cost estimates, please describe what work will be performed by the utility and what work will be performed by the contractor(s).

RESPONSE:

CPS Energy

- a.
 1. Refer to the *Howard to San Miguel ROW costs spreadsheet* for cost per square foot estimated for each segment.
 2. Refer to the *Howard to San Miguel ROW costs spreadsheet* for the estimated square footage of easement per segment.

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3. Yes, “incidental” costs including legal fees, appraisal fees, title fees, agent costs, and survey fees were estimated for each segment and are included in the ROW costs. See the *Howard to San Miguel ROW costs spreadsheet*.
4. No.
5. Refer to the *Howard to San Miguel ROW costs spreadsheet* for all ROW information available at this time.

The requested information contained in the *Howard to San Miguel ROW costs spreadsheet* is being provided to the requesting party in its native format at the time of this response.

- b. It is currently anticipated that CPS Energy contractors will perform a majority of the transmission line design and construction work. CPS Energy’s will perform preliminary design work, quality checks and assessments, project management, some limited work by internal construction crews, and construction inspection.

STEC

- a.
 1. See STEC’s response to Frank Allen Ranch Question No. 1-3. STEC does not have per segment values per acre of right-of-way.
 2. See STEC’s response to Frank Allen Ranch Question No. 1-3.
 3. See the Direct Testimony of Paul G. Person on Behalf of South Texas Electric Cooperative, Inc., Section IV.
 4. See the Direct Testimony of Paul G. Person on Behalf of South Texas Electric Cooperative, Inc., Section IV.
 5. See STEC’s response to Frank Allen Ranch Question No. 1-3.

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- b. See the Direct Testimony of Paul G. Person on Behalf of South Texas Electric Cooperative, Inc., Section IV.

ATTACHMENT:

CPS Energy Response to Cap Aggregates Q 11, *Howard to San Miguel ROW costs spreadsheet*, undated, Native Excel File

Sponsored By:

Scott D. Lyssy
Paul Person
Ethan J. Fholer

Title:

Manager of Civil Engineering, CPS Energy
Manager of Engineering, South Texas Electric Cooperative, Inc.
Senior Project Engineer, POWER Engineers, Inc.

Prepared By:

Scott D. Lyssy
Arthur H. Gifford

Title:

Manager of Civil Engineering, CPS Energy
Transmission Project Coordinator, South Texas Electric Cooperative, Inc.

Attachment
Capitol Aggregates 1-11
will be provided in
Native Excel File
at the time of filing