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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 FRANK ALLEN RANCH, LLC'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 Frank Allen Ranch, LLC's (Frank Allen Ranch) 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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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

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AMEND THEIR CERTIFICATES OF	§	ADMINISTRATIVE HEARINGS
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SAN MIGUEL 345-KV TRANSMISSION	§	
LINE IN BEXAR AND ATASCOSA	§	
COUNTIES	§	

**CPS ENERGY'S RESPONSE TO FRANK ALLEN RANCH, LLC'S
FIRST REQUEST FOR INFORMATION**

FRANK ALLEN RANCH 1-1:

Please provide a complete electronic copy of the Geographical Information System ("GIS") Shapefiles/Geodatabase you used to perform analysis to create the Environmental Assessment and Alternative Route Analysis filed with the Application as Attachment 1. Please do not remove, delete, or hide any additional information or data in these files.

RESPONSE:

The requested information is being provided to the requesting party in its native format at the time of this response.

ATTACHMENT:

Response to Question No. 1-1 – Native Shapefiles.

Sponsored By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

Prepared By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

Attachment
Frank Allen Ranch 1-1
will be provided in
Native Shapefiles
at the time of filing

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**CPS ENERGY'S RESPONSE TO FRANK ALLEN RANCH, LLC'S
FIRST REQUEST FOR INFORMATION**

FRANK ALLEN RANCH 1-2:

Please provide a Google Earth .kmz file that has the segments, segment labels, routes, habitable structures, and substation locations of the proposed project. Please do not remove, delete, or hide any additional information or data in these files.

RESPONSE:

The requested information is being provided to the requesting party in its native format at the time of this response.

ATTACHMENT:

Response to Question No. 1-2 – Native .kmz File.

Sponsored By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

Prepared By:
Denise M. Williams

Title:
Project Manager, POWER Engineers, Inc.

Attachment
Frank Allen Ranch 1-2
will be provided in
Native .kmz File
at the time of filing

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**CPS ENERGY'S RESPONSE TO FRANK ALLEN RANCH, LLC'S
FIRST REQUEST FOR INFORMATION**

FRANK ALLEN RANCH 1-3:

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

RESPONSE:

CPS Energy

Please refer to the native Excel version of Attachment No. 2 to the Application filed in this proceeding on October 4, 2024.

STEC

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.

ATTACHMENTS:

CPS Energy Response to Question No. 1-3, Attachment 2 to the Application – Native Excel File.

STEC Response to Question No. 1-3, non-HSPM information – Native Excel Files.

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**CPS ENERGY'S RESPONSE TO FRANK ALLEN RANCH, LLC'S
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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.

Attachments
Frank Allen Ranch 1-3
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**CPS ENERGY'S RESPONSE TO FRANK ALLEN RANCH, LLC'S
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FRANK ALLEN RANCH 1-4:

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 your proposed routes. Also, for each structure type provided, please provide a cost estimate of a single structure.

RESPONSE:

CPS Energy

Each route was examined and locations of tangent, running angle, and dead-end structures were theoretically spotted where practical. Refer to the Material and Construction Tab in the native Excel version of Attachment No. 2 to the Application filed in this proceeding on October 4, 2024. Columns C-F (rows 2-35) show an estimated quantity and type of structure. Rows 43-45 are the estimated costs per structure. The basis of the cost estimates is from CPS Energy historical data and includes structures, anchor bolts, and hardware. Rows 53-55 are informed by the CPS Energy historical labor cost to install each type of structure.

STEC

Please refer to STEC's portion of the response to Frank Allen Ranch RFI 1-3, which includes costs per structure per route for STEC.

Please note that the estimated cost of a single structure might vary based on soil conditions and final design for a specific location. The estimated cost of a single structure does not include the cost of the conductor, right-of-way and clearing, or many other components of constructing the line that are not specifically associated with just the structure itself. Therefore, use of just the structure cost cannot be accurately used to estimate the cost of a new route or a modified route.

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Scott D. Lyssy
Paul Person
Ethan J. Fholer

Title:

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

Prepared By:

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Arthur H. Gifford

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**CPS ENERGY’S RESPONSE TO FRANK ALLEN RANCH, LLC’S
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FRANK ALLEN RANCH 1-5:

Explain and describe your process for preparing the cost estimates. As part of your response, state whether you developed the cost estimates using a “top down” method where average lengths per mile are computed and multiplied by the different lengths or using a “bottom up” method where detailed estimates were made for costs such as labor, material, interest, engineering, and right-of-way costs?

RESPONSE:

CPS Energy

A “bottom up” method was used by CPS Energy to estimate costs for this project. Each route was examined and detailed estimates were developed using the following cost components: labor costs (internal and external), materials, engineering (internal and external), right-of-way costs, right-of-way improvement costs, and other cost (other cost includes, for example, legal, regulatory fees, environmental, archeological survey cost, etc.).

STEC

On STEC’s portion of the project, estimates were developed utilizing a combination of the “bottom up” and “top down” approaches. A “bottom up” approach was utilized for structure types, quantity of structures, wire lengths and their associated material and labor costs were estimated for each route alternative, considering the route characteristics such as line length, number of angles and other pertinent information. A “top down” approach was utilized for the estimated right-of-way, engineering, and surveying cost.

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**CPS ENERGY’S RESPONSE TO FRANK ALLEN RANCH, LLC’S
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FRANK ALLEN RANCH 1-6:

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:

CPS Energy

Each route was examined and obvious factors such as TxDOT roadway and railroad crossings were identified. To minimize risks and operational disruptions during construction, it is CPS Energy’s practice to install a dead-end structure on both sides of each crossing. This requires a more costly structure or an additional structure all together. These additional structures costs were captured in the native Excel version of Attachment No. 2 to the Application filed in this proceeding on October 4, 2024.

STEC

Structures necessary for road crossings were included in the cost estimates. Road crossings will be implemented as close to perpendicular as possible, which is desirable by the Texas Department of Transportation (TxDOT). Depending on the approach to the road crossing, a dead-end or angle structure may be required. Therefore, the cost of the crossing could increase, but it depends on the approach. Deadend structures and angle structures are also used for other obstructions that would impact the cost of a route.

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**CPS ENERGY'S RESPONSE TO FRANK ALLEN RANCH, LLC'S
FIRST REQUEST FOR INFORMATION**

FRANK ALLEN RANCH 1-7:

Please provide Tables 4-1 and 4-2 of Environmental Assessment and Alternative Route Analysis filed with the Application as Attachment 1, in Microsoft Excel format with all formulas and links intact.

RESPONSE:

The requested information is being provided to the requesting party in its native format at the time of this response.

ATTACHMENT:

Response to Question No. 1-7, Attachment 1 – Native Excel File.

Sponsored By:

Denise M. Williams

Title:

Project Manager, POWER Engineers, Inc.

Prepared By:

Denise M. Williams

Title:

Project Manager, POWER Engineers, Inc.

Attachment
Frank Allen Ranch 1-7
will be provided in
Native Excel File
at the time of filing

The following files are not convertible:

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	Response Frank Allen Ranch 1-2.kmz
	Attachment 2 - Howard Rd. to San Miguel
Cost Estimate (Native).xlsx	
	STEC_CCN Cost Estimates_San Miguel -
Howard Rd 345 kV_2024-07-26 (1).xlsx	
	STEC_CCN Route Estimate Summary_Public
(1).xlsx	
	Response Frank Allen Ranch 1-7.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.