

Save Our Scenic Hill Country Environment, Inc.

Comments in Docket No. 37448

Additional Information

Save Our Scenic Hill Country Environment, Inc. (SOSHCE) strongly protests LCRA TSC's proposed predominate use of lattice tower structures and continued ordering of lattice structure materials.

SOSHCE's requests should be implemented by the Public Utility Commission of Texas (PUC).

SOSHCE is an organization with more than 500 members. A large number of those members are landowners in Gillespie and Llano Counties, two of the counties that would be seriously impacted by the LCRA TSC Gillespie to Newton project. Some of those landowners are Directly Affected and some of those are Intervenor or are submitting Protests. The organization has been involved in monitoring and communicating developments in this and related dockets to members and others. The organization received an LCRA TSC letter dated March 3, 2009 that requested information pertaining to the study area. SOSHCE also received from LCRA TSC notices of the Public Participation Meetings that were held in May and the Application to Amend the CCN dated October 28, 2009. SOSHCE was recognized as one of the contacted Organizations in the LCRA TSC Public Open House exhibits.

SOSHCE's response to the March 3, 2009 letter from LCRA TSC is attached (Attachment 1). The response was included in LCRA's CCN application on page 410\*. A letter that SOSHCE sent to the PUC on June 30, 2009 is summarized on page 211 and is attached (Attachment 2). Both letters requested the use of monopole rather than lattice structures. The letter to the PUC also requested that the PUC ensure that LCRA TSC retain the flexibility to use monopoles as it was understood that lattice tower materials were already being ordered. It also requested that LCRA TSC utilize underground transmission lines in developed, populated, historical and recreational areas.

The Hill Country is recognized as being a uniquely scenic part of the state by LCRA TSC as well as residents and visitors. Gillespie and Llano Counties are in the heart of the Hill Country.

LCRA TSC acknowledges that the areas impacted by the Gillespie to Newton 345-kV transmission line are special. On page 179, the following is stated.

"It is virtually impossible for a new transmission line not to have some visual impacts, particularly in a setting such as the Hill Country, where there are currently very few 345-kV transmission lines. Therefore the potential aesthetic effects from the construction of this project could be considered to be more significant than in other parts of the state."

\* unless otherwise noted, page numbers refer to those in the Application of LCRA Transmission Services Corporation to Amend Its Certificate of Convenience For the Gillespie to Newton CREZ Transmission Line (Docket No. 37448-6)

Likewise, on page 9, it is stated:

“Fredericksburg and the surrounding area are known as a major tourist attraction for shopping, vineyards, and scenic beauty.”

Continuing on page 179, it is stated that:

“LCRA TSC will attempt to mitigate, as much as possible, the potential visual impacts of the proposed project, regardless of which route is ultimately selected.”

LCRA TSC acknowledges that landowners, organizations and public officials have demanded that the aesthetic impacts of the project be minimized and that monopoles be utilized in general rather than lattice structures. These groups include the Llano County Commissioners (pages 414-415), the Gillespie County Commissioners (pages 408-409), the Gillespie County Economic Development Commission (page 406) and the Fredericksburg Convention and Visitors Bureau (page 405) as well as SOSHCE. LCRA TSC summarized the input that was received from these groups on pages 211-212.

On page 685, LCRA TSC acknowledges:

“It should also be noted that virtually all public comment related to structure type was the desire to have steel poles as an alternative to lattice towers.”

There are precedents that clearly indicate monopoles can and should be utilized in this area.

The letter SOSHCE sent to the PUC listed two of the precedents for utilizing monopoles in rural areas.

- (1) The utilization of monopoles by LCRA for the 345-kV transmission line from the Kendall Substation to the Cagnon Substation.
- (2) The utilization of monopoles by an affiliate of NextERA Energy Resources on the transmission line that is currently under construction from the Horse Hollow wind farm near Abilene to the Kendall Substation.

Regarding the Kendall to Cagnon monopoles line, LCRA TSC’s brief and inadequate explanation on page 683 stated that:

“LCRA TSC also owns approximately 21 miles of 345-kV tubular steel poles in Kendall County. LCRA TSC found that the construction of these 345-kV tubular steel poles was more expensive than anticipated at that time and presented a variety of construction challenges in rugged terrain.”

For the NextERA Energy monopoles that were used in this area, LCRA TSC indicated on page 681 that:

“Prestressed concrete poles, similar to those used for a private 345-kV single-circuit transmission line constructed by NextERA in the Hill Country, would not be feasible for the 345-kV double-circuit-capable line which is the subject of this CCN application and would present no easement advantage.”

The key point here is that another company utilized monopoles. The appearance is the important issue, not the construction material type.

As further support for the use of monopoles, a recent document (37448-258) was posted on the PUC filings retrieval website. In attached documents attributed to Lone Star Transmission, LLC regarding its CREZ Central A to Central C to Sam Switch to Navarro 345 kV Transmission Line Project, it is stated on page 3 of 5 of the Frequently Asked Questions section that:

“We plan to use aesthetically pleasing poles, which are scheduled to range from 120-foot to 140-foot, for a majority of the route. We anticipate each pole will be a single shaft capable of holding both circuits. This type of pole requires much less right-of-way than other types of transmission line structures.”

Further, on page 2 of 4 of the Fact Sheet section, the following is stated:

“Aesthetically pleasing poles, from 120 to 140 foot tall, are planned to be used for a majority of the line, which is expected to transport enough energy to power over 2.5 million homes.”

(These documents are also accessible from the Lone Star Transmission, LLC website: <http://www.lonestar-transmission.com/> .)

The PUC has recognized that monopole structures have reduced visual impact and lessened aesthetic and economic degradation relative to lattice structures.

In the Clear Springs to Hutto 345-kV transmission line, PUC Docket No. 33978, the PUC required LCRA TSC to utilize monopoles in the Extra Territorial Jurisdiction area of the City of Hutto. In the Final Order dated October 10, 2008, the Commission stated:

“The Commission finds that using the pole structures in the extra-territorial jurisdiction of the City of Hutto is justified, despite the somewhat greater cost, because of the reduced visual impact and the lessened aesthetic and economic degradation associated with transmission lines constructed with pole structures relative to lattice-tower structures.”

As a uniquely scenic part of the state, the Hill Country desires at least the same, or even greater, consideration than the area near Hutto.

It is also interesting to note that on page 44 of the Order that the cost reduction for using lattice rather than pole structures was \$25 million with a total project cost of \$192 million. This incremental cost for monopoles is significantly less than the more than \$67 million increase estimated by LCRA TSC for the subject Gillespie to Newton project that covers a similar distance.

Even if monopole structures are more costly, the price is extremely small compared to the visual impact and accompanying loss in property values caused by the permanent scarring that will occur in the Hill Country. The consumers outside of this area that will get most of the benefit should be expected to at least help reduce the negative impacts.

Regarding LCRA TSC's structure selection, they stated on page 6 of the CCN application that:

"Lattice towers were selected as typical structures based on cost and efficiency."

They went on to say:

".....since aesthetics are subjective and difficult to weigh, LCRA TSC selected double-circuit lattice towers as typical structure type based on quantifiable factors, cost (an economic factor) and weight (which relates to efficiency)."

Despite their commitment to "attempt to mitigate, as much as possible, the potential visual impact of the proposed project", they essentially have determined that they would ignore "the aesthetics" in determining the structures they will use. SOSHCE and others believe the structures will have a significant negative economic impact on those areas within sight of the structures.

Regarding the cost of monopoles, on pages 684 and 685, LCRA TSC indicated the cost of the project would increase from \$161.9 million for lattice structures to \$229.7 million for monopoles. To put this differential into perspective, the total estimated cost for the CRZ transmission line projects is \$4.9 billion per the PUC. The increase in cost would amount to less than 1.5% or less than 6 cents per month per residential customer. Even if the increase in cost is extrapolated to the other projects in the Hill Country, it would be a small price to pay.

Underground transmission lines should be utilized in especially unique areas for the very short distances that would be involved. LCRA TSC has the capability to avoid developed, populated, historic and recreational areas through routing options in a number of cases. Where that is not the case, underground transmission lines should be utilized.

On page 7, LCRA TSC states:

"Underground construction is not reasonable for this line. In another project, PUC Docket No. 33978 (Clear Springs to Hutto 345-kV transmission line) with more favorable substrate and topography, the estimated cost for an underground line was \$30 to \$40 million dollars per mile."

As the Clear Springs to Hutto information is dated, LCRA TSC should update its analysis and make it specific to this project. Whatever the actual cost is for the very short distances involved, the reduced permanent impacts on these unique areas is justifiable.

Both the Gillespie County Commissioners (pages 408-409) and SOSHCE (page 211 and Attachment 2) supported the use of underground transmission lines in developed, populated, historical and recreational areas.

LCRA TSC should be ordered to immediately stop the ordering of lattice structure materials, particularly with the recent delays in the CCN filing dates for the other LCRA TSC projects.

On page 685, it is stated:

“.....LCRA TSC began ordering lattice steel for all of LCRA TSC’s CREZ345-kV transmission lines in June 2009.”

Continuing on page 686,

“LCRA TSC began ordering in June 2009, and at the end of October 2009, LCRA TSC’s orders account for approximately one third of the total needs for all of LCRA TSC’s CREZ projects. At the end of April 2010, LCRA TSC’s orders would account for most of the total needs for this project.

Thus, if the Commission orders LCRA TSC to use steel poles in certain areas, the amount of lattice towers allocated to other LCRA TSC 345-kV CREZ transmission lines may increase and potentially restrict structure type decisions on future projects.”

On September 16, 2009, LCRA TSC and PUC Commission Staff filed a joint motion (Docket No. 37049-88) to extend the filing date required for certain applications to amend LCRA’s certificates of convenience and necessity for priority projects to serve competitive renewable energy zones. The Commission granted the motion on October 19, 2009. The filing date for the Twin Buttes-to-McCamey D project was delayed from October 28, 2009 until January 15, 2010. The McCamey D-to-Kendall-to-Gillespie project date was extended to July 6, 2010. Combined with the uncertainty pertaining to structure type, these delays clearly indicate that LCRA TSC should immediately stop ordering lattice tower materials.

To summarize, there is compelling evidence that the PUC should require LCRA TSC to minimize the impacts of this project by utilizing underground transmission lines in certain areas and monopoles elsewhere. Likewise, LCRA TSC should be ordered to terminate ordering of lattice structure materials until the PUC makes a final decision on structure type. SOSHCE strongly protests LCRA TSC’s proposed predominate use of lattice towers in this project and their continued ordering of lattice structure materials.