

Save Our Scenic Hill Country Environment, Inc.

Supplemental Comments in Docket No. 37448

Additional Information

Save Our Scenic Hill Country Environment, Inc. (SOSHCE) continues to strongly protest LCRA TSC's continuing proposed use of lattice tower structures, particularly in light of new information from LCRA TSC that indicates concrete monopoles are likely usable and will have a much smaller incremental cost than steel monopoles.

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 Intervenors or have submitted Protests. The organization has been involved in monitoring and communicating developments in this and related dockets to members and others. The organization received a 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 2009 and the Application to Amend the CCN letter dated October 28, 2009. SOSHCE was recognized as one of the contacted Organizations in the LCRA TSC Public Open House exhibits.

SOSHCE filed Comments in this Docket that were posted on the PUC website (37448-432) on December 28, 2009. In that filing, SOSHCE strongly protested LCRA's planned predominate use of lattice tower structures and continuing ordering of lattice materials. Included in the filing was the statement, with supporting information, that there are precedents that clearly indicate that monopoles can and should be utilized in this area. It was also stated that, even if monopoles 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.

On January 6, 2010, LCRA TSC's Third Errata was posted on the PUC website (37448-513). It stated (page 3 of 5*) that "As a result of this Errata filing, Mr. Symanck's prefiled testimony now contains a discussion regarding the *potential* cost, feasibility, and availability of concrete poles. Mr. Symanck's cost analysis does *not* change LCRA TSC's project cost estimates or the preferred structure type, as LCRA TSC believes that (1) concrete pole construction still results in higher project cost estimates over the costs of lattice tower construction, and (2) use of concrete poles presents certain deliverability and construction limitations that reduce the usability of concrete structures."

* page numbers refer to those in LCRA Transmission Services Corporation's Third Errata (Docket No. 37448-513) tracked change version

On January 8, 2010, LCRA released a statement entitled “LCRA TSC files information with Public Utility Commission on potential use of different transmission line structures.” A copy of that release is attached (Attachment 1). It is stated by a LCRA representative that “Providing this new information about concrete poles to the PUC illustrates what we have been telling folks about the process of selecting transmission line structures- at this point in time we still recommend using lattice towers in our project because they still cost less, but of course we will build whatever the PUC tells us to build.”

LCRA TSC now implies that concrete poles are usable.

In Mr. Symank’s original testimony, he stated (page 14) “Prestressed concrete poles would not be feasible for the CREZ 345 kV double circuit capable transmission line.” He now implies that concrete poles for spans of up to 600 feet are available by stating (page 14) that “Poles for spans over 600 feet are not yet available.” He goes on to state (page 14) that “Poles for 900 feet spans are not yet available. Depending on the supplier’s decision to enlarge capacity, supply, and demand, they might be available at the end of 2010.”

This admission is more consistent with the statements of Lone Star Transmission, LLC which indicate they plan to use aesthetically pleasing 120 to 140 feet poles for a majority of its CREZ Central A to Central C to Sam Switch to Navarro 345 kV Transmission Line Project. Related information was presented in SOSHCE’s earlier Comments.

LCRA TSC information indicates that the cost for concrete poles is significantly less than that for steel monopoles.

In the Errata, LCRA TSC did not show the total cost increase for concrete poles versus lattice towers as they did for steel poles. Rather, they presented the increased cost per mile in three different soil types- sand/limestone/granite. For 130 feet tall, 600 feet span concrete poles, they showed (page 14) increased costs per mile of \$160,000/\$287,000/ \$422,000, respectively, assuming out of state delivery. For the 85.2 mile Preferred Route, these increases translate into additional costs of \$13.6 million/\$24.5 million/\$36.0 million. LCRA TSC did not indicate how many miles of each soil type would apply. Using a simplistic approach of averaging these, the total increase would be \$24.7 million.

In Exhibit CDS-1R, they show that in-state delivery would reduce the cost of each 130 feet concrete pole by \$6,000. Based on the 650’ spans shown in the table, this would reduce the total increase by approximately \$4.2 million to \$20.5 million.

Even more importantly, LCRA TSC states (page 14) that the increases per mile for 140 feet, 900 feet span poles would be \$31,000/\$114,000/\$278,000. These translate into total project increases of \$2.6 million/\$9.7 million/\$23.7 million. An average of these is \$12.0 million.

These increases are significantly less than the \$68 million LCRA TSC shows (page 18) for steel poles versus lattice towers.

The lower cost for concrete poles makes it even more imperative that they be used to minimize degradation of the Hill Country.

To put the additional cost of concrete poles versus lattice structures into perspective, the PUC's total estimated cost for all of the CREZ transmission line projects is \$4.9 billion. The averaged soil type increase for 600 foot spans of \$24.7 million or \$20.5 million would equate to increases of 0.5% and 0.4%, respectively. The \$12.0 million increase for 900 feet span poles would be 0.2%.

The PUC estimated that in total the CREZ projects would increase costs to residential customers by approximately \$4.00 per month. The increases for 600 feet span poles would result in added costs per residential customer of about two cents per month. The increase for 900 feet span poles would equate to less than an additional one cent per month.

Even if the increased costs are extrapolated to the other projects in the Hill Country, it would be a small price to pay to at least partially mitigate the permanent scarring of this pristine area that will occur.

Delays in integrated projects provide the time required to utilize concrete poles in this project.

Even if utilization of concrete poles results in delays, it is immaterial as the McCamey D to Kendall to Gillespie 345 kV project and the related installation of the 138 kV/ 345 kV auto-transformer at the Gillespie substation will have to be completed before this 345 kV project can be put into service. The date for the filing of the CCN application for the McCamey D to Kendall to Gillespie project was extended from October 28, 2009 until July 6, 2010 by the PUC on October 19, 2009.

To summarize, there is compelling evidence that the PUC should require LCRA TSC to utilize concrete poles based on the additional information provided by LCRA TSC and the related considerations.