APPLICATION OF LCRA TRANSMISSION SERVICES CORPORATION TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE PROPOSED ZORN TO MARION 345-KV TRANSMISSION LINE IN GUADALUPE COUNTY, TEXAS BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

DIRECT TESTIMONY

OF

ROXANNE HERNANDEZ

ON BEHALF OF

APPLICANT

LCRA TRANSMISSION SERVICES CORPORATION

March 1, 2016
PUC DOCKET NO. 45601  
DIRECT TESTIMONY AND EXHIBITS OF ROXANNE HERNANDEZ

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EXHIBITS

Exhibit RH-1: PUC Substantive Rule § 25.101(b)(3)(B)
Exhibit RH-2: PURA § 37.056
Exhibit RH-3: Alternative Route 5A Data Tables with Primary Segments Map
I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
A. My name is Roxanne Hernandez. My business address is: Lower Colorado River Authority, 3505 Montopolis Drive, Building D, Austin, Texas 78744.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?
A. I am employed by the Lower Colorado River Authority (LCRA) as a Senior Regulatory Case Manager (RCM), and am providing testimony in this docket on behalf of LCRA Transmission Services Corporation (LCRA TSC).

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL QUALIFICATIONS AND BUSINESS EXPERIENCE.
A. I earned a Bachelor of Arts Degree in Sociology from Indiana University, a Master of Science Degree in Earth Resources from Colorado State University (CSU), and completed additional graduate work in Sociology at CSU. While in graduate school, I worked summers as a seasonal park ranger for Colorado State Parks and also worked as a Consulting Sociologist on an ecosystem management project that sought to develop public/private partnerships. In that capacity I worked with the general public and stakeholders to help create a structure for more efficient stewardship of the Colorado State Forest State Park. In 1996, after one year as an Administrative Development Assistant in Colorado State Parks’ North Region office, I continued with Colorado State Parks as a full-commissioned ranger. In 1998, I went to work for Jefferson County Open Space (JCOS) in Golden, Colorado, as a Policy Planner. In that capacity I structured and led an organizational change effort for JCOS park planning and management, managed JCOS’s acquisition proposal program for new open space properties, and organized and implemented a variety of citizen participation processes for park planning and development. In early 2004, I became Manager of Planning and Development for JCOS.

I relocated to Texas in late 2004, and in 2005 I worked briefly for Texas Parks and Wildlife. In the fall of 2005, I went to work for LCRA as a Regulatory Case Manager (RCM) where, among other responsibilities, I managed the Medina to CPS 138-kV Transmission Line Project in Bandera and Medina Counties (Docket No. 32934). In the
fall of 2008, I left LCRA to work for Bastrop County as its first Lost Pines Habitat Conservation Plan Administrator. There I was responsible for implementation of the county’s US Fish and Wildlife Service-issued 10(a)(1)(b) incidental take permit for the Houston toad. After the 2011 Bastrop County Complex Wildfire, I was also responsible for coordination and implementation of environmental recovery efforts on private property. I returned to LCRA in late 2014 as a Senior RCM working primarily on transmission line certification projects for LCRA TSC.

Q. **PLEASE DESCRIBE YOUR JOB RESPONSIBILITIES, PARTICULARLY AS THEY APPLY TO THIS PROJECT.**

A. As the RCM for the proposed LCRA TSC Zorn to Marion 345-kV Project (the Project), I was responsible for coordinating the preparation of LCRA TSC’s application in this docket (the Application) and managing the presentation of the Application for submission and approval by the Public Utility Commission of Texas (PUC or Commission). My involvement in the Project included:

- Managing the public involvement process, including the coordination of the public open house meeting and other meetings with local officials;
- Overseeing the preparation by POWER Engineers, Inc. (POWER) of the *Environmental Assessment and Alternative Route Analysis for the Proposed Zorn to Marion 345-kV Transmission Line Project in Guadalupe County, Texas* (EA);
- Managing the overall Application preparation process, including coordinating internal and external team members and the selection of a route by LCRA TSC that best addresses the requirements of the Public Utility Regulatory Act (PURA) and PUC Substantive Rules;
- Sending notification to all affected parties in accordance with PUC rules; and
- Providing testimony in support of the Application at the Commission.

Q. **HAVE YOU TESTIFIED BEFORE THE COMMISSION PREVIOUSLY?**

A. Yes, I filed written testimony in the PUC Docket No. 32934 (Medina-to-CPS 138-kV transmission line).

II. **PURPOSE OF TESTIMONY**

Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS DOCKET?**

A. My testimony addresses the following:
• Basic information about LCRA and LCRA TSC;
• The public participation process that LCRA TSC implemented for the Project; and
• The process by which LCRA TSC evaluated the alternative routes and identified Route 10 as the route that LCRA TSC believes best addresses the requirements of PURA and the PUC Substantive Rules.

The Application, filed on March 1, 2016, will be offered into evidence by LCRA TSC as an exhibit. The statements and opinions expressed in this testimony are based on my previously described experience, my review of the EA prepared by POWER (included in the Application as Attachment No. 1), discussion and collaboration with LCRA specialists, discussion and collaboration with POWER employees who participated in the development of the EA, and field inspections of the project area.

Q. PLEASE BRIEFLY DESCRIBE THE TESTIMONY OF THE OTHER WITNESSES WHO PROVIDE DIRECT TESTIFY ON BEHALF OF LCRA TSC IN THIS DOCKET.

A. Mr. Charles DeWitt, P.E., Engineering Manager in the System Planning and Protection Department, testifies regarding the purpose and need for the Project. Ms. Aimee Pasquarella, P.E., Engineer, Transmission Line Design, testifies regarding the schedule, cost, and design of the new proposed transmission line facilities. Mr. Rob Reid, Vice President and Environmental Division Manager for POWER, sponsors and testifies regarding the preparation of the EA for the Project. Each LCRA TSC witness also sponsors portions of the EA and the Application that correspond to his or her respective discipline.

Q. WHAT PORTIONS OF THE APPLICATION DO YOU SPONSOR?

A. I sponsor the answers to Questions 1, 2, 3, 9, 10, 12, and 25 of the Application. I co-sponsor the answers to Questions 4 and 11 of the Application with Ms. Pasquarella and Mr. DeWitt, and the answers to Questions 17, 18, 19, and 29 of the Application with Mr. Reid.
Q. WAS YOUR TESTIMONY AND THE INFORMATION YOU SPONSOR IN THE APPLICATION PREPARED BY YOU OR BY KNOWLEDGEABLE PERSONS UPON WHOSE EXPERTISE, JUDGMENT, AND OPINIONS YOU RELY IN PERFORMING YOUR DUTIES?
A. Yes.

Q. IS THE INFORMATION CONTAINED IN YOUR TESTIMONY AND THE PORTIONS OF THE APPLICATION YOU SPONSOR TRUE AND CORRECT TO THE BEST OF YOUR KNOWLEDGE AND BELIEF?
A. Yes.

III. INFORMATION CONCERNING LCRA TSC AND THE PROJECT

Q. PLEASE DESCRIBE LCRA TSC.
A. LCRA TSC is a non-profit corporation created in 2000, following the passage of Senate Bill 7 (SB 7) to provide regulated transmission, transformation, and metering service to customers in the Electric Reliability Council of Texas (ERCOT) under tariffs approved by the PUC. LCRA TSC is a Transmission Service Provider (TSP) with no retail customers. LCRA TSC has no employees. Employees of LCRA provide necessary services to LCRA TSC through a service agreement.

Q. PLEASE DESCRIBE LCRA TSC’S TRANSMISSION SYSTEM.
A. LCRA TSC owns or operates approximately 5,100 circuit miles of high voltage transmission lines in Central Texas and portions of West and South Texas. In addition, LCRA TSC operates facilities at over 380 substations through ownership or lease agreements with LCRA TSC’s direct-connect customers. LCRA TSC’s transmission facilities are primarily located in the Central Texas area between ERCOT’s largest load centers—Houston, Dallas-Ft. Worth, and San Antonio. As a result, the LCRA TSC system contains numerous tie points to other ERCOT TSPs (e.g., CenterPoint, CPS Energy, Austin Energy, AEP, Oncor, and South Texas Electric Cooperative).
Q. PLEASE BRIEFLY DESCRIBE THE PROJECT.
A. LCRA TSC proposes to design and construct a new 345-kV transmission line in Guadalupe County between the existing LCRA TSC Zorn and Marion substations. LCRA TSC proposes to install one 345-kV circuit from Zorn to Marion initially, with a second 345-kV circuit to be installed between Marion and the existing LCRA TSC Clear Springs substation at a later date. A significant portion of the line between Zorn and Clear Springs will use the vacant position on the existing Clear Springs to Hutto transmission line (approved in PUC Docket No. 33978). The remainder of the Project from around Clear Springs to Marion will require new construction on new right of way.

Mr. DeWitt’s testimony provides detailed information on why LCRA TSC is undertaking the Project and an associated discussion on the specific purpose of, and need for, the Project. As discussed in Mr. DeWitt’s testimony, ERCOT deemed this Project critical to reliability of the ERCOT System pursuant to PUC Substantive Rule § 25.101(b)(3)(D). Per this rule, the Commission considers the Project on an expedited basis, rendering a decision approving or denying the Application within 180 days of the date of filing the Application.

Q. PLEASE DESCRIBE HOW THE PROJECT WILL BE FINANCED.
A. LCRA TSC will finance the facilities included in the Application in a manner similar to that which has been used for projects previously constructed by LCRA TSC. That is, it will be financed initially with a combination of tax-exempt commercial paper, tax-exempt private revolving note, and subsequently with fixed-rate debt. Interest on the debt may be capitalized until the Project is in service, at which point it is intended that both the principal and interest will be serviced with Transmission Cost of Service revenues.
IV. IDENTIFICATION OF DIRECTLY AFFECTED PROPERTIES AND NOTICE

Q. PLEASE DESCRIBE THE PROCESS FOR IDENTIFYING DIRECTLY AFFECTED LANDOWNERS AND PROVIDING NOTICE BY DIRECT MAIL IN THIS DOCKET.

A. PUC rules currently require LCRA TSC to notify directly affected landowners (as identified on the current county tax rolls) who are located within 500 feet of the centerline of any proposed route for a proposed transmission line of 230-kV or greater. For this Project, LCRA TSC identified all parcels within approximately 500 feet of the centerline of all primary alternative routes based on county tax appraisal district data received from the Guadalupe Appraisal District.

Q. PLEASE DESCRIBE THE NOTICE LCRA TSC IS PROVIDING IN ASSOCIATION WITH THE APPLICATION.

A. Public Notice: LCRA TSC will publish a public notice in the New Braunfels Herald-Zeitung and the Seguin Gazette no later than one week after the Application is filed with the PUC. Each of the newspapers in which notice will be published is considered a newspaper of general circulation in Guadalupe County. Concurrent with the filing of the Application, LCRA TSC mailed written direct notice by First-Class mail to each owner of land that would be directly affected by the Project. As I discussed previously, landowners of record were determined by review of the Guadalupe Appraisal District’s databases.

Notice to Counties and Municipalities: Concurrent with the filing of the Application, written notice was hand delivered or mailed by First-Class mail to Guadalupe County officials and municipal authorities for the cities of Seguin, New Braunfels, Marion, Santa Clara, Cibolo, and Schertz.

Notice of Neighboring Utilities: Concurrent with the filing of the Application, written notice was hand delivered or mailed by First-Class mail to the following neighboring utilities providing electric utility service within five miles of the requested facility:
Electric Cooperatives
Guadalupe Valley Electric Cooperative (GVEC)

Investor-Owned Utilities
N/A

City Utilities
New Braunfels Utilities
City of Seguin Electric Department
CPS Energy

Notice to Other Officials and Organizations: Concurrent with the filing of the Application, written notice was hand delivered or mailed by First-Class mail to state and federal representatives and senators in whose districts the Project is proposed, various independent school districts, and other interested parties or organizations, including the Office of Public Utility Counsel.

An affidavit attesting to the provision of notice to counties, municipalities, neighboring utilities, and the Office of Public Utility Counsel will be filed with the PUC. In addition, LCRA TSC will file an affidavit attesting to the provision of notice to all directly affected landowners no later than 20 days after the filing of the Application. These affidavits will include representative copies of all notices provided.

Q. PLEASE DESCRIBE THE NOTICE PROVIDED BY DIRECT MAIL TO AFFECTED LANDOWNERS.

A. As required by PUC Procedural Rule § 22.52, the notice sent to all directly affected landowners included a description of the Project, a highway-based map of the alternative routes, route descriptions, information about how to participate in the proceeding, and a contact name and phone number in order for interested persons to obtain additional information about the Project. The mailed notice also included the PUC Landowner Brochure. This information is included in response to Question 25 in the Application.

Q. DID LCRA TSC PROVIDE NOTICE OF THE OPEN HOUSE REQUIRED UNDER PUC PROCEDURAL RULE § 22.52?

A. Yes. The notice LCRA TSC provided in association with the open house meeting held for the Project on September 17, 2015, is more fully described in response to Question 18.
of the Application, Chapter 4 and Appendix B of the EA, and Section VII of my direct testimony, below.

V. ROUTING

Q. ARE YOU FAMILIAR WITH THE ROUTING ISSUES IDENTIFIED IN PUC SUBSTANTIVE RULE § 25.101(b)(3)(B)?
A. Yes. The “routing issues” referenced in this part of the PUC’s Substantive Rules are generally referred to as the PUC’s “routing criteria” and are attached as Exhibit RH-1.

A. PUC Substantive Rule § 25.101(b)(3)(B), requires that, to the extent reasonable without compromising reliability and safety and considering the requirements of PURA § 37.056 (which I have attached as Exhibit RH-2), engineering constraints, and costs, proposed electric transmission lines should be routed in such a manner as to:
   1. Parallel or utilize existing compatible right-of-way (ROW), including the use of vacant positions on existing multiple-circuit transmission lines;
   2. Parallel or utilize other existing compatible ROW;
   3. Parallel property lines or other natural or cultural features; and
   4. Conform with the PUC’s policy of prudent avoidance.

Q. ARE THE ROUTES INCLUDED WITHIN THE APPLICATION IDENTIFIED IN ACCORDANCE WITH THE COMMISSION’S ROUTING CRITERIA?
A. Yes. Where feasible, the alternate routes and route segments included within the Application utilize compatible corridors/routing features, parallel existing compatible ROW, property lines, and other natural or cultural features. Further, all or most of the portion of the Project between the Zorn and Clear Springs substations will utilize an open position on a previously certificated double-circuit capable 345-kV line (Docket No. 33978). Using this open position eliminates at least 7.6 miles of additional impacts to the environment and on landowners within that geographic area. Considering PURA § 37.056, PUC Substantive Rule § 25.101(b)(3)(B), engineering constraints, costs, grid reliability, and the PUC’s policy of prudent avoidance, LCRA TSC has reasonably routed the Project’s alternate routes to moderate the impact on the affected community and
directly affected landowners. LCRA TSC has done so by paralleling existing
transmission line ROW to the extent feasible without compromising reliability, by
paralleling other existing compatible ROW, and by paralleling property lines where
reasonable.

Q. ARE LCRA TSC’S PRIMARY ALTERNATE ROUTES CONSISTENT WITH
THE PUC’S POLICY OF “PRUDENT AVOIDANCE”? 
A. Yes. The proposed alternate routes for the Project are consistent with the PUC’s
“prudent avoidance” policy. All of the proposed alternate routes and segments
composing such routes reflect reasonable investments of money and effort in order to
limit exposure to electric and magnetic fields.

Q. THE EA DESCRIBES AN INITIAL STUDY AREA BOUNDARY AND A FINAL
STUDY AREA BOUNDARY. PLEASE EXPLAIN THIS CHANGE.
A. LCRA TSC originally envisioned using the entirety of the vacant position on the existing
Clear Springs to Hutto transmission line for the portion of the Project between the Zorn
and Clear Springs substations. During the process of developing preliminary route
segments for the Project, however, it became apparent that more direct and potentially
less expensive routing possibilities existed if alternative options for the new transmission
line deviated from the Clear Springs to Hutto structures north of the Clear Springs
substation.

Q. HAVE ANY CHANGES BEEN MADE TO THE PRELIMINARY ALTERNATIVE
SEGMENTS PRESENTED AT THE OPEN HOUSE? IF SO, WHY WERE
THESE CHANGES MADE?
A. Yes. The Application reflects the following changes that were made to the segments
presented at the open house meeting on September 17, 2015:

- Segments A, B, H, and I, all in the vicinity of the Marion substation, were
  reconfigured and segments R2 and S2 were added to satisfy engineering requirements
  associated with entry into the substation.
- Segments F2 and G2 were relocated to the southeast to parallel property lines, rather
  than run interior to those parcels.
• Segment S was reconfigured to avoid a private cemetery.
• Segment N was modified to more closely parallel a property line.
• The southernmost portion of segment Q1 was reconfigured to minimize the loss of trees in a pecan orchard.
• The northern portion of segment Q1 was reconfigured to more closely parallel property lines.
• Segment K1 was relocated to the northwest after a request from the property owner to parallel their property line. The original segment K1 ran in between two separate parcels owned by the same property owner.
• Segment R1 was relocated after a request from a potentially affected landowner. This segment was moved to the southeast, locating it on the opposite side of the same property.

These modifications are illustrated and further described in the EA at Section 4.3.1.

Q. DOES THE APPLICATION CONTAIN AN ADEQUATE NUMBER OF ALTERNATIVE ROUTES TO CONDUCT A PROPER EVALUATION?

A. Yes. Mr. Reid addresses in his testimony the combination of segments included in the Application as part of 15 forward-progressing routes for the Project. POWER evaluated these 15 geographically diverse alternative routes and all 72 alternative route segments and determined that they are all consistent with the provisions of PURA, the PUC’s Substantive Rules, and the Commission’s policy of prudent avoidance. In addition to the 15 proposed alternative routes LCRA TSC filed in the Application, there are many more forward-progressing routes that could be formed by connecting the various alternate route segments in different combinations to create new routes. While many more route segments and routes could theoretically be created, for a project of this size and length, LCRA TSC has provided the Commission with a significant number of diverse routing options from which the Commission can make a reasonable decision in this proceeding. All of the routes and route segments have been filed with the PUC as part of the Application. Therefore, all of the proposed alternative routes and other possible routes that could be formed by the proposed route segments are viable options for constructing and operating the needed electrical facilities.
VI. IMPACTS ON LANDOWNERS

Q. PLEASE EXPLAIN THE STEPS TAKEN BY LCRA TSC TO REDUCE THE IMPACTS TO LANDOWNERS THAT MAY RESULT FROM CONSTRUCTION OF THE PROJECT.

A. LCRA TSC has proposed alternative routes that parallel and/or utilize existing compatible ROW (roads, existing transmission line ROW, vacant position on an existing multi-circuit transmission line), follow compatible routing features, and parallel apparent property lines where reasonable. Additionally, LCRA TSC made routing adjustments (as described above and in the EA in Section 4) based on public input, where reasonable and practical.

Q. ARE THERE ANY DIFFERENCES BETWEEN PROPERTY LINES AND PARCEL LINES?

A. Yes, there can be differences between property lines and parcel lines. As stated previously, individual parcels are identified using the tax information for each designated parcel as provided by the county appraisal district. However, a landowner may own many different parcels or tracts. Thus, while the tax information is ultimately attributed by parcel, these parcel boundaries might not represent the full extent of a particular landowner’s contiguous parcels, which when combined comprise their property. Unless landowners combine these parcels under a common survey and the tax information is consolidated, then it is LCRA TSC’s experience that each parcel will be identified as a separate and distinct property in the records of the county tax appraisal district.

After the preliminary segments were presented at the September 2015 open house meeting, LCRA staff identified parcels that seemed to be under common ownership and grouped them to better discern apparent property boundaries. The result of that grouping effort is reflected in the Location of Directly Affected Properties map, which is Attachment 4 of the Application.
Q. IS THERE AN IMPACT ON ELECTRICAL EFFICIENCY OR RELIABILITY AS A RESULT OF THE ROUTE ADJUSTMENTS YOU DISCUSSED?

A. No. None of the adjustments I discussed result in any negative impact to electrical efficiency or reliability, as more fully discussed by Mr. DeWitt and Ms. Pasquarella in their testimonies.

VII. PUBLIC INVOLVEMENT

Q. PLEASE DESCRIBE LCRA TSC’S ACTIVITIES FOR PUBLIC INVOLVEMENT IN THE PROJECT.

A. LCRA TSC held an open house meeting for the Project on September 17, 2015, from 5:30 p.m. to 7:30 p.m. at the Coliseum in Seguin, Texas. LCRA TSC mailed 1,318 written notices of the meeting to all owners of property within approximately 500 feet of the centerline of the preliminary alternative segments. Also, local public officials and various state and federal officials were mailed or delivered individual written notice of the meeting. In addition, a public notice for the open house was placed in two local newspapers, the New Braunfels Herald-Zeitung and the Seguin Gazette that ran on September 8 and 15, 2015, announcing the location, time, and purpose of the meeting. A copy of the notice published in newspapers is provided in Appendix B of the EA.

The meeting had the following objectives:

• Promote a better understanding of the Project, including its purpose, need, potential benefits, and impacts, and of the PUC certification process;

• Inform the public with regard to the routing procedure, schedules, and route approval process; and

• Gather the values and concerns of the public and community leaders.

The meeting was configured in an informal, information-station format rather than a formal speaker/audience format, with each station assigned to a particular aspect of the Project or routing process and staffed by LCRA or POWER personnel. Open house exhibits included information about LCRA and LCRA TSC; Project Purpose and Need; the PUC Certification Process for New Transmission Lines; Agencies and Officials Contacted; Environmental Criteria for Alternative Route Evaluation; Topographic and Aerial Based Alternative Routes Maps; Structure Options and Photos of representative structures; Typical Right-of-Way Maintenance; Easement Acquisition Process; and
Electric and Magnetic Fields (see Appendix B of the EA). Each station included maps, illustrations, photographs, and/or text explaining each particular topic. A GIS computer station was available to show the extent of the Project, the proposed preliminary alternative route segments, property ownership parcel boundaries, and recent aerial photography of the Project area. Staff at the GIS station were also available to answer detailed questions such as the approximate distance from a proposed preliminary route segment centerline to the nearest corner of a habitable structure. Attendees were encouraged to visit each station in order, so that the entire process could be explained in the logical sequence of project development. The information station format is typically advantageous because it allows attendees to process information in a more relaxed manner and also allows them to focus on their particular area of interest and ask specific questions of the subject-matter experts. Furthermore, one-to-one discussions with LCRA or POWER personnel typically encourage more interaction from those persons who might be hesitant to participate in a formal speaker-audience format.

A total of 153 people signed in as attending the public open house meeting. In some cases, only one family member may have signed in when more were present. All attendees were provided a questionnaire, preliminary route segment map, and frequently asked questions document (see Appendix B in the EA). Some attendees handed in completed questionnaires at the meeting (77), while others took questionnaires with them, acquired questionnaires from neighbors, or acquired a questionnaire from the LCRA project website. A total of 38 additional completed questionnaires were submitted to LCRA TSC following the open house meeting. Thus, a total of 115 questionnaires were received by LCRA TSC at or subsequent to the September 17, 2015, public open house meeting. Additional comments were also sent in the form of letters or emails.

Additional information concerning the public involvement program and a summary of the questionnaire results is provided in Section 4.2.2 of the EA. A copy of the notice that was provided to property owners, a copy of the questionnaire provided to meeting attendees, and copies of the open house exhibits are included in Appendix B of the EA.
VIII. SELECTION OF ROUTE THAT BEST ADDRESSES THE REQUIREMENTS OF PURA AND PUC SUBSTANTIVE RULES

Q. WHAT ROUTE DID LCRA TSC SELECT AS THE ROUTE THAT BEST ADDRESSES THE REQUIREMENTS OF PURA AND PUC SUBSTANTIVE RULES?

A. Based on the requirement in the Commission’s application form for new transmission line projects, LCRA TSC selected Route 10 as the route that best addresses the requirements of PURA and PUC’s Substantive Rules.

Q. WHY DID LCRA TSC IDENTIFY ROUTE 10 AS THE ROUTE THAT BEST MEETS THE REQUIREMENTS OF PURA AND PUC SUBSTANTIVE RULES?

A. Question 17 in the PUC’s standard CCN application form requires the applicant to “state which route the applicant believes best addresses the requirements of PURA and the PUC Substantive Rules.” In compliance with the application form, LCRA TSC evaluated 15 possible routes and selected Route 10 as the route that best complies with PURA and the PUC’s Substantive Rules. Route 10 provides the following advantages:

- Requires the shortest length of new ROW (9.9 miles).
- Has the least number of habitable structures within 500’ of the route centerline (42).
- Has the lowest estimated cost ($47,675,000).

However, while LCRA TSC believes that Route 10 best addresses the requirements of PURA and the PUC’s Substantive Rules, all 15 routes and any forward-progressing routes that can be delineated from the 72 individual route segments that serve to connect the Zorn and Marion substations are viable options available for selection by the PUC.

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1 The total number of habitable structures identified within 500 feet of Route 10 that I discuss in my testimony has been increased by one from the total number presented in the EA in order to include an additional habitable structure (No. 390A) addressed by Mr. Reid in his testimony that was inadvertently not included in the EA.
Q. DID LCRA TSC EVALUATE ANY OTHER SEGMENT COMBINATIONS 
BESIDES THE 15 PRIMARY ALTERNATIVE ROUTES CONTAINED IN THE 
EA?

A. Yes. During the course of determining the response to Question 17 of the Application, and subsequent to development of the EA, LCRA TSC identified “Alternative Route 5A” as an additional route that merited evaluation. Alternative Route 5A is Route 5 with segments D1 and M1 replacing segments C1, E1, and L1.

Like the primary routes presented in the Application, Alternative Route 5A is located within Guadalupe County. If constructed, some portion of this route will be located within the city limits of New Braunfels, Marion and Santa Clara. See Exhibit RH-3 for data associated with this route and a route segments map.

Q. IS ROUTE 10 THE PREFERRED ROUTE?

A. No, neither Route 10, nor any other route, is LCRA TSC’s “preferred” route. Route 10 is simply the route LCRA TSC identified as the route it believes best addresses the requirements of PURA and the PUC’s Substantive rules. All of the primary alternative routes included in the application address the need for the project and comply with the applicable statutory and regulatory criteria. As such, LCRA TSC is willing to construct, own, and operate the Project on any of the routes presented in the Application.

IX. SUMMARY AND CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. My testimony can be summarized as follows:

- LCRA TSC undertook significant efforts to meet, and in some cases exceed, the requirements specified in the PUC’s notice rules for identifying directly affected property owners. LCRA TSC provided notice of the public open house and the filing of the Application to all directly affected landowners it identified. LCRA TSC has submitted a robust number of geographically diverse alternative routes that the PUC can use in evaluating the Application.

- LCRA TSC actively sought and received public input beginning in September 2015 and continuing through the filing of the Application. LCRA TSC collected public input in various ways, including by conducting an open house; soliciting
information through questionnaires, phone calls, and written correspondence; and
attending meetings with public officials and other interested parties.

- LCRA TSC considered public input throughout the process and, where feasible,
  incorporated input from landowners, governmental officials, or other stakeholders
  or interested parties to modify route segments.
- LCRA TSC identified Route 10 as the route that best addresses the requirements
  of PURA and the PUC’s Substantive Rules for the Project.
- LCRA TSC has presented in the Application information regarding all the factors
  the Commission is required to consider under PURA and the PUC’s Substantive
  Rules.
- Each of the proposed alternative routes presented in the Application complies
  with the factors in PURA § 37.056 and PUC Substantive Rule § 25.101(b)(3)(B),
  including the policy on prudent avoidance.
- LCRA TSC is willing to build any of the 15 routes contained in the Application or
  any other forward progressing route composed of the route segments contained in
  the Application.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
A. Yes.
CHAPTER 25. SUBSTANTIVE RULES APPLICABLE TO ELECTRIC SERVICE PROVIDERS.

Subchapter E. CERTIFICATION, LICENSING AND REGISTRATION.


(a) Definitions. The following words and terms, when used in this section, shall have the following meanings unless the context clearly indicates otherwise:

(1) Construction and/or extension -- Shall not include the purchase or condemnation of real property for use as facility sites or right-of-way. Acquisition of right-of-way shall not be deemed to entitle an electric utility to the grant of a certificate of convenience and necessity without showing that the construction and/or extension is necessary for the service, accommodation, convenience, or safety of the public.

(2) Generating unit -- Any electric generating facility. This section does not apply to any generating unit that is less than ten megawatts and is built for experimental purposes only.

(3) Habitable structures -- Structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis. Habitable structures include, but are not limited to, single-family and multi-family dwellings and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, and schools.

(4) Prudent avoidance -- The limiting of exposures to electric and magnetic fields that can be avoided with reasonable investments of money and effort.

(b) Certificates of convenience and necessity for new service areas and facilities. Except for certificates granted under subsection (e) of this section, the commission may grant an application and issue a certificate only if it finds that the certificate is necessary for the service, accommodation, convenience, or safety of the public, and complies with the statutory requirements in the Public Utility Regulatory Act (PURPA) §37.056. The commission may issue a certificate as applied for, or refuse to issue it, or issue it for the construction of a portion of the contemplated system or facility or extension thereof, or for the partial exercise only of the right or privilege. The commission shall render a decision approving or denying an application for a certificate within one year of the date of filing of a complete application for such a certificate, unless good cause is shown for exceeding that period. A certificate, or certificate amendment, is required for the following:

(1) Change in service area. Any certificate granted under this section shall not be construed to vest exclusive service or property rights in and to the area certificated.

(A) Uncontested applications: An application for a certificate under this paragraph shall be approved administratively within 80 days from the date of filing a complete application if:

(i) no motion to intervene has been filed or the application is uncontested;

(ii) all owners of land that is affected by the change in service area and all customers in the service area being changed have been given direct mail notice of the application; and

(iii) commission staff has determined that the application is complete and meets all applicable statutory criteria and filing requirements, including, but not limited to, the provision of proper notice of the application.

(B) Minor boundary changes or service area exceptions: Applications for minor boundary changes or service area exceptions shall be approved administratively within 45 days of the filing of the application provided that:

(i) all utilities whose certificated service area is affected agree to the change;

(ii) all customers within the affected area have given prior consent; and

(iii) commission staff has determined that the application is complete and meets all applicable statutory criteria and filing requirements, including, but not limited to, the provision of proper notice of the application.

(2) New generating unit. A new electric generating unit constructed, owned, or operated by a bundled electric utility.
(3) **New electric transmission line.** All new electric transmission lines shall be reported to the commission in accordance with §25.83 of this title (relating to Transmission Construction Reports).

(A) **Need:**

(i) Except as stated below, the following must be met for a transmission line in the Electric Reliability Council of Texas (ERCOT) power region. The applicant must present an economic cost-benefit study that includes an analysis that shows that the levelized ERCOT-wide annual production cost savings attributable to the proposed project are equal to or greater than the first-year annual revenue requirement of the proposed project of which the transmission line is a part. Indirect costs and benefits to the transmission system may be included in the cost-benefit study. The commission shall give great weight to such a study if it is conducted by ERCOT. This requirement for an economic cost-benefit study does not apply to an application filed pursuant to §25.174 of this title (relating to Competitive Renewable Energy Zones) for a transmission line that is intended to serve a competitive renewable energy zone. This requirement also does not apply to an application for a transmission line that is necessary to meet state or federal reliability standards, including: a transmission line needed to interconnect a transmission service customer or end-use customer; or needed due to the requirements of any federal, state, county, or municipal government body or agency for purposes including, but not limited to, highway transportation, airport construction, public safety, or air or water quality.

(ii) For a transmission line not addressed by clause (i) of this subparagraph, the commission shall consider among other factors, the needs of the interconnected transmission systems to support a reliable and adequate network and to facilitate robust wholesale competition. The commission shall give great weight to:

(I) the recommendation of an organization that meets the requirement of PURA §39.151; and/or

(II) written documentation that the transmission line is needed to interconnect a transmission service customer or an end-use customer.

(B) **Routing:** An application for a new transmission line shall address the criteria in PURA §37.056(c) and considering those criteria, engineering constraints, and costs, the line shall be routed to the extent reasonable to moderate the impact on the affected community and landowners unless grid reliability and security dictate otherwise. The following factors shall be considered in the selection of the utility’s alternative routes unless a route is agreed to by the utility, the landowners whose property is crossed by the proposed line, and owners of land that contains a habitable structure within 300 feet of the centerline of a transmission project of 230 kV or less, or within 500 feet of the centerline of a transmission project greater than 230 kV, and otherwise conforms to the criteria in PURA §37.056(c):

(i) whether the routes parallel or utilize existing compatible rights-of-way for electric facilities, including the use of vacant positions on existing multiple-circuit transmission lines;

(ii) whether the routes parallel or utilize other existing compatible rights-of-way, including roads, highways, railroads, or telephone utility rights-of-way;
CHAPTER 25. SUBSTANTIVE RULES APPLICABLE TO ELECTRIC SERVICE PROVIDERS.

Subchapter E. CERTIFICATION, LICENSING AND REGISTRATION.

(iii) whether the routes parallel property lines or other natural or cultural features; and

(iv) whether the routes conform with the policy of prudent avoidance.

(C) Uncontested transmission lines: An application for a certificate for a transmission line shall be approved administratively within 80 days from the date of filing a complete application if:

(i) no motion to intervene has been filed or the application is uncontested; and

(ii) commission staff has determined that the application is complete and meets all applicable statutory criteria and filing requirements, including, but not limited to, the provision of proper notice of the application.

(D) Projects deemed critical to reliability. Applications for transmission lines which have been formally designated by a PURA §39.151 organization as critical to the reliability of the system shall be considered by the commission on an expedited basis. The commission shall render a decision approving or denying an application for a certificate under this subparagraph within 180 days of the date of filing a complete application for such a certificate unless good cause is shown for extending that period.

(c) Projects or activities not requiring a certificate. A certificate, or certificate amendment, is not required for the following:

(1) A contiguous extension of those facilities described in PURA §37.052;

(2) A new electric high voltage switching station, or substation;

(3) The repair or reconstruction of a transmission facility due to emergencies. The repair or reconstruction of a transmission facility due to emergencies shall proceed without delay or prior approval of the commission and shall be reported to the commission in accordance with §25.83 of this title.

(4) The construction or upgrading of distribution facilities within the electric utility’s service area.

(5) Routine activities associated with transmission facilities that are conducted by transmission service providers. Nothing contained in the following subparagraphs should be construed as a limitation of the commission’s authority as set forth in PURA. Any activity described in the following subparagraphs shall be reported to the commission in accordance with §25.83 of this title. The commission may require additional facts or call a public hearing thereon to determine whether a certificate of convenience and necessity is required. Routine activities are defined as follows:

(A) The modification or extension of an existing transmission line solely to provide service to a substation or metering point provided that:

(i) an extension to a substation or metering point does not exceed one mile; and

(ii) all landowners whose property is crossed by the transmission facilities have given prior written consent.

(B) The rebuilding, replacement, or respacing of structures along an existing route of the transmission line; upgrading to a higher voltage not greater than 230 kV; bundling of conductors or reconductoring of an existing transmission facility, provided that:

(i) no additional right-of-way is required; or

(ii) if additional right-of-way is required, all landowners of property crossed by the electric facilities have given prior written consent.

(C) The installation, on an existing transmission line, of an additional circuit not previously certificated, provided that:

(i) the additional circuit is not greater than 230 kV; and
Sec. 37.0541. CONSOLIDATION OF CERTAIN PROCEEDINGS. The commission shall consolidate the proceeding on an application to obtain or amend a certificate of convenience and necessity for the construction of a transmission line with the proceeding on another application to obtain or amend a certificate of convenience and necessity for the construction of a transmission line if it is apparent from the applications or a motion to intervene in either proceeding that the transmission lines that are the subject of the separate proceedings share a common point of interconnection. This section does not apply to a proceeding on an application for a certificate of convenience and necessity for a transmission line to serve a competitive renewable energy zone as part of a plan developed by the commission under Section 39.904(g)(2).

Added by Acts 2009, 81st Leg., R.S., Ch. 1170 (H.B. 3309), Sec. 1, eff. June 19, 2009.

Sec. 37.055. REQUEST FOR PRELIMINARY ORDER. (a) An electric utility or other person that wants to exercise a right or privilege under a franchise or permit that the utility or other person anticipates obtaining but has not been granted may apply to the commission for a preliminary order under this section.

(b) The commission may issue a preliminary order declaring that the commission, on application and under commission rules, will grant the requested certificate on terms the commission designates, after the electric utility or other person obtains the franchise or permit.

(c) The commission shall grant the certificate on presentation of evidence satisfactory to the commission that the electric utility or other person has obtained the franchise or permit.

Acts 1997, 75th Leg., ch. 166, Sec. 1, eff. Sept. 1, 1997. Amended by:

Acts 2009, 81st Leg., R.S., Ch. 1170 (H.B. 3309), Sec. 4, eff. June 19, 2009.

Sec. 37.056. GRANT OR DENIAL OF CERTIFICATE. (a) The commission may approve an application and grant a certificate only if
the commission finds that the certificate is necessary for the service, accommodation, convenience, or safety of the public.

(b) The commission may:
(1) grant the certificate as requested;
(2) grant the certificate for the construction of a portion of the requested system, facility, or extension or the partial exercise of the requested right or privilege; or
(3) refuse to grant the certificate.

(c) The commission shall grant each certificate on a nondiscriminatory basis after considering:
(1) the adequacy of existing service;
(2) the need for additional service;
(3) the effect of granting the certificate on the recipient of the certificate and any electric utility serving the proximate area; and
(4) other factors, such as:
   (A) community values;
   (B) recreational and park areas;
   (C) historical and aesthetic values;
   (D) environmental integrity;
   (E) the probable improvement of service or lowering of cost to consumers in the area if the certificate is granted; and
   (F) to the extent applicable, the effect of granting the certificate on the ability of this state to meet the goal established by Section 39.904(a) of this title.

(d) The commission by rule shall establish criteria, in addition to the criteria described by Subsection (c), for granting a certificate for a transmission project that serves the ERCOT power region, that is not necessary to meet state or federal reliability standards, and that does not serve a competitive renewable energy zone. The criteria must include a comparison of the estimated cost of the transmission project and the estimated cost savings that may result from the transmission project. The commission shall include with its decision on an application for a certificate to which this subsection applies findings on the criteria.

Acts 2011, 82nd Leg., R.S., Ch. 949 (H.B. 971), Sec. 2(a), eff. June 17, 2011.

Sec. 37.057. DEADLINE FOR APPLICATION FOR NEW TRANSMISSION FACILITY. The commission may grant a certificate for a new transmission facility to a qualified applicant that meets the requirements of this subchapter.

The commission must approve or deny an application for a certificate for a new transmission facility not later than the first anniversary of the date the application is filed. If the commission does not approve or deny the application on or before that date, a party may seek a writ of mandamus in a district court of Travis County to compel the commission to decide on the application.

Amended by:
Acts 2009, 81st Leg., R.S., Ch. 1170 (H.B. 3309), Sec. 4, eff. June 19, 2009.

Sec. 37.058. CERTIFICATE AND DETERMINATION ISSUED TO CERTAIN NON-ERCOT UTILITIES FOR GENERATING FACILITY. (a) This section applies only to an electric utility that operates solely outside of ERCOT.

(b) An electric utility may file with the commission a request that the commission:

(1) grant a certificate for an electric generating facility;

(2) make a public interest determination for the purchase of an existing electric generating facility under Section 14.101; or

(3) both grant a certificate and make a determination.

(c) Notwithstanding any other law, in a proceeding involving the purchase of an existing electric generating facility, the commission shall issue a final order on a certificate for the facility or making a determination on the facility required by Section 14.101, as applicable, not later than the 181st day after the date a request for the certificate or determination is filed with the commission under Subsection (b). For generating facilities granted a certificate under this subsection, notwithstanding Section 36.053,
<table>
<thead>
<tr>
<th>Land Use</th>
<th>5A</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Length of alternative route (miles)</td>
<td>10.6</td>
</tr>
<tr>
<td>2 Number of habitable structures¹ within 500 feet of the centerline</td>
<td>45</td>
</tr>
<tr>
<td>3 Number of newly affected habitable structures² within 500 feet of the centerline</td>
<td>43</td>
</tr>
<tr>
<td>4 Length of ROW using existing transmission line ROW</td>
<td>0.0</td>
</tr>
<tr>
<td>5 Percent ROW using existing transmission line ROW</td>
<td>0.0%</td>
</tr>
<tr>
<td>6 Length of ROW parallel to existing transmission line ROW</td>
<td>0.6</td>
</tr>
<tr>
<td>7 Percent ROW parallel to existing transmission line ROW</td>
<td>5.7%</td>
</tr>
<tr>
<td>8 Length of ROW parallel to other existing ROW (roadways, railway, etc.)</td>
<td>1.4</td>
</tr>
<tr>
<td>9 Percent ROW parallel to other existing ROW (roadways, railway, etc.)</td>
<td>12.8%</td>
</tr>
<tr>
<td>10 Length of ROW parallel to apparent property lines³</td>
<td>3.5</td>
</tr>
<tr>
<td>11 Percent ROW parallel to apparent property lines³</td>
<td>32.6%</td>
</tr>
<tr>
<td>12 Length of ROW across parks/recreational areas⁴</td>
<td>0</td>
</tr>
<tr>
<td>13 Number of additional parks/recreational areas⁴ within 1,000 feet of the centerline</td>
<td>0</td>
</tr>
<tr>
<td>14 Length of ROW through cropland</td>
<td>3.4</td>
</tr>
<tr>
<td>15 Length of ROW through pasture/rangeland</td>
<td>5.8</td>
</tr>
<tr>
<td>16 Length of ROW through land irrigated by traveling systems (rolling or pivot type)</td>
<td>0.0</td>
</tr>
<tr>
<td>17 Number of pipeline crossings</td>
<td>3</td>
</tr>
<tr>
<td>18 Number of transmission line crossings (Total)</td>
<td>2</td>
</tr>
<tr>
<td>19 Number of transmission line crossings (Existing Clear Springs to Marion 345-kV transmission lines)</td>
<td>0</td>
</tr>
<tr>
<td>20 Number of transmission line crossings (Other existing 345-kV transmission lines)</td>
<td>0</td>
</tr>
<tr>
<td>21 Number of transmission line crossings (Existing 138-kV transmission lines)</td>
<td>2</td>
</tr>
<tr>
<td>22 Number of U.S. and state highway crossings</td>
<td>1</td>
</tr>
<tr>
<td>23 Number of farm-to-market road (FM) crossings</td>
<td>2</td>
</tr>
<tr>
<td>24 Number of cemeteries within 1,000 feet of the centerline</td>
<td>0</td>
</tr>
<tr>
<td>25 Number of FAA registered airports with at least one runway more than 3,200 feet in length located within 20,000 feet of the centerline</td>
<td>1</td>
</tr>
<tr>
<td>26 Number of FAA registered airports having no runway more than 3,200 feet in length located within 10,000 feet of the centerline</td>
<td>0</td>
</tr>
<tr>
<td>27 Number of private airstrips within 10,000 feet of the centerline</td>
<td>2</td>
</tr>
<tr>
<td>28 Number of heliports within 5,000 feet of the centerline</td>
<td>0</td>
</tr>
<tr>
<td>29 Number of commercial AM radio transmitters within 10,000 feet of the centerline</td>
<td>0</td>
</tr>
<tr>
<td>30 Number of private airstrips within 10,000 feet of the centerline</td>
<td>2</td>
</tr>
<tr>
<td>31 Number of heliports within 5,000 feet of the centerline</td>
<td>0</td>
</tr>
<tr>
<td>32 Number of commercial AM radio transmitters within 10,000 feet of the centerline</td>
<td>0</td>
</tr>
<tr>
<td>33 Number of FM radio transmitters, microwave towers, and other electronic installations within 2,000 feet of the centerline</td>
<td>2</td>
</tr>
<tr>
<td>Aesthetics</td>
<td></td>
</tr>
<tr>
<td>27 Estimated length of ROW within foreground visual zone⁵ of U.S. and State highways</td>
<td>1.2</td>
</tr>
<tr>
<td>28 Estimated length of ROW within foreground visual zone⁵ of FM roads</td>
<td>2.4</td>
</tr>
<tr>
<td>29 Estimated length of ROW within foreground visual zone⁵ of park/recreational areas⁴</td>
<td>0.3</td>
</tr>
<tr>
<td>Ecology</td>
<td></td>
</tr>
<tr>
<td>30 Length of ROW through upland woodlands/brushland</td>
<td>0.8</td>
</tr>
<tr>
<td>31 Length of ROW through bottomland/riparian woodlands</td>
<td>0.3</td>
</tr>
<tr>
<td>32 Length of ROW across National Wetlands Inventory mapped wetlands</td>
<td>0.10</td>
</tr>
<tr>
<td>33 Length of ROW across known habitat of federally listed endangered or threatened species</td>
<td>0</td>
</tr>
<tr>
<td>34 Length of ROW across open water (rivers, canals, lakes, ponds)</td>
<td>0.06</td>
</tr>
<tr>
<td>35 Number of stream crossings</td>
<td>15</td>
</tr>
<tr>
<td>36 Number of river crossings</td>
<td>1</td>
</tr>
<tr>
<td>37 Length of ROW parallel (within 100 feet) to streams or rivers</td>
<td>0.1</td>
</tr>
<tr>
<td>38 Length of ROW across 100-year floodplains</td>
<td>1.0</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td></td>
</tr>
<tr>
<td>39 Number of recorded historic or prehistoric sites crossed by ROW</td>
<td>0</td>
</tr>
<tr>
<td>40 Number of additional recorded historic or prehistoric sites within 1,000 feet of the centerline</td>
<td>1</td>
</tr>
<tr>
<td>41 Number of National Register-listed or determined-eligible sites crossed by ROW</td>
<td>0</td>
</tr>
<tr>
<td>42 Number of additional National Register-listed or determined-eligible sites within 1,000 feet of the centerline</td>
<td>0</td>
</tr>
<tr>
<td>43 Length of ROW through areas of high archaeological/historic site potential</td>
<td>5.4</td>
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<tr>
<td>Cost</td>
<td></td>
</tr>
<tr>
<td>Single Pole</td>
<td>$49,037,000</td>
</tr>
<tr>
<td>Lattice Tower</td>
<td>$51,119,000</td>
</tr>
</tbody>
</table>

¹ Single-family and multi-family dwellings, and related structures, mobile homes, apartment buildings, commercial structures, industrial structures, business structures, churches, hospitals, nursing homes, schools, or other structures normally inhabited by humans or intended to be inhabited by humans on a daily or regular basis within 500 feet of the centerline of a transmission project of 230 kV or more.

² Newly affected habitable structures are habitable structures within 500 feet of an alternative route that are not already within 500 feet of an existing transmission line.
³ Property lines created by existing roads, highway, or railroad ROW are not “double-counted” in the length of ROW parallel to property lines criterion. Where there are contiguous parcels in common ownership, only paralleling of the outside boundary of the parcels were tabulated. Paralleling interior parcel lines within a group of two or more contiguous parcels were not tabulated as parallel to apparent property.

⁴ Defined as parks and recreational areas owned by a governmental body or an organized group, club, or church located within 1,000 feet of the centerline of the project.

⁵ One-half mile, unobstructed. Lengths of ROW within the visual foreground zone of Interstates, U.S. and State highways criterion are not “double-counted” in the length of ROW within the visual foreground zone of FM roads criterion.

⁶ One-half mile, unobstructed. Lengths of ROW within the visual foreground zone of parks/recreational areas may overlap with the total length of ROW within the visual foreground zone of Interstates, U.S. and State highways criterion and/or with the total length of ROW within the visual foreground zone of FM roads criterion.
## Habitable Structures and Other Land Use Features in the Vicinity of Alternative Route 5A

**SEGMENT COMBINATION:** R2-B-D-R-D1-M1-O1-R1-U1-L2-T2-F2-G2

<table>
<thead>
<tr>
<th>Map Number</th>
<th>Approximate Distance from Route Centerline (feet)</th>
<th>Structure of Feature</th>
<th>Nearest Alternative Route Segment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>336</td>
<td>Single-family residence</td>
<td>R2</td>
</tr>
<tr>
<td>2</td>
<td>221</td>
<td>Single-family residence</td>
<td>R2</td>
</tr>
<tr>
<td>10</td>
<td>399</td>
<td>Single-family residence</td>
<td>D</td>
</tr>
<tr>
<td>98</td>
<td>311</td>
<td>Single-family residence</td>
<td>R</td>
</tr>
<tr>
<td>122</td>
<td>330</td>
<td>Single-family residence</td>
<td>M1</td>
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<tr>
<td>123</td>
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</tr>
<tr>
<td>124</td>
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<td>M1</td>
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<tr>
<td>125</td>
<td>485</td>
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<tr>
<td>126</td>
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<td>135</td>
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<td>482</td>
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<tr>
<td>137</td>
<td>359</td>
<td>Commercial</td>
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<tr>
<td>138</td>
<td>413</td>
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<td>Commercial</td>
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<td>576</td>
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<td>581</td>
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<tr>
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<tr>
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<tr>
<td>585</td>
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<td>U1</td>
</tr>
<tr>
<td>586</td>
<td>411</td>
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<td>U1</td>
</tr>
<tr>
<td>587</td>
<td>291</td>
<td>Single-family residence</td>
<td>U1</td>
</tr>
<tr>
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<td>256</td>
<td>Single-family residence</td>
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<td>Commercial</td>
<td>U1</td>
</tr>
<tr>
<td>901</td>
<td>403</td>
<td>Microwave LCRA; Brazos Electric Coop</td>
<td>R2</td>
</tr>
<tr>
<td>902</td>
<td>1,088</td>
<td>LM Private Guadalupe Power Partners, LP</td>
<td>D</td>
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