

**APPLICATION OF ELECTRIC TRANSMISSION
TEXAS, LLC TO AMEND ITS CERTIFICATES OF
CONVENIENCE AND NECESSITY FOR THE
PROPOSED BARNEY DAVIS TO NAVAL BASE
SINGLE-CIRCUIT 138 KV TRANSMISSION LINE IN
NUECES COUNTY, TEXAS**

DOCKET NO. 42467

Submit seven (7) copies of the application and all attachments supporting the application. If the application is being filed pursuant to P.U.C. SUBST. R. 25.101(b)(3)(D) or P.U.C. SUBST. R. 25.174, include in the application all direct testimony. The application and other necessary documents shall be submitted to:

Public Utility Commission of Texas

Attn: Filing Clerk

1701 N. Congress Ave.

Austin, Texas 78711-3326

Application of Electric Transmission Texas, LLC to Amend Its Certificates of Convenience and Necessity for the Proposed Barney Davis to Naval Base Single-Circuit 138 kV Transmission Line in Nueces County, Texas

1. Applicant (Utility) Name: Electric Transmission Texas, LLC

Certificate Number: 30193 and 30194

Street Address: 400 W. 15th Street, Suite 800
Austin, Texas 78701

Mailing Address: 400 W. 15th Street, Suite 800
Austin, Texas 78701

2. Please identify all entities that will hold an ownership interest or an investment interest in the proposed project but which are not subject to the Commission's jurisdiction.

Electric Transmission Texas, LLC (ETT) is a joint venture between subsidiaries of American Electric Power and MidAmerican Energy Holdings Company.

3. Person to Contact: Charles T. Jasper

Title/Position: Regulatory Case Manager

Phone Number: (972) 960 – 4473

Mailing Address: 17111 Preston Road, Suite 200
Dallas, Texas 75248-1232

Email Address: charles.jasper@hdrinc.com

Alternate Contact: Barry R. Smith

Title/Position: Manager, Regulatory Services

Phone Number: (512) 391 – 6340

Mailing Address: 400 W. 15th Street, Suite 800
Austin, Texas 78701

Email Address: brsmith1@aep.com

Legal Counsel: Jerry Huerta – AEP Service Corp

Phone Number: (512) 481 – 3323

Mailing Address: 400 W. 15th Street, Suite 1520
Austin TX 78701

Email Address: jnhuerta@aep.com

4. Project Description:

Name or Designation of Project:

Barney Davis to Naval Base 138 kV Transmission Line Project

Provide a general description of the project, including the design voltage rating (kV), the operating voltage (kV), the CREZ Zone(s) (if any) where the project is located (all or in part), any substations and/or substation reactive compensation constructed as part of the project, and any series elements such as sectionalizing switching devices, series line compensation, etc. For HVDC transmission lines, the converter stations should be considered to be project components and should be addressed in the project description.

On January 24, 2013, the Electric Reliability Council of Texas (ERCOT) endorsed a project to support the reliability of the regional transmission system in the Flour Bluff/South Christi area. The project requires Electric Transmission Texas, LLC (ETT) to construct a new 138 kV transmission line

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from ETT's Barney Davis Substation to AEP Texas Central Company's (AEP TCC) Naval Base Substation and AEP TCC to install a new 138/69 kV autotransformer and 138 kV termination facilities at Naval Base Substation. This project will improve the reliability by providing the Flour Bluff and South Corpus Christi area with another 138 kV direct electrical source from the Barney Davis Substation to the Naval Base Substation. This project provides the necessary support to the area transmission network needed to reduce the possibility of loss of electric load, particularly during scheduled maintenance outages of autotransformers at Airline Substation, west of Oso Bay, or for either of the existing 69 kV transmission lines from Airline to Laguna or Airline to Naval Base substations. At Naval Base Substation, AEP TCC will also be constructing a new 69 kV Gas Insulated Substation (GIS) to address contamination issues that can impact the reliability of the operation of the Naval Base Substation in addition to installing a new 138 kV/69 kV autotransformer and 138 kV termination facilities, as previously mentioned. The GIS installation is independent of this project and not dependent on this project. ETT will be constructing the new 138 kV termination facilities at the Barney Davis Substation.

Once completed, this work will improve transmission electric service reliability to the Flour Bluff peninsula and surrounding areas.

If the project will be owned by more than one party, briefly explain the ownership arrangements between the parties and provide a description of the portion(s) that will be owned by each party. Provide a description of the responsibilities of each party for implementing the project (design, Right-Of-Way acquisition, material procurement, construction, etc.).

Not Applicable.

If applicable, identify and explain any deviation in transmission project components from the original transmission specifications as previously approved by the Commission or recommended by a PURA §39.151 organization.

There are no transmission specifications that have been previously approved by the Commission for this project. There have been no deviations in the transmission project components from the original transmission specifications previously recommended by ERCOT (a PURA §39.151 organization).

5. Conductor and Structures:

Conductor Size and Type:

The various routes either use all overhead or a combination of overhead and underground conductors.

Overhead Conductor: 959.6 kcmil ACSS/TW/AW (Suwannee) (Aluminum Conductor Steel Supported / Trapezoidal Wire / Aluminum-Clad Steel)

Underground Conductor: 5000 kcmil Enameled Copper Cable (12" spacing, concrete encased with native backfill)

Number of conductors per phase:

One per phase for overhead and underground

Continuous Summer Static Current Rating (A):

Overhead: 2233 Amps

Underground: 2121 Amps

Continuous Summer Static Line Capacity at Operating Voltage (MVA):

Overhead: 534 MVA

Underground: 507 MVA

Continuous Summer Static Line Capacity at Design Voltage (MVA):

Overhead: 534 MVA

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Underground: 507 MVA

Type and composition of Structures:

Typical Structure will be a galvanized steel monopole.

Some 3 pole galvanized steel structures will be used.

For routes with underground there will be galvanized steel transition structures to change from overhead to underground.

Height of Typical Structures:

80 ft

Explain why these structures were selected; include such factors as landowner preference, engineering considerations, and costs comparisons to alternate structures that were considered. Provide dimensional drawings of the typical structures to be used in the project.

There are numerous structure types available for the overhead construction of single circuit 138 kV transmission lines. These include lattice towers, two pole H-frames and single pole structures. The majority of the routes on this project have the majority of their length in areas that are primarily residential and commercial as the routes are within the community of Flour Bluff. Being in residential and commercial areas where routing of the line is located mostly along city streets that have houses or businesses built adjacent to them does not allow for structures with a large footprint to be installed. Hence lattice towers are not practical for this project. H-frames were not chosen as the typical structure for this same reason, although some multi-pole structures may be used as necessary for line crossings, etc... Galvanized steel monopoles were chosen for the typical structure as they have a much smaller footprint when compared to the other structure types. Additionally, ETT has learned from previous open houses that landowners have historically favored single pole structures compared to lattice or H-frame structures from an aesthetics standpoint. Galvanized steel monopoles will also provide a long lasting service life given the corrosive environment in this coastal area. Two distinctive features to the routing of a transmission line in the area have also contributed to the height of the typical structures. The first feature is that the majority of the routes will be located along existing road rights-of-way with other utility features which will shorten the typical spans. The second feature is that the area has two active Navy airfields located within the area that will impact the height of structures above ground level.

For joint applications, provide and separately identify the above-required information regarding structures for the portion(s) of the project owned by each applicant.

Not Applicable.

6. Right-of-way:

Miles of Right-of-Way:

The miles of right-of-way for all 18 alternative routes filed by the Applicant ranges from approximately 6.14 miles for Routes 9 and 10 to approximately 16.07 miles for Route 6. The right-of-way length for each alternative route is presented in Table 6-1 of the Environmental Assessment and Route Analysis for the Proposed Barney Davis to Naval Base 138 kV Transmission Line Project, Nueces County, Texas (EA/ Routing Study) (Attachment No. 1 to this application).

Miles of Circuit:

Approximately 6.14 miles for Routes 9 and 10 to approximately 16.07 miles for Route 6.

Width of Right-of-Way:

The typical right-of-way width is 100 feet wide.

Percent of Right-of-Way Acquired:

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No right-of-way has been acquired for the project at the time of filing this application.

For joint applications, provide and separately identify the above-required information for each route for the portion(s) of the project owned by each applicant.

Not Applicable.

Provide a brief description of the area traversed by the transmission line. Include a description of the general land uses in the area and the type of terrain crossed by the line.

The study area is located in the Gulf Coast region of Texas in Nueces County (see Figure 2-2 of EA/ Routing Study, Attachment No. 1 to this application). Land-surface elevations range from mean sea level (msl), at the Laguna Madre, to approximately 28 ft above msl, in the southwestern corner of the Waldron Airfield. The study area lies in the southeastern portion of Corpus Christi, primarily located on the Encinal Peninsula, commonly referred to as Flour Bluff. Corpus Christi serves as the county seat for Nueces County and is the largest city on the south Texas Coast. Once an isolated fishing village outside the city limits of Corpus Christi, Flour Bluff was annexed in 1962. Flour Bluff is bordered by Corpus Christi Bay to the north, the King Ranch to the south, the Laguna Madre to the east, and Oso Bay to the west. Currently, the majority of the study area is categorized as suburban and contains many areas of dense residential development, mainly single-family and multi-family structures. However, there are also rural ranch homes on larger tracts and upscale waterfront homes, primarily located on the western side of the peninsula along the Oso Bay shoreline. Numerous mobile home and recreational vehicle developments are also located in various locations throughout Flour Bluff. Commercial development is most heavily concentrated along the State Highway 358/South Padre Island Drive corridor, which extends from east to west across the northern portion of the study area. A higher degree of commercial development is also located along the major roadways that extend north and south from South Padre Island Drive (Waldron Road, Flour Bluff Drive, and Rodd Field Road). Many new residential and commercial developments have broken ground and are currently under construction, or are planned throughout the study area. A significant amount of that development is occurring in the western portion of the study area (west of Oso Bay), where large tracts of cropland are being converted to residential, commercial, and public uses.

The Naval Air Station Corpus Christi (NASCC) occupies the vast majority of the land area on the northern portion of Flour Bluff, north of the South Padre Island Drive. The NASCC's main base comprises approximately 2,850 acres of land of which the majority are Department of Defense owned. The NASCC has supported pilot training and operations since 1941. Presently, the NASCC provides primary flight training to Naval Aviators for several aircraft. In 1961, the Army established the world's largest helicopter repair depot, The Army Aeronautical Maintenance Center, called Corpus Christi Army Depot (CCAD). In 1972, the Naval Air Training Command Headquarters was relocated to NASCC from Pensacola, Florida. NASCC is currently a major center for military activity in south Texas with over 40 tenant commands. These tenants include the Chief of Naval Air Training, CCAD, National Air Security Operations Center, U.S. Coast Guard, and more. Approximately 400 newly qualified aviators are trained at NASCC each year. Approximately 10,250 employees, including military personnel, civil service employees, and contractors currently work at NASCC.

In addition to the main base, NASCC also has control of Waldron Airfield, which occupies approximately 650 acres of land north of Yorktown Road, between Flour Bluff Drive and Waldron Road in the southern portion of the study area. With the exception of one air control tower, and a fire/emergency station, there are no facilities or aircraft stationed at the field. The field is used for routing touch-and-go maneuvers.

Two higher-education campuses are located in the northern portion of the Oso Peninsula. Coastline Community College is situated in the southwest corner of the intersection of 5th Street and D Street, operating out of Building 1731 in the NASCC. The Texas A&M Corpus Christi is located in the northwestern portion of the study area, on the south side of Ocean Drive, with Corpus Christi Bay to the north and Cayo del Oso to the south.

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The Barney Davis Energy Center, owned by Topaz Power Group, is a 664-MW natural gas-fired generating station located in the southeastern portion of the study area. The power station's cooling pond covers approximately 1,100 acres along the southern portion of the study area. Topaz upgraded and expanded the Barney Davis Energy Center with a more-efficient combined-cycle generating facility.

The southernmost portion of the study area is occupied by the King Ranch, specifically its Laureles Division. This division stretches southwest to Kingsville and south to Baffin Bay. Including all four of its divisions, the King Ranch comprises approximately 825,000 acres in Nueces, Kennedy, Kleberg, and Willacy counties.

7. Substations or Switching Stations:

List the name of all existing HVDC converter stations, substations or switching stations that will be associated with the new transmission line. Provide documentation showing that the owner(s) of the existing HVDC converter stations, substations and/or switching stations have agreed to the installation of the required project facilities.

Barney Davis Substation – Owned by ETT

Naval Base Substation – Owned by AEP TCC

List the name of all new HVDC converter stations, substations or switching stations that will be associated with the new transmission line. Provide documentation showing that the owner(s) of the new HVDC converter stations, substations and/or switching stations have agreed to the installation of the required project facilities.

There are no new stations, substations, or switching stations that will be associated with this project.

8. Estimated Schedule:

<u>Estimated Dates of:</u>	<u>Start</u>	<u>Completion</u>
<i>Right-of-way and Land Acquisition</i>	9/24/15	2/18/16
<i>Engineering and Design</i>	6/9/15	4/5/16
<i>Material and Equipment Procurement</i>	12/17/15	4/7/16
<i>Construction of Facilities</i>	4/6/16	12/5/16
<i>Energize Facilities</i>		12/5/16

9. Counties:

For each route, list all counties in which the route is to be constructed.

All of the 18 route alternatives filed in this Application are located within Nueces County.

10. Municipalities:

For each route, list all municipalities in which the route is to be constructed.

All of the 18 alternative routes filed in this Application lie within the City of Corpus Christi, Texas.

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For each applicant, attach a copy of the franchise, permit or other evidence of the city's consent held by the utility, if necessary or applicable. If franchise, permit, or other evidence of the city's consent has been previously filed, provide only the docket number of the application in which the consent was filed. Each applicant should provide this information only for the portion(s) of the project which will be owned by the applicant.

Please see Attachment No. 2 to this application.

11. Affected Utilities:

Identify any other electric utility served by or connected to facilities in this application.

LCRA Transmission Services Corporation (LCRA TSC) does have transmission facilities in the area of the project and AEP TCC transmission facilities connect with this new project.

Describe how any other electric utility will be affected and the extent of the other utilities' involvement in the construction of this project. Include any other electric utilities whose existing facilities will be utilized for the project (vacant circuit positions, ROW, substation sites and/or equipment, etc.) and provide documentation showing that the owner(s) of the existing facilities have agreed to the installation of the required project facilities.

AEP TCC owns Naval Base Substation to which ETT will be connecting one end of the project. A letter from AEP TCC is provided as Attachment No. 3a to this application, agreeing to the interconnection and AEP TCC will incur these costs and will operate and maintain these termination facilities. For all of the routes filed in the application AEP TCC will have distribution facilities impacted such that some of the facilities will have to be removed and relocated to ETT transmission structures. The estimated cost that AEP TCC would incur to have these facilities retired from the current locations to make way for the new ETT transmission structures and reconstructed on the said structures is provided in the response to Question No. 13. AEP TCC desires to have control and involvement of these activities to its distribution facilities and will coordinate with ETT on the route approved. AEP TCC will incur these costs and continue to operate and maintain these distribution facilities. ETT will also have routes that will utilize a portion of easement corridor along Segment 1b that belongs to AEP TCC. AEP TCC and ETT have agreed to work together on the development of an easement agreement for such location if a route is chosen using this segment. A letter stating such agreement between AEP TCC and ETT is provided as Attachment No. 3b to this application.

12. Financing:

Describe the method of financing this project. For each applicant that is to be reimbursed for all or a portion of this project, identify the source and amount of the reimbursement (actual amount if known, estimated amount otherwise) and the portion(s) of the project for which the reimbursement will be made.

The Project will be financed through a combination of debt and equity.

13. Estimated Costs:

Provide cost estimates for each route of the proposed project using the following table. Provide a breakdown of "Other" costs by major cost category and amount. Provide the information for each route in an attachment to this application.

	<u>Transmission Facilities</u>	<u>Substation Facilities</u>
<i>Right-of-way and Land Acquisition</i>		
<i>Engineering and Design (Utility)</i>		
<i>Engineering and Design (Contract)</i>		

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<i>Procurement of Material and Equipment (including stores)</i>		
<i>Construction of Facilities (Utility)</i>		
<i>Construction of Facilities (Contract)</i>		
<i>Other (all costs not included in the above categories)</i>		
<i>Estimated Total Cost</i>		

A table indicating the estimated cost of the transmission facilities for each route, including the AEP TCC incurred distribution underbuild is provided as Attachment No. 4a to this application. A table indicating the estimated cost for substation termination facilities is included in Attachment No. 4b to the application. A table providing the estimated total project cost rolled up is included in Attachment No. 4c to this application.

For joint applications, provide and separately identify the above-required information for the portion(s) of the project owned by each applicant.

Not Applicable.

14. Need for the Proposed Project:

For a standard application, describe the need for the construction and state how the proposed project will address the need. Describe the existing transmission system and conditions addressed by this application. For projects that are planned to accommodate load growth, provide historical load data and load projections for at least five years. For projects to accommodate load growth or to address reliability issues, provide a description of the steady state load flow analysis that justifies the project. For interconnection projects, provide any documentation from a transmission service customer, generator, transmission service provider, or other entity to establish that the proposed facilities are needed. For projects related to a Competitive Renewable Energy Zone, the foregoing requirements are not necessary; the applicant need only provide a specific reference to the pertinent portion(s) of an appropriate commission order specifying that the facilities are needed. For all projects, provide any documentation of the review and recommendation of a PURA §39.151 organization.

The Flour Bluff peninsula area of south Corpus Christi is presently interconnected electrically by 69 kV transmission lines originating from the west across Oso Bay and from the east from the barrier islands. There are five transmission facility planned maintenance plus single outage combinations that result in the need to use load shed to recover the local area to acceptable service conditions. The worst combination outage case being the loss of one of the autotransformers at Airline Substation, when the other is out of service for repair or maintenance. The loss of these two autotransformers will cause the Flour Bluff area and the barrier islands to experience a voltage collapse, which will result in wide spread loss of electrical service to the area (spring off-peak case revealed that 101 MW of load shed was required).

There have been five occurrences over the past ten years that have resulted in the loss of 69 kV source feeds from the Airline Substation to the Laguna Substation that have resulted in loss of electric service in the area. These are unacceptable outage events pursuant to the Electric Reliability Council of Texas (ERCOT) and National Electric Reliability Council (NERC) standards for reliable transmission service.

In January 2013, the ERCOT endorsed a project to address this service reliability issue for the Flour Bluff area specifically and the Corpus Christi region and the barrier islands in general. The project requires ETT to construct a new 138 kV transmission line to connect the Barney Davis Substation and the Naval Base Substation. At Naval Base Substation, AEP TCC is also required to install a new 138 kV / 69 kV autotransformer and the 138 kV termination facilities for the new ETT transmission line.

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15. Alternatives to Project:

For a standard application, describe alternatives to the construction of this project (not routing options). Include an analysis of distribution alternatives, upgrading voltage or bundling of conductors of existing facilities, adding transformers, and for utilities that have not unbundled, distributed generation as alternatives to the project. Explain how the project overcomes the insufficiencies of the other options that were considered.

Alternatives to this proposed Barney Davis to Naval Base line included new alternative 138 kV sources from Barney Davis to Laguna and from Pharaoh to Naval Base Substations. Other alternatives consider additional transformation at Wooldridge and Naval Base Substations. Finally, the conversion of the 69 kV system to 138 kV operation was also evaluated.

Only options that provided a new 138 kV source resolved the maintenance outage violations (N-1-1) studied under 2013 spring and fall peak conditions. In addition, the proposed line resulted in better support of future load growth when compared to the other options. Also, the voltage stability margin for the proposed line was significantly higher than the other options. Based on this result, the facilities associated with proposed line is the best alternative to meet the needs of the Airline/North Padre Island area.

It is the electrical load in the distribution system that is the cause of the overloading on the existing transmission network in the area and, as such, there is no distribution solution to address the project need.

16. Schematic or Diagram:

For a standard application, provide a schematic or diagram of the applicant's transmission system in the proximate area of the project. Show the location and voltage of existing transmission lines and substations, and the location of the construction. Locate any taps, ties, meter points, or other facilities involving other utilities on the system schematic.

A schematic of the transmission system in the proximate area of this Project is included with this application as Attachment No. 5.

17. Routing Study:

Provide a brief summary of the routing study that includes a description of the process of selecting the study area, identifying routing constraints, selecting potential line segments, and the selection of the routes. Provide a copy of the complete routing study conducted by the utility or consultant. State which route the applicant believes best addresses the requirements of PURA and P.U.C. Substantive Rules.

The following summary is based on information provided in Chapter 2.0 of the EA/Routing Study (Attachment No. 1 to this application).

The objective of the routing study was to develop and evaluate an adequate number of geographically diverse alternative routes to allow the Commission to conduct a proper evaluation for the proposed single-circuit 138 kV transmission line. ETT and Atkins utilized a comprehensive transmission line routing and evaluation methodology to delineate and evaluate alternative transmission line routes. Methods used were governed by ETT's transmission line routing processes and criteria, and factors set forth in Section 37.056(c)(4)(A)-(D) of the Texas Utilities Code and Commission Substantive Rule 25.101(b)(3)(B).

Data used in the development and evaluation of alternative routes were drawn from a variety of sources, including published literature, and information from local, state and federal agencies, recent aerial photography, and ground reconnaissance of the study area.

The first step in the process was the selection of a study area. The study area needed to encompass the endpoints for the proposed project (the existing Barney Davis Substation and the existing Naval

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Base Substation) and include an area large enough in which an adequate number of geographically diverse, forward progressing alternative routes could be located. Numerous land use and geographic constraints were considered as the study area boundaries were developed. The northern boundary of the study area follows the southern shore of Corpus Christi Bay. To the south, the study area boundary was dictated in part by the location of the Barney Davis Substation, in consideration with the location of the Barney M. Davis Power Plant and associated cooling pond. The eastern boundary was limited by the Laguna Madre, while the western boundary was placed just west of Rodd Field Road to allow consideration of routing alternatives parallel to existing transmission lines west of Oso Bay. This resulted in the establishment of a rectangular study area, approximately seven miles long, along its western boundary, approximately eight miles long, along its eastern boundary and more than six miles wide, encompassing an area of approximately 49 square miles.

In an effort to minimize impacts to sensitive environmental and land use features, a constraints mapping process was used in the development and refinement of potential alternative routes. The geographic location of environmentally sensitive and other restrictive areas within the study area were located and considered during alternative route delineation. These constraints were mapped onto recent aerial photography. The alternative routes were influenced greatly by the location of Waldron Airfield and the NASCC Truax Airfield, concentrated residential and commercial development, community facilities, cemeteries, historic and archeological sites, wetland areas, parks, churches, schools, and known threatened or endangered species habitat, and existing compatible rights-of-way, including transmission lines, roadways, and approximate property lines.

Utilizing available resources described above, numerous preliminary alternative route segments were developed and evaluated. The resulting preliminary segments were presented to members of the public at two open house meetings held in the study area in October 2013. At the open house meetings, attendees were asked to provide information regarding the preliminary route segments and to identify their concerns regarding specific segments. Following the open house meetings, additional communications were received from landowners, the U.S. Navy, the city of Corpus Christi, and the U.S. Army Corps of Engineers. All of these comments were considered. Many resulted in modifications to the preliminary routes segments. Based on this input, the project team deleted some segments, others were added, and others modified in response to issues presented at the open house meetings. These modifications are discussed in more detail in Section 2.3 of the EA/ Routing Study (Attachment No. 1 to this application). These modifications resulted in the identification of primary alternative routes.

Next the environmental evaluation of the primary alternative routes was performed by Atkins. The environmental evaluation criteria and the environmental evaluation process is discussed in detail in Section 6.0 of the EA/ Routing Study (Attachment No. 1 to this application). Following Atkins review of the primary alternative routes, AEPSC, as agent for ETT, undertook a further evaluation to consider the reliability, constructability, operation and maintenance, and the cost to construct each alternative. This initial evaluation of the alternative routes resulted in the elimination of two alternative routes from further consideration, Routes 1 and 2. Routes 1 and 2 were the highest estimated cost routes at \$148,900,000 for Route 1 and \$160,573,000 for Route 2. Both routes also would require additional permitting time, long term environmental reclamation requirements, and increase risk potential of additional environmental impacts within Laguna Madre during construction. It was determined the potential benefits that these two routes might provide by providing a more geographically diverse set of alternative routes did not offset the combined issues and costs associated with these two routes.

The final evaluation by the ETT project team resulted in the identification of Alternative Route 11 as the route that the applicant believes best addresses the requirements of PURA and PUC Substantive Rules. A discussion of the determination, as to why ETT believes that Alternative Route 11 best addresses the requirements of PURA and PUC Substantive Rules, is provided as Attachment No. 6a to this application.

The EA/ Routing Study is included as Attachment No. 1 to this application.

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18. Public Meeting or Public Open House:

Provide the date and location for each public meeting or public open house that was held in accordance with P.U.C. PROC. R. 22.52. Provide a summary of each public meeting or public open house including the approximate number of attendants, and a copy of any survey provided to attendants and a summary of the responses received. For each public meeting or public open house provide a description of the method of notice, a copy of any notices, and the number of notices that were mailed and/or published.

ETT held two open-house meetings for the proposed Barney Davis to Naval Base 138 kV transmission line project. Both open-house meetings were held at the Flour Bluff High School Cafetorium, 2505 Waldron Road, Corpus Christi, Texas on the following dates:

- October 28, 2013, 6:00 to 8:00 p.m.
- October 29, 2013, 6:00 to 8:00 p.m.

Direct mail notice of the open-house meetings was sent by first class mail to approximately 2,400 persons listed on the current county tax rolls as an owner of land located within 300 ft of the preliminary route segments, as well as local officials. These meetings were intended to solicit comments from landowners, citizens, and public officials concerning the proposed project. The meetings had the following objectives:

- Promote a better understanding of the proposed project including the purpose, need, and potential benefits and impacts;
- Inform and educate the public with regard to the procedure, schedule, and decision-making process; and
- Ensure that the decision-making process accurately identifies and considers the values and concerns of the public and community leaders.

Rather than a formal presentation in a speaker-audience format, each meeting was held in an open-house format. ETT representatives and Atkins staff set up several information stations around the meeting room. Each station was devoted to a particular aspect of the routing study and was manned by ETT representatives and/or Atkins staff. Large displays of maps, illustrations, photographs, and/or text explaining each particular topic were presented at the stations. Interested citizens and property owners were encouraged to visit each station in a particular order so the entire process and general project development sequence could be explained clearly. The open-house or information-station format is advantageous because it allows attendees to process information in a more relaxed manner and also allows them to focus on their particular areas of interest and ask specific questions. More importantly, the one-on-one discussions with ETT representatives and Atkins staff encourage more interaction from those citizens who might be hesitant to participate in a speaker-audience format.

At the first station visitors signed in and were provided questionnaires to fill out along with a map for reference. The questionnaire solicited comments on landowner/citizen concerns as well as an evaluation of the information presented at the meetings. An example copy of the questionnaire is included in Appendix C of the Environmental Assessment and Alternative Route Analysis for the Proposed Barney Davis to Naval Base 138 kV Transmission Line project, Nueces County, Texas (EA/Routing Study), included as Attachment No. 1 to this application).

Completed questionnaires were received by ETT either at the meetings or later by mail. However, not all respondents answered every question, nor did all attendees fill out the questionnaire. Additionally, several questionnaires were received from respondents who did not attend an open-house meeting and/or who may not be directly affected by the proposed project.

Fifty-five citizens/landowners signed in at the public meeting on October 28 and 59 citizens/landowners signed in at the public meeting on October 29. A total of 95 questionnaires were submitted to ETT following the public meetings. Nine questions were asked on the questionnaire, the first of which asked if the respondents had attended an open house meeting. Eighty-two

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respondents (86%) answered that they had attended an open house meeting, while 8 (8%) indicated they had not attended an open-house meeting. Please refer to Section 5.2 of the EA/ Routing Study, included as Attachment No. 1 to this application for a summary and evaluation of responses to all questions asked on the questionnaire.

19. Routing Maps:

Base maps should be a full scale (one inch = not more than one mile) highway map of the county or counties involved, or other maps of comparable scale denoting sufficient cultural and natural features to permit location of all routes in the field. Provide a map (or maps) showing the study area, routing constraints, and all routes or line segments that were considered prior to the selection of the routes. Identify the routes and any existing facilities to be interconnected or coordinated with the project. Identify any taps, ties, meter points, or other facilities involving other utilities on the routing map. Show all existing transmission facilities located in the study area. Include the locations of radio transmitters and other electronic installations, airstrips, irrigated pasture or cropland, parks and recreational areas, historical and archeological sites (subject to the instructions in Question 27), and any environmentally sensitive areas (subject to the instructions in Question 29).

Please refer to Figure Nos. 2-2, 6-1a and 6-1b in the EA/ Routing Study, included as Attachment No. 1 to this application.

Provide aerial photographs of the study area displaying the date that the photographs were taken or maps that show (1) the location of each route with each route segment identified, (2) the locations of all major public roads including, as a minimum, all federal and state roadways, (3) the locations of all known habitable structures or groups of habitable structures (see Question 19 below) on properties directly affected by any route, and (4) the boundaries (approximate or estimated according to best available information if required) of all properties directly affected by any route .

Attachment No. 7a to this application is a series of 16 maps at a scale of approximately 1in. = 200 ft that depicts the approximate boundaries of properties directly affected by any of the 18 primary alternative routes filed in this application. Each property has been assigned a unique "Property ID No.". This Property ID No. is among the information provided in Attachment No. 7b, that is the cross-reference discussed below.

For each route, cross-reference each habitable structure (or group of habitable structures) and directly affected property identified on the maps or photographs with a list of corresponding landowner names and addresses and indicate which route segment affects each structure/group or property.

Attachment No. 7b to this application is a spreadsheet which is a cross-reference to land use features, (including habitable structures), whose location is shown on Figure Nos. 2-2, and/or 6-1a and 6-1b, with the names and addresses of the owners. This information is sorted by landowner last name, first name, and then, by segment number. Note that in some cases, a habitable structure may be directly affected by more than one route segment. In such cases, it will be replicated in the cross-reference spreadsheet. It is also possible for a habitable structure, or property, to have multiple owners listed on the current county tax rolls. In such cases, it will be replicated in the cross-reference. These examples explain multiple listings of the same habitable structure, or property, on the cross-reference.

20. Permits:

List any and all permits and/or approvals required by other governmental agencies for the construction of the proposed project. Indicate whether each permit has been obtained.

Once a route has been approved by the Commission, AEPSC, as agent for ETT, will coordinate with permitting agencies to determine permits required for the approved route.

City of Corpus Christi

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The proposed project is located within the jurisdiction of the city of Corpus Christi. Therefore, this project will comply with all the necessary city ordinances and regulations. In locations where the proposed project ROW will be located along city-owned roadways or easements, ETT will pursue the necessary legal agreements to construct the proposed project. Input from the city of Corpus Christi has been solicited during the development of this proposed project, as indicated by Attachment No. 2 to this application.

Federal Aviation Administration

Based on Federal Aviation Administration (FAA) guidelines, AEPSC, as agent for ETT, will make a final determination of the need for FAA notification based on the alignment of the approved route, structure locations, and structure designs. The result of this notification, and the subsequent coordination with the FAA, could include changes in the design and/or potential requirements to mark and/or illuminate portions of the line.

U.S. Army Corps of Engineers

Under Section 404 of the Clean Water Act (CWA), activities in waters of the U.S. can be regulated by the U.S. Army Corps of Engineers (USACE), in conjunction with the U.S. Environmental Protection Agency (EPA). The discharge of dredged or fill materials in waters of the U.S., including wetlands, is subject to the USACE regulatory policies. Thus, potential impacts to waters of the U.S. incurred by the proposed transmission line project may be subject to USACE regulation. The study area is located within the Galveston District of the USACE. If necessary, AEPSC, as agent for ETT, will coordinate with the USACE prior to clearing and construction, to ensure compliance with the appropriate regulations associated with construction-related impacts to waterbodies and wetland features.

Certain construction activities that potentially impact waters of the U.S., including wetlands may be authorized by one of the USACE's Nationwide Permits (NWP). Permits that may apply to placement of support structures and associated activities are NWPs 25 and 12. NWP 25, structural discharges, generally authorizes the discharge of concrete, sand, rock, etc., into tightly sealed forms or cells where the material is used as a structural member for standard pile-supported structures (linear projects, not buildings or other structures). NWP 12 generally authorizes discharges associated with the construction of utility lines and substations within waters of the U.S. and additional activities affecting waters of the U.S., such as those associated with the construction and maintenance of utility line substations; foundations for overhead utility line towers, poles, and anchors; and access roads for the construction and maintenance of utility lines.

Under Section 10 of the Rivers and Harbors Act of 1899, the USACE is directed by Congress to regulate all work and structures in, or affecting the course, condition, or capacity of, navigable waters of the U.S. (including tidal waters). Oso Bay is considered Section 10 waters; therefore, any work within these tidal waters would require a USACE permit.

Texas Commission on Environmental Quality

This project would require more than 1 acre of clearing; therefore, the Texas Commission on Environmental Quality (TCEQ) would require implementation of a Storm Water Pollution Prevention Plan (SWPPP). ETT will submit a Notice of Intent (NOI) with the TCEQ prior to clearing and construction.

Texas Historical Commission

AEPSC, as agent for ETT, will obtain clearance as necessary from the Texas Historical Commission (THC) with regard to requirements concerning historic and prehistoric cultural resources, prior to construction.

Texas Department of Transportation

Permits and/or approvals will be obtained as necessary from the Texas Department of Transportation (TxDOT) for any crossing of, or access from, a state-maintained roadway.

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General Land Office

The Texas General Land Office (GLO) requires a Miscellaneous Easement (ME) for any ROW crossing a state-owned riverbed, navigable stream, or coastal submerged lands (state bay tracts). Several features within the study area could fall into this category, and one or more could be crossed by the proposed transmission line. Following PUC approval of a route for this project, AEPSC, as agent for ETT, will coordinate with the GLO and obtain an ME, where necessary.

Coastal Coordination Advisory Committee

In 1996, the federal government approved the Coastal Management Program (CMP), overseen by the Coastal Coordination Council (CCC), to improve the management of the state's coastal resources and ensure the long-term ecological and economic productivity of the area. The CMP is a networked program linking the regulations, programs, and resource of local, state, and federal agencies with management responsibilities in the Coastal Management Zone (CMZ), under the authority of the federal Coastal Zone Management Act of 1972 (U.S. Department of Commerce, 1996).

In 2010, the CCC underwent review by the Texas Sunset Advisory Commission (SAC). The SAC found that while the state benefits from maintaining a federally approved CMP, the CCC is no longer needed to administer it. In response to the SAC review, the Texas legislature passed and the governor signed into law HB 2250/SB 656. This law, which became effective on September 1, 2011, abolished the CCC, assigned the CCC's functions to the Land Commissioner and the GLO, and required the Land Commissioner to establish a Coastal Coordination Advisory Committee (CCAC). The CCAC consists of appointees from the former CCC member agencies and appointed public members.

To assist the CCAC, four "coastal issue teams" were formed on various issues to increase interagency coordination and communication among staff who work daily on these issues. The issue teams deal with the following: (1) water quality; (2) CMP grants; (3) CMP coastal long-term planning; (4) the Permitting Assistance Group (PAG); and (5) Regulatory issues.

As a state agency, the PUC is charged with complying with the policies of the CMP when approving CCNs for electric transmission lines located in the coastal zone. The consistency requirement of the Texas Administrative Code (TAC) § 25.102(a) states that if a transmission service provider or electric utility requests a CCN located, either in whole or in part, within the coastal management program boundary as defined in 31 TAC § 503.1 then the transmission service provider or electric utility must indicate where the facility would be located within the boundary in its application. In addition, the transmission service provider or electric utility must indicate in its application whether any part of the proposed facilities are seaward of the Coastal Facility Designation Line as defined in 31 TAC § 19.2(a) (21) and identify the type (or types) of Coastal Natural Resource Area (or Areas) using the designations in 31 TAC § 501.3(b), that will be impacted by any part of the proposed facilities.

U.S. Navy

ETT's proposed project will be required to comply with the U.S. Navy's Air Installation Compatible Use Zones in the vicinity of Waldron Airfield and the NASCC Truax Airfield. Atkins' Aviation Group conducted an airspace assessment to ensure compliance with airspace and land use restrictions in the vicinity of the airfields. These restrictions were taken into consideration during route development. Coordination with the U.S. Navy during the routing process provided information regarding aviation operations and special permits or approvals. Underground alternatives across U.S. Navy-owned property were explored. If the selected route includes a portion that crosses U.S. Navy-owned property, ETT, will be required to obtain U.S. Navy approval for an underground utility easement.

21. Habitable structures:

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For each route list all 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 300 feet of the centerline if the proposed project will be constructed for operation at 230kV or less, or within 500 feet of the centerline if the proposed project will be constructed for operation at greater than 230kV. Provide a general description of each habitable structure and its distance from the centerline of the route. In cities, towns or rural subdivisions, houses can be identified in groups. Provide the number of habitable structures in each group and list the distance from the centerline of the route to the closest and the farthest habitable structure in the group. Locate all listed habitable structures or groups of structures on the routing map.

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 3 is presented in Table 6-5 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 4 is presented in Table 6-6 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 5 is presented in Table 6-7 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 6 is presented in Table 6-8 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 7 is presented in Table 6-9 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 8 is presented in Table 6-10 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 9 is presented in Table 6-11 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 10 is presented in Table 6-12 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 11 is presented in Table 6-13 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 12 is presented in Table 6-14 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 13 is presented in Table 6-15 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 14 is presented in Table 6-16 of the EA/Routing Study (Attachment No. 1 to this application).

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A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 15 is presented in Table 6-17 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 16 is presented in Table 6-18 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 17 is presented in Table 6-19 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 18 is presented in Table 6-20 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 19 is presented in Table 6-21 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each habitable structure within 300 feet and its distance from the centerline of Alternative Route 20 is presented in Table 6-22 of the EA/ Routing Study (Attachment No. 1 to this application).

The location of listed habitable structures or groups of structures is shown on Figures 6-1a and 6-1b of the EA/ Routing Study (Attachment No. 1 to this application).

22. Electronic Installations:

For each route, list all commercial AM radio transmitters located within 10,000 feet of the center line of the route, and all FM radio transmitters, microwave relay stations, or other similar electronic installations located within 2,000 of the center line of the route. Provide a general description of each installation and its distance from the center line of the route. Locate all listed installations on a routing map.

There are no AM radio transmitters located within 10,000 ft of any of the 18 primary alternative routes. There are no FM radio transmitters located within 2,000 ft of any of the 18 primary alternative routes.

A general description of each electronic installation and its distance from the centerline of Alternative Route 3 is presented in Table 6-5 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 4 is presented in Table 6-6 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 5 is presented in Table 6-7 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 6 is presented in Table 6-8 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 7 is presented in Table 6-9 of the EA/ Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 8 is presented in Table 6-10 of the EA/ Routing Study (Attachment No. 1 to this application).

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A general description of each electronic installation and its distance from the centerline of Alternative Route 9 is presented in Table 6-11 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 10 is presented in Table 6-12 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 11 is presented in Table 6-13 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 12 is presented in Table 6-14 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 13 is presented in Table 6-15 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 14 is presented in Table 6-16 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 15 is presented in Table 6-17 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 16 is presented in Table 6-18 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 17 is presented in Table 6-19 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 18 is presented in Table 6-20 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 19 is presented in Table 6-21 of the EA/Routing Study (Attachment No. 1 to this application).

A general description of each electronic installation and its distance from the centerline of Alternative Route 20 is presented in Table 6-22 of the EA/Routing Study (Attachment No. 1 to this application).

The location of listed installations is shown on Figures 6-1a and 6-1b of the EA/Routing Study (Attachment No.1 to this application).

23. Airstrips:

For each route, list all known private airstrips within 10,000 feet of the center line of the project. List all airports registered with the Federal Aviation Administration (FAA) with at least one runway more than 3,200 feet in length that are located within 20,000 feet of the center line of any route. For each such airport, indicate whether any transmission structures will exceed a 100:1 horizontal slope (one foot in height for each 100 feet in distance) from the closest point of the closest runway. List all listed airports registered with the FAA having no runway more than 3,200 feet in length that are located within 10,000 feet of the center line of any route. For each such airport, indicate whether any transmission structures will exceed a 50:1 horizontal slope from the closest point of the closest

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runway. List all heliports located within 5,000 feet of the center line of any route. For each such heliport, indicate whether any transmission structures will exceed a 25:1 horizontal slope from the closest point of the closest landing and takeoff area of the heliport. Provide a general description of each listed private airstrip, registered airport, and heliport; and state the distance of each from the center line of each route. Locate and identify all listed airstrips, airports, and heliports on a routing map.

There are no known private airstrips within 10,000 feet of the centerline of any of the 18 primary alternative routes.

There are no airports registered with the Federal Aviation Administration (FAA) having no runway more than 3,200 feet in length located within 10,000 feet of the center line of any of the 18 primary alternative routes.

Each of the 18 primary alternative routes has two airports registered with the FAA with at least one runway more than 3,200 feet in length that are located within 20,000 feet of its center line (Waldron Airfield and NASCC Truax Airfield).

Waldron Airfield, located in the south-central portion of the study area, includes two asphalt runways, each measuring 5,000 feet in length and 200 feet in width. The airfield is used for U.S. Navy pilot training. The NASCC Truax Airfield is located in the northern portion of the study area. This airport features three asphalt runways measuring 5,004 ft, 5,003 ft, and 5,000 ft, respectively, and one Porous European Mix (an asphalt concrete mix) runway measuring 8,002 ft in length.

According to Atkins' preliminary calculations, construction of the proposed transmission line along any of the primary routes will require FAA notification. Additionally, Atkins conducted airspace assessments for both airfields to determine if construction modifications of the proposed transmission line would be required to satisfy any airspace restrictions or limitations.

The Waldron Airfield and the NASCC Truax Airfield Airspace Assessments for ETT, contained as Appendices A1 and A2 to EA/Routing Study (Attachment No. 1 to this application), determined that there were three sets of imaginary airspace surfaces, determined by the Department of Defense (DoD) and the FAA, which place restrictions on the height of the proposed transmission line near each air field. The assessments analyzed the Naval Facilities Engineering Command (NAVFAC) Outlying Field (OLF) surfaces, which apply to Navy Basic Training OLFs. The Assessment also analyzed FAA FAR Part 77 Civil Airport, in the event that the airport may be used as a General Aviation facility in the future, and FAR Part 77 DoD, which is applied to all military airfields. It was recommended that the most restrictive airspace surfaces, those defined by FAR Part 77 DoD, are adhered to for height restrictions for the proposed transmission line. These surfaces are shown on Figure 2-2 (map pocket) of the EA/Routing Study (Attachment No. 1 to this application).

The Navy's Unified Facilities Code (UFC) also specifies zones beyond the end of airport runways with specific grading and land use compatibility requirements. The Clear Zone (CZ), Accident Potential Zone (APZ) 1, and APZ 2 are illustrated on Figure 2-2, and the specific restrictions within these zones are contained within the UFC. The geometry for these zones was provided to Atkins by the Navy. The assessments determined that aboveground transmission lines should not be located within the CZ nor APZ 1 but are permitted within APZ 2, assuming they meet all other height restriction criteria.

Using the data obtained within the Airspace Assessments, it was determined that a number of routes would require design modifications such as adjustments to structure heights and/or the requirement that portions of the route be installed underground to avoid the restricted airspace in the immediate vicinity of the airfields. Routes 4, 6, 15, and 17 would not require any underground construction because they avoid the CZ, APZ 1, and FAA slope restriction areas entirely. Routes 7 and 8 would each require approximately 0.62 mile of underground construction, followed by Route 16 (0.65 mile), Route 5 (0.68 mile), routes 9 and 10 (1.08 miles), Route 13 (1.47 miles), routes 14 and 20 (1.48 miles), routes 18 and 19 (1.67 miles), Route 12 (1.69 miles), Route 3 (1.93 miles), and Route 11 with 2.50 miles. In addition, required FAA notification and any subsequent

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coordination with the FAA, DoD, and the Navy could require changes in the line design and/or potential requirements to mark and/or light the transmission line structures.

In addition, a number of the primary alternative routes are located within 5,000 ft of at least two heliports. Routes 11, 14, 16, 18, 19, and 20 are each located within 5,000 ft of two helipads located at the NASCC Army Depot facility. Routes 7, 8, 9, 10, 12, 13, 15, and 17 are located within 5,000 ft of the helipad associated with the Amerril Energy natural gas facility, located in the northeastern portion of the study area, and one of the NASCC Army Depot helipads. Routes 3, 4, 5, and 6 are located within 5,000 ft of three helipads.

Generally, if engineering modifications are implemented to comply with the restricted airspace, the proposed transmission line should have no significant effect on aviation operations within the study area.

The distance from the center line of Alternative Route 3 to each of the qualifying installations is presented in Table 6-5 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 4 to each of the qualifying installations is presented in Table 6-6 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 5 to each of the qualifying installations is presented in Table 6-7 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 6 to each of the qualifying installations is presented in Table 6-8 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 7 to each of the qualifying installations is presented in Table 6-9 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 8 to each of the qualifying installations is presented in Table 6-10 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 9 to each of the qualifying installations is presented in Table 6-11 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 10 to each of the qualifying installations is presented in Table 6-12 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 11 to each of the qualifying installations is presented in Table 6-13 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 12 to each of the qualifying installations is presented in Table 6-14 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 13 to each of the qualifying installations is presented in Table 6-15 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 14 to each of the qualifying installations is presented in Table 6-16 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 15 to each of the qualifying installations is presented in Table 6-17 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 16 to each of the qualifying installations is presented in Table 6-18 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 17 to each of the qualifying installations is presented in Table 6-19 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 18 to each of the qualifying installations is presented in Table 6-20 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from the center line of Alternative Route 19 to each of the qualifying installations is presented in Table 6-21 of the EA/ Routing Study (Attachment No. 1 to this application).

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The distance from the center line of Alternative Route 20 to each of the qualifying installations is presented in Table 6-22 of the EA/ Routing Study (Attachment No. 1 to this application).

The location of listed installations is shown on Figures 6-1a and 6-1b of the EA/ Routing Study (Attachment No.1 to this application).

24. Irrigation Systems:

For each route identify any pasture or cropland irrigated by traveling irrigation systems (rolling or pivot type) that will be traversed by the route. Provide a description of the irrigated land and state how it will be affected by each route (number and type of structures etc.). Locate any such irrigated pasture or cropland on a routing map.

No pasture or cropland irrigated by traveling irrigation systems (rolling or pivot type) will be traversed by any of the 18 Primary Alternative Routes.

25. Notice:

Notice is to be provided in accordance with P.U.C. PROC. R. 22.52.

- A. *Provide a copy of the written direct notice to owners of directly affected land. Attach a list of the names and addresses of the owners of directly affected land receiving notice.*

A copy of the written direct notice, with attached map, that will be provided to owners of directly-affected land is included as Attachment No. 8a to this application. A list of the names and addresses of those owners of directly-affected land to whom notice will be mailed by first-class mail is attached as Attachment No. 8b to this application.

- B. *Provide a copy of the written notice to utilities that are located within five miles of the routes.*

A copy of the written notice to utilities, with attached map, that will be provided to the utilities providing electric service within a five mile radius of the Proposed Transmission Line Project is attached as Attachment No. 9 to this application. The following utilities will be provided the requisite notice on or before the filing date as required by Commission rules:

LCRA Transmission Services Corporation

American Electric Power Texas Central Company

- C. *Provide a copy of the written notice to county and municipal authorities.*

A representative copy of the written notice, with attached map, provided to county and municipal authorities is attached as Attachment No. 10 to this application.

The county and municipal officials will be provided the requisite notice on or before the filing date as required by Commission rules.

- D. *Provide a copy of the notice that is to be published in newspapers of general circulation in the counties in which the facilities are to be constructed. Attach a list of the newspapers that will publish the notice for this application. After the notice is published, provide the publisher's affidavits and tear sheets.*

Notice for this Application will be published the week following the filing of the Application in the *Corpus Christi Caller – Times*, a newspaper of general circulation in Nueces County, and the *Padre Island Moon*, a newspaper of general circulation in Nueces County. A representative copy of the general Public Notice to be published is included as Attachment No. 11 to this application. Proof of publication will be provided in the form of publisher's affidavits and tear sheet following publication of the public notice.

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In addition to the notices described above, P.U.C. Proc. R. 22.52 requires the applicant to provide notice of the filing of this application to the Office of Public Utility Counsel. A copy of that notice is included in this application as Attachment No. 12. ETT also provided notice to companies having oil or natural gas pipelines in service within the study area that would be parallel to, or crossed by, routing segments of the Project.

For a CREZ application, in addition to the requirements of P.U.C. PROC. R. 22.52 the applicant shall, not less than twenty-one (21) days before the filing of the application, submit to the Commission staff a “generic” copy of each type of alternative published and written notice for review. Staff’s comments, if any, regarding the alternative notices will be provided to the applicant not later than seven days after receipt by Staff of the alternative notices. Applicant may take into consideration any comments made by Commission staff before the notices are published or sent by mail.

Not Applicable.

26. Parks and Recreation Areas:

For each route, list all parks and recreational areas owned by a governmental body or an organized group, club, or church and located within 1,000 feet of the center line of the route. Provide a general description of each area and its distance from the center line. Identify the owner of the park or recreational area (public agency, church, club, etc.). List the sources used to identify the parks and recreational areas. Locate the listed sites on a routing map.

A review of the Texas Outdoor Recreation Inventory (TORI), the Texas Outdoor Recreation Plan (TORP), the Corpus Christi Strategic Parks and Recreation Master Plan (City of Corpus Christi, 2012), various federal, state, and local maps, and field reconnaissance was used to identify parks and recreation areas in the study area (TPWD, 1984, 1990, 2013f). The NPS indicates that no national parks, forests, grasslands, or wildlife refuges exist within the boundaries of the study area (NPS, 2013b).

Texas Parks and Wildlife Department Recreation Areas

The Redhead Pond WMA is located in the eastern portion of the study area along Laguna Shores Road, south of Hustlin Hornet Road. The Redhead Pond WMA protects freshwater wetland habitat for wintering waterfowl and other birds, and it offers a unique opportunity to view large concentrations of wild birds within a short drive of downtown Corpus Christi (TPWD, 2013g).

TPWD also indicates that the CCA/CPL Marine Development Center is located in the southeastern portion of the study area within the Topaz Barney M. Davis Power Plant. This facility is the first state-operated hatchery and visitor center, and produces juvenile red drum and spotted seatrout for releasing into Texas bays for stock enhancement. Tours of the hatchery are open to the public (TPWD, 2013h).

City Parks and Recreation Areas

The majority of parks and recreation areas within the study area are operated and maintained by the City of Corpus Christi. According to the city’s Parks and Recreation Department, a total of 26 city parks are located within the study area. Neighborhood and niche parks are typically centrally located in a neighborhood or central to the several smaller neighborhoods that they serve and are intended to serve as local central gathering places. A niche park is generally less than 3 acres, and a neighborhood park typically ranges between 3 and 10 acres. Community parks are larger parks ranging in size from 10 to 50 acres. Regional parks are intended to serve an entire park planning area. Nature park preserves are designed to serve specific functions in terms of wildlife habitat, flood control, and improved water quality. Depending on the size and type, facilities available at the city parks generally include baseball and softball fields, basketball courts, play units, grills,

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picnic units, shelters, restrooms, and more (City of Corpus Christi, 2012). The following city parks are located within the study area.

Type	Name of Park	Acres	Location
N	Caribbean	1.00	Mediterranean and Otranto
N	Castle	2.88	Alhambra and Versailles
PP	Dimmit	1.50	Jester and Laguna Madre
N	Golden Oaks	2.95	Red Oak Drive
C	Parker	13.74	Waldon and Graham
N	Retta	1.68	Furgale and Vialoux
N	South Seas	1.53	Panay and Sulu
NP	Turtle Cove	7.98	Love Bird and Oriole
C	Waldron	20.00	St. Francis and St. Benedict
N	Wranosky	2.88	Graham Road
N	Brandywine	2.75	Mansfield and Summer Ridge
ESP	Graceland	0.68	Elvis Drive
ESP	Greystone	0.92	Sydney
PP	Han and Pat Suter Wildlife	6.50	Ennis Joslin and Nile
SUP	Lakeview	5.12	Holly and Rodd Field
ESP	Las Brisas	0.40	Fred's Folley
PP	Oso Bay	172.61	Holly Road and Wooldridge Road
RP	Oso Creek 1	104.90	Oso Creek Parkway
SUP	Paul Jones Sports Complex	39.10	Paul Jones and Barnhardt
N	Peary	1.00	Pauls Jones and Barnhardt
N	Rancho Vista	1.32	Rancho Vista Boulevard and Vaquero
NP	Sands	5.55	Silver Sands/Dawn Breeze
NP	Sgt. J.D. Bock	3.93	Vancouver and Canadian
NP	South Bay	5.90	Sea Lane and Seashore
NP	Southfork	9.21	Oso Parkway and Twin Creek
ESP	Victoria Park	6.22	Oso Creek Parkway and Barnes Elementary

C = Community Park; ESP = Esplanades, Parkways, Trails; N = Niche Park; NP = Neighborhood Park; PP = Nature Park Preserve; RP = Regional Park; SUP = Special Use Park

Other Parks and Recreation Areas

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The Oso Beach Municipal Golf Course, an 18-hole course created in 1939 and open to the public in 1946, is located along the study area's western boundary, north of SH 358 (Oso Beach Golf Course, 2013).

The NASCC operates the Gulf Winds Golf Course within their base. This par-71 military-owned and operated golf course is closed to the public, and features 18 holes at 5,700 total yards (GolfTexas, 2013).

Numerous athletic/recreational facilities associated with Flour Bluff ISD are located throughout their campus. These include ballfields, tennis courts, a football stadium, and various playing fields.

Athletic fields are located in the southeastern corner of Waldron Airfield, located northwest of the intersection of Waldron Road and Yorktown Boulevard. This facility is referred to as "Waldron Field," contains numerous fields for little league baseball, softball, kickball, and soccer.

An additional unnamed recreation area containing soccer fields is located south of South Padre Island Drive and west of Oso Bay in the northwestern portion of the study area.

The Audubon Outdoor Club of Corpus Christi (AOC) owns and maintains one bird sanctuary in the study area. The Held/Moran Nature Preserve is located in the south-central portion of the study area near the intersection of Waldron Road and Mediterranean Drive. The preserve protects approximately 90 ac of coastal oak-lands and two ponds (AOC, 2013).

Funtrackers is a privately-owned family amusement center that includes go karts, bumper boats, miniature golf, and an arcade. Funtrackers is located southeast of the South Padre Island Drive and Flour Bluff Drive intersection.

In addition to the parks and recreation areas listed above, a multitude of recreational opportunities exist within the Laguna Madre and Oso Bay. Sportfishing for redfish and speckled trout, among other species is common. Fishing from kayaks or shallow-water motorcraft allows anglers to access the shallow water. Wildlife viewing, including bird watching, is another recreational opportunity associated with the bays and its estuaries in the study area. Additionally, the Laguna Madre is noted for its steady wind and kiteboarding opportunities. A number of websites, including the Corpus Christi Convention and Visitors Bureau, direct kiteboarders to an undeveloped launch site, "Lola," located on the Laguna Madre shoreline east of the Laguna Shores Road/Lola Johnson Road intersection.

While there are no existing hike or bike trails within the study area boundaries, Corpus Christi Parks & Recreation Department has designated Opportunity Trail Corridors in their Corpus Christi Strategic Parks and Recreation Master Plan, based on earlier studies, including: The 2011 Integrated Community Sustainability Plan; The Future Land Use Plan; The MPO Bicycle and Pedestrian Plan; and the 2010 Corpus Christi Beach Development Plan. They have identified potential hike/bike trail opportunities on certain roadways within the study area, specifically along portions of—Yorktown Boulevard, Flour Bluff Drive, Graham Road, Waldron Road, Glenoak Drive, Held Drive, and Kaipo Drive, as well as along the shorelines of Oso Bay, Oso Creek, and the Laguna Madre. Additionally, paddling trails have been proposed along the shoreline (City of Corpus Christi, 2010, 2013b).

References, cited above, are included among those in Chapter 8.0 (References) of the EA/ Routing Study, included as Attachment No. 1 to this application.

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 3 is presented in Table 6-5 of the EA/Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 4 is presented in Table 6-6 of the EA/Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized

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group, club or church located within 1,000 feet of the center line of Alternative Route 5 is presented in Table 6-7 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 6 is presented in Table 6-8 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 7 is presented in Table 6-9 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 8 is presented in Table 6-10 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 9 is presented in Table 6-11 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 10 is presented in Table 6-12 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 11 is presented in Table 6-13 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 12 is presented in Table 6-14 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 13 is presented in Table 6-15 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 14 is presented in Table 6-16 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 15 is presented in Table 6-17 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 16 is presented in Table 6-18 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 17 is presented in Table 6-19 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 18 is presented in Table 6-20 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 19 is presented in Table 6-21 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each park and recreational area owned by a governmental body, or an organized group, club or church located within 1,000 feet of the center line of Alternative Route 20 is presented in Table 6-22 of the EA/ Routing Study (Attachment No. 1 to this application).

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The location of listed parks and recreational areas is shown on Figure 6-1a and Figure 6-1b of the EA/ Routing Study (Attachment No. 1 to this application).

27. Historical and Archeological Sites:

For each route, list all historical and archeological sites known to be within 1,000 feet of the center line of the route. Include a description of each site and its distance from the center line. List the sources (national, state or local commission or societies) used to identify the sites. Locate all historical sites on a routing map. For the protection of the sites, archeological sites need not be shown on maps.

As a part of the data gathering effort conducted by Atkins for this project, research of available records and literature was conducted at the Texas Archeological Research Laboratory (TARL), J.J. Pickle Research Campus, The University of Texas at Austin with the purpose of determining the location of previously recorded archeological sites (sites issued a trinomial/record at TARL) within the proposed study area. The Texas Historical Commission (THC's) online Restricted Archeological Sites Atlas files were also used to identify listed and eligible NRHP properties and sites, NRHP districts, cemeteries (including Historic Texas Cemeteries [HTC]), Official Texas Historical Markers (OTHM)s (including Recorded Texas Historic Landmarks), State Antiquities Landmarks (SALs), as well as any other potential cultural resources such as National Historic Landmarks (NHLs), National Monuments, National Memorials, National Historic Sites, and National Historical Parks to ensure the completeness of the study. As a secondary source of NRHP-listed properties and NHLs, the National Park Service's NRHP GIS Spatial Data and database, as well as the NHL program, were consulted. Additionally, TxDOT's database of NRHP-listed and -eligible bridges was also reviewed. Finally, the Office of Coast Survey's Automated Wreck and Obstruction Information System (AWOIS) database was reviewed.

The results of the reviews identified approximately 59 previously recorded archeological sites; 1 THC-recorded cemetery designated as a HTC (Duncan Cemetery); 1 THC-recorded cemetery with an OTHM (Sunshine Cemetery); 1 OTHM commemorating Flour Bluff; 1 shipwreck; 1 AWOIS-recorded obstruction, and a portion of the King Ranch NRHP district within the study area. Table 4-2 of the EA/ Routing Study (Attachment No. 1 to the application) provides a summary and description of previously recorded cultural resources in the vicinity of the primary alternative routes.

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 3 is presented in Table 6-5 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 4 is presented in Table 6-6 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 5 is presented in Table 6-7 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 6 is presented in Table 6-8 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 7 is presented in Table 6-9 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 8 is presented in Table 6-10 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 9 is presented in Table 6-11 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 10 is presented in Table 6-12 of the EA/ Routing Study (Attachment No. 1 to this application).

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The distance from each site known to be within 1,000 ft of the center line of Alternative Route 11 is presented in Table 6-13 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 12 is presented in Table 6-14 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 13 is presented in Table 6-15 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 14 is presented in Table 6-16 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 15 is presented in Table 6-17 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 16 is presented in Table 6-18 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 17 is presented in Table 6-19 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 18 is presented in Table 6-20 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 19 is presented in Table 6-21 of the EA/ Routing Study (Attachment No. 1 to this application).

The distance from each site known to be within 1,000 ft of the center line of Alternative Route 20 is presented in Table 6-22 of the EA/ Routing Study (Attachment No. 1 to this application).

A summary of cultural resource impacts is presented in Section 4.11.4 of the EA/ Routing Study (Attachment No. 1 to this application).

The location of historical sites is shown on Figures 6-1a and 6-1b of the EA/ Routing Study (Attachment No. 1 to this application).

28. Coastal Management Program:

For each route, indicate whether the route is located, either in whole or in part, within the coastal management program boundary as defined in 31 T.A.C. §503.1. If any route is, either in whole or in part, within the coastal management program boundary, indicate whether any part of the route is seaward of the Coastal Facilities Designation Line as defined in 31 T.A.C. §19.2(a)(21). Using the designations in 31 T.A.C. §501.3(b), identify the type(s) of Coastal Natural Resource Area(s) impacted by any part of the route and/or facilities.

This application includes facilities located within the coastal management program boundary as defined in 31 T.A.C. § 503.1.

The coastal management program (CMP) boundary as defined in 31 T.A.C. § 503.1 and the Coastal Facilities Designation Line (CFDL) as defined in 31 T.A.C. § 19.2(a)(21) coincide in the portion of Nueces County encompassed by the study area defined in the EA for this Project. The entire study area and all alternative routes of the Project are located seaward of the CMP boundary and the CFDL .

P.U.C. Subst. R. 25.102 indicates that the Commission “may grant a certificate for the construction of generating or transmission facilities within the coastal boundary as defined in 31 T.A.C. § 503.1 only when it finds that the proposed facilities are consistent with the applicable goals and policies of the Coastal Management Program specified in 31 T.A.C. § 501.14(a), or that the proposed facilities will not have any direct and significant impacts on any of the applicable coastal natural resource areas specified in 31 T.A.C. § 501.3(b).” After P.U.C. Subst. R. 25.102 was adopted, CCC rule § 501.14(a) was repealed and replaced by § 501.16, which now establishes the policies for construction of electric transmission facilities with the CMP. (See Texas Register, Vol 29,

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Number 30, July 23, 2004, p. 7039.)

The Coastal Coordination Council (CCC) has adopted rules to ensure that state agency actions are consistent with the CMP goals and policies [TAC 31, Part 16, Chapter 505, Subchapter A.]. When issuing a certificate of convenience and necessity, the actions of Public Utility Commission must be consistent with the CMP goals and policies [§ 505.11(a)(2)]. The CCC achieves consistency primarily through individual agency rules that reflect the CMP goals and policies [§ 505.10(b)]. The Commission has adopted rules that reflect the CMP goals and policies.

One of the goals and policies of the CMP is “to ensure sound management of all coastal resources by allowing for compatible economic development and multiple human uses of the coastal zone.” [§ 501.12(2)] The CCC recognizes that transmission lines may be constructed within the coastal zone [§ 501.2(6)] and has adopted specific rules to address transmission line projects. CCC rule § 501.16 delineates the policies for the construction of electric transmission facilities in the coastal zone [§ 501.16(a)(4)] and requires the Commission to comply with the policies in that section when issuing certificates of convenience and necessity [§ 501.16(b)]. The policy of the CCC indicates that transmission lines constructed within a coastal zone “be located, where practicable, in existing rights-of-way or previously disturbed areas if necessary to avoid or minimize adverse effects.” [§ 501.16(a)(4)(A)] According to the definition in § 501.3(a)(11), the term ‘practicable’ means “available and capable of being done after taking into consideration existing technology, cost, and logistics in light of the overall purpose of the activity.” P.U.C. Subt. R. 25.101 reflects the CMP goals and policies and requires the applicant for a CCN to consider ‘engineering constraints’ and ‘costs’ [P.U.C. Subt. R. 25.101(b)(3)(B)], and reflects the CMP goals and policies of constructing transmission lines in existing rights-of-way and in previously disturbed areas [P.U.C. Subt. R. 25.101(b)(3)(B)(i), (ii) and (iii)]. The CCC rules recognize that the construction of a transmission line may affect coastal historic areas, wildlife corridors or fish or bird migratory routes, and habitat for terrestrial and aquatic wildlife [501.3(a)(1)(C), (D), and (E)]; and the Commission has the statutory obligation to consider the effects on historical values and environmental integrity [PURA § 37.056].

The CCC goal of constructing transmission lines in previously disturbed areas as expressed in § 501.16(a)(4) is limited to transmission lines constructed to or on Coastal Barrier Resource System Units (barrier islands). Though this Project is not located on a barrier island, the selected alternative routes comply with this goal by paralleling or utilizing existing transmission lines; or paralleling existing roads to the greatest extent possible.

In 2010, the CCC underwent review by the Texas Sunset Advisory Commission (SAC). The SAC found that while the state benefits from maintaining a federally approved CMP, the CCC is no longer needed to administer it. In response to the SAC review, the Texas legislature passed and the governor signed into law HB 2250/SB 656. This law, which became effective in on September 1, 2011, abolished the CCC, assigned the CCC’s functions to the Land Commissioner and the GLO, and required the Land Commissioner to establish a Coastal Coordination Advisory Committee (CCAC). The CCAC consists of appointees from the former CCC member agencies and appointed public members.

To assist the CCAC, four “coastal issue teams” were formed on various issues to increase interagency coordination and communication among staff who work daily on these issues. The issue teams deal with the following: (1) water quality; (2) CMP grants; (3) CMP coastal long-term planning; (4) the Permitting Assistance Group (PAG); and (5) Regulatory issues.

Portions of the Project are located within coastal natural resource areas (CNRA) as identified in 31 T.A.C. § 501.3(b). CNRAs include waters of the open Gulf of Mexico, waters under tidal influence, submerged lands, coastal wetlands, submerged aquatic vegetation, tidal sound and mud flats, oyster reefs, hard substrate reefs, coastal barriers, coastal shore areas, gulf beaches, critical dune areas, special hazard areas (floodplains, etc.), critical erosion areas, coastal historic areas, and coastal preserves.

To determine whether any CNRAs are located along the alternative routes, Atkins conducted a

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review of the CMP and performed field reconnaissance in the study area. Atkins also reviewed aerial photography and associated mapping provided by the Texas General Land Office, Federal Emergency Management Agency, U.S. Fish and Wildlife Service, and the U. S. Geological Survey. Based on this review, Atkins determined that the following CNRAs are located along the alternative routes to varying extents.

Tidal sand and mud flats

Coastal Shore areas

Submerged aquatic vegetation

Submerged lands

Water under tidal influence

Coastal wetlands

Coastal preserves

Special hazard areas

Any potential impacts to the CNRAs listed above will be avoided or minimized by the special construction methods to be utilized in sensitive environmental areas (see Section 1.4 of the EA/ Routing Study) and by potential mitigation measures required by the appropriate state or federal agency. Table 4-1 in the EA/ Routing Study (Attachment No. 1 to this application) presents detailed information pertaining to the length a particular CNRA is crossed by each alternative route. A detailed discussion of each route's potential impact on a particular CNRA is included in section 4.10 of the EA/ Routing Study (Attachment No. 1 to this application).

As required by P.U.C. Subst. R. 25.102, the proposed facilities are consistent with the goals and policies of the Coastal Management Program specified in § 501.16 [formerly § 501.14(a)].

29. Environmental Impact:

Provide copies of any and all environmental impact studies and/or assessments of the project. If no formal study was conducted for this project, explain how the routing and construction of this project will impact the environment. List the sources used to identify the existence or absence of sensitive environmental areas. Locate any environmentally sensitive areas on a routing map. In some instances, the location of the environmentally sensitive areas or the location of protected or endangered species should not be included on maps to ensure preservation of the areas or species. Within seven days after filing the application for the project, provide a copy of each environmental impact study and/or assessment to the Texas Parks and Wildlife Department (TPWD) for its review at the address below. Include with this application a copy of the letter of transmittal with which the studies/assessments were or will be sent to the TPWD.

Wildlife Habitat Assessment Program
Wildlife Division
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, Texas 78744

The applicant shall file an affidavit confirming that the letter of transmittal and studies/assessments were sent to TPWD.

Environmental Assessment and Alternative Route Analysis for the Proposed Barney Davis to Naval Base 138 kV Transmission Line Project, Nueces County, Texas, prepared for Electric Transmission Texas, by Atkins is included as Attachment No. 1 to this application. Sources, used to identify the existence or absence of sensitive environmental areas, are provided in Section 8.0 of the EA/ Routing Study (Attachment No. 1 to this application). Sensitive areas are delineated on Figure 2-2 (Primary

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Alternative Routes in Relation to Environmental and Land Use Constraints) of the EA/ Routing Study (Attachment No. 1 to this application).

A copy of the letter of transmittal with which the EA/ Routing Study was sent to the TPWD is included as Attachment No. 13a to this application. An affidavit confirming that the letter of transmittal, and studies /assessments were sent to TPWD is included as Attachment No. 13b to this application.

30. Affidavit:

Attach a sworn affidavit from a qualified individual authorized by the applicant to verify and affirm that, to the best of their knowledge, all information provided, statements made, and matters set forth in this application and attachments are true and correct.

Attachment No. 14 to this application is the affidavit of John D. Pulay.