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PUC PROJECT NO. 35077

INFORMATIONAL FILING OF ERCOT	§	BEFORE THE
INTERCONNECTION AGREEMENTS	§	PUBLIC UTILITY COMMISSION
PURSUANT TO SUBST. R. § 25.195(e)	§	OF TEXAS

**ONCOR ELECTRIC DELIVERY COMPANY LLC’S RESPONSE TO B.F. HICKS’
SUPPLEMENTARY COMPLAINT**

Oncor Electric Delivery Company LLC (“Oncor”) respectfully submits this response to the October 4, 2024, Supplementary Complaint filed in this project by B.F. Hicks.¹ Pursuant to 16 Texas Administrative Code (“TAC”) § 22.78(a), this response is timely filed.

I. BACKGROUND

Oncor filed a Standard Generation Interconnection Agreement (“SGIA”) for the Umbra (Stockyard) Solar & BESS project (“Umbra Solar”) on November 9, 2022,² followed by an amendment to the SGIA on May 23, 2024.³ On September 13, 2024, Mr. Hicks filed a letter of complaint regarding Umbra Solar, alleging that Oncor “is working with the foreign solar developers across [Franklin County]” including “probably one hundred miles of transmission line clearance”⁴ The letter asks the Public Utility Commission of Texas (“Commission”) to prevent construction or require relocation of the transmission lines.⁵ On September 20, 2024, Oncor filed a response clarifying that the developer of Umbra Solar, Stockyard Solar Project, LLC, is not prohibited from owning generation in Texas, and in any event, Oncor has not begun construction of the Umbra Solar interconnection.⁶ On October 4, 2024, Mr. Hicks filed the Supplementary Complaint, which makes a series of unfounded allegations regarding the Umbra

¹ Supplementary Complaint, Interchange Item No. 1947 (Oct. 4, 2024).

² Interconnection Agreement Between Oncor Electric Delivery Company LLC and Stockyard Solar Project, LLC (Umbra (Stockyard) Solar & BESS), Interchange Item No. 1516 (Nov. 9, 2022).

³ Amendment No. 1 to the Generation Interconnection Agreement Between Oncor Electric Delivery Company LLC and Stockyard Solar, LLC (Umbra (Stockyard) Solar & BESS), Interchange Item No. 1831 (May 23, 2024).

⁴ Advice that Oncor Electric Delivery Company is Working with Foreign Solar Developers, Interchange Item No. 1927 (Sep. 13, 2024).

⁵ *Id.*

⁶ Oncor Electric Delivery Company LLC’s Response to B.F. Hicks, Interchange Item No. 1931 (Sep. 20, 2024).

Solar interconnection and re-urges Mr. Hicks' request to prevent construction of transmission lines through Franklin County.⁷

II. ONCOR'S RESPONSE

Oncor has a statutory obligation to provide non-discriminatory access to the transmission system when requested by a generator.⁸ Oncor will continue to fulfill this obligation in accordance with PURA, the Commission's rules, Oncor's Tariff for Transmission Service, and other applicable requirements. As stated in Oncor's September 20 filing, Oncor (including its subcontractors) has not begun construction of the Umbra Solar interconnection. This includes right-of-way clearing.⁹ Oncor's only active transmission project in Franklin County, aside from routine maintenance and vegetation management activities, is the replacement of 11 structures along an existing 345 kV transmission line to improve right-of-way clearances.¹⁰ This work is occurring entirely within Oncor's existing right-of-way and is exempt from the Commission's certification requirements under 16 TAC § 25.101(c)(5)(B). Further, the photographs labeled *Photo #3* on page 6 of the Supplementary Complaint are *not* Oncor facilities, as Mr. Hicks alleges.

III. CONCLUSION

Mr. Hicks' allegations have no basis in fact, and his request for relief has no legal basis. Oncor does not believe any further action is required on this issue.

⁷ Supplementary Complaint at 1-2.

⁸ Tex. Util. Code Ann., Public Utility Regulatory Act § 35.004(a)-(b) ("PURA").

⁹ See *CY 2024 Electric Utility Transmission Construction Reports Under 16 TAC § 25.83*, Project No. 56006, Oncor's September 2024 Monthly Construction Progress Report (Interchange Item No. 289) at p. 25, ln. 924 (Sep. 13, 2023) (estimating that Oncor will begin construction on the Bear Pen Switch—the point of interconnection for Umbra Solar—on June 6, 2025).

¹⁰ See Project No. 56006, Oncor's September 2024 Monthly Construction Progress Report at p. 8, ln. 262.

Respectfully submitted,

By: /s/ Jared M. Jones

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**ATTORNEYS FOR ONCOR ELECTRIC
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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been filed with the Commission and served on B.F. Hicks via email on this the 11th day of October, 2024.

/s/ Rachel R Roberts