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PUC DOCKET NO. 38597

APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY TO AMEND A CERTIFICATE OF CONVENIENCE AND NECESSITY (CCN) FOR A PROPOSED CREZ 345 KV TRANSMISSION LINE WITHIN ARCHER, CLAY, COOKE, DENTON, JACK, MONTAGUE, WICHITA, WILBARGER, AND WISE COUNTIES	§	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

SUPPLEMENTAL RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO FOREST CITY & MAHARD'S FIRST REQUEST FOR INFORMATION QUESTION NOS. 1-01, 1-03, 1-05, AND 1-06

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Oncor Electric Delivery Company LLC ("Oncor") files this Supplemental Response to the aforementioned requests for information.

I. Written Responses

Attached hereto and incorporated herein by reference are Oncor's written responses to the aforementioned requests for information. Each such response is set forth on or attached to a separate page upon which the request has been restated. Such responses are also made without waiver of Oncor's right to contest the admissibility of any such matters upon hearing. Oncor hereby stipulates that its responses may be treated by all parties exactly as if they were filed under oath.

II. Inspections

In those instances where materials are to be made available for inspection by request or in lieu of a written response, the attached response will so state. For those materials that a response indicates may be inspected at the Austin voluminous room, please call at least 24 hours in advance for an appointment in order to assure that there

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is sufficient space and someone is available to accommodate your inspection. To make an appointment at the Austin voluminous room, located at 1005 Congress, Suite B-50, Austin, Texas, or to review those materials that a response indicates may be inspected at their usual repository, please call Teri Smart at 214-486-4832. Inspections will be scheduled so as to accommodate all such requests with as little inconvenience to the requesting party and to company operations as possible.

Respectfully submitted,

ONCOR ELECTRIC DELIVERY COMPANY LLC

By: Dan Kelly /MMG

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ATTORNEYS FOR ONCOR ELECTRIC DELIVERY COMPANY LLC

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been emailed or sent via overnight delivery or first class United States mail, postage prepaid, to the propounding party, on this the 15th day of November, 2010.

Dan Kelly /MMG

REQUEST:

If Oncor's application proposes segments of routes that travel parallel to existing transmission lines for some portions of the proposed routes, but do not parallel existing transmission lines for other portions of the proposed routes, what circumstances justify the disparate treatment for each route segment?

RESPONSE:

The following response was prepared by or under the direct supervision of Russell J. Marusak, the sponsoring witness for this response.

The following information is provided in accordance with the agreement of the requesting party in lieu of the requested information. The information, as agreed to be provided, pertains to Links T5, T3, V, and V0.

In addition to considering paralleling existing transmission lines, Commission Substantive Rule 25.101 (b)(3)(B) requires that routing also consider the policy of prudent avoidance. Furthermore, Halff considered other routing constraints consistent with PURA 37.056 (c)(4)(A)-(D). Beginning from the Anna Switching station progressing northeast to southwest, a series of links parallels portions of an existing single-circuit 345 kV transmission line. These include Links V, T3, and T5. (Link V0 is a connection point within the Ann Station.)

The entire length of Link V and Link T3 parallel the existing 345 kV transmission line because Halff identified no other constraints that would otherwise preclude paralleling this corridor. From the Link T3 and Link T2 node, Link T5 continues to parallel the existing 345 kV transmission line to a point just north of FM 1461. A southward deviation is necessary to avoid habitable structures along Four Seasons Lane that would otherwise be within the right-of-way. This deviation follows apparent property boundaries until it turns back west toward the existing 345 kV transmission line at a point that accommodates paralleling CR 123. Link T5 resumes paralleling the existing 345 kV transmission line for a short distance, but must likewise deviate from this parallel path to avoid habitable structures that would otherwise be within the right-of-way. After Link T5 crosses US 380, no other transmission lines provide a westward progressing opportunity to parallel toward the node of Links O3 and O4.

REQUEST:

For any segments of routes that do travel parallel to existing transmission lines, please describe in detail for each such segment Oncor's position on the benefits and disadvantages of running such route segments parallel to existing transmission lines.

RESPONSE:

The following response was prepared by or under the direct supervision of Charles T. Jasper, the sponsoring witness for this response.

The following information is provided in accordance with the agreement of the requesting party in lieu of the requested information. The information, as agreed to be provided, pertains to Links T5, T3, V and V0 and Links Z7, Z8 and portions of Z1 and Z9 where Oncor is proposing to co-locate the proposed 345 kV transmission line with an Oncor 138 kV transmission line.

Those portions of Links T5, T3, V, and V0 which parallel the existing Collin – Anna 345 kV transmission line and those portions of Links Z1, Z7, Z8 and Z9 which will be co-located with the existing Arco-Krugerville section of the Denton-Frisco-Celina 138 kV transmission line in an existing single right-of-way have the advantage of demonstrating compliance with PUC Substantive Rule 25.101(B)(3)(b)(ii). Paralleling existing compatible right-of-way can often mitigate or moderate the negative impacts associated with the construction and operation of a new transmission line on the affected community and landowners, including the following ways:

First, in agricultural areas such as those in proximity to Links T5, T3, V, and V0, paralleling an existing right-of-way with a new transmission line can place these obstacles to planting, application of fertilizers, insecticides, herbicides, and harvesting into a single corridor. This is important when aerial applications are made.

Second, assuming that both rights-of-way for the transmission lines will exist on the same landowner's property, paralleling an existing right-of-way with a new transmission line can place two rights-of-way that may present land use constraints, such as building prohibitions or limitations, into a single corridor.

Third, from a wildlife habitat perspective, paralleling an existing right-of-way with a new transmission line can reduce the impact of wildlife habitat fragmentation, especially in wooded areas. Paralleling an existing right-of-way with a new transmission line can also reduce the impact to birds during migration, by minimizing the number of corridors that can present hazards to flight.

Paralleling an existing right-of-way with a new transmission line also can have some unintended negative effects, including concentrating the impacts associated with

transmission lines to landowners that are already being burdened by the existing transmission line. On tracts that currently have habitable structures located in proximity to an existing transmission line, the paralleling an existing transmission line can result in placing one or more existing habitable structures within the right-of-way for the proposed new transmission line. Paralleling an existing transmission line could also impact other existing structures, including cemeteries, electronic installations, oil/gas wells, water wells, etc. On tracts currently being used for agricultural purposes, the addition of another transmission line places additional obstacles in a field to be avoided during planting, application of fertilizers, insecticides, herbicides, and harvesting operations. On tracts being developed for commercial or residential purposes, placing an additional transmission line on a tract can reduce the amount of land that can be efficiently and effectively used for new homes, or businesses. Additionally paralleling of certain transmission facilities can raise grid security and reliability issues.

Although Substantive Rule 25.101(b)(3)(B)(ii) requires the consideration of paralleling existing compatible rights-of-way, it requires an applicant to address the criteria in PURA 37.056(c), engineering constraints, and costs, grid reliability, and security, when routing new transmission lines, unless a route is agreed upon by the utility and directly affected landowners. Oncor has complied with each of these requirements in the routing of the preferred and alternate routes filed with the CCN Application for the Proposed Transmission Line Project.

REQUEST:

What is Oncor's position on the potential ramifications to system reliability if 345-kV transmission lines are sited adjacent to other transmission lines?

RESPONSE:

The following response was prepared by or under the direct supervision of Kenneth A. Donohoo, the sponsoring witness for this response.

The following information is provided in accordance with the agreement of the requesting party in lieu of the requested information. The information, as agreed to be provided, pertains to Links T5, T3, V and V0 and supplies a definition of "criticality" as the term is used in Oncor's original response to this RFI.

As understood in the context of system reliability, "criticality" is a determination of whether or not a line is critical to the system based on the load flows across that line, the line's location in relation to other transmission facilities, and the purpose for the line or the other elements of the transmission grid that are reliant on the line. If a critical transmission line is lost, then a widespread outage might occur. It may also be critical if the outage results in a huge amount of power being instantaneously rerouted to other transmission facilities, which cause security and reliability problems on other portions of the ERCOT system.

The potential ramifications are highly dependent on system conditions at the time of the outage of the adjacent facilities. The system conditions include generation commitment/dispatch levels, load levels and transmission topology/configuration. The ramifications vary from minimal (no loss of load or generation) to moderate (loss of local load and generation) to severe (widespread outage of transmission system, load and generation).

The paralleling of the Krum W – Anna transmission line for the relatively short distances along Links T5, T3, and V, with the Jacksboro – W Denton line is not considered a critical situation. Oncor believes it is reasonable to parallel these lines for this project.

REQUEST:

Under what circumstances does Oncor believe it is appropriate and advisable to parallel existing and approved but not yet constructed right-of-way with a new transmission line?

RESPONSE:

The following response was prepared by or under the direct supervision of Kenneth A. Donohoo, the sponsoring witness for this response.

The following information is provided in accordance with the agreement of the requesting party in lieu of the requested information. The information, as agreed to be provided, is contained in Oncor's supplemental response to Forest City & Mahard RFI Set 1, Question No. 1-05.

Oncor believes it is appropriate to parallel existing and proposed transmission lines when there is no security and reliability concerns.