



Control Number: 42087



Item Number: 485

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PUC DOCKET NO. 42087

APPLICATION OF ONCOR ELECTRIC
DELIVERY COMPANY LLC TO AMEND
A CERTIFICATE OF CONVENIENCE
AND NECESSITY FOR A PROPOSED
138 KV TRANSMISSION LINE IN
DENTON, TARRANT, AND WISE
COUNTIES, TEXAS

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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

FILED
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PUBLIC UTILITY COMMISSION
FILING CLERK

**RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC
TO TODD GROUP'S FIRST REQUEST FOR INFORMATION**

TO THE PUBLIC UTILITY COMMISSION OF TEXAS:

Oncor Electric Delivery Company LLC ("Oncor") files this 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

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: 

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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 filed with the Commission, served on the movant via email or traditional service, and served on all other parties via the PUC Interchange pursuant to SOAH Order No. 1 entered in this docket, on this the 21ST day of April, 2014.



Jaren A. Taylor

REQUEST:

A portion of the current proposed Link D runs parallel to the Oncor Willow Creek to Hicks 345-kV CREZ right of way instead of being underbuilt with the existing CREZ transmission line. Please state the bases for the decision not to underbuild any portion of Link D with the existing 345-kV CREZ transmission line?

RESPONSE:

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

Link D is not under-built on the Willow Creek to Hicks 345 KV line for multiple reasons. Under-building Link D on any portion of the Willow Creek to Hicks 345 KV line would require that portion to be removed and rebuilt with new structures. The new structures would need to be taller and stronger to support the additional load created by the under-build. This would have major cost implications, and would require the Willow Creek to Hicks 345 KV line be taken out of service during the rebuild.

REQUEST:

A portion of the current proposed Link D runs parallel to the Oncor Willow Creek to Hicks 345-kV CREZ right of way. Does Oncor contend that engineering constraints (as that term is used in PUC Subst. R. 25.101(b)(3)(B)) impacted your decision not to underbuild any portion of Link D with the existing CREZ transmission line? Please state the general factual bases that support your response.

RESPONSE:

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

Please see Oncor's response to Hillwood Group RFI Set No. 1, Question No. 1-01 regarding the reasons Oncor did not propose underbuilding on the Willow Creek - Hicks line.

REQUEST:

Can any of the existing monopoles for the Oncor Willow Creek to Hicks 345-kV CREZ Transmission Line on the Todd Group's property be used to underbuild any portion of proposed Link D? State the general factual bases that support your response.

RESPONSE:

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

No. See Oncor's response to Hillwood Group RFI Set No. 1, Question No. 1-01 for the factual bases that supports this statement.

REQUEST:

Can any of the existing monopoles for the Oncor Willow Creek to Hicks 345-kV CREZ Transmission Line on the Todd Group's property be used to underbuild any portion of proposed Link D if modifications are made to the monopoles? Please state the general factual bases that support your response.

RESPONSE:

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

No. The existing Willow Creek to Hicks 345 kV monopoles on the Todd Group's property could not be modified to underbuild any portion of proposed Link D. As discussed in Oncor's response to Hillwood Group RFI Set No. 1, Question No. 1-01 response, new transmission structures specifically designed and constructed for the underbuild would be needed.

REQUEST:

Please describe the modifications, if any, referenced in response to Request No. 1-4.

RESPONSE:

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

Please see Oncor's response to Hillwood Group RFI Set No. 1, Question No. 1-04.

REQUEST:

Please describe the approximate additional costs for the modifications, if any, described in response to Request No. 1-4.

RESPONSE:

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

Please see Oncor's response to Hillwood Group RFI Set No. 1, Question No. 1-04.

REQUEST:

If you contend replacement monopoles would be necessary to underbuild Link D with the existing Oncor Willow Creek to Hicks 345-kV CREZ Transmission Line, then what is the approximate additional cost for the replacement monopoles as compared to the monopoles to be used for the current proposed Link D?

RESPONSE:

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

No cost analysis has been performed for underbuilding any of the proposed project on the existing Oncor Willow Creek to Hicks 345 kV CREZ Transmission Line.

REQUEST:

Please describe the basic differences between the monopoles used on the Todd Property for the existing Oncor Willow Creek to Hicks 345-kV CREZ Transmission Line and the existing monopoles used on the portion of the same line used to underbuild the Oncor 138-kV Sunset - Rhome transmission line. (This line segment is further identified in Finding of Fact No. 44 in the PUC Order, signed December 13, 2010, in Docket No. 38324 as being on a portion of Link ZZ, and Links BBB and EEE until approximately the southern border of Tract 154.)

RESPONSE:

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

Generally, the Willow Creek to Hicks 345 kV line, Sunset to Rhome 138 kV under-built poles are taller than the Willow Creek to Hicks 345 kV line poles on the Todd property (north of the Hicks Switching Station). These poles are also designed to handle larger loads than the poles on the Todd property. This generally requires stronger poles with larger foundations.

REQUEST:

Do you consider underbuilding any portion of the proposed Link D with the existing Oncor Willow Creek to Hicks 345-kV CREZ Transmission Line to be a minor modification consistent with minimizing the impact on landowners? Please state the general factual bases that support your response.

RESPONSE:

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

Underbuilding on the existing Willow Creek to Hicks 345 kV CREZ Transmission Line would not be a minor modification. Please see Oncor's response to Hillwood Group RFI Set No. 1, Question No. 1-01 for the factual basis that supports this response.

REQUEST:

Do you consider the costs of acquiring a new right of way and constructing a new transmission line for the proposed Link D to be more economical than underbuilding a portion of Link D with the existing Oncor Willow Creek to Hicks 345-kV CREZ Transmission Line? Please state the general factual bases that support your response.

RESPONSE:

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

No analysis has been done on the cost to underbuild on the Todd Group property. It is anticipated that it is more economical to build a new line on new ROW than to tear down, rebuild, and underbuild on an existing line.

REQUEST:

What are the approximate cost comparisons for acquiring a new right of way and constructing a new transmission line for the proposed Link D as compared to underbuilding a portion of Link D with the existing Oncor Willow Creek to Hicks 345-kV CREZ Transmission Line? Please state the general factual bases that support your response.

RESPONSE:

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

No analysis has been performed to determine this cost.

REQUEST:

The southern end of proposed Link D cuts across Todd Group's property rather than paralleling the Oncor Willow Creek to Hicks 345-kV CREZ Transmission Line right of way. Please state the general factual bases that support your decision not to parallel an existing compatible right of way at that location.

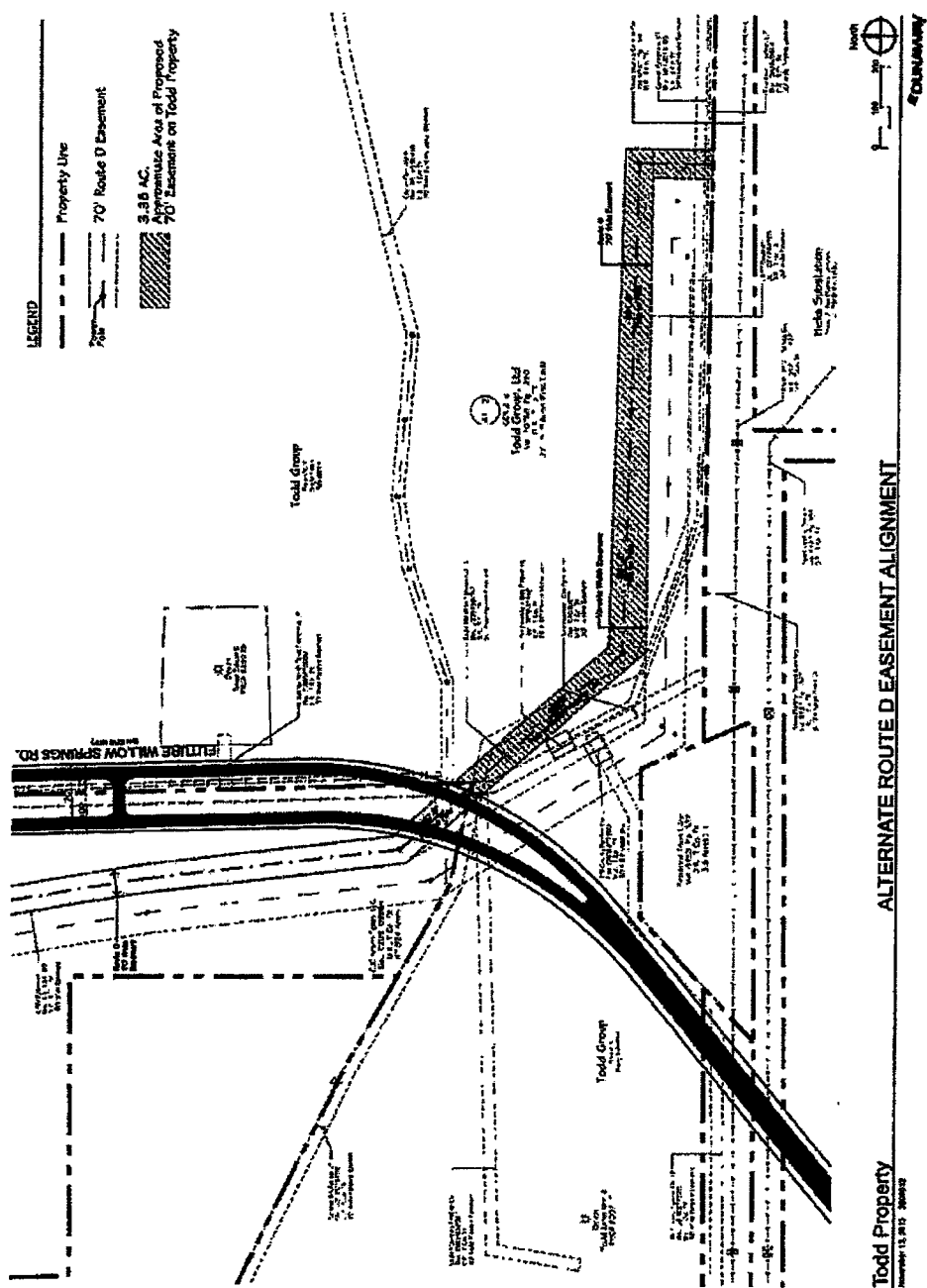
RESPONSE:

The following response was prepared by or under the direct supervision of John D. Wooten, the sponsoring witness for this response.

The proposed Link D parallels the existing Oncor Willow Creek to Hicks 345 kV Transmission Line for approximately 720 feet on Todd Group's property. Due to the understood location of several existing natural gas pipelines adjacent to the Oncor Willow Creek to Hicks 345 kV Transmission Line, the proposed Link D does not parallel the existing Oncor Willow Creek to Hicks 345 kV Transmission Line for its entire length across Todd Group's property.

REQUEST:

Todd Group submitted a modified route location as identified on the attached Exhibit titled "Revised D." Please state the general factual bases that support your reasons, if any, why the current proposed Link D could not be modified as per the attached exhibit.



REVISÉ D

RESPONSE:

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

Oncor cannot state whether the modification to Link D, as proposed in the attached Todd Group's Revised D Exhibit, is feasible until on-the-ground surveys can be performed. Should a route be approved by the PUC containing Link D, Oncor will cooperate with Todd Group concerning the placement of Link D across their property in order to minimize the impact of the proposed transmission line.