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DOCKET NO. 52455

**APPLICATION OF ONCOR ELECTRIC § PUBLIC UTILITY COMMISSION
DELIVERY COMPANY LLC TO §
AMEND ITS CERTIFICATE OF § OF TEXAS
CONVENIENCE AND NECESSITY FOR §
THE OLD COUNTRY SWITCH 345-KV §
TAP TRANSMISSION LINE IN ELLIS §
COUNTY**

**COMMISSION STAFF’S RECOMMENDATIONS OR COMMENTS ON ONCOR’S
RESPONSES TO QUESTIONS REGARDING ALTERNATIVES TO THE PROJECT**

On August 26, 2021, Oncor Electric Delivery Company LLC (Oncor) filed an application to amend its Certificate of Convenience and Necessity (CCN) No. 30043 for a proposed 345-kilovolt (kV) transmission line in Ellis County.

On August 30, 2021, the administrative law judge (ALJ) filed Order No. 1, requiring the Staff of the Public Utility Commission (Staff) of Texas to file a recommendation or comments on Oncor’s responses to the four standard electric CCN questions regarding alternatives to the project by September 24, 2021. Therefore, this pleading is timely filed.

I. COMMENTS ON ONCOR’S RESPONSE TO ORDER NO. 1

On September 9, 2021, Oncor filed its responses to the four standard electric CCN questions posed in Order No. 1. Staff has reviewed the responses and recommends that Oncor’s responses are sufficient and in accordance with Staff’s understanding of the application. This recommendation, however, does not address the merits of the application. As supported by the attached memorandum of John Poole, Infrastructure Division, Staff notes that Oncor has adequately substantiated the need for the transmission line. However, an adjustment to capacity may be required, and Staff will address this issue with forthcoming requests for information.

II. CONCLUSION

Staff respectfully requests that the Oncor’s responses to the four electric CCN questions be deemed sufficient for further processing of this docket.

Dated: September 24, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on September 24, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Rashmin Asher for Mildred Anaele
Mildred Anaele

Public Utility Commission of Texas

Memorandum

TO: Mildred Anaele
Legal Division

FROM: John Poole, P.E.
Infrastructure Division

DATE: September 24, 2021

RE: Docket No. 52455, *Application of Oncor Electric Delivery Company LLC to Amend its Certificate of Convenience and Necessity for the Old Country Switch 345-kV Tap Transmission Line in Ellis County.*

On August 26, 2021 Oncor Electric Delivery Company LLC (Oncor) filed an application to amend their Certificate of Convenience and Necessity (CCN) to allow them to build a new single circuit 345 kilovolt (kV) transmission line to be built on double circuit capable lattice steel “V” tower structures in Ellis County, Texas. This transmission line will connect the proposed Oncor Old Country Switch Station, to be located approximately two miles west of Interstate Highway 35 East and approximately 0.3 miles east of Farm to Market Road 876 along the existing Oncor Venus Switch-Navarro Switch 345 kV transmission line, to the proposed Oystercatcher Solar Substation located near the intersection of Iola Lane and LR Campbell Road approximately 3.5 miles north-northwest of Italy, Texas. The line will proceed in a generally southwesterly direction for about 3.2 to 4.9 miles. I have reviewed the Application and Oncor’s responses to Order No. 1 to address the Alternatives to Transmission Line issues as ordered in Order No. 1 of the Application.¹

1. Has the Electric Reliability Council of Texas (ERCOT) Independent System Operator (ISO) recommended the proposed transmission line as necessary to alleviate "existing and potential transmission and distribution constraints and system needs within ERCOT" in the annual report filed under PURA § 39.155(b)? If not, is there a need for the proposed transmission line?

¹ Order No.1 at 2-3 (Aug. 30, 2021).

I have reviewed the Application and the response filed by Oncor on September 9, 2021 in this docket for compliance. While ERCOT has not recommended the line, Oncor has shown it is necessary to interconnect a 223 megawatt (MW) Solar Farm which is not possible without a transmission solution.²

2. If such a need exists, is the proposed transmission line the best option to meet the need, based on an analysis taking into account considerations of efficiency, reliability, costs, and benefits?

I have reviewed the Application and the response filed by Entergy on September 9, 2021 in this docket for compliance. Based on the capacity of the need to interconnect, I agree that a transmission project is the only solution. Oncor claims that the only other transmission line in the area that could interconnect this generation facility is a 69 kV transmission line owned by Brazos Electric Power Cooperative, Inc. However, a 69 kV transmission line is not capable of carrying the capacity required to properly interconnect the generation facility.³ Due to the fact the interconnection requires utilizing 345 kV facilities the large capacity of the line, 3070 mega volt amperes (MVA) for a 223 MW generation project, may be the most cost effective and reliably project. However, until Oncor substantiates this, an adjustment to capacity for the project may be required. I agree, based on my review of the application that a transmission project is required.

3. For utilities subject to the unbundling requirements of PURA § 39.051, is the proposed transmission line the best option when compared to employing distribution facilities to meet the specified need?

² Application at 8-9 (Aug. 26, 2021).

³ Oncor Electric Delivery Company's Response to Order No. 1 at 2 (Sept. 9, 2021).

A generation facility of this capacity requires a transmission solution especially as there are no significant local loads, and this project connects the generation facility to the nearest feasible transmission facility.

4. For utilities not subject to the unbundling requirements of PURA § 39.051, is the proposed transmission line the best option when compared to employing distribution facilities, distributed generation, and/or energy efficiency to meet the specified need?

Oncor is subject to the unbundling requirements of PURA § 39.051.⁴

⁴ Oncor Electric Delivery Company's Response to Order No. 1 at 3 (Sept. 9, 2021).