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**SOAH DOCKET NO. 473-22-0768
PUC 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, TEXAS (OLD COUNTRY SWITCH CCN)	§ § § § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO
CHAMBERS CREEK RANCH'S SECOND REQUESTS FOR INFORMATION**

**TO THE HONORABLE LINDA H. BRITE AND KATERINA DEANGELO,
ADMINISTRATIVE LAW JUDGES:**

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 700, Austin, Texas, or to review those materials that a response indicates may be inspected at their usual repository, please call Joni Price at 214-486-2844. 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,

By: /s/ Jared M. Jones

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been served by email on all parties of record who have provided an email address, on this the 1st day of December, 2021, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/ Jared M. Jones

Request

Please refer to Oncor's response to Chambers Creek RFI 1-12.

- a. Please provide all information, studies, reports, analyses, etc., that support Oncor's decision to not construct the substation at Option 3.
- b. Please confirm that Oncor owns or has an easement along the ROW of the existing Venus Switch – Navarro Switch 345 kV transmission Line.
- c. Please confirm that Oncor could access Substation Option 3 via the ROW of the existing Venus Switch – Navarro Switch 345-kV transmission line.
- d. Please provide any and all photographs Oncor has of the site near Substation Option 3.
- e. Please provide any topographical maps Oncor has of the site near Substation Option 3, that would support Oncor's characterization of the site have "undesirable topography."
- f. Please provide a detailed narrative explaining what makes the topography of Substation Option 3 "undesirable."
- g. Please confirm that Substation Option 3 is not in a FEMA floodplain. If this cannot be confirmed, please provide a detailed narrative explaining the response.
- h. Please provide the Google Earth files used to create ATTACHMENT 1 - Old Country Switch Station Locations Map.

Response

The following response was prepared by or under the direct supervision of Oscar Rodriguez, the sponsoring witness for this response.

- a. The information requested is Highly Sensitive and will be made available only after execution of certificate to be bound by the modified protective order in this docket. An index of the confidential information is included in Attachment 1. The *Site Visit Meeting Notes* document was created following field reconnaissance of potential station sites conducted on June 15, 2020. The attendees of this visit included a team of Oncor specialists in civil engineering, transmission services, substation development, and field construction, whose combined observations and feedback formed the basis of Oncor's decision not to construct the station at Option 3.
- b. Confirmed. Oncor has a non-exclusive transmission line easement along the right-of-way of the existing Venus Switch – Navarro Switch 345 kV transmission line.

- c. Denied. Oncor could not access Substation Option 3 via the right-of-way of the existing Venus Switch – Navarro Switch 345 kV transmission line, as noted on page 2 of Attachment 1 hereto. Oncor's easement does not permit Oncor to construct an access road through the right-of-way.
- d. Oncor does not have photographs of the site near Substation Option 3.
- e. Please see the Federal Emergency Management Agency ("FEMA") floodplain map included as Attachment 2 hereto.
- f. As shown in Attachment 2, Substation Option 3 is surrounded on three sides by FEMA flood hazard areas, including a sizeable valley that lies directly between Substation Option 3 and Bill Lewis Road. In order to reliably access Substation Option 3, Oncor would need to construct an access road that circumnavigated the valley, resulting in a longer, more circuitous route, which would add to the expense of the project.
- g. As shown in Attachment 2, Substation Option 3 is in an area of minimal flood hazard, but is surrounded on three sides by FEMA flood hazard areas.
- h. Attachment 1 – Old Country Switch Station Locations Map was created using the shapefiles provided to Chambers Creek Ranch in Oncor's response to Chamber Creek Ranch's RFI Set 1, Question No. 1-01. The proposed transmission line and potential station locations were drawn on a PDF version of the map.

ATTACHMENTS

ATTACHMENT 1 – Highly Sensitive Protected Material Index – 1 page

ATTACHMENT 2 – Federal Energy Management Agency ("FEMA") floodplain map – 1 page

HIGHLY SENSITIVE PROTECTED MATERIAL INDEX

1. Site Meeting Notes dated 6/15/2020 – 3 pages

National Flood Hazard Layer FIRMette



96°53'45"W 32°15'6"N



0 250 500 1,000 1,500 2,000 Feet 1:6,000

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Flood
		17.5 Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
		Digital Data Available
MAP PANELS		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 11/17/2021 at 9:16 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

DOCKET 52455 ATTACHMENT 2
CHAMBERS CREEK RANCH RFI SET NO. 1
QUESTION NO. 2-01
PAGE 1 OF 1



Request

Please refer to Oncor's response to Chambers Creek RFI 1-19b.

- a. Please confirm that Route 160 is \$2.1 million (20%) less expensive than Route 54, the least expensive route included in Oncor's Application.
- b. Please provide all studies and/or analyses that support Oncor's claim that the hypothetical substation location would result in "substantial additional costs."
- c. Please provide a detailed narrative explaining the "unique topography" of the hypothetical substation location.
- d. Please provide Oncor's estimate of the cost of the hypothetical substation such that it can be directly compared to the \$7.825 million cost estimate of Oncor's proposed location of the Old Country Switch.
- e. Please confirm that Oncor has access to the ROW on the Venus Switch – Navarro Switch 345-KV transmission line.
- f. Please explain why this substation location would require a different layout than the location selected by Oncor.
- g. Please provide the detailed engineering design/layout of the Old Country Switch at the location selected by Oncor.

Response

The following response was prepared by or under the direct supervision of Oscar Rodriguez, the sponsoring witness for this response.

- a. The transmission line costs for Route 160 are less expensive than for Route 54. However, this route does not terminate at Oncor's Old Country Switch and would involve other, non-quantified costs associated with the station.
- b. Please see (1) the *Site Visit Meeting Notes* provided in Oncor's response to Chambers Creek Ranch's RFI Set No. 2, Question No. 2-01, and (2) Oncor's response to Chambers Creek Ranch's RFI Set No. 2, Question No. 2-01f. Additionally, the property for this hypothetical substation location has not been acquired and there is no guarantee it can be timely acquired to allow construction to proceed as scheduled.
- c. Please see Oncor's response to Chambers Creek Ranch's RFI Set No. 2, Question No. 2-01f.
- d. Oncor does not have a cost estimate of the hypothetical substation. Creating such an estimate would require Oncor to conduct on-the-ground surveying and engineering designs for the station, which have not been performed.

- e. Confirmed. Oncor has access to the right-of-way on the Venus Switch – Navarro Switch 345 kV transmission line.
- f. The layout of a substation is determined by several factors, including (i) the station's position and orientation relative to the incoming and exiting transmission lines, jumpers, tap lines, and/or points of interconnection; (ii) the local topography and grading; and (iii) the location and direction of access roads and points of entry. The hypothetical substation is in a different location, presumably with distinct topography (although Oncor has not conducted surveys of the hypothetical station site), from the chosen location for the Old Country Switch. Furthermore, Oncor has not evaluated potential routes for access roads to this location in any detail. Therefore, at a minimum, the grading layout and access points of the hypothetical substation would differ from those at the chosen location for the Old Country Switch.
- g. The information requested is highly sensitive protected material and will be made available only after the execution of a certification to be bound by the modified protective order in this docket. An index of the highly sensitive confidential information is included in Attachment 1.

ATTACHMENTS

ATTACHMENT 1 – Highly Sensitive Confidential Index, 1 page

HIGHLY SENSITIVE PROTECTED MATERIAL INDEX

1. Old Country Switch detailed engineering design/layout – 2 pages

Request

Please refer to Oncor's response to Chambers Creek RFI 1-16.

- a. Please provide a detailed explanation of what makes this substation location "less reliable."
- b. Please provide any and all studies, reports, analyses, etc., that support Oncor's assertion that this substation location is less reliable.
- c. Please provide any and all studies, reports, analyses, GIS data, etc., that support Oncor's assertion that this substation location has sub-optimal terrain.
- d. Please provide any and all studies, reports, analyses, GIS data, etc. that supports Oncor's assertion that this substation location is "more flood prone than the location selected by Oncor."
- e. Please confirm that if the Commission required Oncor to construct the Old Country Switch at this location, it would do so.

Response

The following response was prepared by or under the direct supervision of Oscar Rodriguez, the sponsoring witness for this response.

- a. Locating stations in or near flood-prone areas hinders reliability. Flooding at an electric substation can cause equipment to fail and present a significant safety hazard. With respect to Substation Option 3, the presence of flood zones on three sides of the site, including directly between Substation Option 3 and Bill Lewis Road, could hinder access to the site. The ability to access facilities for maintenance and/or repairs is a key component of reliability.
- b. Please see the *Site Visit Meeting Notes* and FEMA flood-plain map provided in Oncor's response to Chambers Creek Ranch's RFI Set No. 2, Question No. 2-01.
- c. Please see the *Site Visit Meeting Notes* and FEMA flood-plain map provided in Oncor's response to Chambers Creek Ranch's RFI Set No 2, Question No. 2-01.
- d. Please see the maps included as Attachment 1 hereto and as Attachment 2 to Oncor's response to Chambers Creek Ranch's RFI Set No. 2, Question No. 2-01. These attachments are 1:6,000 scale FEMA floodplain maps respectively showing: (1) Oncor's chosen location for the Old Country Switch station; and (2) the location of Station Option 3; both overlain with FEMA flood hazard data. As shown in Attachment 1, there are no special flood hazard areas located within approximately 2,000 feet of Oncor's chosen location for the Old Country Switch station. By contrast, Station Option 3 is surrounded on three sides by FEMA flood zones and in close proximity to a

regulatory floodway.

- e. If ordered to do so by the Commission, Oncor would construct the Old Country Switch at this location. However substantial civil engineering, at increased costs, would likely be required to make this site feasible for substation construction.

ATTACHMENT

ATTACHMENT 1 – FEMA floodplain map – 1 page

National Flood Hazard Layer FIRMMette



96°54'50"W 32°16'N



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
		Area of Minimal Flood Hazard Zone X
OTHER AREAS		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

DOCKET 2455 ATTACHMENT 1
CHAMBERS CREEK BRANCH RFI SET NO. 2
QUESTION NO. 2-03
PAGE 1 OF 1

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **11/22/2021 at 2:06 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Request

Please provide Application Attachment 1 and all of its Appendices in the complete and original native PDF format. Note that this is not on the PUC Interchange in complete or native format.

Response

The following response was prepared by or under the direct supervision of Kimberly Buckley, the sponsoring witness for this response.

Oncor will provide Application Attachment 1 to Chambers Creek Ranch in its complete and native format through Oncor's file-sharing site.