



## Filing Receipt

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**PUC DOCKET NO. 52455**

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

**ONCOR ELECTRIC DELIVERY COMPANY LLC’S RESPONSE TO ORDER NO. 1**

Oncor Electric Delivery Company LLC (“Oncor”) files this Response to Order No. 1 (“Response”) and would respectfully show as follows:

**I. INTRODUCTION**

On August 26, 2021, Oncor filed an application (the “Application”) to amend its certificate of convenience and necessity for the proposed Old Country Switch 345 kV Tap Transmission Line project (the “Project”) to interconnect the planned Oystercatcher Solar generating facilities in Ellis County, Texas to the Electric Reliability Council of Texas (“ERCOT”) transmission grid. On August 30, 2021, the Public Utility Commission of Texas (“Commission”) Office of Policy and Docket Management issued Order No. 1 Requiring Information from Applicant and Recommendation from Staff on Sufficiency of Application and Notice; Addressing Other Procedural Matters (“Order No. 1”).<sup>1</sup> Among other things, Order No. 1: (a) identified four issues that the Commission requested Oncor to address, and (b) directed Oncor file its response by September 9, 2021. Accordingly, this Response is timely filed.

**II. RESPONSE TO ORDER NO. 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<sup>2</sup> § 39.155(b)? If not, is there a need for the proposed transmission line?**

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<sup>1</sup> Order No. 1 states that “[t]he total estimated cost for the proposed transmission line is approximately \$7.825 million.” However, \$7.825 million represents Oncor’s estimated costs associated with the Old Country Switch station only. The estimated costs for the transmission line range from \$10,392,000 to \$13,695,000, depending on the route selected by the Commission. See Application at 7-8 & Attachment No. 2.

<sup>2</sup> Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.017 (“PURA”).

The ERCOT ISO has not recommended the Project 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). However, there is a need for the Project.

The Project is needed to interconnect new solar generating facilities to the ERCOT grid. Oystercatcher Solar LLC has requested that Oncor provide the facilities necessary to interconnect the Oystercatcher Solar 223 MW solar farm to the ERCOT transmission grid.<sup>3</sup> Interconnecting generation of this capacity requires transmission-level facilities. This fact and the supporting documentation for it contained in the application are entitled to great weight under 16 TAC § 25.101(b)(3)(A)(ii)(II).

Oncor proposes to accomplish the requested interconnection for this transmission service customer by constructing a 345 kV transmission line extending from the planned Oystercatcher Solar Substation, which will be built, owned, and operated by Oystercatcher Solar LLC, to the proposed Old Country Switch station, which will be built, owned, and operated by Oncor. The Old Country Switch station will be located adjacent to Oncor’s Venus Switch – Navarro Switch 345 kV transmission line, the east circuit of which Oncor will loop through the proposed new Old Country Switch station.

**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?**

Yes. Oncor’s Venus Switch – Navarro Switch 345 kV transmission line is the nearest existing transmission line that can accommodate generation of this capacity. ERCOT has reviewed the transmission facilities in the area and identified Oncor’s Venus Switch – Navarro Switch transmission line as the most efficient means of providing transmission service to the Oystercatcher Solar facilities. The site of the proposed Oystercatcher Solar facilities is approximately 2.7 miles from the Venus Switch – Navarro Switch transmission line. Therefore, a new transmission line will be required to extend service to the Oystercatcher Solar facilities.

The only other existing transmission line in the vicinity of the Project is a 69 kV transmission line owned by Brazos Electric Power Cooperative, Inc. Transmission facilities operating at 69 kV are generally not capable of carrying the capacity required to interconnect generation of this capacity. Accordingly, this Project is the best option to meet the identified need.

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<sup>3</sup> See Application at Attachment 3 (ERCOT Standard Generation Interconnection Agreement between Oncor and Oystercatcher Solar LLC).

- 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?**

Yes. Distribution facilities are not practical alternatives to the Project. Interconnecting 223 MW of new solar generation will require facilities that can provide a connection to the ERCOT grid at transmission-level voltage. Generation interconnections of this magnitude are typically connected to the transmission system to enable long distance transfer of power and are not intended to serve exclusively local loads. Accordingly, the proposed transmission line is the best option when compared to employing distribution facilities to meet the specified need.

- 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?**

Not applicable. Oncor is subject to the unbundling requirements of PURA § 39.051.

Respectfully submitted,

By: /S/ Jaren A. Taylor

Jaren A. Taylor  
State Bar No. 24059069  
Winston P. Skinner  
State Bar No. 24079348  
Jared M. Jones  
State Bar No. 24117474  
VINSON & ELKINS LLP  
Trammell Crow Center  
2001 Ross Avenue, Suite 3900  
Dallas, Texas 75201-2975  
Telephone: (214) 220-7754  
Facsimile: (214) 999-7754  
jarentaylor@velaw.com  
wskinner@velaw.com  
jjones@velaw.com

**ATTORNEYS FOR ONCOR ELECTRIC  
DELIVERY COMPANY LLC**

**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 9th day of September, 2021, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/S/ Jaren A. Taylor