



Filing Receipt

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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
LONE STAR LAND & CATTLE COMPANY, LLC'S
FIRST 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 10th day of January, 2022, 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 review **Attachment 1** to this First Request for Information where in the pinkish line represents a modification to Segment DDD. Please consider an alternate route, named "Route 145-Mod" constructed using Segments A, T, **DDD-Mod**, EEE1, CCC, XX, WW, UU, TT, QQ, OO.

- a. Please provide Oncor's best available estimates of the route evaluation criteria for this alternative route in the same format as Table 7-2, Environmental Data for Alternative Route Evaluation, which is contained in Application Attachment 1, Environmental Assessment and Route Analysis.

Response

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

Environmental data for the alternate route designated "Route 145-Mod" is provided in Attachment 1 hereto.

ATTACHMENT

ATTACHMENT 1 – Environmental Assessment Data for Route 145-Mod – 2 pages

The following files are not convertible:

1-01a_Att_1-
Environmental_Assessment_Data_for_Route_145-Mod.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.

Request

Please review **Attachment 1** to this First Request for Information where in the pinkish line represents a modification to Segment DDD. Please consider an alternate route, named "Route 145-Mod" constructed using Segments A, T, **DDD-Mod**, EEE1, CCC, XX, WW, UU, TT, QQ, OO.

- b. Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 2, Cost Estimates.

Response

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

The cost estimate for the transmission line for the alternative route is \$11,708,000. Please see Attachment 1, the cost table for Routes 145-Mod and 152.

ATTACHMENT

ATTACHMENT 1 – Cost table for routes 145-Mod and 152 – 1 page

The following files are not convertible:

1-01b-Att-1-
Cost_Estimate_145Mod_and_152.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.

Request

Please review **Attachment 1** to this First Request for Information where in the pinkish line represents a modification to Segment DDD. Please consider an alternate route, named "Route 145-Mod" constructed using Segments A, T, **DDD-Mod**, EEE1, CCC, XX, WW, UU, TT, QQ, OO.

- c. If Oncor is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.

Response

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

Oncor will construct any route that is selected by the Public Utility Commission of Texas, including Route 145-Mod.

Request

Please consider an alternate route, named "Route 152" constructed using Segments A, T, U1, DDD, EEE1, CCC, XX, WW, UU, TT, QQ, OO.

- a. Please provide Oncor's best available estimates of the route evaluation criteria for this alternative route in the same format as Table 7-2, Environmental Data for Alternative Route Evaluation, which is contained in Application Attachment 1, Environmental Assessment and Route Analysis.

Response

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

Environmental data for the alternate route, "Route 152", was provided in the Environmental Assessment and Alternate Route Analysis prepared by Freese and Nichols included as Application Attachment 1. Detailed route evaluation criteria for Route 152 can be found in Application Attachment 1, Appendix D, Table 7-2, Environmental Data for Alternative Route Evaluation on page D-16.

Environmental Assessment, Appendix D, Table 7-2, in its complete, electronic, and native format, may be found at the PUCT Interchange, Docket No. 52455, Item No. 2.

[http://interchange.puc.texas.gov/search/documents/?controlNumber=52455&itemNumber=](http://interchange.puc.texas.gov/search/documents/?controlNumber=52455&itemNumber=2)

[2](http://interchange.puc.texas.gov/search/documents/?controlNumber=52455&itemNumber=2)

Request

Please consider an alternate route, named "Route 152" constructed using Segments A, T, U1, DDD, EEE1, CCC, XX, WW, UU, TT, QQ, OO.

- b. Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 2, Cost Estimates.

Response

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

The cost estimate for the transmission line for the alternative route is \$12,738,000. Please see Oncor's response to LSLC RFI Set No. 1, Question No. 1-01b, Attachment 1.

Request

Please consider an alternate route, named "Route 152" constructed using Segments A, T, U1, DDD, EEE1, CCC, XX, WW, UU, TT, QQ, OO.

- c. If Oncor is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.

Response

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

Oncor will construct any route that is selected by the Public Utility Commission of Texas, including Route 152.