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PUC DOCKET NO. 52455

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

MOTION TO ADMIT ADDITIONAL EVIDENCE

On May 2, 2022, the Public Utility Commission of Texas (“Commission”) Office of Policy and Docket Management (“OPDM”) filed a memorandum requesting additional information from Oncor Electric Delivery Company LLC (“Oncor”). Specifically, the memorandum requested that Oncor support the \$7,825,000 in estimated station costs associated with the Old Country Switch station proposed in this docket, including the station’s facilities and equipment, physical size, and design capacity for expansion. OPDM requested responses to these issues by May 5, 2022 at 3:00 PM. Therefore, this response is timely filed.

To address OPDM’s request, Oncor submits the attached supplemental direct testimony of Oncor witness, Mr. Oscar E. Rodriguez, which includes the requested information supporting Oncor’s estimated station costs. Oncor respectfully requests that this supplemental testimony be admitted to the evidentiary record.

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 May 4th, 2022, in accordance with the Commission's Second Order Suspending Rules, issued on July 16, 2020, in Project No. 50664.

/s/ Michele M. Gibson

PUC DOCKET NO. 52455

**SUPPLEMENTAL DIRECT TESTIMONY
OF OSCAR E. RODRIGUEZ, WITNESS FOR
ONCOR ELECTRIC DELIVERY COMPANY LLC**

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EXHIBIT SD-OER-1 Layout of Old Country Switch Station

1 **SUPPLEMENTAL DIRECT TESTIMONY OF OSCAR E. RODRIGUEZ**

2 **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

3 Q. ARE YOU THE SAME OSCAR E. RODRIGUEZ WHO FILED DIRECT
4 TESTIMONY IN THIS DOCKET?

5 A. Yes. I previously filed direct testimony in this docket on behalf of Oncor
6 Electric Delivery Company LLC ("Oncor").

7 Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT
8 TESTIMONY?

9 A. The purpose of my supplemental direct testimony is to provide additional
10 support for Oncor's estimated costs associated with the Old Country Switch
11 station, as requested in a memorandum dated May 2, 2022 and filed by
12 Public Utility Commission of Texas' ("Commission's") Office of Policy and
13 Docket Management. This testimony was prepared by me or under my
14 direct supervision and the statements and representations it contains are
15 true and correct to the best of my knowledge and belief.

16 **II. ESTIMATED STATION COSTS AND DESIGN**

17 Q. WHAT ARE ONCOR'S ESTIMATED COSTS FOR THE OLD COUNTRY
18 SWITCH STATION?

19 A. Oncor's estimated station costs are approximately \$7,825,000.

20 Q. ARE THESE COSTS CURRENTLY SUPPORTED IN THE EVIDENTIARY
21 RECORD?

22 A. Yes. Support for Oncor's estimated station costs are included in Oncor's
23 application for a certificate of convenience and necessity ("CCN"). Pages
24 7-8 of the CCN application include a breakdown of Oncor's estimated costs
25 associated with the station, including costs for right-of-way acquisition,
26 engineering and design, material and equipment procurement, and
27 construction. My supplemental direct testimony will provide additional
28 information regarding those cost estimates, including descriptions of the

1 station's facilities and equipment, physical size, and design capacity for
2 expansion.

3 Q. PLEASE DESCRIBE THE OLD COUNTRY SWITCH STATION
4 FACILITIES.

5 A. The Old Country Switch station is designed as a 3-breaker, ring-
6 arrangement point-of-interconnection station that will provide access to the
7 Electric Reliability Council of Texas ("ERCOT") transmission grid for the
8 Oystercatcher Solar generating facilities. More specifically, the station is
9 designed to loop one circuit of Oncor's Venus Switch – Navarro 345 kV
10 transmission line through the station, with the ability to accommodate a
11 second circuit with minor modifications to the station. This design will
12 provide two paths for electricity generated by the Oystercatcher Solar
13 facilities to access the transmission grid. This design will allow for
14 operational flexibility to keep Oystercatcher Solar connected to the grid
15 during maintenance and unplanned outages.

16 Q. WHAT FACILITIES AND EQUIPMENT WILL COMPRISE THE
17 PROPOSED OLD COUNTRY SWITCH STATION?

18 A. The Old Country Switch station will include aluminum tubular bussing and
19 a static mast for lightning protection. Additionally, each circuit entering the
20 station will have associated A-frame dead-end structures, capacitively
21 coupled voltage transformers, line traps, circuit breakers, disconnect
22 switches, and current transformers. The station will not serve load or
23 otherwise transform power to distribution voltage, so it is not designed to
24 accommodate power transformers.

25 Q. WHAT ARE THE PROPOSED OLD COUNTRY SWITCH STATION'S
26 DESIGNED DIMENSIONS?

27 A. As currently designed, the fence line of the Old Country Switch Station will
28 be approximately 426' by 313'. These dimensions and additional details

1 regarding the layout of the station are provided in the diagram included as
2 Exhibit SD-OER-1 hereto.

3 Q. WILL THE PROPOSED OLD COUNTRY SWITCH STATION INCLUDE
4 CAPACITY FOR EXPANSION?

5 A. Yes. Capacity will be available for the addition of one circuit in the future
6 with minimal modifications to the station. This additional capacity will allow
7 new generators in the area to connect to the ERCOT transmission grid
8 through the Old Country Switch station.

9 Q. PLEASE PROVIDE A BREAKDOWN OF ONCOR'S ESTIMATED
10 STATION COSTS.

11 A. Oncor's estimated station costs include approximately: \$3,491,000 for
12 material procurement, which includes the cost of all the equipment I
13 described above, including stores; \$2,636,000 for contract labor and
14 construction, which includes the costs for construction contractors laying
15 foundations, installing equipment, conducting surveys, grading the station
16 site, and installing the electrical ground grid; \$584,000 for Oncor
17 engineering and design, which covers the costs associated with work done
18 on this project by Oncor's internal engineering team; \$393,000 for right-of-
19 way and land acquisition; \$370,000 for contract engineering and design,
20 including ground surveying, geotechnical services, and station engineering
21 consulting services; and \$351,000 for Oncor construction, which covers
22 Oncor's costs associated with operations commissioning and internal field
23 construction coordinators.

24 **III. CONCLUSION**

25 Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY?

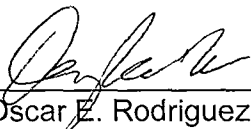
26 A. Yes, it does.

AFFIDAVIT

STATE OF TEXAS §
 §
COUNTY OF Tarrant §

BEFORE ME, the undersigned authority, on this day personally appeared Oscar E. Rodriguez who, having been placed under oath by me, did depose as follows:

"My name is Oscar E. Rodriguez. I am of legal age and a resident of the State of Texas. The foregoing testimony and exhibit(s) offered by me are true and correct, and the opinions stated therein are, to the best of my knowledge and belief, accurate, true and correct."



Oscar E. Rodriguez

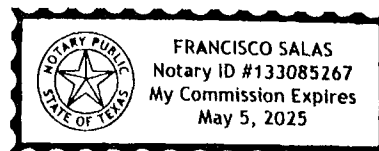
SUBSCRIBED AND SWORN TO BEFORE ME on this 4th day of May, 2022.



Notary Public, State of Texas

My Commission Expires

May 5, 2025



PUC Docket No. 52455

Rodriguez – Supplemental Direct
Oncor Electric Delivery Company LLC
Old Country Switch CCN

