Filing Receipt

Filing Date - 2023-07-31 11:10:18 AM

Control Number - 55067

Item Number - 1417

E-Filing Mistake

PUC Docket # 55067

Item # 1394

I filed item #1394 of Docket #55067 on July 30th.
When I open the ZIP file #1394 I see all five pages of my PDF file.
When others try to open #1394 they only see five blank pages.
I am refiling my PDF … Please delete 1394

Russell Sherwood
713-542-9570

Application of Oncor Electric Delivery Company LLC
for the Ramhorn Hill to Dunham 345 KV Transmission Line

PUC of Texas Dockett #55067

Statement of Position

Russell Sherwood

I am Russell Sherwood, airport manager for the Propwash Airport (16X) which is located north of the proposed segment M8 shown in Oncor's Ramhorn application of June 8, 2023. My Statement of Position is intended to call attention to the fact that erecting a tower along a segment of M8 south of Propwash intrudes into the FAA granted Avigation Easement for the airport.

In summary, Oncor's request of the FAA was to determine if a proposed 80' electric tower (note that the minimum tower shown in the Oncor PUC application is 120') would pose a hazard to navigation. Propwash's Avigation Easement starts the 20:1 slope 200 feet south of the runway. The data Oncor provided the FAA is flawed if Oncor calculates the beginning of the 20:1 slope from the middle of the Propwash Airport runway. The difference in calculations is dramatic.

Mid-runway calculation incorrectly places the easement slope 74± feet ABOVE the actual easement. Using the mid-runway calculation makes it appear as if the Oncor tower is well below the easement when in fact it is not.
Propwash's easement starts 1297 feet closer to M8. The actual easement slope angle is 10± feet BELOW the Oncor tower and will penetrate the Avigation Easement.

Clearly, an Oncor tower is too tall for use along the Propwash glide path anywhere along the proposed M8 segment. Risk to the nearby community and aircraft goes up significantly if M8 is built.

Drawings and explanations are included in greater detail in the next four pages.

I oppose any route that contains the M8 segment.

Russell Sherwood
Propwash (16X) Airport Manager
713-542-9570

Dated: July 30, 2023

The FAA granted Propwash (16X) a public use airport, an Avigation Easement with a 20:1 slope starting 200 feet south of the runway. The Avigation Easement is intended to protect landing and departing aircraft from obstacles protruding into the flight path.

See Form 7460-1 on page 3.
In November of 2022, Oncor Electric Delivery reported to the Federal Aviation Agency (FAA) on Form 7460-1 for ASN 2022-ASW-22411-OE that a new tall structure was planned just south of Propwash Airport and requested a determination if the proposed structure would be a Hazard to Air Navigation. After examination the FAA returned the form to Oncor with the report status of "Interim". An Interim Status indicates that the FAA found the proposed structure would violate the "Avigation Easement".

Refer to page 4 easement drawing for Propwash and Segment M8.
This drawing is a simplified side view of the Propwash Avigation Easement. The black bar represents our 3,000 foot long runway. I used the runway as a gauge to make all other measurements as close to scale as practical.

Using my GPS to measure the distance from the south end of the Propwash Runway to M8 I got approximately 2100 feet (represented by the black text and arrow).

Subtracting the FAA 200 foot start of slope point, from the 2100 feet we get 1900 feet. 1900 feet is the distance from start of the easement slope to M8 (represented in blue text and a blue sloped line).

The white area under the blue shaded area is airspace that the FAA considers "Not A Hazard To Air Navigation".

The ground is shown shaded in green. The red triangle represents a scale model of M8 at 120 feet tall. 120 feet is the shortest tower on the Oncor "Typical Double Circuit 345 KV Steel Pole" handout (see page 5). Elevation in the M8 area is 15 feet lower than the Propwash runway. If you look carefully the red M8 triangle is set down into the green to compensate for the lower elevation at M8. Even the short M8 towers will penetrate the Avigation Easement (blue line).

Refer to page 3 and 4.
On FAA Form 7460-1 for ASN 2022-ASW-22411-OE, Oncor listed the "Distance to Structure" as 3397.2 feet. 3397 feet is the distance from the center of the runway to M8. Starting the easement slope at the runway center gives an error in the slope over M8 that is about 74 feet too high. This case incorrectly shows that M8 is below the Avigation Easement. The incorrect slope is shown with red text and lines.

This shows that even the shortest tower is a "Hazard To Air Navigation" and that route M8 will put not only aircraft but the surrounding community at additional risk and therefore I am opposed to M8.

Russell Sherwood
Propwash (16X) Airport Manager

Form 7460-1 for ASN 2022-ASW-22411-OE

Overview

Study (ASN): 2022-ASW-22411-OE
Prior Study:
Status: Interim
Letters:

Received Date: 11/15/2022
Entered Date: 11/15/2022
Completion Date: 12/08/2022
Expiration Date:
Map: View Map

Sponsor Information

Sponsor: Oncor - Pearl Frazier
Attention Of: Pearl Frazier
Address: 115 W 7th St
Address2:
City: Fort Worth
State: TX
Postal Code: 76102
Country: US
Phone: 682-305-6874
Fax:

Sponsor's Representative Information

Representative: Oncor Electric Delivery
Attention Of: Pearl Frazier
Address: 777 Main Street
Address2:
City: Fort Worth
State: TX
Postal Code: 76102
Country: US
Phone: 682-305-6874
Fax:

Construction Info

Notice Of: CONSTR
Duration: PERM (Months: 0 Days: 0)
Work Schedule: 01/01/2024 to 05/15/2024
Date Built:

Structure Summary

Structure Type: Utility Pole
Structure Name: M8 - 80 - PW
FCC Number:

Structure Details

Latitude (NAD 83):	33° 04' 16.59" N
Longitude (NAD 83):	97° 21' 29.96" W
Horizontal Datum:	NAD 83
Survey Accuracy:	4D
Marking/Lighting:	
Other Description:	
Current Marking/Lighting:	N/A Proposed Structure
Current Marking/Lighting Other Description:	
Name:	
City:	Dallas
State:	TX
Nearest County:	Denton
Nearest Airport:	16X
Distance to Structure:	3397.2 feet
On Airport:	No
Direction to Structure:	179.51°
Description of Location:	Urban areas
Description of Proposal:	Adding new transmission line poles at these locations. These locations are not connected on the same line, but proposals for future lines

Height and Elevation

	Proposed	DNE	DET
Site Elevation:	785		
Structure Height:	80	48	**80**
Total Height (AMSL):	865	833	**865**

Frequencies

Low Freq	High Freq	Unit	ERP	Unit

PUC Docket 55067
Regarding Segment M8
and
FAA Form 7460-1

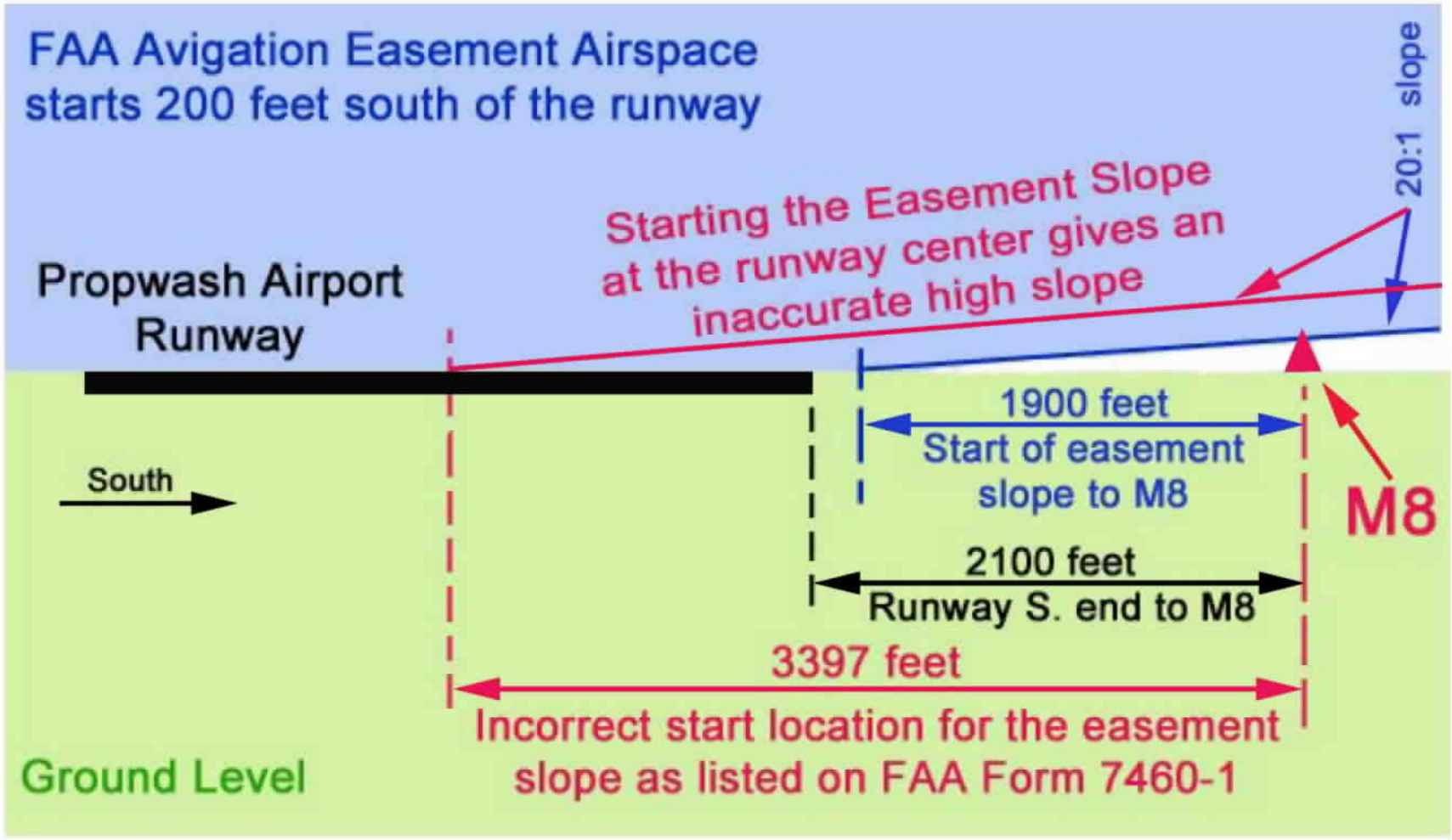
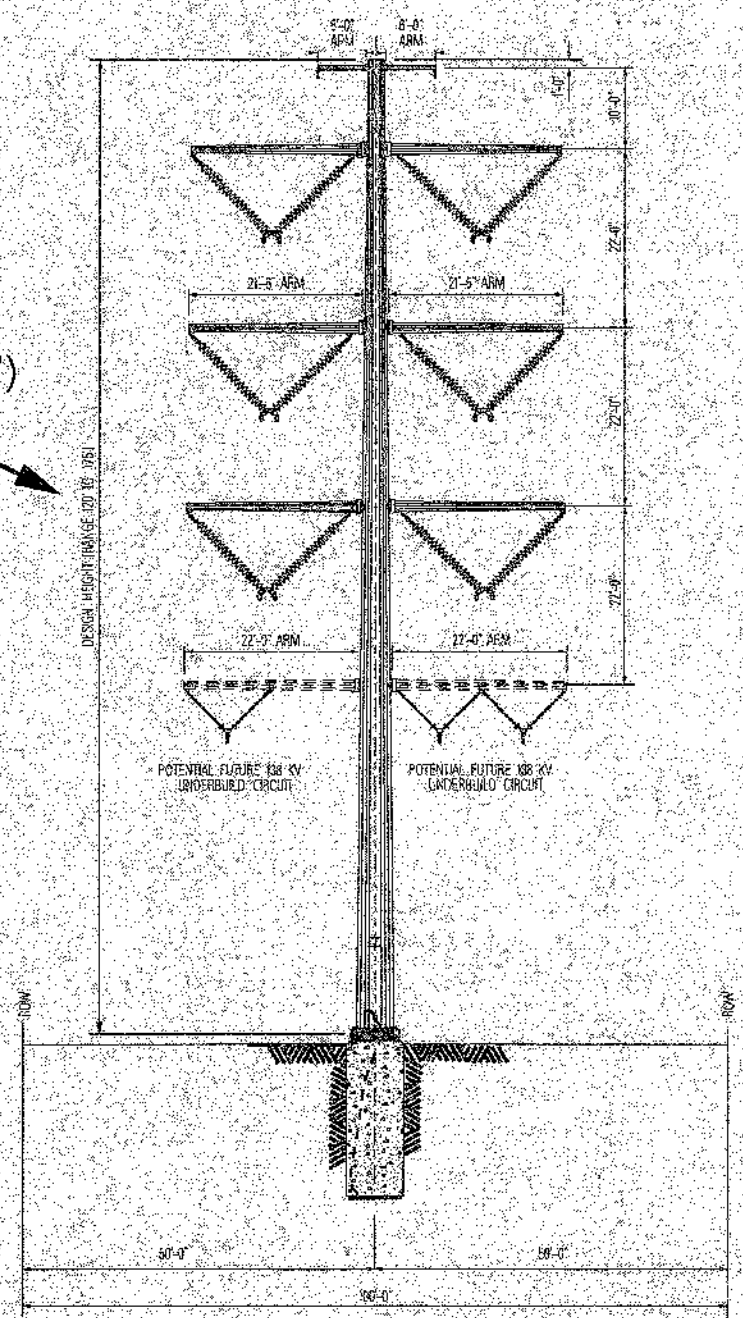


EXHIBIT 2

Design Height
(Range 120' to 175')



TYPICAL DOUBLE CIRCUIT 345 KV STEEL POLE WITH 138 KV UNDERBUILD

PROPOSED RAVENHORN HILL SWITCH - DUNHAM SWITCH
345 KV TRANSMISSION LINE PROJECT

ONCOR