



Filing Receipt

Filing Date - 2023-08-11 12:16:44 PM

Control Number - 55067

Item Number - 1631

**SOAH DOCKET NO. 473-23-21216
PUC DOCKET NO. 55067**

| | | |
|-------------------------------------|----------|--------------------------------|
| APPLICATION OF ONCOR | § | BEFORE THE STATE OFFICE |
| ELECTRIC DELIVERY COMPANY | § | |
| LLC TO AMEND ITS CERTIFICATE | § | |
| OF CONVENIENCE AND | § | OF |
| NECESSITY FOR THE RAMHORN | § | |
| HILL TO DUNHAM 345 KV | § | |
| TRANSMISSION LINE IN DENTON | § | ADMINISTRATIVE HEARINGS |
| AND WISE COUNTIES | § | |

**RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO
MATTHEW SPAETHE'S FIRST REQUEST FOR INFORMATION**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

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 are voluminous, materials will be provided in electronic format through an Oncor FTP file sharing site upon request. Requests for voluminous materials should be directed to Regulatory@oncor.com. To review 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

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 filed with the Commission and served on all parties of record via the PUC Interchange, as well as via e-mail on all parties from whom any action is required, pursuant to SOAH Order No. 2 filed in this docket, on this the 11th day of August, 2023.

/s/ Michele M. Gibson

Request

Please provide information for "Freedom Airport" in the same format as Table 3-18 Aircraft Landing Facilities in or Near the Study Area, which is contained in Application, Attachment 1, Environmental Assessment and Alternative Route Analysis.

Response

The following response was prepared by or under the direction supervision of Russell J. Marusak, the sponsoring witness for this response.

The requested information is provided below. For sources listed at the end of the table, please refer to Application Attachment 1, Environmental Assessment and Alternative Route Analysis at page 3-75.

AIRCRAFT LANDING FACILITIES IN OR NEAR THE STUDY AREA

| Facility Name | FAA ID ¹ | Facility Use | County | Relative Location |
|--|---------------------|--------------|--------|---|
| FAA Registered Airport with Runway Less than 3,200 Feet | | | | |
| Freedom | XS05 | Private | Wise | Northwestern portion of the study area near the Denton-Wise County line |
| SOURCES: AirNav, 2023; FAA, 2023. | | | | |
| NOTES: | | | | |
| 1. Identification code assigned to facilities registered with the FAA. | | | | |

Request

Please explain why Freedom Airport was not included in Table 3-18, even though it is a FAA registered airport in the study area.

Response

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

Freedom (XS05) was not included in Table 3-18 because at the time of researching airport locations, it was not a registered facility. For additional information, see Oncor's response to Spaethe RFI Set No. 1, Question No. 1-03.

Request

Please explain and describe Oncor's process for preparing Table 3-18. When was the data pulled to complete table and does Oncor update prior to filing its Application?

Response

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

As documented in Section 2.3 in of the Environmental Assessment, constraints data are researched early in the routing study process. Airport GIS shapefile data were initially downloaded in August 2022 after which research of individual facility data through various sources began in September 2022. Over the course of a project, Halff utilizes feedback from the landowners, continuous review of aerial imagery, and field inspections of the study area to verify the physical limits of a constraint and to search for changes that may alert them to potential new constraints. Halff and Oncor made route modifications based on the confirmation of physical constraints (e.g., active construction) after initial records research. On a case-by-case basis, Halff or Oncor may contact facilities directly or FAA offices to confirm active status on a particular facility.

In the case of Freedom (XS05), Halff analyzed updated January 2023 aerial imagery. As of that date, no runway existed that matched what was provided in the Spaethe public meeting questionnaire. More recent post-filing imagery from May 2023 shows similar conditions. Thus, the most recent aerial imagery available shows that no such runway has been constructed.



Figure 1: January 8, 2023



Figure 2: May 31, 2023

Source: Nearmap 2023 aerial imagery

Request

Please explain if Freedom Airport prevents Segment Q5 from being constructed. If it does not, please explain why and what conditions would Oncor not construct a transmission line bisecting an airport.

Response

The following response was prepared by, or under the direct supervision of, Amy L. Zapletal, the sponsoring witness for this response.

Unknown. Oncor cannot reliably assess potential impacts to speculative future development plans. Once the Commission approves a route, Oncor will conduct detailed engineering accounting for any relevant existing constraints. After Oncor completes final design of the Commission-approved route, Oncor will submit the design to the FAA for review.

Request

Will any airspace permits be necessary to construct any of the proposed routes? If so, which of the proposed Segments will require an airspace permit?

Response

The following response was prepared by, or under the direct supervision of, Amy L. Zapletal, the sponsoring witness for this response.

Oncor does not know what, if any, permits will be required following FAA review of Oncor's final designs. Oncor will coordinate as necessary with the FAA to obtain any required permits following receipt of an FAA determination.