



## **Filing Receipt**

**Filing Date - 2023-08-21 01:59:07 PM**

**Control Number - 55067**

**Item Number - 1667**

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

**REBUTTAL TESTIMONY  
OF AMY L. ZAPLETAL, P.E., WITNESS FOR  
ONCOR ELECTRIC DELIVERY COMPANY LLC**

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1                                **REBUTTAL TESTIMONY OF AMY L. ZAPLETAL, P.E.**

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

3        Q.     ARE YOU THE SAME AMY L. ZAPLETAL WHO PRESENTED DIRECT  
4                TESTIMONY ON BEHALF OF ONCOR ELECTRIC DELIVERY COMPANY LLC  
5                ("ONCOR") IN THIS DOCKET?

6        A.     Yes.

7        Q.     HAVE YOU REVIEWED THE DIRECT TESTIMONY OF INTERVENORS AND  
8                PUBLIC UTILITY COMMISSION OF TEXAS ("COMMISSION") STAFF?

9        A.     Yes, I have.

10      Q.     WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

11      A.     The purpose of my rebuttal testimony is to respond to the filings, including direct  
12                testimony, of various intervenors regarding the Ramhorn Hill-Dunham 345 kV  
13                transmission line project ("Proposed Transmission Line Project").

14                                **II. REBUTTAL REGARDING POTENTIAL IMPACTS TO AIRPORTS**

15      Q.     VARIOUS INTERVENORS, INCLUDING JANET ZELNIK (PAGE 1), WAYNE  
16                WILKERSON, ON BEHALF OF HIMSELF AND NORMA WILKERSON (PAGE 6,  
17                LINE 12, TO PAGE 7, LINE 19), AND DAVID A. RETTIG, ON BEHALF OF THE  
18                TOWN OF NORTHLAKE (PAGE 12, LINE 264, TO PAGE 13, LINE 298), AMONG  
19                OTHERS, EXPRESS CONCERNS ABOUT THE PROPOSED TRANSMISSION  
20                LINE PROJECT'S PROXIMITY TO AIRPORTS. HOW DOES ONCOR ADDRESS  
21                THIS CONCERN?

22      A.     As detailed in my direct testimony, Oncor identified 35 aircraft landing facilities in  
23                and around the study area, including the Propwash Airport and Northwest Regional  
24                Airport. For links in proximity to an aircraft landing facility, Oncor conducted a  
25                preliminary study of structure heights and right-of-way ("ROW") requirements.  
26                Based on this study, Oncor determined that the Proposed Transmission Line  
27                Project can be constructed along any of the links filed with Oncor's CCN  
28                application. While accommodations may need to be made in certain areas, such  
29                accommodations can be addressed during the detailed engineering of the line.  
30                After the Commission approves a route for the Proposed Transmission Line

Project, Oncor will coordinate with the Federal Aviation Administration ("FAA") as necessary to ensure aviation safety.

Q. INTERVENORS MR. AND MRS. WILKERSON (PAGE 6, LINES 12-22) CHALLENGE WHETHER ONCOR CAN CONSTRUCT LINK M8 WITHOUT VIOLATING THE FAA'S OBSTRUCTION STANDARDS FOR PROPWASH AIRPORT. HOW DO YOU RESPOND?

A. Oncor can construct Link M8 without penetrating the glideslope at Propwash Airport. This would be accomplished by making accommodations for the airport in the detailed design phase of the project. Mr. Wilkerson points to the diagram in the Environmental Assessment showing the *typical* structure that will be utilized for the Proposed Transmission Line Project, which has a height range of 120-175 feet. However, Oncor can utilize alternate structures where necessary to address engineering constraints. Oncor acknowledges that the Propwash Airport glideslope would represent an engineering constraint if a route using Link M8 were approved, and Oncor will comply with any and all FAA requirements in addressing that constraint, consistent with the Commission's order.

Depending on the terrain along Link M8, Oncor may need to use a 2- or 3-pole design and change to a horizontal circuit configuration with a wider ROW where the Propwash Airport presents a height limitation. Once the Commission selects a route, Oncor will coordinate with the FAA and design the Proposed Transmission Line Project with due consideration to the FAA's obstruction standards at Propwash Airport.

Q. INTERVENOR MATTHEW SPAETHE (PAGE 5, LINES 24-28) STATES THAT LINK Q5 CROSSES PROPERTY WHERE HE PLANS TO BUILD AN FAA-REGISTERED AIRSTRIP (XS05), AND THAT THE PROPOSED TRANSMISSION LINE PROJECT WOULD FORCE HIM TO ABANDON THESE PLANS. PLEASE ADDRESS THIS ISSUE.

A. Oncor is aware of Mr. Spaethe's plan to develop an airstrip on his property in the future. However, even recent aerial photography reveals that there is no airfield there today. Further, Oncor has been unable to discern any evidence of

1 construction activity on the property to date. Oncor will coordinate with the FAA  
2 and landowners once the Commission selects a route to mitigate impacts on  
3 planned future development, where possible, and to ensure the Proposed  
4 Transmission Line Project can operate safely and reliably with consideration given  
5 to any existing constraints. Mr. Spaethe's plan to develop an airstrip is also  
6 addressed in the rebuttal testimony of Oncor witness Mr. Russell J. Marusak.

7 Q. THE TOWN OF NORTHLAKE (PAGE 13, LINE 299, TO PAGE 14, LINE 306)  
8 STATES THAT ONCOR SHOULD FUND THE NORTHWEST REGIONAL  
9 AIRPORT'S PURCHASE OF A PRECISION APPROACH PATH INDICATOR  
10 SYSTEM. HOW DOES ONCOR RESPOND?

11 A. If the Commission selects a route in proximity to Northwest Regional Airport, Oncor  
12 will coordinate with the FAA and the airport to ensure that the Proposed  
13 Transmission Line Project can operate safely and reliably, consistent with FAA  
14 regulations, the Commission's standard ordering language, and any other  
15 applicable laws and regulations. This includes installing any transmission line  
16 safety equipment required under the applicable standards, regulations, and laws.  
17 Oncor is unaware of any law or regulation that would require installation of new  
18 systems at Northwest Regional Airport due to construction of the Proposed  
19 Transmission Line Project.

20 **III. REBUTTAL REGARDING POTENTIAL IMPACTS TO OTHER UTILITIES**

21 Q. THE DIRECT TESTIMONY OF THOMAS STEVEN MARTIN ON BEHALF OF  
22 TEXAS MUNICIPAL POWER AGENCY ("TMPA") (PAGE 5, LINE 5, TO PAGE 6,  
23 LINE 3) RAISES A CONCERN ABOUT POTENTIAL IMPACTS TO TMPA'S  
24 TRANSMISSION FACILITIES. PLEASE ADDRESS THIS ISSUE.

25 A. If the Commission approves a route that may impact TMPA facilities, Oncor will  
26 coordinate directly with TMPA to address any potential impacts. This type of utility  
27 coordination is common for linear projects. Oncor witness Mr. Harsh Naik also  
28 addresses this issue in his rebuttal testimony.

1                   **IV. REBUTTAL REGARDING HEALTH AND SAFETY CONCERNS**

2    Q.    THE DIRECT TESTIMONIES OF MARTIN ROJAS (PAGE 8, LINES 24-30); ROSS  
3           ARTHUR BREWER (PAGE 3, LINES 7-21); MARGARET CHAVEZ, ON BEHALF  
4           OF HERSELF AND ANTONIO CHAVEZ (PAGE 8, LINES 12-17); AND OTHER  
5           PARTIES, EXPRESS GENERAL CONCERNS ABOUT TRANSMISSION LINES  
6           PRODUCING ELECTRIC AND MAGNETIC FIELDS ("EMF"). HOW DOES  
7           ONCOR MITIGATE POTENTIAL EFFECTS OF EMF PRODUCED BY ITS  
8           TRANSMISSION LINES?

9    A.    Oncor minimizes potential EMF effects by designing the Proposed Transmission  
10          Line Project to maximize the cancelling effects of the fields of adjacent phases of  
11          the transmission line, thereby reducing EMF strength, and by maintaining  
12          appropriate ROW width consistent with field strength. At the edge of the ROW,  
13          EMF levels from the Proposed Transmission Line Project will be comparable to  
14          common household appliances, such as an electric can opener, and considerably  
15          less than many electronic devices we expose ourselves to on a frequent basis.

16          Potential EMF impacts are also mitigated by routing the Proposed  
17          Transmission Line Project to comply with the Commission's policy of prudent  
18          avoidance. Oncor witness Ms. Brenda J. Perkins discusses in her direct testimony  
19          that all filed routes for the Proposed Transmission Line Project comply with this  
20          policy. The rebuttal testimony of Dr. Edward P. Gelmann offers his independent  
21          expert opinion regarding alleged potential health effects for persons and animals  
22          living near 345 kV electric transmission lines.

23   Q.    INTERVENORS VIKTOR AND ANZHELA CHOPOVENKO SUBMITTED A FILING  
24          EXPRESSING HEALTH AND SAFETY CONCERNS ABOUT: (1) WEATHER  
25          EVENTS, SUCH AS TORNADOES, WINDS, AND LIGHTNING, OCCURRING  
26          NEAR TRANSMISSION LINES; (2) FIRE HAZARDS POSED BY TRANSMISSION  
27          LINES; AND (3) LIVING NEAR THE PROPOSED TRANSMISSION LINE  
28          PROJECT. JAMES AND HOLLEY LEWIS ALSO SUBMITTED A FILING  
29          VOICING CONCERNS ABOUT LIGHTNING RISKS ASSOCIATED WITH  
30          TRANSMISSION LINES. HOW DO YOU RESPOND TO THESE CONCERNS?

1 A. Oncor designs, constructs, operates, and maintains its facilities in accordance with  
2 all governing rules and regulations, including the National Electrical Safety Code  
3 ("NESC"), to prevent and mitigate potential safety hazards, and Oncor's ROW-  
4 maintenance and vegetation-management practices are designed to further  
5 mitigate potential safety concerns. Moreover, Oncor has around 100 years of  
6 experience safely operating electric infrastructure across Texas in areas where  
7 people live, work, and play on a daily basis. Oncor's practice and experience have  
8 proven very effective in addressing potential safety hazards.

9 Oncor transmission lines are equipped with static wires that protect the  
10 conductors from a direct lightning strike by transferring the energy of a lightning  
11 strike to the structure and then into the ground through the structure base. Due to  
12 the grounding of the structure through the foundation, that energy is typically  
13 dissipated in all directions from the foundation base to a typical depth of around 15  
14 feet below the surface (which may vary depending on foundation depth and the  
15 resistivity of the surrounding soil). Thus, the presence of transmission structures  
16 actually provide lightning protection to the surrounding area. Similarly, Oncor  
17 designs its transmission lines with high speed relaying equipment that de-  
18 energizes the conductor within a few milliseconds of a fault. These measures  
19 greatly mitigate any potential fire risk associated with Oncor's transmission lines.

20 Q. MR. SPAETHE'S DIRECT TESTIMONY (PAGE 8, LINES 19-23) EXPRESSES A  
21 CONCERN ABOUT LINK Q2 CROSSING HIS DRIVEWAY, REQUIRING HIM TO  
22 DRIVE UNDERNEATH THE TRANSMISSION LINE. PLEASE ADDRESS THIS  
23 CONCERN.

24 A. Thousands of people drive under Oncor 345 kV transmission lines every day in  
25 various counties across Texas without incident. There are no safety issues relating  
26 to driving underneath Oncor's transmission lines. The engineering design of the  
27 Proposed Transmission Line Project will accommodate clearances to the potential  
28 future 138 kV circuit. For 138 kV lines, Oncor's standard clearance is a minimum  
29 height of 24 feet above grade at maximum sag, with much higher clearances of 32  
30 to 60 feet under normal operating conditions and nearer to structures. The

1 proposed 345 kV circuits will generally have a clearance of 45 feet above grade at  
2 maximum sag, with much higher clearances of 65 to 75 feet under normal  
3 operating conditions and nearer to structures. These clearances offer an  
4 additional safety buffer beyond the NESC standards and provide sufficient space  
5 for vehicles to travel underneath the transmission line safely.

6 **V. REBUTTAL REGARDING POTENTIAL IMPACTS TO WATER RESOURCES**

7 Q. THE DIRECT TESTIMONIES OF JAMES CLARK, ON BEHALF OF THE CITY OF  
8 JUSTIN (PAGE 10, LINES 9-15); AMELIA MCCURDY, ON BEHALF OF THE  
9 FLOYD T. MCCURDY TESTAMENTARY TRUST (PAGE 9, LINES 9-11); AND  
10 PEGGY LOGAN MCCURDY (PAGE 9, LINES 7-9) EXPRESS CONCERNS  
11 ABOUT THE POTENTIAL FOR EROSION, INCLUDING POTENTIAL  
12 SEDIMENTATION IMPACTS TO NEARBY WATER RESOURCES. DOES  
13 ONCOR TAKE MEASURES TO ADDRESS EROSION CONCERNS?

14 A. Yes. Following the Commission's approval of the Proposed Transmission Line  
15 Project, Oncor will control erosion consistent with the Commission's final order and  
16 any applicable permitting requirements. The Commission typically adopts an  
17 ordering paragraph directing Oncor to adopt appropriate erosion control measures.  
18 If a storm water pollution prevention plan ("SWPPP") is required, the SWPPP  
19 would also prescribe specific erosion-control measures. Potential impacts of  
20 erosion on local water quality is addressed in the rebuttal testimony of Oncor  
21 witness Mr. Marusak.

22 Q. THE DIRECT TESTIMONY OF ALAN YARBROUGH (PAGE 3) EXPRESSES A  
23 CONCERN ABOUT LINK J4 IMPACTING A DRAINAGE SYSTEM AND  
24 POTENTIALLY CAUSING FLOODING. INTERVENOR RODNEY STOKES ALSO  
25 EXPRESSES A CONCERN THAT THE PROPOSED TRANSMISSION LINE  
26 PROJECT MAY CAUSE FLOOD WATER DISPLACEMENT (PAGES 9-10). HOW  
27 DO YOU RESPOND?

28 A. Oncor's compliance with the Commission's final order and applicable permitting  
29 requirements concerning erosion-control measures, as well as the SWPPP, if one  
30 is required, should mitigate any potential impacts to this drainage system. The



1 structures that will be utilized for the Proposed Transmission Line Project will have  
2 typical foundations of 12 to 15 feet in diameter, typically spaced about 600 to 700  
3 feet apart. So the Proposed Transmission Line Project will cause relatively little  
4 flood-water displacement and have minimal impact on the flow of flood waters.

5 Q. INTERVENOR JANET BRESLER SUBMITTED A FILING (INTERCHANGE ITEM  
6 NO. 1406) EXPRESSING HER CONCERN ABOUT THE POTENTIAL NEED TO  
7 MOVE AN AEROBIC SEPTIC SYSTEM AND WATER SPRINKLERS ON HER  
8 PROPERTY. HOW DOES ONCOR ADDRESS THIS ISSUE?

9 A. Oncor commonly encounters obstacles such as water or septic systems when  
10 building a transmission line. If a landowner notifies Oncor of underground water  
11 systems, including water lines and sprinklers, Oncor will cover the ground on top  
12 of such systems with a flexible rock base or timber or composite construction  
13 access mats to protect them during construction. With typical span lengths of  
14 approximately 600 to 700 feet for the Proposed Transmission Line Project, Oncor  
15 is able to traverse long distances between structure locations to potentially span  
16 underground water systems. Oncor has extensive experience and a longstanding  
17 commitment to working with landowners in attempting to accommodate their  
18 concerns, and this situation would be no different.

19 **VI. REBUTTAL OF ADDITIONAL INTERVENOR CONCERNS**

20 Q. GEOFFREY A. MEYER, TESTIFYING ON BEHALF OF EXEL INC. D/B/A DHL  
21 SUPPLY CHAIN (USA) (PAGE 8, LINES 1-24), EXPRESSES A CONCERN  
22 ABOUT THE PROPOSED TRANSMISSION LINE PROJECT INTERFERING  
23 WITH PLANNED WAREHOUSE FACILITIES AND OTHER IMPROVEMENTS.  
24 WHAT IS ONCOR'S RESPONSE?

25 A. Oncor coordinated with DHL Supply Chain extensively prior to filing the CCN  
26 application, including modifying certain route links to accommodate the plans for  
27 the DHL facility that were provided to Oncor. If the Commission approves a route  
28 that crosses DHL property, Oncor will continue this coordination to minimize the  
29 impact of the Proposed Transmission Line Project to the extent feasible, while still  
30 ensuring that the transmission line can operate safely and reliably. This includes

exploring the possibility of a minor modification on DHL property, consistent with the Commission's standard ordering language.

Q. MR. AND MRS. WILKERSON (PAGE 5, LINES 4-19) CLAIM THAT ONCOR DID NOT ACCURATELY ESTIMATE THE COST TO BUILD LINK M8. HOW DO YOU RESPOND?

A. I disagree. Oncor estimated the cost to build Link M8, and all other proposed links, using Oncor's standard cost-estimate methodology. This approach is consistent with the methodology Oncor has applied in dozens of prior projects and with Oncor's experience with actual costs. To estimate project costs, Oncor considered the nature of the land and current land uses in distinct regions of the study area, including the area surrounding Link M8, to arrive at land values that are representative of those regions as a whole. Certain properties will have higher values than the estimates included in Oncor's application, and others will have lower values. But on the whole, those discrepancies will trend toward the averages.

Q. MR AND MRS. CHOPOVENKO VOICE CONCERNS ABOUT TRANSMISSION LINES CAUSING INTERFERENCE WITH NEARBY ELECTRONIC DEVICES, COMMUNICATION EQUIPMENT, AND SENSITIVE EQUIPMENT. IS SUCH INTERFERENCE LIKELY?

A. No. Due to advances in technology, transmission lines will generally not cause any substantial interference with electronic devices, including communication equipment. In fact, communication equipment such as cellular antennas are commonly placed directly on the structures of fully operational transmission lines. Surveyors routinely use Global Positioning Satellite ("GPS")-based surveying equipment that relies on precise communications with GPS satellites without incident. Any potential for communication equipment interference depends on the type of equipment used and, with respect to radio equipment, the frequency on which such equipment operates.

Oncor operates its own communication systems for both transmission and distribution operations, which are within close proximity to transmission lines,

1 substations, and switching stations. Oncor's communication systems have not  
2 been adversely impacted or interfered with, either by its own high-voltage facilities  
3 or those of other transmission service providers. The Proposed Transmission Line  
4 Project is very unlikely to cause interference with nearby electronic devices,  
5 communication equipment, and other sensitive equipment.

6 Q. VARIOUS INTERVENORS, INCLUDING EDGAR BRENT WATKINS, AS CO-  
7 TRUSTEE OF THE WATKINS FAMILY TRUST, AND ON BEHALF OF HIMSELF  
8 AND MARY ANN LIVENGOD, AS CO-TRUSTEE OF THE WATKINS FAMILY  
9 TRUST (PAGE 6, LINES 9-11); PAUL GLASGOW, ON BEHALF OF GFAT, LLC  
10 (PAGE 7, LINES 30-34); AND JANET BEVERLY (PAGE 5) EXPRESS  
11 CONCERNS THAT THE PROPOSED TRANSMISSION LINE PROJECT WILL  
12 CAUSE DISRUPTIVE BUZZING NOISES. PLEASE ADDRESS THIS CONCERN.

13 A. Generally, 345 kV transmission lines do not emit audible noise. Under rare  
14 circumstances, such as when a large amount of moisture is in the air, a slight  
15 humming sound may be detectable directly below the line, but only until those  
16 conditions subside. Oncor does not anticipate that the Proposed Transmission  
17 Line Project will cause any disruptive noises outside the ROW, even under these  
18 rare conditions.

19 Q. THE DIRECT TESTIMONIES OF VARIOUS INTERVENORS, INCLUDING DAVID  
20 BRATTON (PAGE 8, LINES 1-2); JERRY BRATTON (PAGE 8, LINES 1-2); AND  
21 HARVEY H. MUELLER, II, ON BEHALF OF H3M PROPERTY HOLDINGS (PAGE  
22 4, LINES 1-2) EXPRESS CONCERNS REGARDING THIRD PARTIES  
23 ACCESSING THEIR PROPERTIES. WHAT IS THE TYPICAL FREQUENCY  
24 THAT LANDOWNERS CAN EXPECT TO HAVE ONCOR PERSONNEL ON  
25 THEIR PROPERTIES DURING AND AFTER CONSTRUCTION OF THE  
26 PROPOSED TRANSMISSION LINE PROJECT?

27 A. Oncor has a long history of establishing and maintaining good relationships with  
28 landowners who own property on which Oncor constructs transmission facilities.  
29 During construction, Oncor will coordinate with landowners to continue their  
30 properties' existing security measures such as gates, fences, and designated

1 access points. After the Proposed Transmission Line Project is built, Oncor will  
2 conduct aerial inspections of the transmission line approximately twice a year and  
3 on-the-ground inspections approximately once every five years. Unless a storm-  
4 related issue occurs or an issue is identified during an aerial inspection that  
5 requires further investigation, Oncor anticipates its access to the ROW will be  
6 limited to these instances.

7 Q. MULTIPLE INTERVENORS, INCLUDING AMELIA MCCURDY (PAGE 9, LINES  
8 1-21); PEGGY LOGAN MCCURDY (PAGE 8, LINE 38 TO PAGE 9, LINE 19); AND  
9 MICHELE BRANUM, ON BEHALF OF THE ESTATE OF MARJORIE ANN PATE  
10 VOICE CONCERNS ABOUT THE PROPOSED TRANSMISSION LINE  
11 PROJECT'S IMPACT TO CATTLE AND HAY PRODUCTION, CATTLE  
12 GRAZING, AND/OR FARMING, RANCHING, AND AGRICULTURAL  
13 OPERATIONS. PLEASE ADDRESS THESE CONCERNS.

14 A. The Proposed Transmission Line Project will not significantly reduce acreage  
15 available for farming, ranching, and agricultural operations. The only areas where  
16 typical farming or ranching activities will be precluded is within a structure's  
17 footprint, which will vary depending on structure type. Oncor's 345 kV steel  
18 monopole that will primarily be used for the Proposed Transmission Line Project  
19 has a typical diameter of 12 to 15 feet at its base, with a typical span length of 600  
20 to 700 feet. Steel monopoles have smaller footprints compared to lattice towers,  
21 and the ROW not occupied by the base of the project's steel monopole structures  
22 may still be used for farming, ranching, and agricultural operations. One benefit of  
23 the 345 kV monopole structure is the narrower ROW requirement compared with  
24 lattice towers, which should further allay concerns regarding impacts to agriculture.

25 Regarding Amelia McCurdy's and Peggy Logan McCurdy's claim that a  
26 transmission line would impair the use of their properties, especially during the  
27 construction phase, I am not aware of any unique characteristics of their properties  
28 that would prevent such a use during construction, and the parties did not provide  
29 details to indicate why they believe the use of their properties would be impaired.  
30 As I previously described, Oncor will work with the parties to continue the

1 properties' existing security measures during construction. Construction crews will  
2 only be on the property to set structures (assuming a structure is required on their  
3 properties) and string conductor. And based on the preliminary path of Links O6,  
4 Q1, and P1 across their properties, it is unlikely that any additional use, such as a  
5 temporary construction easement, would be required.

6 In Oncor's experience, landowners are generally able to conduct their  
7 agricultural and cattle operations during construction of a new transmission line.  
8 The impact of transmission line construction to harvesting crops varies depending  
9 on the season of construction; however, these activities generally do not interfere  
10 with each other. Similarly, Oncor's construction of transmission lines generally  
11 does not interfere with cattle grazing. Oncor will coordinate with landowners in an  
12 attempt to minimize construction impacts to farming, ranching, and agricultural  
13 operations.

14 Q. DOES ONCOR HAVE EXPERIENCE WITH CATTLE GRAZING AND  
15 AGRICULTURAL OPERATIONS OCCURRING WITHIN THEIR ROW?

16 A. Yes. Oncor has thousands of miles of transmission line ROW where cattle grazing  
17 occurs beneath the transmission line. Oncor works diligently with landowners  
18 during construction to avoid impacts to cattle, agricultural harvests, and the like.  
19 Oncor will coordinate with Amelia McCurdy, Peggy Logan McCurdy, and other  
20 landowners in the study area during construction of the Proposed Transmission  
21 Line Project to mitigate any potential impacts to their operations.

22 Q. CERTAIN INTERVENORS, INCLUDING DENTON COUNTY LAND & CATTLE  
23 (PAGE 2); BOBBY SAMUEL, ON BEHALF OF GRBK EDGEWOOD LLC AND  
24 GBTM SENDERA LLC (PAGE 8, LINES 14-22); AND GAGE HARRIS, ON  
25 BEHALF OF VESTED ROCK VENTURES, LTD. (PAGE 3, LINES 19-22) VOICE  
26 CONCERNS ABOUT THE LOCATIONS OF OIL AND GAS WELLS, PIPELINES,  
27 AND SIMILAR INFRASTRUCTURE RELATIVE TO THE PROPOSED  
28 TRANSMISSION LINE PROJECT'S ROW. DOES ONCOR HAVE EXPERIENCE  
29 DEALING WITH OIL AND GAS FACILITIES NEAR TRANSMISSION LINE ROW?

1 A. Yes. Oncor possesses a wealth of institutional knowledge and experience owning  
2 and operating transmission facilities in close proximity to well pads, natural gas  
3 pipelines, and other oil and gas infrastructure. Oncor operates hundreds of miles  
4 of transmission lines that run through and near property used for oil and gas  
5 exploration, drilling, processing, and transportation, among other activities, and  
6 much of Oncor's new construction over the last 10 to 15 years has occurred in  
7 west Texas, where oil and gas development is prolific. In numerous instances, oil  
8 and gas wells are drilled and pipelines are installed in locations directly abutting  
9 Oncor's existing transmission line easements. Pipelines, wells, and well pads  
10 have existed in harmony with transmission lines for decades, and transmission  
11 lines routinely cross pipelines. Oncor does not anticipate any disturbance to  
12 existing oil and gas activities during construction, operation, and maintenance of  
13 the Proposed Transmission Line Project. Intervenor concerns regarding oil and  
14 gas infrastructure are also addressed in Mr. Marusak's rebuttal testimony.

15 Q. INTERVENORS MELISSA DENNIS (PAGE 2); ANA AND TIMOTHY SIMMONS  
16 (PAGE 5, LINE 18, TO PAGE 6, LINE 6); AND THE SHALE CREEK  
17 HOMEOWNERS ASSOCIATION, INC. PROPOSE THAT ONCOR STUDY  
18 BUILDING THE PROPOSED TRANSMISSION LINE PROJECT  
19 UNDERGROUND. WOULD IT BE FEASIBLE TO CONSTRUCT THE  
20 PROPOSED TRANSMISSION LINE PROJECT UNDERGROUND?

21 A. As I explained in my direct testimony, to Oncor's knowledge, no underground lines  
22 of the Proposed Transmission Line Project's ampacity exist in the United States.  
23 Therefore, constraints and operational issues associated with such construction  
24 are not fully understood. Based on Oncor's analysis, even if this were a feasible  
25 option, it would require additional facilities, including eight concrete-encased duct  
26 banks along the entire length of the underground section, approximately twelve  
27 underground splice vaults per mile with access via manhole, a 2- to 3-acre  
28 transition station at either end of the underground section (in addition to the 345  
29 kV switching stations already proposed), and an estimated minimum ROW width  
30 of 180 feet. This would potentially be far more impactful to the surrounding

1 communities than an overhead transmission line—especially during the  
2 construction process. Underground construction would also be significantly more  
3 expensive—on the order of 15 to 20 times the cost for overhead transmission line  
4 construction—and none of this includes the future installation of a 138 kV circuit,  
5 which would require additional concrete-encased duct banks, splice vaults, and  
6 ROW. Operation and maintenance of an underground section would also require  
7 Oncor's access to the facilities within the ROW after construction is complete. For  
8 these reasons, Oncor does not view undergrounding the Proposed Transmission  
9 Line Project as a feasible alternative.

10 Q. JAMES AND HOLLY LEWIS (PAGE 2) ASK WHETHER ONCOR WILL INSTALL  
11 BIRD FLIGHT DIVERTERS, AND THE DIRECT TESTIMONY OF PETER J.  
12 WANGOE II, ON BEHALF OF JUSTIN TOWN CENTER, LTD. (PAGE 3, LINES  
13 46-48) EXPRESSES A CONCERN ABOUT BIRD MORTALITIES ASSOCIATED  
14 WITH POWER LINES. PLEASE ADDRESS THESE ISSUES.

15 A. Oncor will comply with all applicable environmental laws and regulations and will  
16 assess areas to determine whether bird flight diverters need to be installed,  
17 consistent with good utility practices and considering cost. Where required, Oncor  
18 installs bird flight diverters to reduce potential bird collision risk under its Section  
19 10(a)(1)(B) United States Fish and Wildlife Service permit. Consideration will also  
20 be given to the use of visual markers on overhead wires in an effort to reduce  
21 potential bird collision risk. As noted in the direct testimony of DHL Supply Chain  
22 witness Mr. Jason E. Buntz, Commission selection of Oncor's "best-meets" route,  
23 Route 179, will mitigate impacts to migrating birds.

24 Q. THE DIRECT TESTIMONY OF TOMMY CANSLER ON BEHALF OF TCCI  
25 RANGE – MEAD 2021 LLC REPEATEDLY INDICATES THAT THE PROPOSED  
26 TRANSMISSION LINE PROJECT ENTAILS CONSTRUCTING FOUR  
27 TRANSMISSION LINES IN A 70-FOOT-WIDE ROW. HOW DO YOU RESPOND?

28 A. In this proceeding, Oncor proposes and seeks Commission approval to build one  
29 double-circuit transmission line—not four. The Proposed Transmission Line  
30 Project would have a typical ROW width of 100 feet, except where additional ROW

1 is required to address engineering constraints. A future 138 kV circuit may be  
2 added in the future, but this would utilize the existing structures and would not  
3 require any additional ROW. This design is specifically intended to moderate the  
4 potential impact of the future circuit on the surrounding community.

5 **VII. CONCLUSION**

6 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

7 A. Yes, it does.



**AFFIDAVIT**

STATE OF TEXAS           §  
   §  
COUNTY OF TARRANT   §

**BEFORE ME**, the undersigned authority, on this day personally appeared Amy L. Zapletal who, having been placed under oath by me, did depose as follows:

My name is Amy L. Zapletal. I am of legal age and a resident of the State of Texas. The foregoing testimony offered by me is true and correct, and the opinions stated therein is, to the best of my knowledge and belief, accurate, true, and correct.

*Amy L. Zapletal*

\_\_\_\_\_  
Amy L. Zapletal

**SUBSCRIBED AND SWORN TO BEFORE ME** by the said Amy L. Zapletal on this 20<sup>th</sup> day of August, 2023.



*Michele M. Gibson*  
\_\_\_\_\_  
Notary Public, State of Texas

My Commission Expires:

06-30-2026

SOAH Docket No. 473-23-21216  
PUC Docket No. 55067

Zapletal - Rebuttal  
Oncor Electric Delivery Company LLC  
Ramhorn Hill-Dunham 345 kV CCN