



Filing Receipt

Filing Date - 2023-08-29 09:38:39 AM

Control Number - 55067

Item Number - 1751

**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
LA ESTANCIA’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 29th day of August, 2023.

/s/ Michele M. Gibson

Request

In the eastern quadrant of the Transmission Line, please assume a route that proceeds from Link C1 to C21, but instead of the route continuing to Link 23, please assume that immediately after the railroad track, Link C21 turns and proceeds in a southeasterly direction parallel to the railroad track until it intersects with Link 3. Please also assume that the route proceeds along Link C3 directly along the north side of FM 1171 to Link C6. For a visual representation of that route, which is referred to herein as "La Estancia Alternative Route 1," please refer to Attachment A to these RFIs. La Estancia Alternative Route 1 is depicted on Attachment A by the black dotted line. Please provide:

- a. the cost of La Estancia Alternative Route 1 as compared to the corresponding links for Route 179;
- b. all environmental data for La Estancia Alternative Route 1;
- c. all land planning data for La Estancia Alternative Route 1; and
- d. the engineering feasibility for La Estancia Alternative Route 1.

Response

The following response was prepared by or under the direct supervision of Amy L. Zapletal and Russell J. Marusak, the sponsoring witnesses for this response.

- a) This response is based on the modified route shown in La Estancia Exhibit No. 5, which includes the slight modifications described below. La Estancia Alternative Route 1 requires the following modifications to Route 179: (1) adding an angle structure to Link C21 to cross the existing railroad at a ninety-degree angle; (2) adding a turning structure to turn Link C21 southwest and parallel the existing railroad; and (3) shortening link C3 to maintain a 50-foot buffer between the modified Link C21 and the existing pipeline easement adjacent to the railroad. Attachment 1 shows this alignment as a magenta line, with the filed alignment for Route 179 shown as a blue line. Attachment 2 provides the cost data for La Estancia Alternative Route 1, including the modifications described herein. The estimated total cost for La Estancia Alternative Route 1 is \$250,000 greater than the estimated total cost for Route 179. The Electronic Native files are included in the .ZIP file for this response on the PUC Interchange.
- b) Attachment 3 provides the environmental and land-use data for Route 179 modified to utilize La Estancia Alternative Route 1, including the modifications described in Oncor's response to La Estancia RFI Set No. 1, Question No. 1-01(a).
- c) See Attachment 3. The Electronic Native files are included in the .ZIP file for this response on the PUC Interchange.
- d) Using the alignment described in Oncor's response to La Estancia RFI Set No. 1, Question No. 1-01(a), this alternative is feasible from an engineering perspective.

ATTACHMENT

Attachment 1 – Figure – 1 page

NATIVE FILES

Attachment 2 – Native File 1 - Environmental Land Use Data .xlsx

Attachment 3 – Native File 2 - Cost Data .xlsx

La Estancia Alternative Route 1
and Route 179

Legend

- La Estancia Alternative Route 1 Alignment
- Route 179 - Filed Alignment



The following files are not convertible:

(Estimated Costs).xlsx	La Estancia RFI 1-01-Attachment 2
(Environmental and Land-Use Data).xlsx	La Estancia RFI 1-01-Attachment 3

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

In the eastern quadrant of the Transmission Line, please assume a route that proceeds along Links E-6, G-5, and F-1. Please assume that Link E-6 is placed directly along the right of way of FM 1171, and please assume that Links G-5 and F-1 are placed directly along the right of way of IH 35W, as shown by the black dotted line on Attachment B to these RFIs. For that alternative route, which is referred to herein as "La Estancia Alternative Route 2," please provide:

- a. the cost of La Estancia Alternative Route 2 as compared to the corresponding links for Route 179;
- b. all environmental data for La Estancia Alternative Route 2;
- c. all and planning data for La Estancia Alternative Route 2; and
- d. the engineering feasibility for La Estancia Alternative Route 2.

Response

- a. This response is based on the modified route shown in La Estancia Exhibit No. 5, which includes the slight modifications described in response to La Estancia RFI 1-1. La Estancia Alternative Route 2 requires removal of one or two existing habitable structures on Tract 801 (HS 256 and 257) to continue Links E6 and G1 along the FM 1171 (Cross Timbers Road) right-of-way. Oncor's cost data and environmental and land-use data assume the prior removal of these habitable structures, so the costs associated with removal are not included in the cost data, and these structures are not included in the habitable structure count. La Estancia's proposed modification to links E6 and G1 would require the use of two angle structures to parallel the FM 1171/IH-35W right-of-way which is one fewer than required for the filed E6-G1 progression. Attachment 1 shows La Estancia's proposed alignment as a magenta line, with the filed alignment for links E6 and G1 shown as a blue line. Attachment 2 provides the cost data for Route 179 modified to utilize La Estancia Alternative Routes 1 and 2, including the modifications described herein and in response to La Estancia RFI 1-1(a). The estimated total cost for La Estancia Alternative Route 2 is \$467,000 less than the estimated total cost for Route 179. The Electronic Native files are included in the .ZIP file for this response on the PUC Interchange.
- b. Attachment 3 provides the environmental and land-use data for Route 179 modified to utilize the alignments for La Estancia Alternative Routes 1 and 2 described in response to La Estancia 1-1(a) and 1-2(a).
- c. See Attachment 3. The Electronic Native files are included in the .ZIP file for this response on the PUC Interchange.
- d. Assuming the prior removal of the existing habitable structures, as described in response to La Estancia 1-2(a), this alternative is feasible from an engineering perspective.

ATTACHMENT:

Attachment 1 – Figure – 1 page

Native Files:

Attachment 2 – Native File 1 – Environmental Land Use Data.xlsx
Attachment 3 – Native File 2 – Cost Data.xlsx



The following files are not convertible:

(Estimated Costs).xlsx	La Estancia RFI 1-02_Attachment 2
(Environmental and Land-Use Data).xlsx	La Estancia RFI 1-02- Attachment 3

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.