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

RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO DENTON COUNTY LAND AND CATTLE LP AND DENTON COUNTY LAND AND CATTLE 2'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*

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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

Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 1 below. Also assume in your response that any and all landowners directly impacted by the proposed route segment modifications have consented to the modifications presented. Based on the segment modifications presented below, please provide the following:

a. The difference in cost associated with Oncor constructing modified route segments M1 and M5 compared to the segments as originally proposed by Oncor in its application as well as the total cost of the modified segments.

Response

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

The estimated cost variance for the proposed modifications to links M1 and M5 are shown below and include the modifications described in response to DCLC RFI 1-1(b) below.

DCLC RFI Estimated Cost Variance for Alternatives Transmission Line/Link Name	**Estimated Cost Variance**
DCLC RFI 1-1(a) **M1** Alternative	$ 247,129
DCLC RFI 1-1(a) **M5** Alternative	$ 484,303

Request

Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 1 below. Also assume in your response that any and all landowners directly impacted by the proposed route segment modifications have consented to the modifications presented. Based on the segment modifications presented below, please provide the following:

b. Any and all associated land use data for modified route segment M1 and M5, including any impediment identified by Oncor or Halff to constructing modified segments M1 and M5 as depicted in Figure 1 that was not present for segments M1 and M5 as originally proposed by Oncor;

c. Any and all associated environmental data for modified route segments M1 and M5, including any impediment identified by Oncor or Halff to constructing modified segments M1 and M5 as depicted in Figure 1 that was not present for segments M1 or M5 as originally proposed by Oncor.

Response

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

b. Attachment 1 provides the environmental and land-use data for the alternative M1 and M5 route segments proposed by DCLC. Halff identified no impediments for the Link M1 alternative. The Electronic Native Files are included in the .ZIP file for this response on the PUC Interchange. Halff identified the following impediments to the Link M5 alternative, which were addressed with the modifications described below:

Impediment 1 – The western vertex that transitions to the original Link M5 alignment appears to be located coincident with multiple natural gas pipelines and an existing roadway. Halff shifted this vertex to the east to avoid this conflict, as shown in Figure 1 below.

Impediment 2 – the southern portion of the Link M5 alternative appears to overlap the easement of an existing natural gas pipeline. Halff slightly shifted this east-west reach north to avoid this overlap, as shown in Figure 1 below.

Each of these modifications to the Link M5 alternative appear to avoid potential conflicts with parking spaces and road access associated with Building 2 in the figure provided by DCLC. Using this alignment, these modifications are viable and

constructible. A KMZ file is being provided, which includes these modifications to the M1 and M5 alternatives.

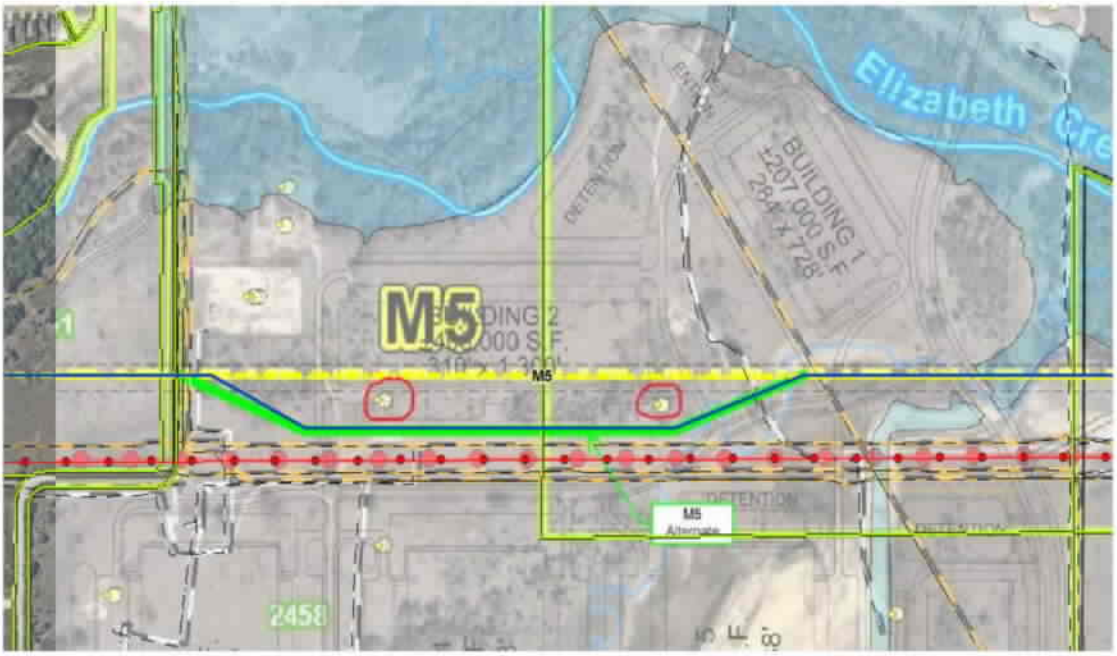

Figure 1: Clipped image showing the approximate location of the DCLC Link M5 alternative alignment (green) and Halff's modified alternative alignment (blue). Red circles indicate nearby wells that Texas Railroad Commission data and aerial photography indicate have been plugged in the last 5 years.

c. See Attachment 1.

NATIVE FILES:

Attachment 1 – Native File 1 - Environmental and Land-Use Data, xlxs

Request

Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 1 below. Also assume in your response that any and all landowners directly impacted by the proposed route segment modifications have consented to the modifications presented. Admit or deny that the proposed modifications to segments M1 and M5 are viable and constructible by Oncor if a route utilizing segments M1 or M5 were approved by the Public Utility Commission of Texas.

Response

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

Admit, assuming the modifications described in response to DCLC RFI 1-1 are approved.

Request

Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 2 below. Also assume in your response that any and all landowners directly impacted by the proposed route segment modification have consented to the modification presented. Based on the segment modifications presented below, please provide the following:

a. The difference in the total cost associated with Oncor constructing the proposed alternate M3 route segments proposed compared to the segment as originally proposed by Oncor in its application as well as the total cost of the alternate M3 route segments presented.

Response

The following response is provided under the direct supervision of Russell Marusak and Amy Zapletal, the sponsoring witnesses for this response.

DCLC RFI Estimated Cost Variance for Alternatives Transmission Line/Link Name	**Estimated Cost Variance**
DCLC RFI 1-3(a) **M3** Alternative **1**	$ 542,986
DCLC RFI 1-3(a) DCLC **M3** Alternative **2**	$ (792,126)

Request

Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 2 below. Also assume in your response that any and all landowners directly impacted by the proposed route segment modification have consented to the modification presented. Based on the segment modifications presented below, please provide the following:

b. Any and all associated land use data for alternate M3 route segments proposed, including any impediment identified by Oncor or Halff to constructing either of the alternate M3 route segments depicted in Figure 2 that was not previously present for segment M3 as originally proposed by Oncor;

c. Any and all associated environmental data for the alternate M3 route segments, including any impediment identified by Oncor or Halff to constructing the alternate M3 route segments as depicted in Figure 2 that was not present for segments M3 as originally proposed by Oncor;

Response

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

b. Attachment 1 provides the environmental and land-use data for route the alternative M3 alignments proposed by DCLC. Halff identified the following impediments, which were addressed with the modifications described below:

M3 Alternative 1 – The northeastern transition from the original Link M3 appeared to be in the middle of John Day Road which is also flanked by natural gas pipelines. The Electronic Native Files are included in the .ZIP file for this response on the PUC Interchange. Halff shifted this transition southwest along the original road alignment to avoid these conflicts, as shown in Figure 2 below.

M3 Alternative 2 – The middle portion of this alternative would have had above-ground oil and gas facilities within the proposed right-of-way. To increase the distance between the proposed alignment and the existing oil and gas facilities, Halff shifted the northeast transition of this alternative to the south, as shown in Figure 2 below. Halff's modified alternative avoids the need for an angle structure at the midway point of the alternative

alignment, and avoids conflicts with John Day Road and the aforementioned natural gas lines in the vicinity.

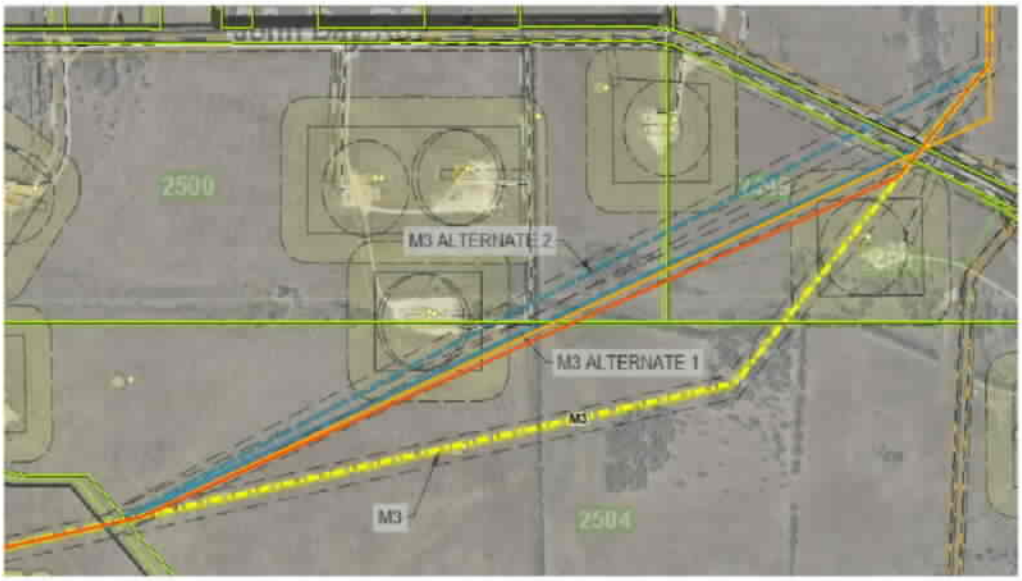

Figure 2: Clipped image showing the approximate location of the DCLC Link M3 alternative alignments (blue) and Halff's modified alternative alignments 1 (red) and 2 (orange).

Using this alignment, these modifications are viable and constructible. The provided KMZ file includes these modifications to the M3 alternatives.

c. See Attachment 1.

NATIVE FILES:

Attachment 1 – Native File 1 - Environmental and Land-Use Data, xlxs

Request

Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 1 below. Admit or deny that the proposed modifications to segment M3 are viable and constructible by Oncor if a route utilizing segment M3 were approved by the Public Utility Commission of Texas.

Response

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

Admit, assuming the modifications described in response to DCLC RFI 1-3 are approved.

The following files are not convertible:

DCLC RFI 1-01b - Attachment 1 (Environmental and Land Use Data).xlsx
DCLC RFI 1-03 (b-c) - Attachment 1 (Environmental and Land Use Data).xlsx

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.