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APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RAMHORN HILL – DUNHAM 345 KV TRANSMISSION LINE IN DENTON AND WISE COUNTIES	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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FURST RANCH INTERVENORS INITIAL BRIEF ON THE MERITS

Old WR Ranch I, L.P. (“Old WR”), 64.3 SE 1171/377 LLC (“64.3”), and SWC 1171-377, Ltd (“SWC”), collectively referred to as “Furst Ranch Intervenor”, files this initial brief on the merits.

**I.
Furst Ranch**

Furst Ranch Intervenor owns approximately 2,200-acres land on all four corners of FM 1171 and US 377 in Denton County, Flower Mound, Texas. Furst Ranch is in the east section of the Oncor study area. Furst Ranch is zoned mixed used with a projected 3,000 single family residences, 5,000 multi-family residences, 1,000 senior living residences, and 500 acres of retail, commercial, and corporate campus uses. Furst Ranch is currently working with Flower Mound officials on forming public-improvement districts (PIDS) and tax increment reinvestment zones (TIRZ) to facilitate construction of critical infrastructure like roads, water lines and sewer lines.

**II.
Oncor Ramhorn Hill – Durham 345 KV Project**

All 74 routes under consideration cross Furst Ranch, including the alternative routes proposed by intervenors. Consequently, Furst Ranch is in the undesirable position of having to acknowledge that, if this Project is approved, Oncor’s new power line will be located on one or

more of its properties. Furst Ranch's only request in this proceeding has been that the Public Utility Commission ("Commission") approve a route that includes line segments A0, A4, B1, B61, B62, C1, and C21 because it follows, for the most part, established existing rights of way and easements, including electric transmission lines, across its properties. It has been estimated that utilizing these line segments will result in approximately 20 acres of new power line easements across Furst Ranch. Paralleling existing easements and rights of way is a routing criterion the Commission encourages to minimize the impact of new electric transmission lines. No intervenor or party in this proceeding offered evidence at the hearing on the merits that a route utilizing other line segments across Furst Ranch would be better than line segments A0, A4, B1, B61, B62, C1, and C21. This includes PUC Staff (Route 179-C) and the Texas Parks & Wildlife (Route 137). Furst Ranch is requesting that the Commission follow its established routing criteria as the power line crosses its property and base its decision on the evidence offered at the hearing on the merits.

III.

Route 179 and Route 179 Alternatives

Oncor's best-meets Route 179 includes line segments A0, A4, B1, B61, B62, C1, and C21. The proposed alternative Route 179C does as well. Proposed alternative Route 179C La Estancia 1 and proposed alternative Route 179C La Estancia 1 & 2 use the same line segments with a slight modification of line segment C21 on La Estancia's property. Oncor Exhibit No. 25 is an updated Table 7-1 that compares Route 179 and its alternatives using the environmental data and established routing criteria. Oncor's Exhibit No. 25 confirms Route 179 and its alternatives compare favorably to one another, and all other routes under consideration, on the relevant data. Based on information and belief, all east section intervenors support Route 179C La Estancia 1 and proposed alternative Route 179C La Estancia 1 & 2. Furst Ranch Intervenor support Route 179 and its alternatives.

IV.
Conclusion and Prayer

Furst Ranch requests that the Commission approve a route that includes line segments A0, A4, B1, B61, B62, C1, and C21. Route 179C La Estancia 1 and Route 179C La Estancia 1&2 include these line segments and have the support of all east section intervenors, including Furst Ranch Intervenor. Furst Ranch request the Commission approve a route with line segments A0, A4, B1, B61, B62, C1, and C21 and for such other and further relief to which they may be justly entitled.

Respectfully submitted,

/s/ Josh T. Westrom

Josh T. Westrom

State Bar No. 24033448

jwestrom@dentonattorney.com

Jones & Westrom

400 W. Oak, Ste 300

Denton, Texas 76201

Telephone No. 940-383-1619

Facsimile No. 940-565-1078

Counsel for OLD WR RANCH I, L.P. ("OLD WR"), 64.3 SE 1171/377 LLC ("64.3"), AND SWC 1171-377, LTD ("SWC") a/k/a Furst Ranch Intervenor