

Filing Receipt

Filing Date - 2023-12-19 02:40:13 PM

Control Number - 55067

Item Number - 1825

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

APPLICATION OF ONCOR ELECTRIC	§	PUBLIC UTILITY COMMISSION
DELIVERY LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	
AND NECESSITY FOR THE RAMHORN	§	OF TEXAS
HILL-DUNHAM 345-KV	§	
TRANSMISSION LINE IN DENTON AND	§	
WISE COUNTIES	§	

REPLY OF DENTON COUNTY LAND & CATTLE LP AND DENTON COUNTY LAND & CATTLE 2 TO THE EXCEPTIONS TO THE PROPOSAL FOR DECISION

Denton County Land & Cattle LP and Denton County Land & Cattle 2 ("DCLC") file this Reply to the Exceptions to the Proposal for Decision. In accordance with the Exceptions and Relies Memorandum filed by Commission Counsel on November 14, 2023, the deadline for filing replies to exceptions is December 19, 2023. Therefore, this reply is timely filed.

I. <u>BACKGROUND</u>

DCLC support the recommendation of the Administrative Law Judges in the Proposal for Decision ("PFD") that the Public Utility Commission of Texas ("Commission") approve Route 179-C as modified by La Estancia Alts. 1 and 2 and DCLC Modified Ml and M5 ("Recommended Route"). The ALJs recommend this route because Route 179-C best meets the applicable routing criteria and is less expensive than Route 179, even after the modifications proposed by DCLC and La Estancia. DCLC continue to support the Recommended Route and respectfully request that the Commission adopt the Recommended Route as outlined in the PFD.

¹ PFD at 3 ("Route 179-C as modified by La Estancia Alternatives 1 and 2 and DCLC's Modified MI and M5 comprising of links: AO-A4-BI-B61-B62-CI-C21-La Estancia Alt. 1 Created Link-C3-C6-EI-Modified E6-Modified GI-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-Modified MI-Modified M5-R2-R5-U3-V3-V4-Z").

² PFD at 50.

II. REPLY TO THE CITY OF JUSTIN'S EXCEPTIONS

The City of Justin ("Justin") does not appear to oppose the Recommended Route itself but

instead takes issue with the fact that the ALJs refused to include among the recommended

modifications to Route 179-C the use of links I6-J1-J21-J22-L1 in place of links I8-J3-K1-L5-L4-

L3 (the "Justin Modification"). Further, Justin's exceptions to the PFD are unclear as to whether

it is advocating for the inclusion of the Justin Modification within the Recommended Route or as

a modification to Route 179. DCLC do not take a position on the cost or viability of the Justin

Modification. However, for the reasons stated in the PFD, the Recommended Route best meets the

applicable routing criteria and any potential cost implications from the Justin Modification would

remain the same regardless of whether it were included in the Recommended Route or Route 179.

Therefore, if the Commission determines that the Justin Modification should be included in the

approved route, DCLC respectfully request that the Commission approve the Recommended Route

with the Justin Modification rather than Route 179 with the Justin Modification.

Respectfully submitted,

JACKSON WALKER LLP

Heath D. Armstrong

State Bar No. 24105048

100 Congress Avenue, Suite 1100

Austin, TX 78701

(512) 236-2098

(512) 391-2163 (Fax)

harmstrong@jw.com

ATTORNEY FOR DENTON
COUNTY LAND & CATTLE LP
AND DENTON COUNTY LAND

& CATTLE 2

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on this date, via the Commission's Interchange in accordance with the Commission's Second Order in Docket No. 50664 suspending the PUC Procedural Rule 22.74.

Heath D. Armstrong