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APPLICATION OF ONCOR ELECTRICPUBLIC UTILITY COMMISSIONDELIVERY LLC TO AMEND ITS§CERTIFICATE OF CONVENIENCE§AND NECESSITY FOR THE RAMHORN§HILL-DUNHAM 345-KV§TRANSMISSION LINE IN DENTON AND§WISE COUNTIES§

REPLY OF ALLIANCE WEST, LP TO THE EXCEPTIONS TO THE PROPOSAL FOR DECISION

Alliance West, LP ("Alliance") files 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. BACKGROUND

Alliance supports 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").¹ 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.² Alliance continues to support the Recommended Route and respectfully requests 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. <u>REPLY TO THE CITY OF JUSTIN'S EXCEPTIONS</u>

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. 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, Alliance respectfully requests that the Commission approve the Recommended Route with the Justin Modification rather than Route 179 with the Justin Modification.

Respectfully submitted, JACKSON WALKER LLP

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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