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

REPLY OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO LA ESTANCIA'S MOTION FOR REHEARING

I. INTRODUCTION

Oncor Electric Delivery Company LLC ("Oncor") files this Reply to La Estancia's Motion for Rehearing¹ ("Motion for Rehearing") of the final order in this case, signed by the Public Utility Commission of Texas ("Commission") on February 1, 2024.² Under Tex. GOV'T CODE § 2001.146(b), this reply is timely filed on or before March 12, 2024, the date that is 40 days after the Commission signed the underlying final order.

II. REPLY TO POINTS OF ERROR IN LA ESTANCIA'S MOTION FOR REHEARING

Oncor specifically replies to the points of error raised in Sections II.A.3, II.A.4, and II.B of La Estancia's motion for rehearing.

A. Reply to Sections II.A.3 and II.A.4 of La Estancia's Motion for Rehearing

In seeking approval of its proposed "La Estancia Alternative 1" route modification, La Estancia claims that the recent opening of the new Livano Canyon Falls apartment complex increases by 132 the number of habitable structures along the Commission-approved Route 179-C. This argument mistakes the number of apartment rental units with the much lower number of apartment buildings that actually count as habitable structures under the Commission's rules. The Commission defines habitable structures to include "apartment buildings." Applying this

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¹ The Motion for Rehearing was signed by La Estancia Investments, L.P.; the Town of Northlake; Seth Deleon; Jeff True; Benito Gonzalez; and Jeremy and Katie Young. For simplicity, Oncor refers to the movants as "La Estancia," particularly because Oncor's reply focuses solely on issues specific to that entity.

² See 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, Docket No. 55067, Order (Feb. 1, 2024).

³ 16 TEX. ADMIN. CODE § 25.101(a)(3).

straightforward definition means counting the number of discrete apartment buildings, which number no more than a dozen—not the number of individual rental units or bedrooms within each apartment building.

Oncor takes no position on the merits of La Estancia's requested "La Estancia Alternative 1" itself. Because this project is critical to ERCOT grid reliability, Oncor respectfully requests that the Commission expeditiously grant or deny this request at its earlier available opportunity.⁴ Route certainty at the earliest possible juncture will greatly assist Oncor's efforts to meet the project's ambitious construction schedule and place this critical line into service as soon as reasonably possible.

B. Reply to Section II.B of La Estancia's Motion for Rehearing

Oncor and La Estancia have recently reached an agreement in principle on a mutually-acceptable "minor route deviation" similar to the "Link E6 Modification" described in the Motion for Rehearing. This agreement effectively moots the request for rehearing on this point and thus obviates the need for the Commission to make a ruling on this issue.

III. CONCLUSION

Oncor appreciates the Commission's consideration of its reply to the Motion for Rehearing.

⁴ See Tex. Gov't Code § 2001.146(c)-(f). The 180-day decisional deadline for this case, filed on June 8, 2023, originally occurred in early December. Oncor extended the time period for Commission action.

Respectfully submitted,

By: /s/ Jared M. Jones

Jaren A. Taylor State Bar No. 24059069 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 jjones@velaw.com

ATTORNEYS FOR ONCOR ELECTRIC DELIVERY COMPANY LLC

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to SOAH Order No. 2, filed in this docket, a copy of the foregoing has been served on the Commission and on all parties of record, via the PUC Interchange, and on all parties from whom an action is required, via email, on this the 12th day of March, 2024.

s/Jared M.	Jones	
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