



## **Filing Receipt**

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**Item Number - 342**

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

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

**RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO  
WATKINS' 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](mailto: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 19<sup>th</sup> day of July, 2023.

/s/ Michele M. Gibson

**Request**

Please provide a complete electronic copy of the Geographic Information System (GIS) Geodatabase and Shapefiles used in the development of the Environmental Assessment and Alternative Route Analysis (Attachment 1 of the Application).

**Response**

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

The electronic native files requested are being provided to the propounding party by email. Any other party may request access to the native files by sending a request to [Regulatory.oncor.com](mailto:Regulatory.oncor.com).

**Request**

Please provide a copy of all aerial photography used in the development of the Application. If included within the Geodatabase, provide all aerial photography electronically as part of the Geodatabase.

**Response**

This request has been withdrawn by the requesting party.

**Request**

Please provide in electronic format, preferably in Microsoft Excel format, a table similar to Table 2, Environmental Data for Filed Routes in the CCN Application, which is contained in Application Attachment 1, but for segments.

**Response**

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

Responsive information was previously provided in Oncor's response to DHL Supply Chain's RFI Set No. 1, Question No. 1-03.

**Request**

Please provide a complete electronic copy, preferably in Microsoft Excel format, of the cost model utilized to create the estimated costs shown in Attachment 3 of the Application. Please leave all formulae and links intact. In addition, please provide a detailed explanation of the methodology utilized to arrive at the costs shown in Attachment 3 of the Application.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

The cost model spreadsheet, which is included in Excel format as Native file 1 – Cost Model and will be provided to the propounding party on the Oncor FTP site, was used to create the estimated costs shown in Application Attachment 3. Based on an agreement with the requesting party, the scope of Oncor's response is limited to non-proprietary data to avoid production of certain highly sensitive information on raw materials, commodities, and specific labor costs. Thus, Oncor will provide a cost model spreadsheet that redacts, excludes, or genericizes any specific information on such costs. The information provided will also exclude or redact certain proprietary, trade secret, and competitively sensitive commercial information.

These cost estimates were developed based on Oncor's current material and labor costs, and on Oncor's previous experience constructing similar electric transmission projects in this area of Texas. These cost estimates are conceptual, insofar as they are not supported by, and do not incorporate, any site-specific design requirements that can only be determined after on-the-ground surveying, geotechnical investigations, subsurface utility engineering ("SUE") investigations, etc., have been completed and after preparation of detailed engineered drawings. For each route, the quantity and type of structures required were estimated based on the link composition, link length, and the estimated size of the turning angles. Other costs were estimated using Oncor's current labor and contractor costs and Oncor's best estimate of the right-of-way and associated costs needed to safely and reliably construct and operate the project, based on the length of each route and the presence of any known constraints.

The information requested is highly sensitive confidential information and will be made available after execution of a certification to be bound by the protective order in this docket. The requested information is included in Native File 1 and is being provided to the propounding party on the Oncor FTP site and will be made available to other parties upon request.

**ELECTRONIC FILE:**

Native file 1 – Cost model.xlsx (HSPM)

**Request**

Please provide, in electronic format, the type (e.g., tangent, angle, dead end, etc. for steel monopole, H frame, lattice, etc. type construction) of structures used on each route and also the quantity of each structure type used on each route. Also, for each structure type provided, please provide a cost estimate of a single structure.

**Response**

This request has been withdrawn by the requesting party..



**Request**

Please provide a copy of each Open House Questionnaire from all open house meetings, and subsequent mail-ins, received in the development of the Application.

**Response**

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

The requested information is Voluminous and is being provided to the propounding party on Oncor's FTP site. Pursuant to Oncor's agreement with the requesting party, Oncor is providing a copy of each Open House Questionnaire and subsequent mail-ins received in the development of the Application. For municipalities or organizations whose members provided form comments or petition-style comments that were substantively identical, Oncor is providing a sample copy of the comment form. The approximate number of each set of form/petition-style comments Oncor received is provided in Section 5.1.1 of the Environmental Assessment. Any other party may request access to the native files responsive to this request by sending an email to [Regulatory@oncor.com](mailto:Regulatory@oncor.com).

**ATTACHMENT:**

Attachment 1 – Voluminous Index – 1 page

VOLUMINOUS INDEX

1. Emails - December 7, 2022 – 162 pages
2. Emails – December 7, 2022 – 270 pages
3. Emails as of January 18, 2023 (Unique Response) - 798 pages
4. Emails as of January 23, 2023 – 660 pages
5. Emails as of December 16, 2022 – 165 pages
6. Emails as of December 19, 2022 – 597 pages
7. Emails as of December 20, 2022 – 295 pages
8. Emails as of December 22, 2022 – 556 pages
9. Emails with graphics – 56 pages
10. Petition Style Samples – 31 pages

**Request**

Please provide any summaries, including tabular data, and all other documents related to the Open House Questionnaires from all open house meetings and subsequent mail-ins. If entered into an electronic format, please provide in an electronic format, preferably in Microsoft Excel.

**Response**

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

Summaries of the Open House Questionnaires and subsequent mail-ins are provided in Section 5.1.1 of the Environmental Assessment. Tabular data regarding the Open House Questionnaires received at the public open house meeting is being provided in its native Excel format in the .zip file for this response on the PUC Interchange.

**ELECTRONIC FILE:**

Native file 1 – Attendance and questionnaire count (Excel)

### Request

Please consider an alternate route, named "Route 179-A," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V1-V3-V4-Z.

- a. Please provide Oncor's best available estimate of the route evaluation criteria for this alternative route in the same format as Table 2, Environmental Data for Filed Routes in the CCN Application, which is contained in Application Attachment 1, Environmental Assessment and Alternative Route Analysis.

### Response

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

See below for the requested information.

Alternative Route Number	179-A
Length of alternative route	114,174
Length of route parallel to existing electric transmission lines	5,227
Length of route parallel to railroads	4,261
Length of route parallel to existing public roads/highways	8,040
Length of route parallel to pipelines	7,636
Length of route parallel to apparent property boundaries	25,094
Total length of route parallel to existing compatible rights-of-way	30,322
Number of habitable structures within 500 feet of the route centerline	100
Number of parks or recreational areas within 1,000 feet of the route centerline	4
Length of the route across parks/recreational areas	0
Length of route through commercial/industrial areas	4,617
Length of the route across cropland/hay meadow	20,248
Length across rangeland pasture	69,522
Length of route across agricultural cropland with mobile irrigation systems	0
Length of route across upland woodlands	10,731
Length of route across riparian areas	6,913
Length of route across potential wetlands	0
Number of stream crossings by the route	25
Length of route parallel to streams (within 100 feet)	695
Length across lakes or ponds (open waters)	2,143
Number of known rare/unique plant locations within the right-of-way	1

Length of route through known habitat of endangered or threatened species	0
Number of recorded cultural resource sites crossed by the route	1
Number of recorded cultural resources within 1,000 feet of the route centerline	3
Length of route across areas of high archaeological/historical site potential	36,864
Number of private airstrips within 10,000 feet of the route centerline	0
Number of FAA-registered airports with at least one runway more than 3,200 feet in length within 20,000 feet of route centerline	3
Number of FAA-registered airports with no runway greater than 3,200 feet in length within 10,000 feet of the route centerline	4
Number of heliports located within 5,000 feet of the route centerline	2
Number of commercial AM radio transmitters located within 10,000 feet of the route centerline	0
Number of FM, microwave and other electronic installations within 2,000 feet of the route centerline	1
Number of U.S. or State Highway crossings by the route	19
Number of Farm to Market (F.M.), county roads, or other street crossings by the route	10
Estimated length of right-of-way within foreground visual zone of U.S. and State Highways	49,335
Estimated length of right-of-way within foreground visual zone of park/recreational areas	41,157

**Request**

Please consider an alternate route, named "Route 179-A," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V1-V3-V4-Z.

- b. Please provide Oncor's best available cost estimates for this alternative route in the same format as the cost estimates provided in Application Attachment 3 – Cost Estimates.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

See below for the requested information.

	<b>Route 179-A</b>
Right-of-way and Land Acquisition	\$ 56,587,000
Engineering and Design (Utility)	\$ 307,000
Engineering and Design (Contract)	\$ 6,078,000
Procurement of Material and Equipment (including stores)	\$ 60,912,000
Construction of Facilities (Utility)	\$ -
Construction of Facilities (Contract)	\$ 51,527,000
Other (all costs not included in the above categories)	\$ -
<b>Estimated Total Transmission Line Cost</b>	<b>\$ 175,411,000</b>
Estimated Oncor Substation Facilities Cost	\$ 74,858,000
<b>Estimated Total Project Cost</b>	<b>\$ 250,269,000</b>

**Request**

Please consider an alternate route, named "Route 179-A," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-V1-V3-V4-Z.

- c. If Oncor is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.

**Response**

The following response is prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

Oncor does not object to this route.

## Request

Please consider an alternate route, named "Route 179-B," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R3-R5-U3-V3-V4-Z.

- a. Please provide Oncor's best available estimate of the route evaluation criteria for this alternative route in the same format as Table 2, Environmental Data for Filed Routes in the CCN Application, which is contained in Application Attachment 1, Environmental Assessment and Alternative Route Analysis.

## Response

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

See below for the requested information.

Alternative Route Number	179-B
Length of alternative route	116,750
Length of route parallel to existing electric transmission lines	5,227
Length of route parallel to railroads	0
Length of route parallel to existing public roads/highways	6,591
Length of route parallel to pipelines	7,636
Length of route parallel to apparent property boundaries	20,438
Total length of route parallel to existing compatible rights-of-way	25,665
Number of habitable structures within 500 feet of the route centerline	98
Number of parks or recreational areas within 1,000 feet of the route centerline	4
Length of the route across parks/recreational areas	0
Length of route through commercial/industrial areas	4,511
Length of the route across cropland/hay meadow	20,248
Length across rangeland pasture	73,219
Length of route across agricultural cropland with mobile irrigation systems	0
Length of route across upland woodlands	10,115
Length of route across riparian areas	6,949
Length of route across potential wetlands	0
Number of stream crossings by the route	25
Length of route parallel to streams (within 100 feet)	695
Length across lakes or ponds (open waters)	1,708
Number of known rare/unique plant locations within the right-of-way	1
Length of route through known habitat of endangered or threatened species	0



Number of recorded cultural resource sites crossed by the route	1
Number of recorded cultural resources within 1,000 feet of the route centerline	3
Length of route across areas of high archaeological/historical site potential	37,915
Number of private airstrips within 10,000 feet of the route centerline	0
Number of FAA-registered airports with at least one runway more than 3,200 feet in length within 20,000 feet of route centerline	3
Number of FAA-registered airports with no runway greater than 3,200 feet in length within 10,000 feet of the route centerline	4
Number of heliports located within 5,000 feet of the route centerline	2

**Request**

Please consider an alternate route, named "Route 179-B," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R3-R5-U3-V3-V4-Z.

- b. Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 3 – Cost Estimates.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

See below for the requested information.

	Route 179-B
Right-of-way and Land Acquisition	\$ 57,055,000
Engineering and Design (Utility)	\$ 315,000
Engineering and Design (Contract)	\$ 6,160,000
Procurement of Material and Equipment (including stores)	\$ 62,243,000
Construction of Facilities (Utility)	\$ -
Construction of Facilities (Contract)	\$ 52,729,000
Other (all costs not included in the above categories)	\$ -
<b>Estimated Total Transmission Line Cost</b>	<b>\$ 178,502,000</b>
Estimated Oncor Substation Facilities Cost	\$ 74,858,000
<b>Estimated Total Project Cost</b>	<b>\$ 253,360,000</b>

**Request**

Please consider an alternate route, named "Route 179-B," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R3-R5-U3-V3-V4-Z.

- c. If Oncor is not willing to construct its proposed transmission line on the alternative route, please explain in detail why not.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

Oncor does not object to this route.

### Request

Please consider an alternate route, named Route 179-C," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M5-R2-R5-U3-V3-V4-Z.

- a. Please provide Oncor's best available estimate of the route evaluation criteria for this alternative route in the same format at Table 2, Environmental Data for Filed Routes in the CCN Application, which is contained in Application Attachment 1, Environmental Assessment and Alternative Route Analysis.

### Response

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

See below for the requested information.

Alternative Route Number	179-C
Length of alternative route	110,373
Length of route parallel to existing electric transmission lines	5,227
Length of route parallel to railroads	0
Length of route parallel to existing public roads/highways	6,591
Length of route parallel to pipelines	9,440
Length of route parallel to apparent property boundaries	20,438
Total length of route parallel to existing compatible rights-of-way	25,665
Number of habitable structures within 500 feet of the route centerline <sup>1</sup>	98
Number of parks or recreational areas within 1,000 feet of the route centerline <sup>2</sup>	4
Length of the route across parks/recreational areas	0
Length of route through commercial/industrial areas	4,551
Length of the route across cropland/hay meadow	22,691
Length across rangeland pasture	58,417
Length of route across agricultural cropland with mobile irrigation systems	0
Length of route across upland woodlands	11,311
Length of route across riparian areas	11,536
Length of route across potential wetlands	0
Number of stream crossings by the route	28
Length of route parallel to streams (within 100 feet)	695
Length across lakes or ponds (open waters)	1,867
Number of known rare/unique plant locations within the right-of-way	1
Length of route through known habitat of endangered or threatened species	0

Number of recorded cultural resource sites crossed by the route	1
Number of recorded cultural resources within 1,000 feet of the route centerline	3
Length of route across areas of high archaeological/historical site potential	56,753
Number of private airstrips within 10,000 feet of the route centerline	0
Number of FAA-registered airports with at least one runway more than 3,200 feet in length within 20,000 feet of route centerline	3
Number of FAA-registered airports with no runway greater than 3,200 feet in length within 10,000 feet of the route centerline	4
Number of heliports located within 5,000 feet of the route centerline	2
Number of commercial AM radio transmitters located within 10,000 feet of the route centerline	0
Number of FM, microwave and other electronic installations within 2,000 feet of the route centerline	2
Number of U.S. or State Highway crossings by the route	19
Number of Farm to Market (F.M.), county roads, or other street crossings by the route	10
Estimated length of right-of-way within foreground visual zone of U.S. and State Highways	63,395
Estimated length of right-of-way within foreground visual zone of park/recreational areas	41,157

**Request**

Please consider an alternate route, named Route 179-C," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M5-R2-R5-U3-V3-V4-Z.

- b. Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 3 – Cost Estimates.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

See below for the requested information.

	<b>Route 179-C</b>
Right-of-way and Land Acquisition	\$ 56,135,000
Engineering and Design (Utility)	\$ 297,000
Engineering and Design (Contract)	\$ 5,965,000
Procurement of Material and Equipment (including stores)	\$ 59,856,000
Construction of Facilities (Utility)	\$ -
Construction of Facilities (Contract)	\$ 50,491,000
Other (all costs not included in the above categories)	\$ -
<b>Estimated Total Transmission Line Cost</b>	<b>\$ 172,744,000</b>
Estimated Oncor Substation Facilities Cost	\$ 74,858,000
<b>Estimated Total Project Cost</b>	<b>\$ 247,602,000</b>

**Request**

Please consider an alternate route, named Route 179-C," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M5-R2-R5-U3-V3-V4-Z.

- c. If Oncor is not willing to construct its proposed transmission line on the alternative route, please explain in detail why not.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

Oncor does not object to this route

**Request**

Using the proposed Modified Segment V3 (attached):

- a. Please provide an estimate of the cost difference and route evaluation criteria changes associated with modifying Segment V3 as depicted by the solid white line on the attached aerial image.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, one of the sponsoring witness for this response.

The following information is provided in accordance with Oncor's agreement with the requesting party.

By agreement with the requesting party, the information is being provided subject to the following limitations: Oncor has not investigated these proposed modifications to the same extent as the links filed in its application; Oncor is interpreting Modified V1 and V3 to the best of its ability based on the aerial image attached to the RFI request; any use of Modified Segments V1 or V3 in an approved route would require consent from landowners directly affected by the modification; and the parties agree Oncor does not need to provide any further information on these modified links unless and until Watkins provides evidence of written consent to these modifications from all landowners directly affected by them.

See below for the requested information. Please note that the values for Modified V3 are estimates based on interpretation of aerial imagery.

Alternative Route Number	V3	Modified V3
Length of alternative route	3,545	4,345
Length of route parallel to existing electric transmission lines	0	0
Length of route parallel to railroads	0	0
Length of route parallel to existing public roads/highways	0	0
Length of route parallel to pipelines	0	0
Length of route parallel to apparent property boundaries	0	1,320
Total length of route parallel to existing compatible rights-of-way	0	0
Number of habitable structures within 500 feet of the route centerline	2	0
Number of parks or recreational areas within 1,000 feet of the route centerline	0	0
Length of the route across parks/recreational areas	0	0



Length of route through commercial/industrial areas	636	636
Length of the route across cropland/hay meadow	0	0
Length across rangeland pasture	2,698	2,698
Length of route across agricultural cropland with mobile irrigation systems	0	0
Length of route across upland woodlands	210	210
Length of route across riparian areas	0	0
Length of route across potential wetlands	0	0
Number of stream crossings by the route	0	0
Length of route parallel to streams (within 100 feet)	0	0
Length across lakes or ponds (open waters)	0	0
Number of known rare/unique plant locations within the right-of-way	0	0
Length of route through known habitat of endangered or threatened species	0	0
Number of recorded cultural resource sites crossed by the route	0	0
Number of recorded cultural resources within 1,000 feet of the route centerline	0	0
Length of route across areas of high archaeological/historical site potential	0	0
Number of private airstrips within 10,000 feet of the route centerline	0	0
Number of FAA-registered airports with at least one runway more than 3,200 feet in length within 20,000 feet of route centerline	1	1
Number of FAA-registered airports with no runway greater than 3,200 feet in length within 10,000 feet of the route centerline	0	0
Number of heliports located within 5,000 feet of the route centerline	1	1
Number of commercial AM radio transmitters located within 10,000 feet of the route centerline	0	0
Number of FM, microwave and other electronic installations within 2,000 feet of the route centerline	0	0
Number of U.S. or State Highway crossings by the route	4	4
Number of Farm to Market (F.M.), county roads, or other street crossings by the route	2	2
Estimated length of right-of-way within foreground visual zone of U.S. and State Highways	3,545	3,545
Estimated length of right-of-way within foreground visual zone of park/recreational areas	0	0

Estimated Cost	\$4,378,000	\$5,684,000
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**Request**

Using the proposed Modified Segment V3 (attached):

- b. Please confirm that any route using Modified Segment V3 instead of the original Segment V3 would be viable, feasible, acceptable from an environmental and land use perspective, and conform to the Commission's policy of prudent avoidance. If you cannot conform, please explain why.

**Response**

This response was prepared by or under the direct supervision of Russell J. Marusak and Brenda J. Perkins, the sponsoring witnesses for this response.

The following response is provided in accordance with Oncor's agreement with the requesting party in lieu of the initially requested information. By agreement with the requesting party, the information is being provided subject to the following limitations: Oncor has not investigated these proposed modifications to the same extent as the links filed in its application; Oncor is interpreting Modified V1 and V3 to the best of its ability based on the aerial image attached to the RFI request; any use of Modified Segments V1 or V3 in an approved route would require consent from landowners directly affected by the modification; and the parties agree Oncor does not need to provide any further information on these modified links unless and until Watkins provides evidence of written consent to these modifications from all landowners directly affected by them.

Confirmed.

**Request**

Using the proposed Modified Segment V3 (attached):

- c. Please confirm that using Modified Segment V3 would not require notice to any other landowners or any other owners of habitable structures. If you cannot so confirm, please explain why.

**Response**

This response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

The following information is provided in accordance with Oncor's agreement with the requesting party in lieu of the initially requested information. By agreement with the requesting party, the information is being provided subject to the following limitations: Oncor has not investigated these proposed modifications to the same extent as the links filed in its application; Oncor is interpreting Modified V1 and V3 to the best of its ability based on the aerial image attached to the RFI request; any use of Modified Segments V1 or V3 in an approved route would require consent from landowners directly affected by the modification; and the parties agree Oncor does not need to provide any further information on these modified links unless and until Watkins provides evidence of written consent to these modifications from all landowners directly affected by them.

Confirmed.

**Request**

Using the proposed Modified Segment V3 (attached):

- d. Please provide updated cost estimates similar to Attachment 3 to the CCN Application for the routes that could utilize Modified Segment V3.

**Response**

This request has been withdrawn by the requesting party.

**Request**

Using the proposed Modified Segment V1 (attached):

- a. Please provide an estimate of the cost difference and route evaluation criteria changes associated with modifying Segment V1, beginning at the intersections of Segments R4 and V1 and ending at the intersection of Modified Segment V3 and V1 as depicted on the attached aerial image.

**Response**

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

The following information is provided in accordance with Oncor's agreement with the requesting party. By agreement with the requesting party, the information is being provided subject to the following limitations: Oncor has not investigated these proposed modifications to the same extent as the links filed in its application; Oncor is interpreting Modified V1 and V3 to the best of its ability based on the aerial image attached to the RFI request; any use of Modified Segments V1 or V3 in an approved route would require consent from landowners directly affected by the modification; and the parties agree Oncor does not need to provide any further information on these modified links unless and until Watkins provides evidence of written consent to these modifications from all landowners directly affected by them.

See below for the requested information. Please note that the values for Modified V1 are estimates based on interpretation of aerial imagery.

Alternative Route Number	V1	Modified V1
Length of alternative route*	4,261	2,521
Length of route parallel to existing electric transmission lines	0	0
Length of route parallel to railroads*	4,261	2,521
Length of route parallel to existing public roads/highways*	1,449	0
Length of route parallel to pipelines	0	0
Length of route parallel to apparent property boundaries*	4,261	2,521
Total length of route parallel to existing compatible rights-of-way*	4,261	2,521
Number of habitable structures within 500 feet of the route centerline	5	2
Number of parks or recreational areas within 1,000 feet of the route centerline	0	0
Length of the route across parks/recreational areas	0	0

Length of route through commercial/industrial areas*	123	73
Length of the route across cropland/hay meadow	0	0
Length across rangeland pasture*	2,889	1,929
Length of route across agricultural cropland with mobile irrigation systems	0	0
Length of route across upland woodlands*	795	65
Length of route across riparian areas	0	0
Length of route across potential wetlands	0	0
Number of stream crossings by the route	0	0
Length of route parallel to streams (within 100 feet)	0	0
Length across lakes or ponds (open waters)	453	453
Number of known rare/unique plant locations within the right-of-way	0	0
Length of route through known habitat of endangered or threatened species	0	0
Number of recorded cultural resource sites crossed by the route	0	0
Number of recorded cultural resources within 1,000 feet of the route centerline	0	0
Length of route across areas of high archaeological/historical site potential	0	0
Number of private airstrips within 10,000 feet of the route centerline	0	0
Number of FAA-registered airports with at least one runway more than 3,200 feet in length within 20,000 feet of route centerline	0	0
Number of FAA-registered airports with no runway greater than 3,200 feet in length within 10,000 feet of the route centerline	0	0
Number of heliports located within 5,000 feet of the route centerline	0	0
Number of commercial AM radio transmitters located within 10,000 feet of the route centerline	0	0
Number of FM, microwave and other electronic installations within 2,000 feet of the route centerline	0	0
Number of U.S. or State Highway crossings by the route	0	0
Number of Farm to Market (F.M.), county roads, or other street crossings by the route	0	0
Estimated length of right-of-way within foreground visual zone of U.S. and State Highways*	3,860	2,120
Estimated length of right-of-way within foreground visual zone of park/recreational areas	0	0

Estimated Costs	\$3,831,000	\$2,607,000
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\*Length reductions result from a reduction in length, not from a modification to an alternate alignment.



**Request**

Using the proposed Modified Segment V1 (attached):

b. Please confirm that any route using Modified Segment V1 instead of the original Segment V1 would be viable, feasible, acceptable from an environmental and land use perspective, and conform to the Commission's policy of prudent avoidance. If you cannot so confirm, please explain why.

**Response**

The following response was prepared by or under the direct supervision of Brenda J. Perkins, the sponsoring witness for this response.

The following information is provided in accordance with Oncor's agreement with the requesting party. By agreement with the requesting party, the information is being provided subject to the following limitations: Oncor has not investigated these proposed modifications to the same extent as the links filed in its application; Oncor is interpreting Modified V1 and V3 to the best of its ability based on the aerial image attached to the RFI request; any use of Modified Segments V1 or V3 in an approved route would require consent from landowners directly affected by the modification; and the parties agree Oncor does not need to provide any further information on these modified links unless and until Watkins provides evidence of written consent to these modifications from all landowners directly affected by them.

Confirmed.

**Request**

Please consider an alternate route, named "Route 179-D," from the Dunham Switch to Ramhorn Hill Switch station consisting of the following combination of segments: A0-A4-B1-B61-B62-C1-C21-C23-C7-E2-E1-E6-G1-G3-H41-H42-H8-I8-J3-K1-L5-L4-L3-L2-M1-M2-M3-R4-**Modified V1-Modified V3-V4-Z**.

- a. Please provide Oncor's best available estimate of the route evaluation criteria for this alternative route in the same format as Table 2, Environmental Data for Filed Routes in the CCN Application, which is contained in Application Attachment 1, Environmental Assessment and Alternative Route Analysis.
- b. Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 3 – Cost Estimates.
- c. c. If Oncor is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.

**Response**

This request has been withdrawn by the requesting party.

**Request**

Please consider the following "Paths" that travel into the Ramhorn Hill Switch station from the end of Segment R4:

- "Path A": V2- Z
  - "Path B": V1-V3-V4-Z
  - "Path C": Modified V1-Modified V3-V4-Z
- a. For any of Oncor's proposed routes and any alternative route proposed by a party in this case that follows Path A, please create and distinctively name two alternative routes: one that follows Path B and another that follows Path C. Then complete those routes using the same segments in the proposed route from the Dunham Switch station to Segment R4. This is a continuing request as new alternative routes are proposed.

**Response**

Pursuant to an agreement with the requesting party, Oncor will respond to this request only with respect to the "Path B" alternatives.

**Request**

Please consider the following "Paths" that travel into the Ramhorn Hill Switch station from the end of Segment R4:

- "Path A": V2- Z
- "Path B": V1-V3-V4-Z
- "Path C": Modified V1-Modified V3-V4-Z

b. Please provide the following information for each new alternative route described in subsection (a) above:

- i. Oncor's best available estimates of the route evaluation criteria for this alternative route in the same format as Table 2, Environmental Data for Filed Routes in the CCN Application, which is contained in Application Attachment 1, Environmental Assessment and Alternative Route Analysis.

**Response**

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

The following information is provided in accordance with Oncor's agreement with the requesting party. Pursuant to this agreement, Oncor will respond only with respect to "Path B" alternatives.

The requested information is being included in the .zip file for this response on the PUC Interchange.

**ELECTRONIC FILE:**

Native file 1 - Path B Alternatives.xlsx

**Request**

Please consider the following "Paths" that travel into the Ramhorn Hill Switch station from the end of Segment R4:

- "Path A": V2- Z
- "Path B": V1-V3-V4-Z
- "Path C": Modified V1-Modified V3-V4-Z

b. Please provide the following information for each new alternative route described in subsection (a) above:

- ii. Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 3 – Cost Estimates.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

The following information is provided in accordance with Oncor's agreement with the requesting party. Pursuant to this agreement, Oncor will respond only with respect to "Path B" alternatives.

Oncor's best available cost estimates for seven (7) alternative routes that originally followed "Path A" [V2-Z] but were reconsidered (denoted with "R") in this RFI to follow "Path B" [V1-V3-V4-Z] are being provided in Excel format. Refer to the "Estimated Total Project Cost" in Columns E through K entitled "Watkins RFI 1-14(b)(ii) / Route 22R, Route 29R, Route 116R, Route 130R, Route 132R, Route 164R, Route 179R". Proposed "Route 179-A" addressed in Watkins RFI 1-8(b) and "Route 179R" addressed herein are composed of identical segments.

The native electronic file is being included in the .zip file for this response on the PUC Interchange.

**ELECTRONIC FILE:**

Native file 1 – Best Available Cost Estimate for alternate path routes (Excel)

**Request**

Please consider the following "Paths" that travel into the Ramhorn Hill Switch station from the end of Segment R4:

- "Path A": V2- Z
- "Path B": V1-V3-V4-Z
- "Path C": Modified V1-Modified V3-V4-Z

b. Please provide the following information for each new alternative route described in subsection (a) above:

- iii. If Oncor is not willing to construct its proposed transmission line on the alternative route, please explain in detail why not.

**Response**

The following response was prepared by or under the direct supervision of Amy L. Zapletal, the sponsoring witness for this response.

The following information is provided in accordance with Oncor's agreement with the requesting party. Pursuant to that agreement, Oncor will respond only with respect to "Path B" alternatives.

Oncor does not object to any route using the "Path B" alternative, provided the required consents are obtained.

**Request**

Please identify the types of compatible rights-of-way that are included in the line item "Total length of route parallel to existing compatible rights of way" on Table 2 of Exhibit BJP-5.

**Response**

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

The types of compatible rights-of-way that are included in the line item "Total length of route parallel to existing compatible rights-of-way" on Table 2 of Exhibit BJP-5 are: property lines, roads, highways, existing electric transmission lines, and other natural or cultural features.

The following files are not convertible:

Count.xlsx	1-07-Attendance-and-Questionnaire-
	1-14b(i)-Path-B-Alternatives.xlsx
for-these-alternative-routes.xlsx	1-14b(ii)-Best-Available-Cost-Estimate-

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.