



## **Filing Receipt**

**Filing Date - 2023-07-21 12:03:52 PM**

**Control Number - 55067**

**Item Number - 472**

**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  
TOWN OF NORTHLAKE’S 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

Jaren A. Taylor  
State Bar No. 24059069  
Winston P. Skinner  
State Bar No. 24079348  
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  
wskinner@velaw.com  
jjones@velaw.com

**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 21<sup>st</sup> day of July, 2023.

/s/ Michele M. Gibson

**Request**

Please provide the Environmental Data for each of the proposed segments comprising the 74 routes filed in the CCN Application in the same format as Table 2 of the Brenda J. Perkins Memorandum of May 30, 2023.

**Response**

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

Oncor previously provided information responsive to this request in response to DHL Supply Chain's RFI Set No. 1, Question No. 1-03. Any party can access this information by downloading the native files for that response and opening the document titled "1-03 - Native File - Table 7-3 Environmental Data for Alternative Link Evaluation.xlsx".

**Request**

Please provide the total lengths of each of the proposed segments comprising the 74 routes filed in the CCN Application.

**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, and can be accessed by any party by downloading the native files for that response and opening the document titled "1-03 - Native File - Table 7-3 Environmental Data for Alternative Link Evaluation.xlsx". The lengths for each of the proposed segments are provided in the first row, titled "Length of alternative route".

**Request**

Please provide the Estimated Total Transmission Line Cost for each of the proposed segments comprising the 74 routes filed in the CCN Application in the same format as in Application "Attachment No. 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.

Oncor did not prepare cost data by segment in the same format as in Application "Attachment No. 3 – Cost Estimates". However, Oncor previously provided information responsive to the substance of this request in its response to Watkins RFI Set No. 1, Question No. 1-04, in the document titled "1-04 - Native File - Cost Model.xlsx" in the "Link Summary" worksheet.

The responsive information is highly sensitive confidential information and will be made available only after execution of a certification to be bound by the protective order in this docket. The responsive information will be provided to the propounding party on the Oncor FTP site and will be made available to other parties upon request, under the same conditions.

**Request**

Please provide the dollar amount used by Oncor in determining the Right-of-Way and Land Acquisition cost associated with Route Segments E1, E1, C4, C6 and C7 as used in the 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 dollar amount used in determining the "Right-of-Way and Land Acquisition" costs for Segments E1, E2, C4, C6, and C7, as used in the Application "Attachment 3 – Cost Estimates", are provided in the table below. These amounts are exclusive of acquisition costs, including appraisals and legal fees, which are estimated on a route-by-route basis.

Segment	Cost (per sq. ft.)
E1	\$4.37
E2	\$10.00
C4	\$5.90
C6	\$10.00
C7	\$5.90

## Request

Please consider an alternate route, named Route 179-A, consisting of all segments comprising Route 179 except that instead of using Segments E1, E2 and C7, Route 179-A uses Segments C4 and C6. Please state whether Route 179 would better meet the criteria in Texas Utilities Cod §37.056(c)(4)(A) – (D) and 16 TAC §25.101, including the Commission's policy of prudent avoidance than alternative Route 179-A, and if so, why.

## 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.

Route 179-A, as described in this request, has the same link composition as Route 148 in the Environmental Assessment and Alternative Route Analysis. Below is the environmental data for Route 148 and Route 179.

Alternative Route Number	148	179
Length of alternative route	115,330	114,898
Length of route parallel to existing electric transmission lines	5,227	5,227
Length of route parallel to railroads	0	0
Length of route parallel to existing public roads/highways	6,591	6,591
Length of route parallel to pipelines	7,636	7,636
Length of route parallel to apparent property boundaries	19,718	20,834
Total length of route parallel to existing compatible rights-of-way	24,945	26,061
Number of habitable structures within 500 feet of the route centerline <sup>1</sup>	108	97
Number of parks or recreational areas within 1,000 feet of the route centerline <sup>2</sup>	3	4
Length of the route across parks/recreational areas	0	0
Length of route through commercial/industrial areas	4,312	4,607
Length of the route across cropland/hay meadow	20,248	20,248
Length across rangeland pasture	71,603	71,051
Length of route across agricultural cropland with mobile irrigation systems	0	0
Length of route across upland woodlands	10,416	10,126
Length of route across riparian areas	6,994	7,162
Length of route across potential wetlands	0	0
Number of stream crossings by the route	26	27
Length of route parallel to streams (within 100 feet)	1,351	1,351
Length across lakes or ponds (open waters)	1,757	1,704
Number of known rare/unique plant locations within the right-of-way	1	1
Length of route through known habitat of endangered or threatened species	0	0
Number of recorded cultural resource sites crossed by the route	1	1
Number of recorded cultural resources within 1,000 feet of the route centerline	3	3
Length of route across areas of high archaeological/historical site potential	38,700	37,905



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	3	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	4
Number of heliports located within 5,000 feet of the route centerline	2	2
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	2	2
Number of U.S. or State Highway crossings by the route	19	19
Number of Farm to Market (F.M.), county roads, or other street crossings by the route	10	11
Estimated length of right-of-way within foreground visual zone of U.S. and State Highways	47,820	47,388
Estimated length of right-of-way within foreground visual zone of park/recreational areas	44,363	45,369

Based on this environmental data, Route 179 would better meet the criteria in the Texas Utilities Code § 37.056(c)(4)(A) – (D) and 16 TAC § 25.101, including the Commission's policy of prudent avoidance. While both routes perform similarly on most routing criteria, Route 179 is shorter, parallels existing compatible rights-of-way to a greater extent, and impacts fewer habitable structures.

However, all routes presented in the Environmental Assessment and Alternative Route Analysis meet the criteria in the Texas Utilities Code § 37.056(c)(4)(A) – (D) and 16 TAC § 25.101, including the Commission's policy of prudent avoidance and are available for the Commission's consideration.

**Request**

Please explain the basis for the conclusion that “no substantial impact is anticipated” to the Northwest Regional Airport as stated in Section 7.7.5, page 7-24 of the Environmental Assessment and Alternative Route Analysis. To the extent Oncor assumed specific glide slopes for Northwest Regional Airport, please provide the glide slopes used in the analysis.

**Response**

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

No substantial impact is anticipated to Northwest Regional Airport based on Oncor's determination that structure heights and locations can be selected that will not violate the Federal Aviation Administration's ("FAA's") obstruction standards. Oncor assumed a 50:1 glide slope for FAA notice criteria and a 20:1 glide slope for FAA obstruction standards. After the Commission approves a route, Oncor will determine structure heights and locations and submit the design to the FAA for review.