

Filing Receipt

Filing Date - 2023-06-08 10:47:42 AM

Control Number - 55067

Item Number - 7

PUC DOCKET NO. 55067

DIRECT TESTIMONY OF AMY L. ZAPLETAL, P.E., WITNESS FOR ONCOR ELECTRIC DELIVERY COMPANY LLC

I. POSITION AN	D QUALIFICATIONS	2
II. PURPOSE OF	TESTIMONY	2
III. DESCRIPTIO	N OF PROPOSED TRANSMISSION LINE PROJECT	3
IV. PROJECT SO	CHEDULE AND FINANCING	4
V. STRUCTURE	AND CONDUCTOR SELECTION	5
VI. STATION CO	NSTRUCTION	6
VII. NEIGHBORII	NG UTILITIES AND POLITICAL SUBDIVISIONS	9
VIII. COST ESTI	MATES	9
IX. ENGINEERIN	NG CONSTRAINTS	11
X. PROJECT PE	RMITTING	20
XI. GENERATIO	N IMPACTS	21
XII. CONCLUSIO	ON	21
AFFIDAVIT		22
Exhibit ALZ-1	Resume of Amy L. Zapletal	
Exhibit ALZ-2	Map of Potential USACE Crossings Evaluated	
Exhibit ALZ-3 Map of Engineering Constraints (I-35W and SH 114)		
Exhibit ALZ-4 Engineering Analysis (I-35W and SH 114)		

1		DIRECT TESTIMONY OF AMY L. ZAPLETAL, P.E.
2		I. POSITION AND QUALIFICATIONS
3	Q.	PLEASE STATE YOUR NAME, EMPLOYMENT POSITION, AND
4		BUSINESS ADDRESS.
5	A.	My name is Amy L. Zapletal. I am employed as a Project Manager Senior
6		in the Transmission Engineering Right-of-Way group at Oncor Electric
7		Delivery Company LLC ("Oncor"). My business address is 777 Main St.,
8		Suite 707, Fort Worth, Texas 76102.
9	Q.	PLEASE DESCRIBE YOUR PROFESSIONAL QUALIFICATIONS.
0	A.	I have served as the lead Oncor engineer responsible for the design,
1		development and execution of the Ramhorn Hill-Dunham 345 kV
12		transmission line project ("Proposed Transmission Line Project"). I have
13		been employed at Oncor as a Project Manager Senior since June of 2021.
4		Prior to my employment at Oncor, my professional experience was
15		dedicated to project management and utility district engineering consulting
16		services. I am a licensed professional engineer in the State of Texas
17		(License No. 94680). I received a Bachelor of Science degree in civil
8		engineering from Texas A&M University in 2000. My educational and
19		professional qualifications are more fully presented in my resume, which is
20		attached hereto as Exhibit ALZ-1.
21	Q.	HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE
22		PUBLIC UTILITY COMMISSION OF TEXAS ("COMMISSION")?
23	A.	Yes. I previously submitted testimony in Docket No. 54733.
24		II. PURPOSE OF TESTIMONY
25	Q.	WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?
26	A.	The purpose of my direct testimony is to introduce, support, describe, and
27		sponsor the project schedule, financing, and cost estimates included in
28		Oncor's Standard Application for a Certificate of Convenience and
29		Necessity ("CCN") for a Proposed Transmission Line filed in this docket (the
30		"Application"). My testimony will also introduce, support, sponsor, and

PUC Docket No. 55067

describe the structure and conductor selection; station construction; neighboring utilities and political subdivisions; known engineering constraints; project permitting; and generation impacts associated with the Proposed Transmission Line Project.

I sponsor Oncor's responses to Application Question Nos. 1-13 and 20. The Application, as it may be amended and/or supplemented, will be offered into evidence by Oncor at the hearing on the merits. My direct testimony was prepared by me or under my direct supervision. The facts and statements set forth in the portions of the Application that I sponsor are true and correct to the best of my knowledge.

III. DESCRIPTION OF PROPOSED TRANSMISSION LINE PROJECT

- 12 Q. PLEASE GENERALLY DESCRIBE THE PROPOSED TRANSMISSION13 LINE PROJECT.
 - The Proposed Transmission Line Project is part of the overall Roanoke Area Upgrades Project, which ERCOT endorsed as critical to the reliability of the ERCOT grid. The Proposed Transmission Line Project includes constructing a new 20- to 23-mile, double-circuit 345 kV transmission line connecting the proposed Dunham Switch, located in Denton County, to the proposed Ramhorn Hill Switch, located in Wise County. The transmission line is proposed to be built on triple-circuit capable monopole structures with two 345 kV circuits initially installed and a vacant circuit position to allow for the future addition of a 138 kV underbuild. Both 345 kV switching stations will be constructed in a 12-breaker, breaker-and-a-half arrangement and will tap into the existing 345 kV transmission system in the northwestern Dallas-Fort Worth Metroplex.

The Proposed Transmission Line Project will be designed and constructed to meet or exceed the specifications and/or criteria set forth in the latest edition of the National Electrical Safety Code ("NESC"), the statutes of the State of Texas, the Commission's rules, and Oncor's standard design practices.

PUC Docket No. 55067

Α.

- Q. WILL NEW PERMANENT RIGHT-OF-WAY ("ROW") BE REQUIRED FOR
 THE PROPOSED TRANSMISSION LINE PROJECT?
- A. Yes. The Proposed Transmission Line Project will require a standard ROW
 width of approximately 100 feet, although additional ROW width may be
 required in certain areas to address engineering constraints.

IV. PROJECT SCHEDULE AND FINANCING

- 7 Q. WHAT IS THE CURRENT SCHEDULE FOR THE PROPOSED 8 TRANSMISSION LINE PROJECT?
- 9 A. The schedule for the Proposed Transmission Line Project was developed 10 based on a 180-day approval timeline due to its designation by ERCOT as 11 critical to reliability. The following schedule is premised on Commission 12 approval of the Proposed Transmission Line Project by December 2023:

Description	Start	Completion
ROW and Land Acquisition	December 2023	December 2024
Engineering and Design	January 2024	October 2024
Material and Equipment		
Procurement	February 2024	October 2024
Construction of Facilities	December 2024	December 2025
Energize Facilities	December 2025	December 2025

- 13 Q. HOW WILL THE PROPOSED TRANSMISSION LINE PROJECT BE
 14 FINANCED?
- 15 As explained in the Application, Oncor proposes to finance the facilities Α. 16 included in the Proposed Transmission Line Project with a combination of 17 debt and equity in compliance with its authorized capital structure, which is 18 similar to the means used for previous construction projects. Oncor plans 19 to utilize internally generated funds (equity) and proceeds received from the 20 issuance of securities. Oncor will typically obtain short-term borrowings as 21 needed for interim financing of its construction expenditures in excess of 22 funds generated internally. These borrowings are then repaid through the 23 issuance of long-term debt securities, the types and amounts of which are 24 as of yet undetermined. Oncor is the sole applicant for the Proposed

PUC Docket No. 55067

6

1 Transmission Line Project, and therefore no other party will be reimbursed 2 for any portion of this project.

V. STRUCTURE AND CONDUCTOR SELECTION

- Q. WHAT STRUCTURES DID ONCOR SELECT FOR CONSTRUCTION OF
 THE PROPOSED TRANSMISSION LINE PROJECT?
- 6 Α. Oncor will construct the Proposed Transmission Line Project primarily on 7 steel monopoles with a typical structure height of 120-175 feet. After 8 evaluating numerous factors relating to the study area, including but not 9 limited to span length between structures, construction and maintenance 10 issues, commodity and labor costs, impacts to affected landowners, and 11 constraints in the study area. Oncor affirmed the use of this structure for the 12 Proposed Transmission Line Project. A typical triple-circuit, 345 kV tangent 13 monopole with two circuits in place is shown in Figure 1-2 in the 14 Environmental Assessment and Alternative Route Analysis for the 15 Proposed Ramhorn Hill Switch to Dunham Switch 345 kV Transmission 16 Line Project in Denton and Wise Counties, Texas ("Environmental 17 Assessment"), which is included as Attachment No. 1 to the Application. 18 Section 1.3 of the Environmental Assessment also discusses Oncor's 19 selected structure type.
- Q. WHY IS ONCOR PROPOSING THE USE OF TRIPLE-CIRCUIT CAPABLE
 STRUCTURES WITH A VACANT CIRCUIT POSITION?
- 22 Α. This proposal is consistent with ERCOT's endorsement for the project, 23 which calls for a double-circuit 345 kV transmission line on triple-circuit 24 capable structures to allow for the future installation of a 138 kV circuit. This 25 design will allow Oncor to address future growth in the project area without 26 the need to acquire additional ROW. Given that the materials and 27 installation costs for triple-circuit capable structures are only 20-25% 28 greater than the costs for double-circuit capable structures, the incremental 29 cost impact of triple-circuit capable construction is minimal compared with

3

1	the costs that would be incurred to construct an entirely new 138 kV
2	transmission line in the project area in the future.

- Q. WHAT CONDUCTOR DOES ONCOR PROPOSE TO USE FOR THE
 PROPOSED TRANSMISSION LINE PROJECT?
- The 345 kV circuits will be installed using bundled 1926.9 kcmil aluminum conductor steel supported, trapezoidal-shaped wire ("ACSS/TW"). The normal peak operating current rating for this conductor is approximately 5,138 amperes, and the line capacity is 3,070 megavolt-amperes ("MVA").
- 9 Q. IS ONCOR'S CHOSEN CONDUCTOR THE MOST COST-EFFECTIVE
 10 AND RELIABLE OPTION FOR THE PROPOSED TRANSMISSION LINE
 11 PROJECT?
- 12 A. Yes. ERCOT's independent review required that this line be constructed with normal and emergency ratings of at least 2,987 MVA. Using a smaller conductor, such as bundled 959 ACSS/TW conductor, would not produce the necessary capacity rating. Considering this ERCOT requirement for the Proposed Transmission Line Project, it is both prudent and necessary to install the bundled 1926.9 kcmil ACSS/TW conductor, which is Oncor's standard conductor for 345 kV transmission lines.

VI. STATION CONSTRUCTION

- Q. WILL ANY STATION WORK BE REQUIRED FOR THE PROPOSED
 TRANSMISSION LINE PROJECT?
- 22 A. Yes. The Proposed Transmission Line Project will include establishing a 23 new Ramhorn Hill Switch station in Wise County and a new Dunham Switch 24 station in Denton County. The switching stations will be constructed entirely 25 on Oncor's fee-owned property.
- Q. PLEASE DESCRIBE THE PROPOSED RAMHORN HILL SWITCHSTATION.
- 28 A. The proposed Ramhorn Hill Switch station will be a 345 kV switching 29 station, initially designed in a 12-breaker, breaker-and-a-half arrangement, 30 and will serve as the western endpoint for the Ramhorn Hill-Dunham

PUC Docket No. 55067

19

1	transmission line. It will be located approximately two miles south of the
2	intersection of U.S. Highway 287 and State Highway ("SH") 114, near the
3	City of Rhome, Texas. The preliminary designed dimensions are
4	approximately 700 feet by 750 feet. A diagram showing the approximate
5	dimensions and proposed layout of the Ramhorn Hill Switch station is
6	included in Attachment No. 2 to the Application.

- Q. WHAT FACILITIES AND EQUIPMENT WILL MAKE UP THE PROPOSED
 RAMHORN HILL SWITCH STATION?
- 9 Α. New facilities and equipment at the Ramhorn Hill Switch station will include 10 aluminum tubular bussing and a static mast for lightning protection. Each 11 345 kV circuit entering the station will have associated A-frame dead-end 12 structures, capacitively coupled voltage transformers, line traps, circuit 13 breakers, disconnect switches, and associated support structures. 14 control center will house relay panels, a Supervisory Control and Data 15 Acquisition ("SCADA") system, and controls for the switchyard equipment. 16 The station is not currently planned to serve load or otherwise transform 17 power to distribution voltage, so it is not designed to accommodate power 18 transformers.
- 19 Q. WILL THE PROPOSED RAMHORN HILL SWITCH STATION INCLUDE 20 CAPACITY FOR EXPANSION?
- 21 A. Yes. Capacity will be available for additional circuits in the future, including
 22 the future 138 kV circuit planned for this line, with incremental modifications
 23 to the station. Additionally, the proposed Ramhorn Hill Switch station site
 24 could ultimately be expanded to accommodate an 18-breaker 345 kV ring
 25 bus arrangement, a potential 138 kV switchyard that can accommodate up
 26 to 18 breakers in a breaker-and-a-half arrangement, 345/138 kV
 27 autotransformers, and a load serving distribution substation.
- 28 Q. PLEASE DESCRIBE THE PROPOSED DUNHAM SWITCH STATION.
- 29 A. The proposed Dunham Switch station will be a 345 kV switching station, 30 initially designed in a 12-breaker, breaker-and-a-half arrangement, and will

PUC Docket No. 55067

- 1 serve as the eastern endpoint for the Ramhorn Hill-Dunham transmission 2 line. It will be located approximately 1.4 miles southeast of the intersection 3 of U.S. Highway 377 and Farm-to-Market Road ("FM") 1171 (regionally 4 known as Cross Timbers Road), in the Town of Flower Mound, Texas. The 5 preliminary designed dimensions of the Dunham Switch station are 6 approximately 700 feet by 600 feet. A diagram showing the approximate 7 dimensions and proposed layout of the Dunham Switch station is included 8 in Attachment No. 2 to the Application.
- 9 Q. WHAT FACILITIES AND EQUIPMENT WILL MAKE UP THE PROPOSED 10 DUNHAM SWITCH STATION?
- 11 A. New facilities and equipment at the Dunham Switch station will include 12 aluminum tubular bussing and a static mast for lightning protection. Each 13 345 kV circuit entering the station will have associated A-frame dead-end 14 structures, capacitively coupled voltage transformers, line traps, circuit 15 breakers, disconnect switches, and associated support structures. 16 control center will house relay panels, SCADA system, and controls for the 17 switchyard equipment. The station is not currently planned to serve load or 18 otherwise transform power to distribution voltage, so it is not designed to 19 accommodate power transformers.
- 20 Q. WILL THE PROPOSED DUNHAM SWITCH STATION INCLUDE 21 CAPACITY FOR EXPANSION?
- 22 A. Yes. Capacity will be available for additional circuits in the future, including 23 the future 138 kV circuit planned for this line, with incremental modifications 24 to the station. Additionally, the proposed Dunham Switch station site could 25 ultimately be expanded to accommodate an 18-breaker, 345 kV ring bus 26 arrangement, a potential 138 kV switchyard that can accommodate up to 27 18 breakers in a breaker-and-a-half arrangement, 345/138 kV 28 autotransformers, and a load serving distribution substation.
- Q. WHY IS IT IMPORTANT TO BUILD EACH OF THESE NEW STATIONSWITH EXPANSION CAPABILITY?

PUC Docket No. 55067

A. This area of Texas is developing rapidly. This means both that available land will become harder to obtain and that electric demand will continue to grow, increasing the need for load-serving infrastructure. The expansion capability of these sites will allow Oncor to grow and expand its facilities incrementally as needed to meet the needs of the community and the ERCOT grid.

VII. NEIGHBORING UTILITIES AND POLITICAL SUBDIVISIONS

- 8 Q. ARE ANY OTHER ELECTRIC UTILITIES INVOLVED WITH THE PROPOSED TRANSMISSION LINE PROJECT?
- 10 A. No. Oncor is the sole applicant for the Proposed Transmission Line Project
 11 and will construct the transmission line and related station facilities.
- 12 Q. PLEASE IDENTIFY THE POLITICAL SUBDIVISIONS IN WHICH THE 13 PROPOSED TRANSMISSION LINE PROJECT WILL BE LOCATED.
- 14 A. Depending on the route selected by the Commission, the Proposed
 15 Transmission Line Project may pass through portions of the City of Justin,
 16 City of Fort Worth, City of New Fairview, and City of Rhome. All filed routes
 17 will pass through the Town of Flower Mound and the Town of Northlake.

18 VIII. COST ESTIMATES

- Q. WHAT ARE THE ESTIMATED COSTS OF THE TRANSMISSION LINE
 WORK FOR THE PROPOSED TRANSMISSION LINE PROJECT?
- A. As detailed in Attachment No. 3 to the Application, I estimate that transmission line costs to construct the Proposed Transmission Line Project, excluding station costs, will range from approximately \$164,581,000 to approximately \$237,423,000, depending on the route selected by the Commission.
- Q. WHAT ARE THE ESTIMATED COSTS OF THE STATION FACILITIES
 ASSOCIATED WITH THE PROPOSED TRANSMISSION LINE PROJECT?
- A. There are approximately \$74,858,000 in estimated station costs associated with the Proposed Transmission Line Project. This includes approximately

7

1	\$33,510,000 for the proposed Ramhorn Hill Switch station and
2	approximately \$41,348,000 for the proposed Dunham Switch station.
3	PLEASE PROVIDE A BREAKDOWN OF ONCOR'S ESTIMATED
4	STATION COSTS FOR RAMHORN HILL SWITCH STATION.
5	Oncor's estimated station costs for the proposed Ramhorn Hill Switch
6	station include approximately: \$8,810,000 for ROW and land acquisition;
7	\$500,000 for contract engineering and design, including ground surveying,
8	geotechnical services, and station engineering consulting services;
9	\$11,570,000 for material procurement, which includes the costs of all the
10	equipment described above, including stores; \$250,000 for Oncor
11	construction costs, which covers Oncor's costs associated with operations
12	commissioning and internal field construction coordinators; and
13	\$12,380,000 for contract labor and construction, which includes the costs
14	for construction contractors, conducting surveys, grading the station site,
15	placing foundations, installing equipment, and installing the electrical
16	ground grid.
17	PLEASE PROVIDE A BREAKDOWN OF ONCOR'S ESTIMATED
18	STATION COSTS FOR DUNHAM SWITCH STATION.
19	Oncor's estimated station costs for the proposed Dunham Switch station
20	include approximately: \$16,648,000 for ROW and land acquisition;
21	\$500,000 for contract engineering and design, including ground surveying,
22	geotechnical services, and station engineering consulting services;
23	\$11,570,000 for material procurement, which included the cost of all the
24	equipment described above, including stores; \$250,000 for Oncor
25	construction, which covers Oncor's costs associated with operations
26	commissioning and internal field construction coordinators; and

PUC Docket No. 55067

ground grid.

27

28

29

30

Zapletal – Direct Oncor Electric Delivery Company LLC Ramhorn Hill-Dunham 345 kV CCN

\$12,380,000 for contract labor and construction, which includes the costs

for construction contractors, conducting surveys, grading the station site,

placing foundations, installing equipment, and installing the electrical

IX. ENGINEERING CONSTRAINTS

- 2 Q. WHAT ARE SOME EXAMPLES OF ENGINEERING CONSTRAINTS?
- 3 A. Examples of engineering constraints may include but are not limited to:
- 4 existing residential development; oil, gas, or water wells; flood-prone areas;
- 5 pipeline ROWs; highway crossings; uneven or unstable terrain; unfavorable
- 6 soil conditions; and bodies of water.

1

- 7 Q. ARE THERE ANY KNOWN ENGINEERING CONSTRAINTS
- 8 ASSOCIATED WITH THE PROPOSED ROUTE FOR THE PROPOSED
- 9 TRANSMISSION LINE PROJECT?
- 10 A. Yes. However, at this time, the proposed routing alternatives do not present
- any known engineering constraints that cannot be resolved with additional
- 12 consideration by Oncor during the design and construction phases following
- approval of the Proposed Transmission Line Project. There may exist
- unknown engineering constraints that would require further adjustments if
- discovered through the survey process.
- 16 Q. PLEASE DESCRIBE THE KNOWN ENGINEERING CONSTRAINTS.
- 17 A. The study area for the Proposed Transmission Line Project includes
- 18 numerous engineering constraints including major highways and
- thoroughfares; aircraft landing facilities; pipelines and oil and gas pads; and
- 20 pockets of dense residential, industrial, and commercial development,
- which are particularly prevalent in the southern portion of the study area.
- This area of north Texas is growing rapidly, and multiple developers have
- 23 informed Oncor of plans for sizeable future development in areas traversed
- by routing alternatives for the Proposed Transmission Line Project, which
- will likely give rise to new constraints throughout the CCN approval,
- engineering and design, ROW acquisition, and construction phases of the
- project. Finally, the study area includes recreational and environmentally
- sensitive property owned and managed by the United States Army Corps
- 29 of Engineers ("USACE").

PUC Docket No. 55067

While the USACE property does not, on its own, constitute an engineering constraint, crossings of the USACE property are governed by the Federal Non-Recreational Outgrant Policy ("Outgrant Policy"), which severely restricts potential crossings. In developing routing alternatives for the Proposed Transmission Line Project, Oncor coordinated closely with the USACE, state and federal legislators, and local officials to identify potential routes across the USACE property while taking into account the engineering constraints associated with any potential crossings. The Outgrant Policy and Oncor's coordination with the USACE are addressed more fully in the direct testimony of Oncor witness Mr. Russell J. Marusak.

- 11 Q. DO ANY OF ONCOR'S PROPOSED ROUTES CROSS PROPERTY12 OWNED BY THE USACE?
 - A. The USACE property is federal land and can only be crossed with USACE permission, which has not been granted. Among the links filed in the Application, only Link G2 would make a short, aerial crossing of the USACE property near Interstate Highway 35W ("I-35W") and Denton Creek. The USACE has indicated that it is amenable to this crossing.

In coordination with Oncor's routing consultant, Halff Associates, Inc. ("Halff"), Oncor evaluated the possibility of crossing the USACE property using: (1) Link G2 to span I-35W and the USACE property at the northernmost point of Utility Corridor 15; (2) an overhead crossing outside of the USACE-established designated utility corridors ("Utility Corridors") in the northern portion of the USACE property, near the Trailwood subdivision; (3) an underground crossing in the same general location as (2); (4) crossings using one of the five designated utility corridors established in the Master Plan; (5) an overhead crossing using an existing Trinity River Authority ("TRA") easement; and (6) overhead crossings outside of the designated utility corridors in the southern portion of the USACE near SH 114. The locations of these alternatives are shown in Exhibit ALZ-2. Oncor's analysis, feedback from the USACE, and the presence of

PUC Docket No. 55067

numerous engineering, routing, and planning constraints associated with these crossings led to the conclusion that these options would not provide feasible routing opportunities.

My direct testimony will address the engineering constraints associated with these potential crossings. Oncor identified engineering constraints specifically associated with three of the Utility Corridors, the TRA easement corridor, and the proposed underground crossing. Additionally, all of the USACE crossings using the Utility Corridors, the TRA easement corridor, or the southern crossings would force the routing for the Proposed Transmission Line Project through the same general area southwest of the USACE property, which contains numerous engineering constraints that severely restrict Oncor's routing options. My direct testimony will address these constraints as well. The routing constraints associated with each potential crossing are addressed more fully in Mr. Marusak's direct testimony. Oncor witness Mr. Harsh Naik addresses the planning constraints.

- 17 Q. WHAT WERE THE RESULTS OF ONCOR'S ANALYSIS OF POTENTIAL
 18 CROSSINGS OF THE USACE PROPERTY USING THE UTILITY
 19 CORRIDORS?
 - A. Oncor identified engineering constraints in several of the Utility Corridors, as well as constraints in the area southwest of the USACE property that are even more restrictive and render the use of the Utility Corridors infeasible from an engineering perspective. I will address the corridor-specific constraints before addressing the more general constraints that impact multiple corridors.

Utility Corridor 11

Utility Corridor 11 is 100 feet wide and is occupied by two existing transmission lines—an Oncor/Texas Municipal Power Agency double-circuit 345 kV transmission line and a Brazos Electric Power Cooperative double circuit 138 kV transmission line. It is also paralleled and partially

PUC Docket No. 55067

occupied by U.S. Highway 377. The Master Plan does not permit this corridor to be expanded beyond 100 feet, including the space occupied by the road. These constraints make it impossible to maintain the 100-foot ROW required for the Proposed Transmission Line Project without clearing substantial portions of the Environmentally Sensitive Area outside of the designated utility corridor.

A 100-foot ROW is essential for the Proposed Transmission Line Project in order to provide sufficient space to maintain NESC clearances and prevent conductor blowout (i.e., horizontal displacement) leading to contact with objects outside the ROW, which could lead to conductor failure, arcing, or fires. Maintaining an appropriate buffer is especially important here, given the pervasive woody vegetation throughout the USACE property.

The Master Plan restricts future use of this corridor to subsurface boring, meaning no overhead facilities may be installed. Even if Oncor could obtain a categorical exclusion to this restriction, locating seven overhead transmission circuits in such close proximity would create planning and reliability concerns, which are addressed more fully in Mr. Naik's direct testimony.

Utility Corridor 12

Utility Corridor 12 is 70 feet wide and is occupied by a road and existing underground utilities. The Master Plan provides that the width of this corridor may not exceed 70 feet, including the space occupied by the road. Thus, this corridor is too narrow for the Proposed Transmission Line Project given the ROW requirements for the transmission line. The Master Plan restricts future use of this corridor to subsurface boring, meaning no overhead facilities may be installed.

Utility Corridor 15

Utility Corridor 15 is 140 feet wide and is occupied by I-35W and an existing CoServ distribution line. This corridor is restricted to the existing

PUC Docket No. 55067

road ROW and may not exceed 70 feet from the center of the road. The Master Plan restricts future use of this corridor to subsurface boring, meaning no overhead facilities may be installed. The proximity of I-35W to this corridor presents a unique engineering constraint, in that the width of the highway for much of the corridor's length challenges the maximum span length for the Proposed Transmission Line Project. Although, as explained above, Link G2 would make a short crossing through Utility Corridor 15 to cross I-35W where the highway is narrower and where the crossing would satisfy Texas Department of Transportation ("TxDOT)" regulations.

Any other use of any of the designated utility corridors would force the routing for the Proposed Transmission Line Project into the area southwest of the USACE property. This area contains numerous engineering constraints, which are addressed more fully below. In conjunction with the corridor-specific constraints, those constraints render the use of the designated utility corridors infeasible.

- Q. WHAT WERE THE RESULTS OF ONCOR'S ANALYSIS OF CROSSING THE USACE PROPERTY USING THE TRA EASEMENT CORRIDOR?
 - The use of the TRA easement corridor is not feasible from an engineering standpoint. The TRA easement is 60 feet wide and contains 16-, 30-, and 42-inch-wide underground pipelines within that space. The easement width and the spacing of the existing pipelines do not allow sufficient space for Oncor to install structure foundations or to maintain the 100-foot ROW required for this project. Structures for this project generally require foundations approximately 12 to 15 feet in diameter. In flood-prone areas like the USACE property, which surrounds Grapevine Lake, larger foundations may be required to properly anchor and support the structures. The size of the foundations required will ultimately depend on the soil composition and depth of the water table, which are currently unknown.

Like the designated utility corridors, the TRA easement corridor would lead the Proposed Transmission Line Project into the heavily

PUC Docket No. 55067

Α.

1		congested area southwest of the USACE property. As discussed above,
2		Oncor cannot route the Proposed Transmission Line Project through this
3		area due to the numerous engineering constraints.
4	Q.	PLEASE DESCRIBE THE ENGINEERING CONSTRAINTS SOUTHWEST
5		OF THE USACE PROPERTY THAT RENDER A CROSSING INFEASIBLE.
6		A. The area bounded by the USACE property to the north and east, SH
7		114 to the south, and I-35W to the west, contains numerous engineering
8		constraints that severely limit Oncor's ability to construct, operate, and
9		maintain the Proposed Transmission Line Project. These constraints are
0		shown in the map included as Exhibit ALZ-3 to my direct testimony. This
1		area lies just north of the City of Fort Worth, northeast of Alliance Airport,
12		and east of the Texas Motor Speedway. Within this area are a commercial
13		and industrial park; densely packed residential subdivisions; a mobile home
14		park; numerous oil, gas, and water pipelines; and existing transmission and
15		distribution lines.
16		To identify potential pathways through this area, Oncor conducted
17		on-the-ground reconnaissance and reviewed aerial imagery and publicly
8		available platting information. These efforts resulted in an engineering
19		analysis, which is included as Exhibit ALZ-4 to my direct testimony. Oncor's
20		analysis identified a number of specific engineering constraints that are
21		incompatible with Oncor's construction, operation, and maintenance of the
22		Proposed Transmission Line Project, including:
23		 buildings with narrow setbacks from existing roads, utilities, and
24		other buildings;
25		 multiple active transportation/logistics operations, including truck
26		court parking, loading areas, and emergency access/fire lanes;
27		 an interconnected storm sewer system with drainage channels,
28		inlets, and underground pipes;
29		 an elevated water storage tank owned by the Town of Northlake;
30		 private above-ground water storage tanks;

- underground and above-ground gas pipelines;
- overhead distribution lines;

- streetlighting systems; and
- security fencing separating properties.

Construction of the Proposed Transmission Line Project will require a consistent 100-foot-wide ROW, structure foundations 12-15 feet in diameter, and approximately 45,000 square feet of contiguous working space at each turning structure to set the structures and pull conductor. Even where at least 100 feet of space exists between buildings to accommodate the ROW and prevent blowout, few areas have space for Oncor to establish a temporary construction easement or maneuver the equipment required to set foundations and string conductor. What space does exist between buildings and roadways is often occupied by existing utilities.

Oncor could not identify a path through the area southwest of the USACE property that would provide the space needed to construct, operate, and maintain the Proposed Transmission Line Project. Even if Oncor could identify a theoretically feasible route, the heavy vehicle traffic in this area and customer outages that would be required would hinder construction efforts. Additionally, even if Oncor could construct a route through this area, access issues resulting from the presence of drainage areas, energized transmission/distribution corridors, transportation/logistics operations, and security fencing would create operational and maintenance challenges that could impair the reliability of the transmission line. For all of these reasons, this area is not a feasible location through which to route the Proposed Transmission Line Project.

- Q. PLEASE DESCRIBE ONCOR'S ANALYSIS CONCERNING A POTENTIAL
 UNDERGROUND CROSSING OF THE USACE PROPERTY.
- A. At the request of various municipalities, Oncor conducted an analysis of what would be required to construct a portion of the Proposed Transmission

- 17 -

PUC Docket No. 55067

Zapletal – Direct Oncor Electric Delivery Company LLC

1		Line Project underground. This analysis was intended to potentially
2		facilitate an approximately 0.2-mile underground crossing in the far north of
3		the USACE property. This area is adjacent to the Trailwood subdivision in
4		Flower Mound, near Northwest Regional Airport. Oncor's analysis
5		uncovered no evidence that a 5,000-ampere transmission line such as the
6		Proposed Transmission Line Project can be built underground. To Oncor's
7		knowledge, no underground lines of this ampacity have been built in the
8		United States, so the constraints and operational issues associated with
9		such construction are not fully understood.
0	Q.	WHAT WOULD BE REQUIRED TO CONSTRUCT A PORTION OF THE

- 10 Q. WHAT WOULD BE REQUIRED TO CONSTRUCT A PORTION OF THE
 11 PROPOSED TRANSMISSION LINE UNDERGROUND, ASSUMING IT
 12 COULD BE DONE?
- 13 A. Assuming a section of the line could be built underground, doing so would 14 require, at minimum:
 - a 150- to 180-foot-wide dedicated easement (compared with 100 feet for overhead);
 - permanent access roads across USACE property and right of entry for surveying, construction, inspection, and maintenance;
 - permanent, concrete-encased duct banks, including four parallel duct banks per 345 kV circuit (eight total) and one duct bank for the 138 kV circuit:
 - six underground cable-splice vaults per mile, each with a maintained access point; and
 - a 3-acre transition station at both ends of the underground section.
- Q. HOW WOULD UNDERGROUND CONSTRUCTION IMPACT THE COST
 OF THE PROPOSED TRANSMISSION LINE PROJECT?
- 27 A. The cost of underground construction for this project would be a minimum of \$100-110 million per mile (not including the future underground

PUC Docket No. 55067

15

16

17

18

19

20

21

22

23

24

- installation of a 138 kV circuit). Additionally, each 3-acre transition station would cost approximately \$5-7 million.
- Q. HOW ELSE WOULD UNDERGROUND CONSTRUCTION IMPACT THE
 PROPOSED TRANSMISSION LINE PROJECT?
- 5 A. The design and construction of an underground segment would extend the
 6 Proposed Transmission Line Project's in-service timeline to at least four
 7 years after CCN approval, compared with approximately two years for
 8 overhead. Access challenges associated with crossing USACE property
 9 and accessing underground circuits could also potentially cause reliability
 10 issues.

Environmental impacts would be greater for underground construction due to the additional ROW required for the transmission line and transition stations; the crossing of an Environmentally Sensitive Area; and the trenching, boring, and/or horizontal directional drilling required for underground construction. Importantly, the USACE indicated that it will not grant permission for permanent access roads, trenching, or crossing Environmentally Sensitive Areas, any of which would definitively render this option infeasible.

19 Q. DID ONCOR EVALUATE ANY OTHER ENGINEERING CONSTRAINTS?

A. Yes. The presence of 35 aircraft landing facilities in and around the study area is a unique engineering constraint that Oncor factored into the routing for the Proposed Transmission Line Project. To ensure that all of the proposed links are constructible in light of Federal Aviation Administration ("FAA") regulations and notice requirements, Oncor conducted a study of preliminary structure heights and ROW requirements for links in proximity to an airport or heliport, including use of the FAA's Obstruction Evaluation/Airport Airspace Analysis Notice Criteria Tool, which evaluates proposed structures based on preliminary heights, locations, proximity to

PUC Docket No. 55067

airports, and other factors to determine if they might trigger the FAA's notice requirements.

Based on this study, Oncor determined that potential structure heights necessary to maintain a standard 100-foot ROW width would be constructible. If, after final design of the Commission's approved route is submitted for FAA review, the FAA determines that structure heights do not comply, Oncor may utilize shorter non-standard steel monopole structures and/or acquire additional ROW width in order to comply with FAA clearance requirements.

X. PROJECT PERMITTING

- 11 Q. WILL ANY PERMITS BE REQUIRED FOR THE PROPOSED
 12 TRANSMISSION LINE PROJECT IN ADDITION TO THE CCN SOUGHT
 13 IN THIS PROCEEDING?
 - Yes, assuming that the Commission approves the Application, it is likely that additional permits will be necessary to construct the Proposed Transmission Line Project. Following approval, and prior to construction, Oncor will acquire all necessary permits/approvals and make all required If required, Oncor will prepare a Storm Water Pollution Prevention Plan and submit a Notice of Intent to the Texas Commission on Environmental Quality under the Texas Pollutant Discharge Elimination System program. A cultural resources survey plan will be developed with the Texas Historical Commission for the approved project. Consultation with the USACE will occur following Commission approval of the Application to determine appropriate permit requirements, including consultation under Section 404 of the Clean Water Act and/or Section 10 permit criteria, as necessary. Consultation with the U.S. Fish and Wildlife Service will occur following Commission approval of the Application to determine appropriate requirements under the Endangered Species Act, if necessary. Oncor will coordinate with the Texas Department of Transportation regarding any

PUC Docket No. 55067

1

2

3

4

5

6

7

8

9

10

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

Α.

1		crossings of interstate and state highways and of state-maintained
2		roadways.
3	Q.	IS ANY PART OF THE PROPOSED TRANSMISSION FACILITIES
4		LOCATED WITHIN THE COASTAL MANAGEMENT PROGRAM
5		BOUNDARY AS DEFINED IN 31 TEXAS ADMINISTRATIVE CODE
6		§ 25.102(A)?
7	A.	No. The Proposed Transmission Line Project is entirely outside the coastal
8		management program boundary.
9		XI. GENERATION IMPACTS
10	Q.	DOES ONCOR EXPECT ANY GENERATOR TO BE PRECLUDED OR
11		LIMITED FROM GENERATING OR DELIVERING ELECTRICITY TO THE
12		ERCOT GRID DUE TO CONSTRUCTION OF THE PROPOSED
13		TRANSMISSION LINE PROJECT, OR THAT ONCOR'S CONSTRUCTION
14		WILL ADVERSELY AFFECT THE RELIABILITY OF THE ERCOT
15		SYSTEM?
16	A.	No, Oncor does not anticipate that construction of the Proposed
17		Transmission Line Project will preclude or limit a generator from generating
18		or delivering power, or adversely affect the reliability of the ERCOT system.
19		As further discussed in Mr. Naik's direct testimony, the Proposed
20		Transmission Line Project is critical to supporting the reliability of the
21		ERCOT transmission system and will address reliability issues that may
22		otherwise limit the generation or delivery of electricity on the ERCOT grid.

23 XII. CONCLUSION

24 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

25 A. Yes, it does.

AFFIDAVIT

STATE OF TEXAS

COUNTY OF Tallan

BEFORE ME, the undersigned authority, on this day personally appeared Amy L. Zapletal who, having been placed under oath by me, did depose as follows:

"My name is Amy L. Zapletal. I am of legal age and a resident of the State of Texas. The foregoing testimony and exhibit offered by me are true and correct, and the opinions stated therein are, to the best of my knowledge and belief, accurate, true and correct."

Amy S. Zapletal

SUBSCRIBED AND SWORN TO BEFORE ME on this 6th day of June, 2023.

MICHELE M GIBSON Notary Public, State of Texas Comm. Expires 06-30-2026 Notary ID 575631-8

Notary Public, State of Texas

My Commission Expires

06-30-2026

AMY L. ZAPLETAL, P.E.

Oncor Electric Delivery Company • 777 Main Street, Suite 707 • Fort Worth, TX 76102

Amy.Zapletal@oncor.com

Professional Experience

ONCOR ELECTRIC DELIVERY COMPANY, TRANSMISSION ENGINEERING Right-of-Way Project Manager Sr.

6/2021 to Present Fort Worth. TX

- Provide overall project management for assigned projects including contractor oversight and direction, budget and schedule adherence, communication and consultation with key stakeholders on emergent issues, while supporting Legal and Regulatory throughout
- Provide consultation and expertise on ROW matters that impact maintenance and capital transmission projects
- Oversee ROW acquisition including landowner negotiations, addressing associated financial and schedule constraints
- Support ROW acquisition activities including mediation, settlement negotiations, and trial support throughout condemnation and appeals processes
- Assist in coordinating, prioritizing, and communicating schedule and scoping changes related to ROWon capital transmission projects
- Facilitate and manage Special Project assignments on an as-needed basis
 - o Engineering Witness for greenfield capital transmission line projects
 - Lead team of transmission line and station engineers to successfully scope and estimate project schedules and costs for a portfolio of related capital projects
 - Support related future ROW acquisition efforts as Engineering Witness during condemnation hearings

INDEPENDENT CONSULTANT Project Manager

7/2012 to 6/2021 Texas

- Develop design documents and construction plan sets, technical specifications and manuals, contract documents, and obtain City approvals of preliminary / final plats
- Procure and manage professional services provided by client's external consultants
- Supervise preparation of developer receivables summaries for municipal utility district ("MUD")
 financial planning and annual audits
- Research and analyze Summary of Costs to calculate bond funding requirements, incorporating the financial feasibility recommendations by the MUD's Financial Advisor, to achieve construction goals without property tax or customer rate increases
- Compile Engineering Reports, Attachments, and TCEQ Construction Contract Check Lists
- Coordinate with client's Production Manager for exhibits created in AutoCAD or GIS
- Facilitate TCEQ application submittal, reproduction, distribution, and archive of documents
- Effectively communicate project status updates with supporting documentation for monthly Board of Directors meeting reports
- Organize financial documentation and collaborate with MUD's Bookkeeper and Auditor during development reimbursement audits and fiscal year operating budget projections

BGE, INC. (FORMERLY BROWN & GAY ENGINEERS, INC.)
Project Manager / Project Engineer / Graduate Engineer

11/2002 to 5/2012 Houston, TX

Dedicated Project Manager with excellent technical, analytical, communication and client relationship skills with land development experience including project management, design and construction of various single-family residential subdivision projects and of facility expansion and rehabilitation projects

- Provide feasibility, design, project management and construction administration services to multiple MUD and land development clients
- Utility District administration including direct client communication; project status reporting; coordination with clients' external consultants; capacity demand planning and customer commitments; and commercial development plan reviews
- Facilitate final design, cost estimates, specifications, bid documents and construction administration for water, wastewater, storm drainage, paving, and various utility facility expansion and rehabilitation projects
- Coordinate with property owners and/or legal condemnation counsel to acquire necessary easements or sites for infrastructure extensions or expansions
- Assist condemnation counsel with exhibits, project schedule and cost analysis for use in mediation or in settling disputes
- Collaborate with client, engineering support staff, and construction contractors for facility condition assessments; for project phasing feasibility and budgeting; and for resolutions to special construction constraints or limitations
- Implement CIP for asset management, funding projections, and annual revenue requirements
- Collaborate and provide training within the Districts Services Group, specializing in consulting services for mature MUDs
- Anticipate and coordinate requests to the TCEQ for compliance approvals of alternative service requirements for public water systems with more than 2,500 connections
- Supervise preparation of Expedited and Non-Expedited Bond Application Reports, Emergency Project Requests, and other special Utility District applications submitted to TCEQ
- Advise fellow / Senior Project Managers on regulatory requirements and conduct internal reviews to determine compliance with time-sensitive Expedited Bond Application Reports prior to submittal to TCEQ

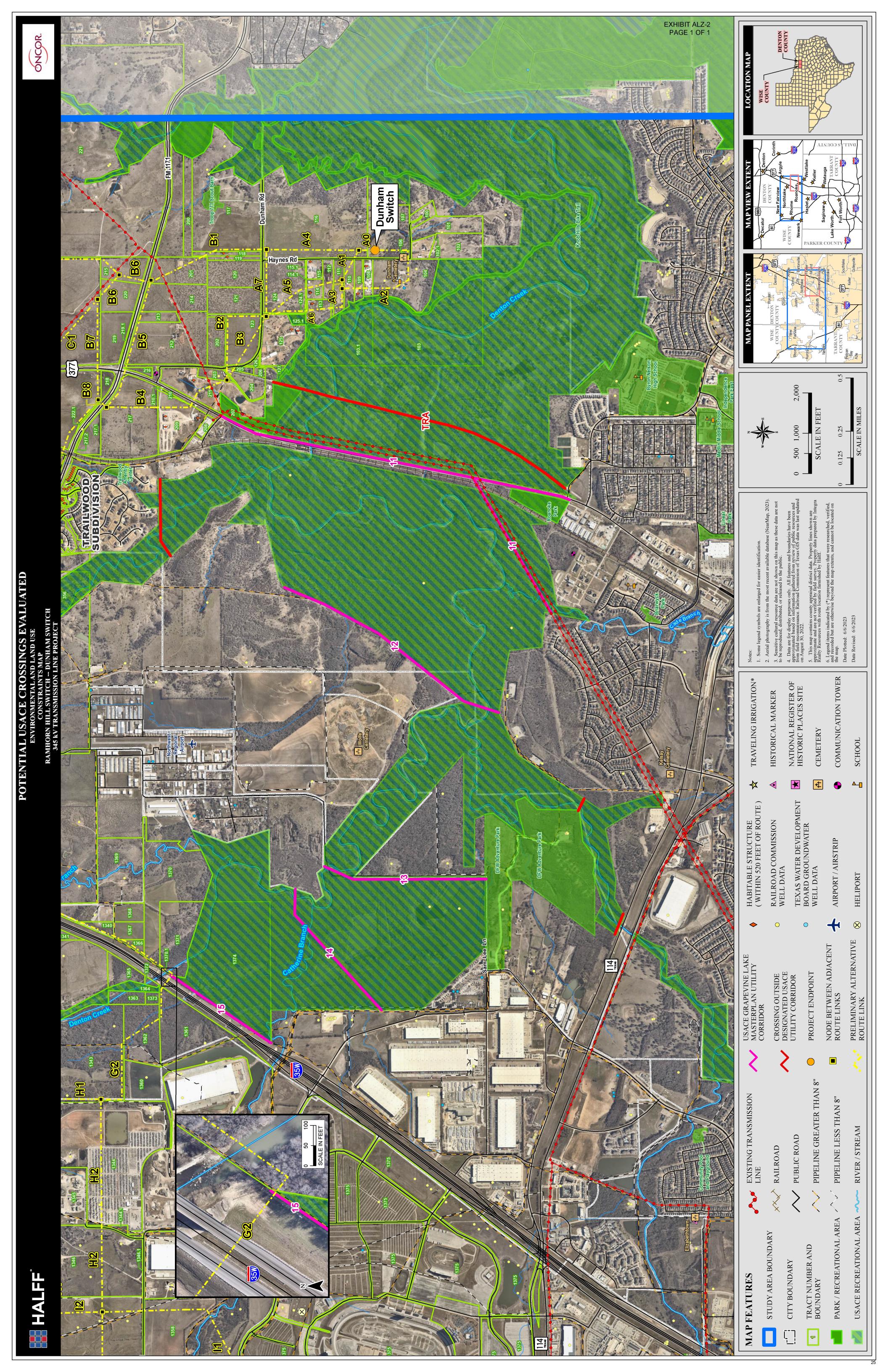
CARTER & BURGESS, INC. Graduate Engineer

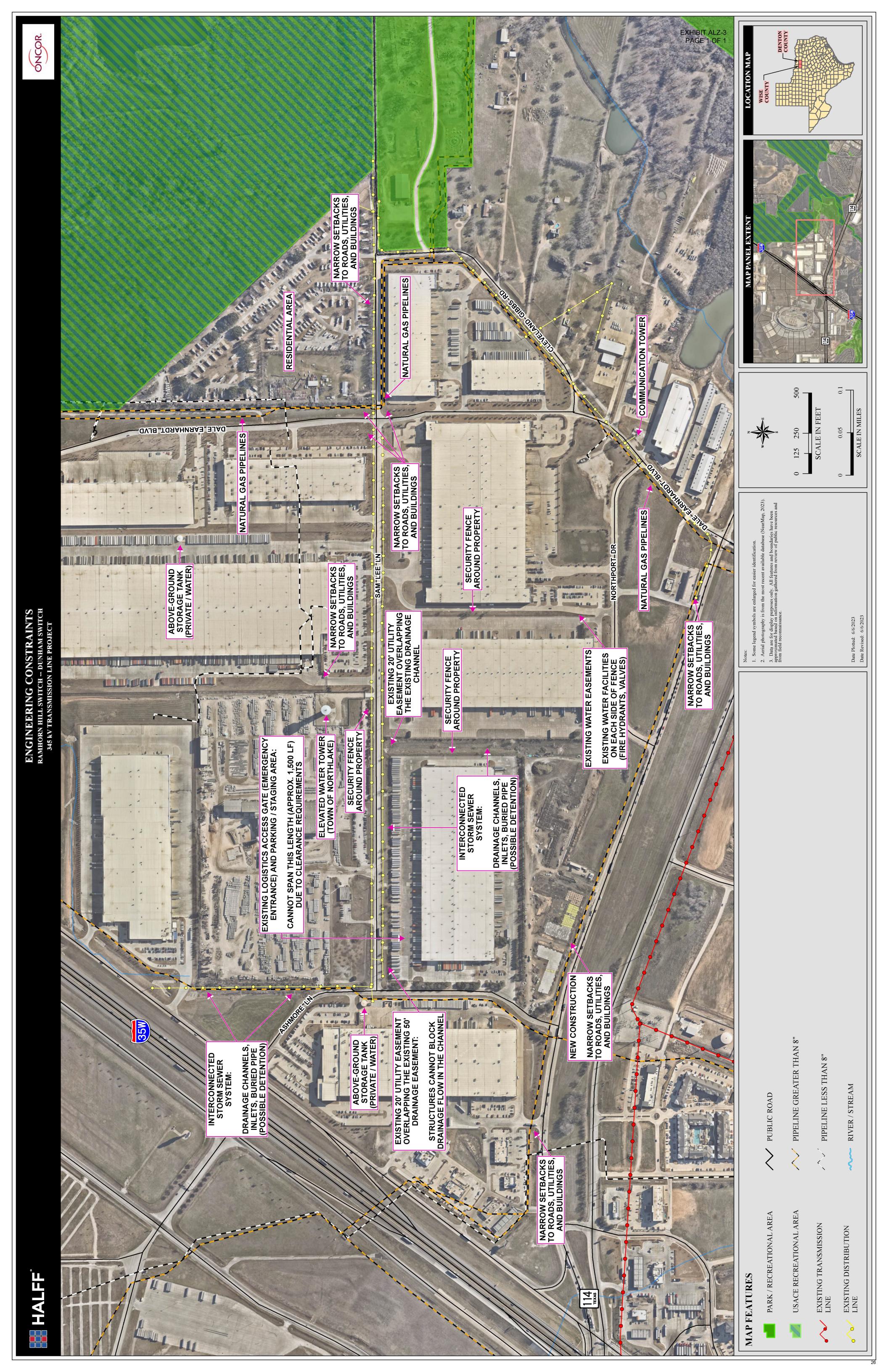
5/2000 to 11/2002 Houston, TX

Assist Project Managers with design and AutoCAD production of final construction plan sets for water, wastewater, paving and storm drainage to serve single-family residential subdivisions

Education and Licenses

Bachelor of Science in Civil Engineering - Texas A&M University, August 2000 Licensed Professional Engineer No. 94680 - State of Texas TBPELS Firm Registration No. F-15098 - State of Texas





ONCOR TRANSMISSION ENGINEERING

Preliminary Design and Constructability Considerations

Installation of Two (2) 345 kV and One (1) 138 kV Overhead Circuits in Links south of USACE Property in Roanoke



777 Main Street Fort Worth TX 76102

Introduction of Site Visit on February 24, 2023:

Oncor engineering conducted field reconnaissance of the area generally located at the intersection of State Highway ("SH") 114 and Interstate Highway 35W ("I-35W") to determine the feasibility of this area for construction of a new double-circuit 345 kV transmission line. This reconnaissance, and the accompanying engineering analysis, determined that this area is not a feasible location for construction of the Ramhorn Hill-Dunham 345 kV transmission line project due to the lack of available space for construction, operation, and maintenance as well as the numerous other engineering constraints identified and discussed herein.

Public Areas Visited:



3 | Page

Oncor Electric Delivery

777 Main Street Fort Worth TX 76102

Area Constraints Identified:

Natural Gas Pipelines

Interconnected Storm Sewer System: Drainage Channels, Inlets, Buried Pipe (Possible Detention)

Above-Ground Storage Tanks for Water (Private Facilities)

> **Elevated Water Storage** (Town of Northlake)

Residential Area

Natural Gas Pipelines

Narrow setbacks to roads, utilities, and buildings

Natural Gas Pipelines

Security Fence **Around Property**

Communication Tower

Natural Gas Pipelines

Pipelines along SH 114

> Detention Easement

Narrow setbacks to roads, utilities, and buildings

Interconnected Storm Sewer System: Drainage Channels, Inlets, Buried Pipe (Possible Detention)

Narrow setbacks to

roads, utilities, and buildings

Existing Water Easements

Existing water facilities on each side of fence (fire hydrants, valves)

Existing 20' Utility Easement overlapping the Existing 50' Drainage Easement: No Structures are allowed to block drainage flow in the channel

Existing 20' Utility Easement overlapping the **Existing Drainage Channel**





Existing Logistics Access Gate (Emergency Entrance) and Parking/Staging Area:

- Cannot span this length (approx. 1,500 LF) due to clearance requirements
- No Construction space for Turning Structures to maneuver around existing easements containing existing facilities

777 Main Street Fort Worth TX 76102

Existing Physical Constraints:

- Overhead Distribution Lines
 - o Existing distribution lines are present on the north and south sides of Sam Lee Lane
 - North side: Oncor overhead ("OH") distribution with communication lines under-built ("U/B")
 - South side: CoServ OH distribution
 - South side: Existing street lighting system
 - Area is singularly certified to CoServ
 - Joint Use for distribution on Oncor Transmission structures supporting 345 kV (and those also with 138 kV U/B) is not practiced due to safety and maintenance concerns.
 - Requires construction of new transmission line within a 100' easement outside of public rights-of-way ("ROW") and outside of existing easements
 - Refer to Key Map and excerpts of recorded plats beginning on Page 11
 - Co-location of 345 kV, 138 kV, and distribution on same poles would create maintenance issues, potentially expose workers to energized high-voltage corridors, and would result in more outage requests to provide safe working environments
 - Approximate structure height required to achieve National Electric Safety Code ("NESC") clearances to the above constraints: minimum 170'
 - Standard structure height planned for project ~120'-175'
 - Taller structures would increase materials and labor costs
- Underground utilities and drainage facilities
 - o Proposed 100' easement would need to abut, not overlap, existing easements
 - Easements contain existing underground gas and water pipelines
 - Range of Oncor structure foundation diameter: 12' to 15'
 - Cannot construct electric facilities within existing drainage easements (i.e. within the
 existing drainage channels) due to water flow requirements and erosion concerns
 affecting Oncor structures, drainage channels, and adjacent structures/facilities
- Existing Logistics Operations:
 - o Immediate access to facilities is a requirement
 - Access would be hindered by the existing restricted- access, semi-trailer parking/staging area, and logistics operations
 - Continuous truck parking/loading places a semi-permanent encroachment within the transmission line ROW
- Interconnected Storm Sewer System
 - o Includes drainage channels, inlets, buried pipes, and possible detention
 - Easements range from 20'-50'
 - Given the large non-standard structures that would be required in drainage areas,
 presence of transmission line would block flow of drainage channels and could decrease detention capacity, if applicable
 - Heavy design coordination and approvals would be required from the Agency with ownership and/or regulation authority
 - Presence of structures within the banks of the drainage channel creates erosion issues that would impact transmission line structures and adjacent facilities

5 | Page

Oncor Electric Delivery

777 Main Street Fort Worth TX 76102

- Narrow Setbacks from Existing Development
 - o 100' ROW required to prevent conductor blowout and observe NESC clearances
 - Security fencing cannot be located within ROW unless gates installed and must cross at angle of at least 45 degrees

Construction Requirements:

- Initial 345 kV Transmission Line Construction:
 - o Construction setup for heavy wires Larger equipment is required
 - Requires a working space of 300 feet by 150 feet at Turning Structures
 - Requires road blockage of Sam Lee Lane for pulling wires ahead and back
 - Customer line outages required to de-energize for construction
 - Work space along Sam Lee Lane
 - Restricted access on fenced properties
 - Must maintain positive drainage within drainage channel during construction
 - Access for construction requires relocation of existing semi-trailer parking areas
- Future Potential 138 kV Transmission Line Construction:
 - Costly construction to work around constraints
 - o Extended Customer line outages required for construction

Operations & Maintenance Considerations:

- Inaccessible structures within drainage areas
- Access will require reaching across an energized corridor

Visible Constraints:





Views of OH distribution looking west from 8601 Sam Lee Lane

777 Main Street Fort Worth TX 76102



View of security fencing Between Lots 11 and 12, Block 4, from 4500 Northport Drive (looking North)







View from 8601 Sam Lee Lane (looking East)

- Existing 20' Water Easement ("WE") on Lot 11 contains water facilities on the west side of the security fence along the north-south property line. Fire hydrants connect from the west side of the fence onto Lot 12. The 15' WE on Lot 12 intersects the 20' WE from the west.
- Areas do not have required working space for construction setup for Turning Structures or for pulling wire.
- Structures cannot be installed in this area unless water lines are relocated.
- Unknowns in this area private storm sewer layouts

777 Main Street Fort Worth TX 76102



View inside security fence - looking west along Sam Lee Lane (20' WE for Fire Hydrants) [Lot 11, Block 4, Northport Addition]



View of drainage channel and adjacent 20' Water Easements south of Sam Lee Lane [Lot 10, Block 4, Northport Addition – restricted to drainage facilities]



View of semi-trailer parking/staging area, 50' drainage easement with channel, and overlapping 20' utility easement south of Sam Lee Lane
[Lot 8, Block 4, Northport Addition]

777 Main Street Fort Worth TX 76102



View of semi-trailer parking/staging area, 50' drainage easement with channel, and overlapping 20' utility easement south of Sam Lee Lane (looking east from Ashmore Lane)

[Lot 8, Block 4, Northport Addition]



View of drainage culvert (20' Drainage Easement connected to 50' Drainage Easement) and 15' CoServ Easement, south of Sam Lee Lane [Lot 8, Block 4, Northport Addition] and

View of semi-trailer parking/staging area and 15' Pipeline Easement, east of Ashmore Lane [Lot 1, Block 5, Northport Addition]

777 Main Street Fort Worth TX 76102





View of 20' Drainage Easement and overlapping 15' (centerline) Pipeline Easement View of drainage channel and culvert connected to underground storm sewer [North of Ashmore Lane (looking north) - Lot 3, Block 6, Northport Addition]



View from the drainage easement north of Ashmore Lane [looking south from Lot 3, Block 6, Northport Addition]

10 | Page Oncor Electric Delivery

777 Main Street Fort Worth TX 76102

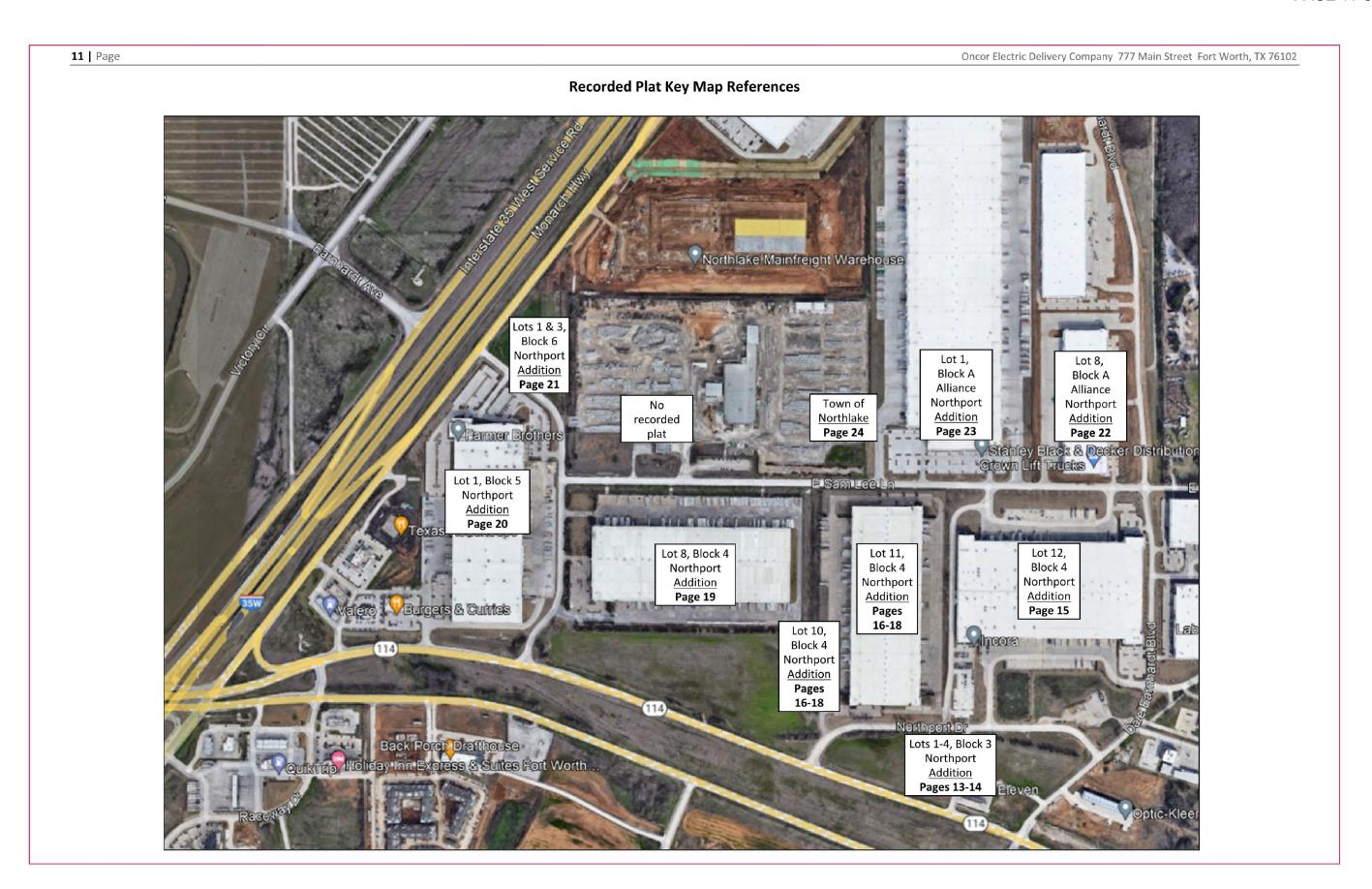


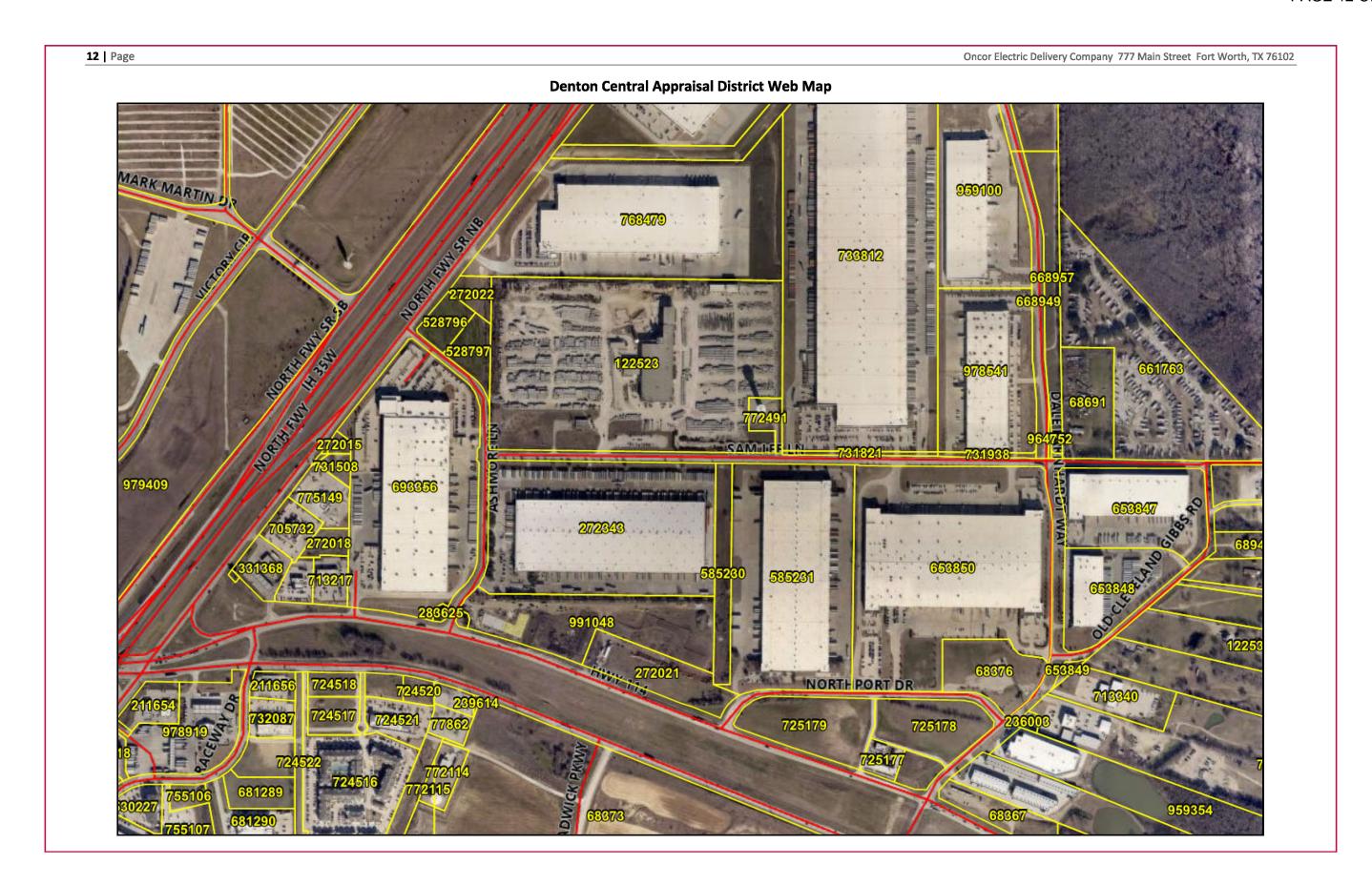
View of new construction on west side of Ashmore Lane, south of Sam Lee Lane

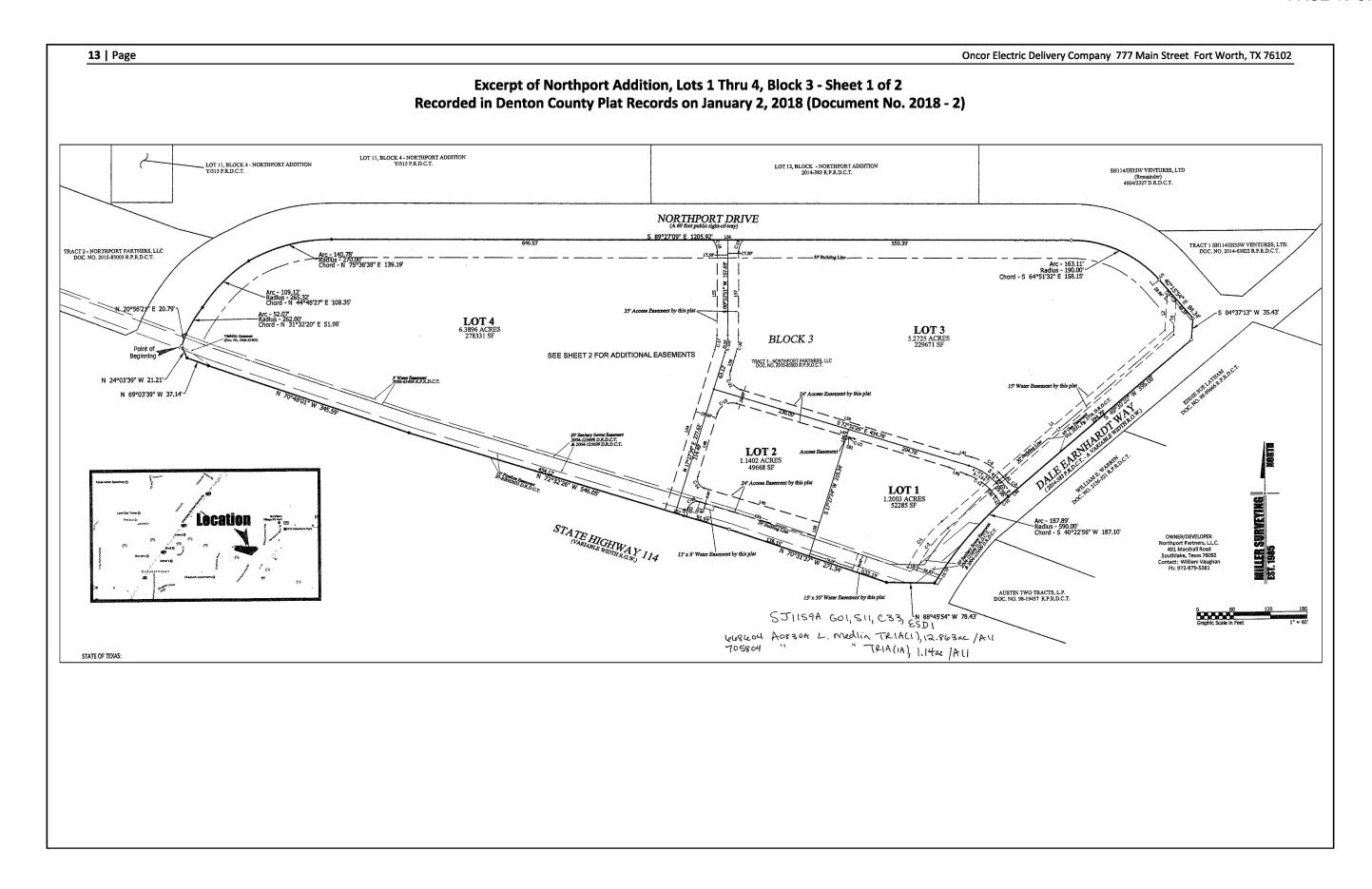
Conclusion:

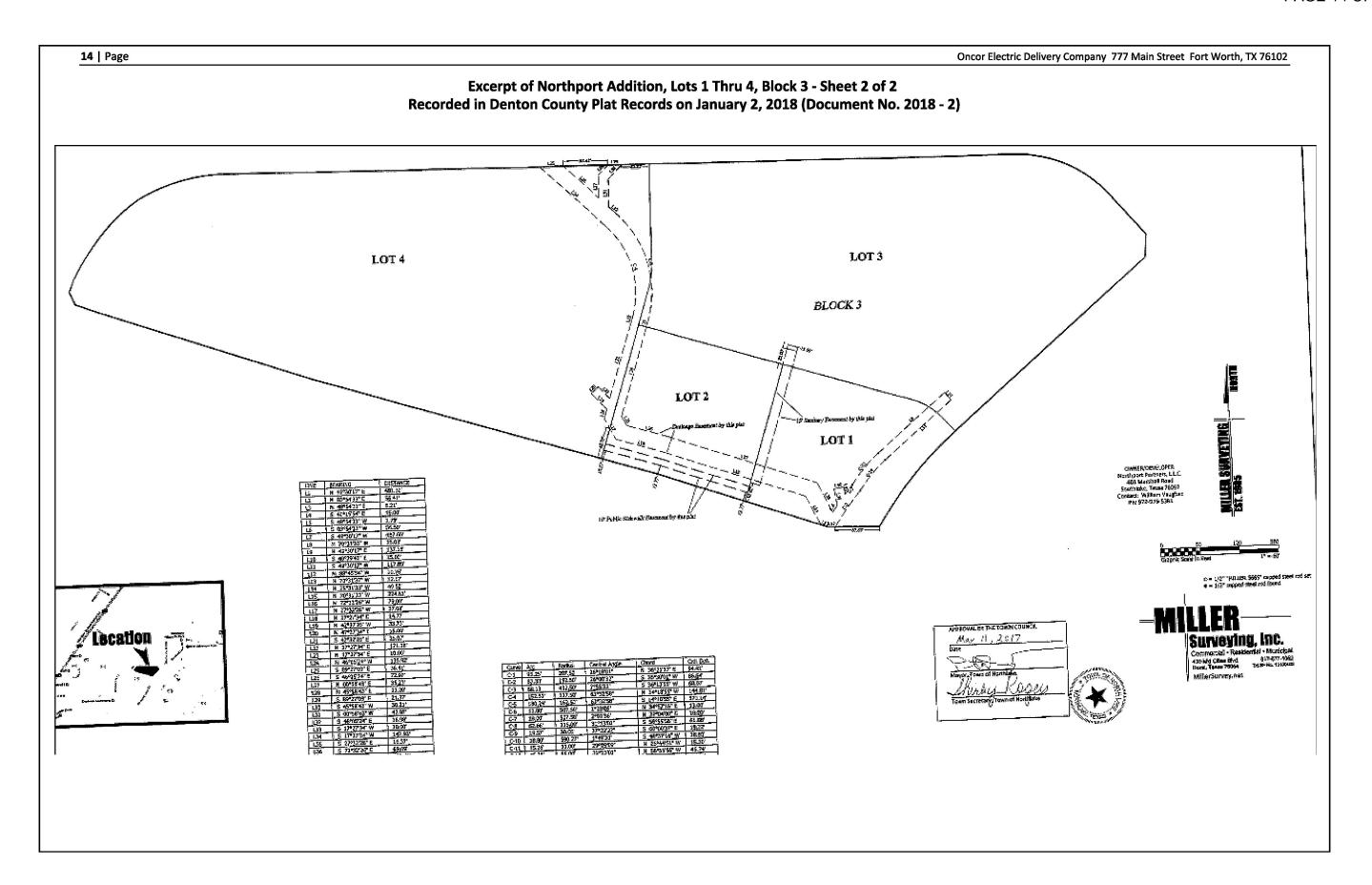
The presence of numerous engineering constraints in the area makes this location incompatible with construction of the Ramhorn Hill-Dunham 345 kV transmission line project. Available space is insufficient to set structures, pull conductor, establish temporary construction easements, and maintain the 100' ROW required for the project. Even if the project could be constructed in this location, existing development would create permanent constraints that could threaten the safe, reliable operation of the transmission line due to limitations on access and various established utilities/structures that would create significant, ongoing operational and maintenance challenges.

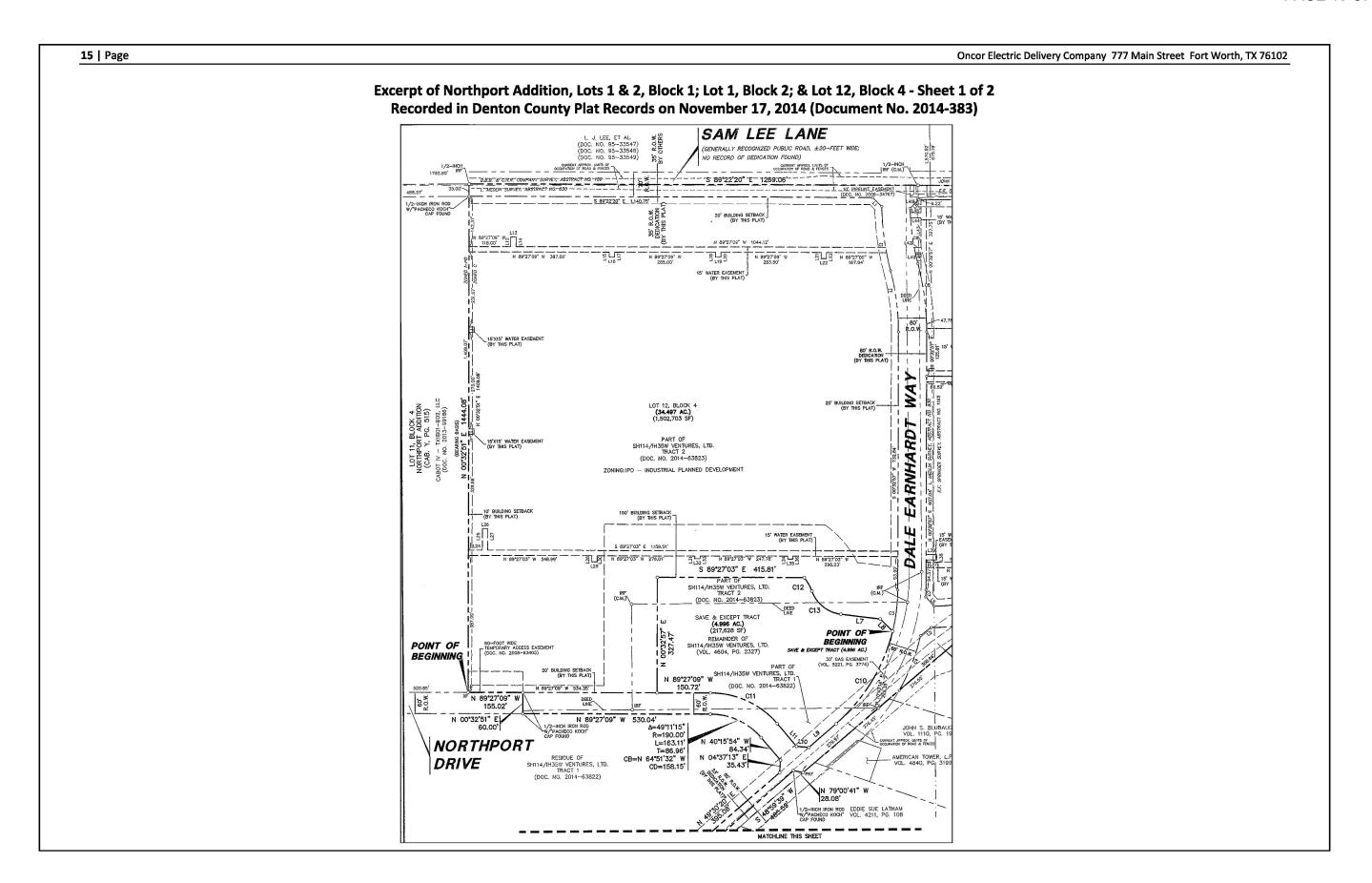
This is not a feasible area for routing the Ramhorn Hill-Dunham 345 kV transmission line project.

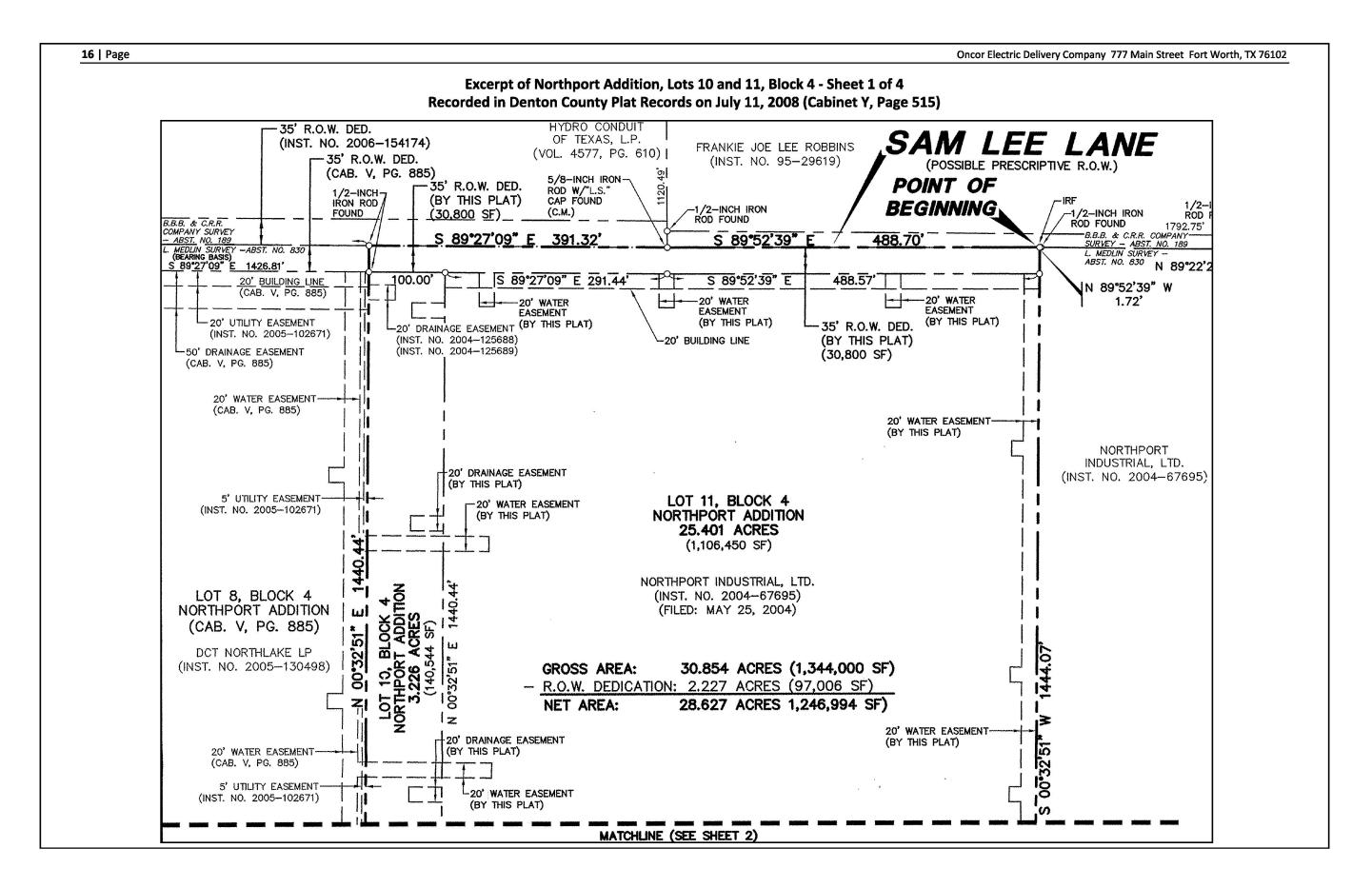


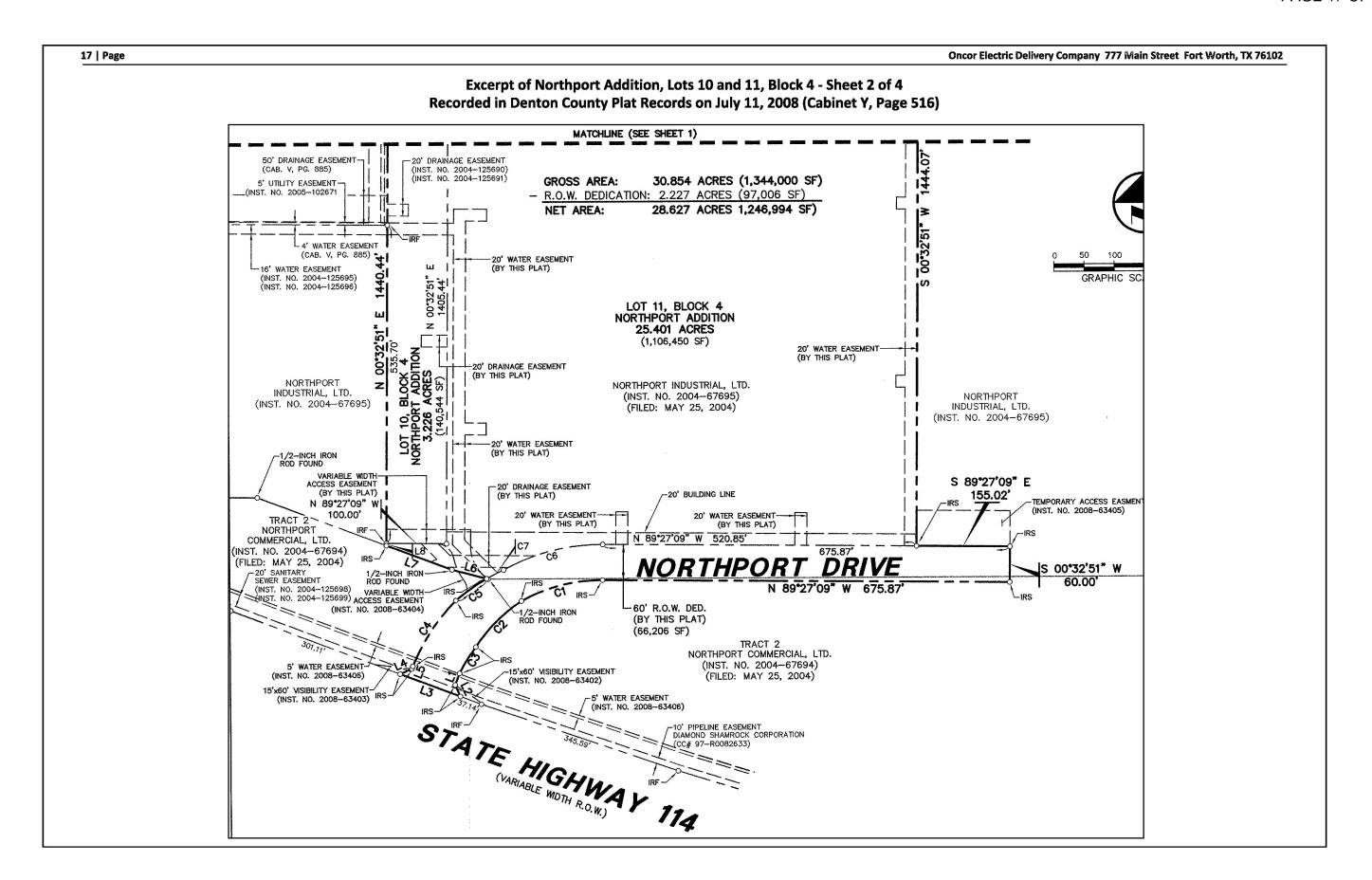


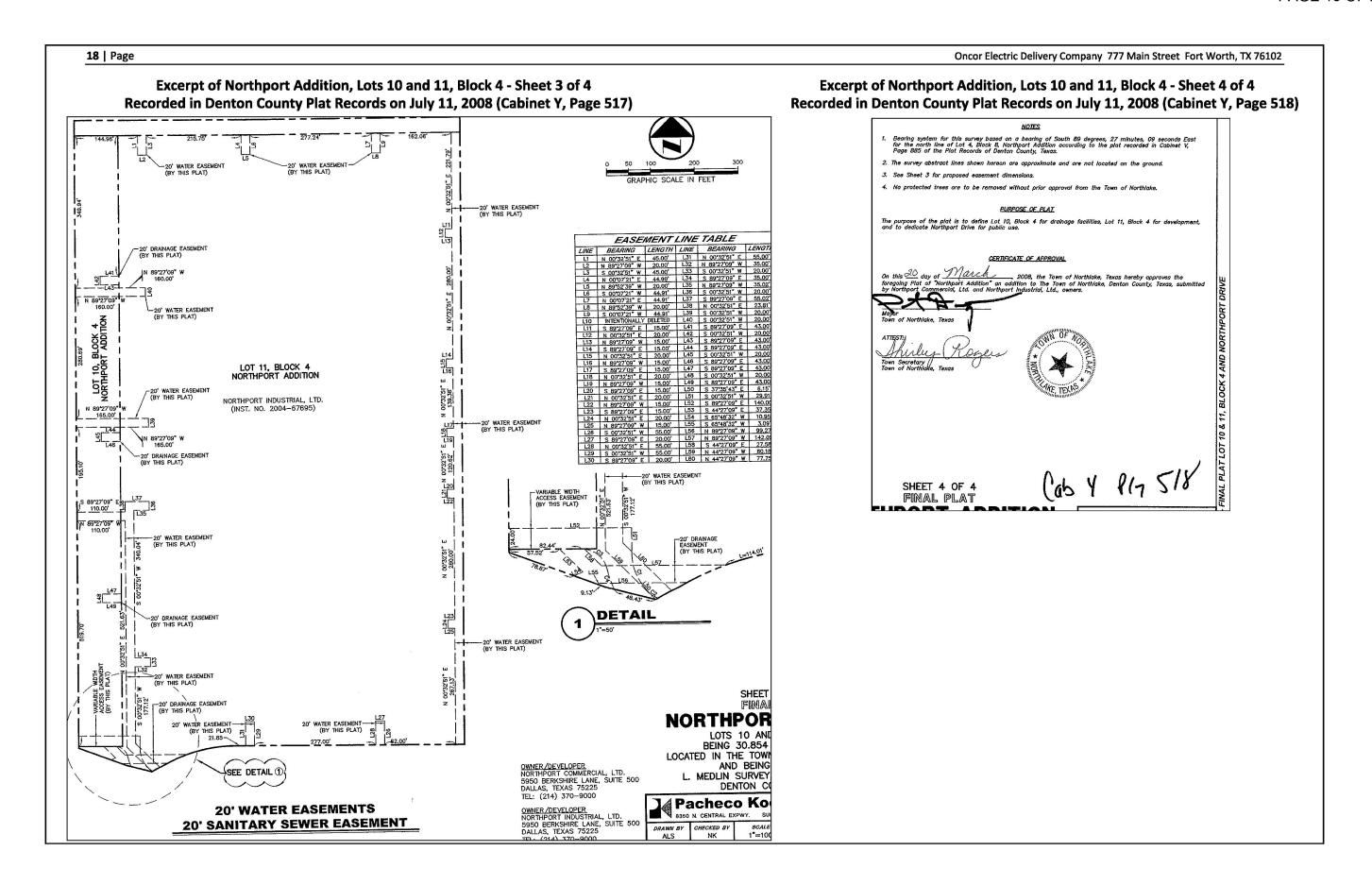


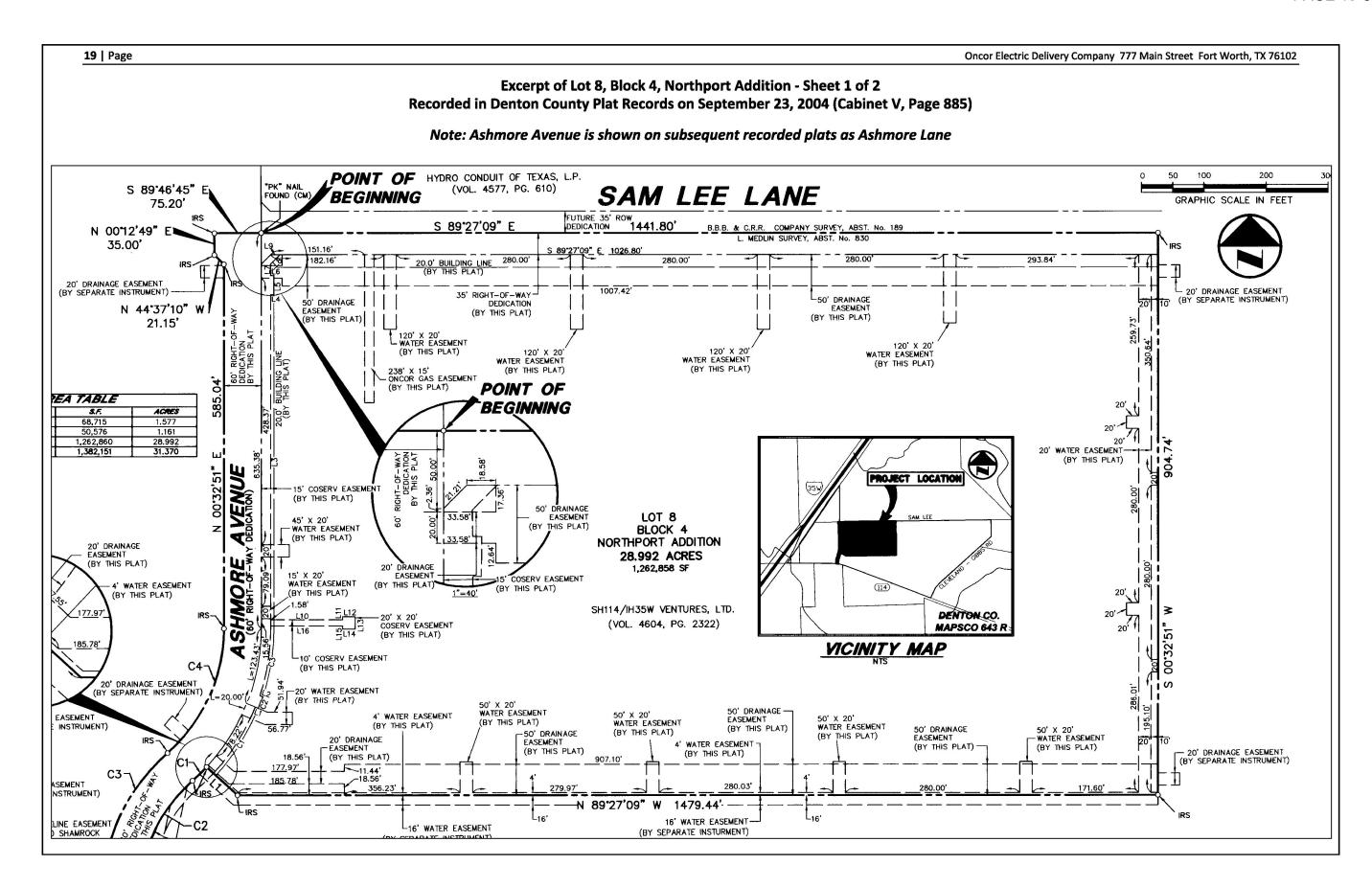


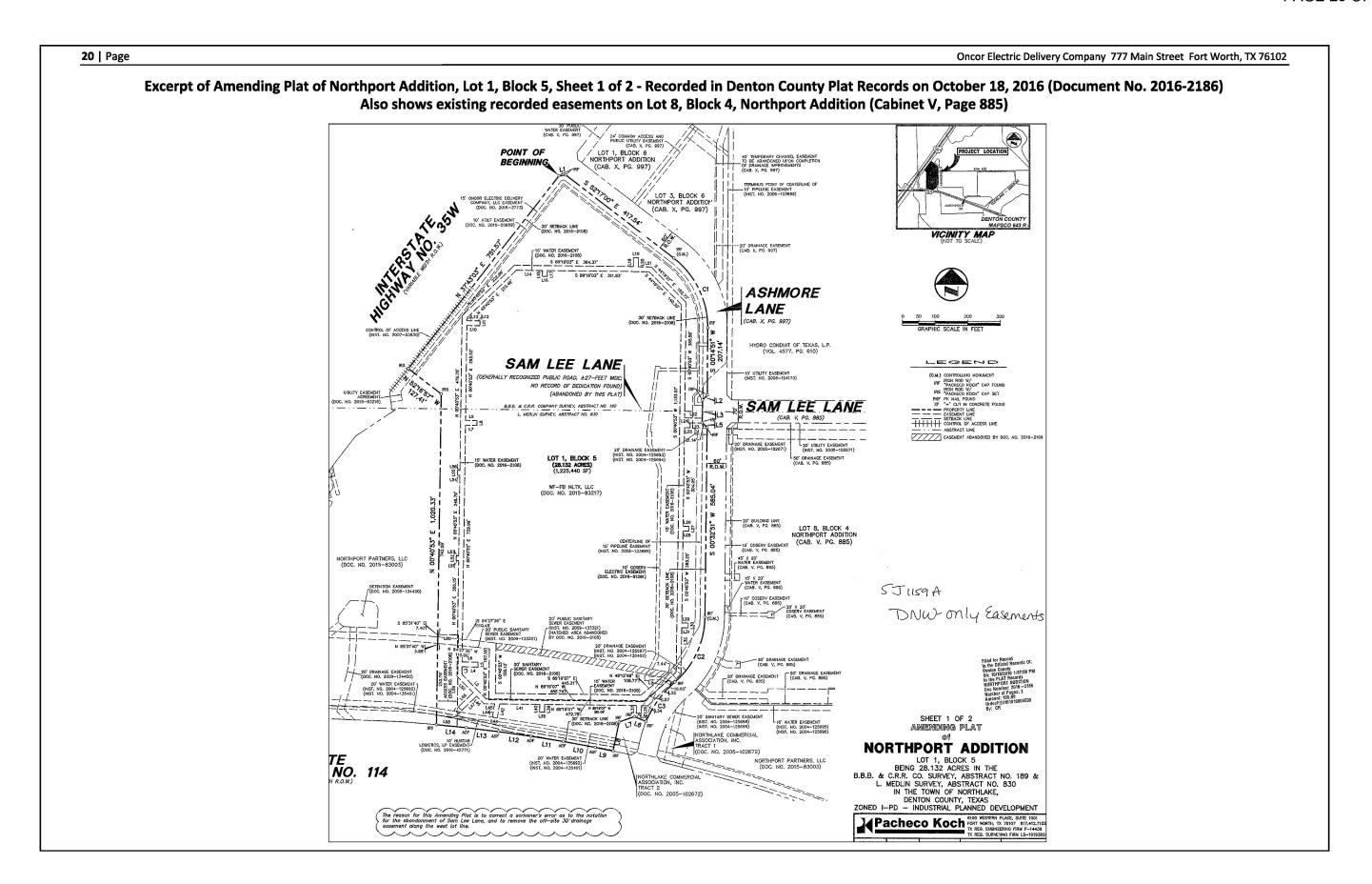


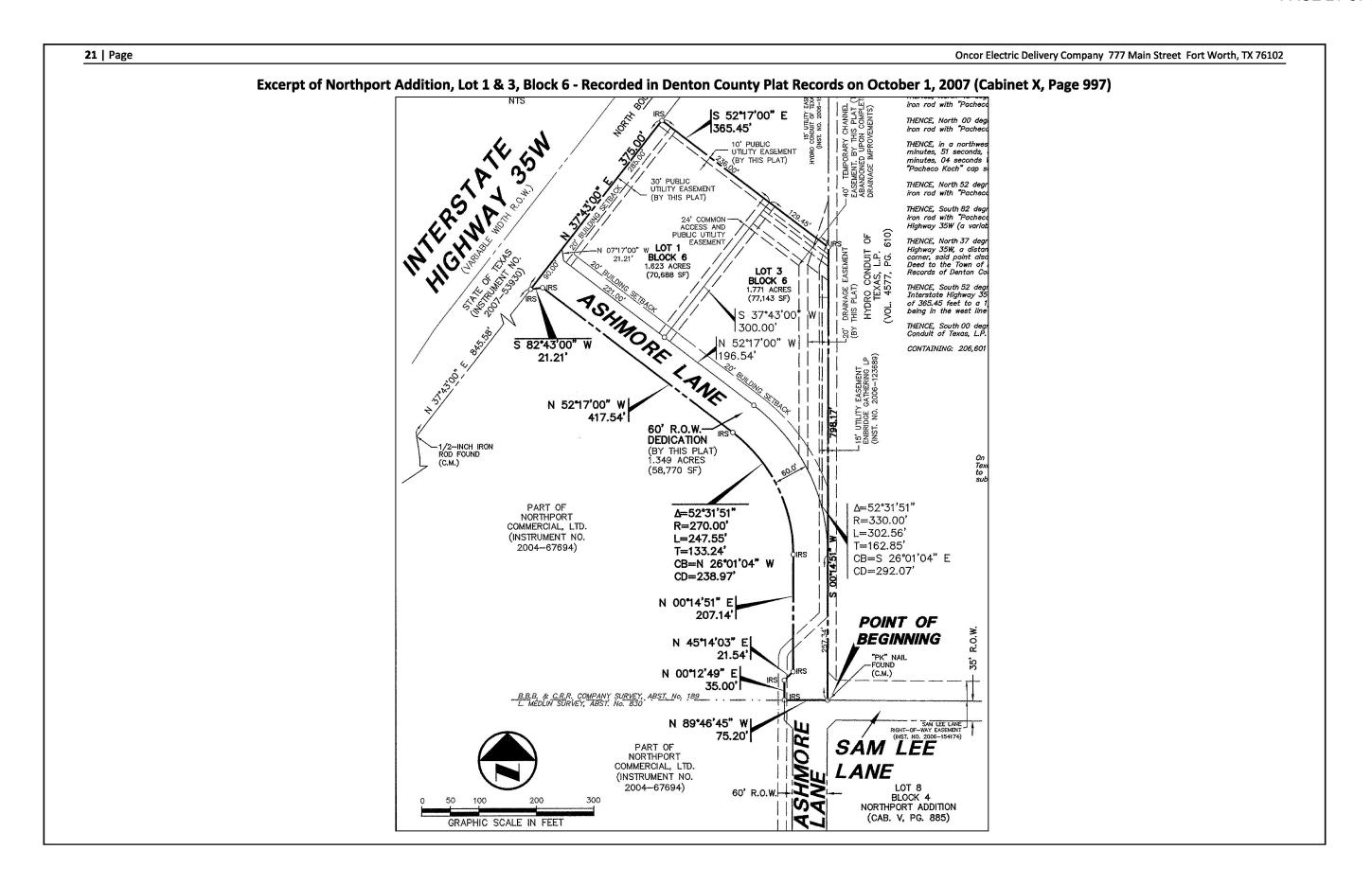


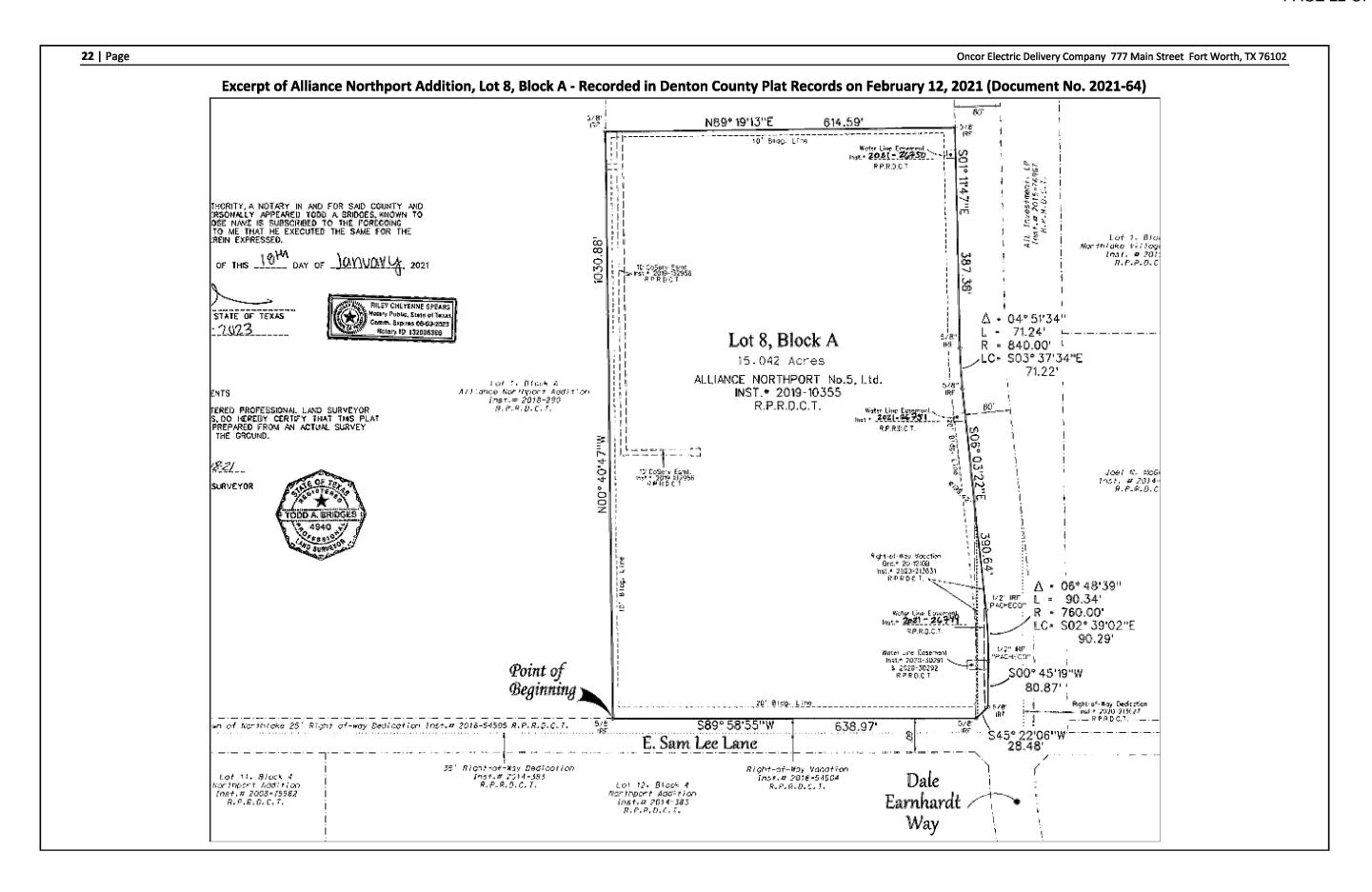


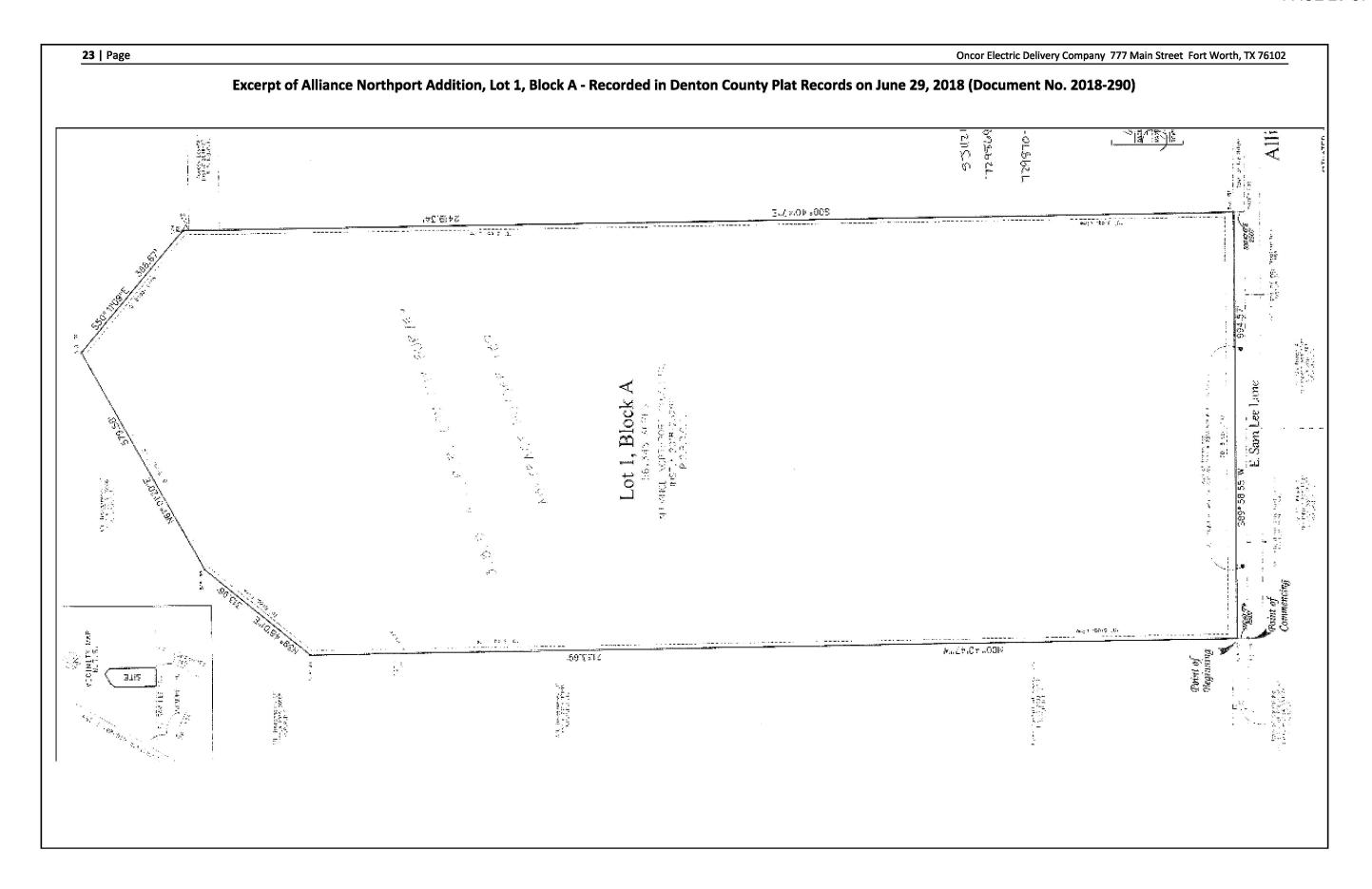








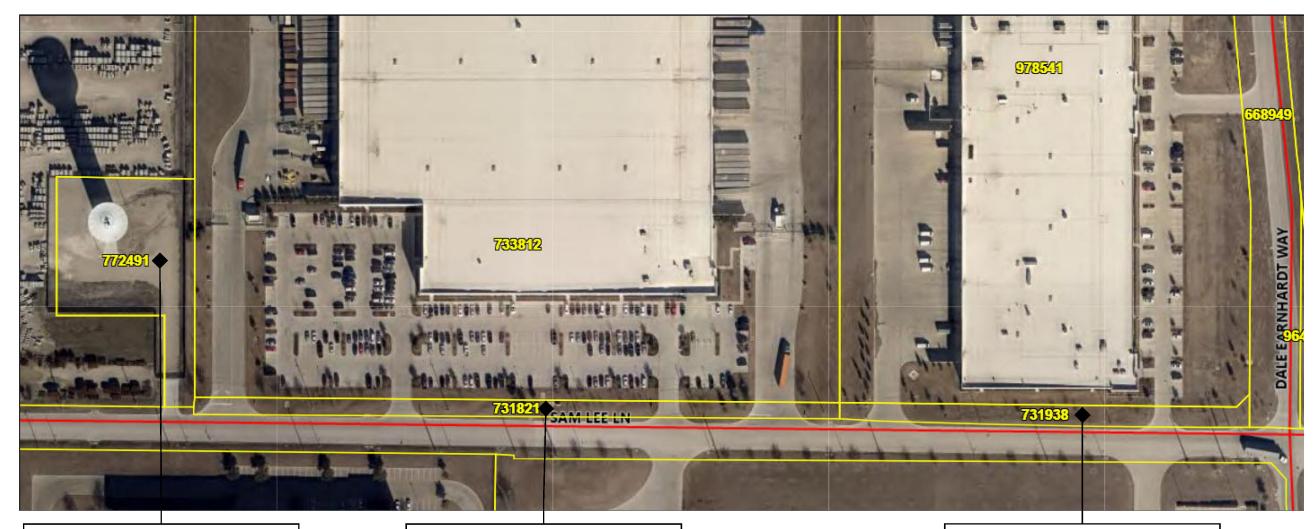




24 | Page

Oncor Electric Delivery Company 777 Main Street Fort Worth, TX 76102

Denton Central Appraisal District Web Map - Town of Northlake Property Records



Property ID: 772491

<u>View Detailed Property Information</u> <u>View Plat</u>

Property Information

Legal Description: A0189A BBB & CRR, LOT 6B, 1.1500 ACRES,

Property Location

8363 SÁM LEE ROANOKE, TX 76262

Ownership Information

NORTHLAKE, TOWN OF 1500 COMMONS CIR STE 300 NORTHLAKE, TX 76226-1598

Property ID: 731821

<u>View Detailed Property Information</u> <u>View Plat</u>

Property Information

Legal Description: A0189A BBB & CRR, TR 7B(PT)(ROW), 0.571 ACRES

Property Location

Ownership Information

NORTHLAKE, TOWN OF 1500 COMMONS CIR STE 300 NORTHLAKE, TX 76226-1598

Property ID: 731938

<u>View Detailed Property Information</u> <u>View Plat</u>

Property Information

Legal Description: A0189A BBB & CRR, TR 7(PT)(ROW), 0.383 ACRES

Property Location

Ownership Information

NORTHLAKE, TOWN OF 1500 COMMONS CIR STE 300 NORTHLAKE, TX 76226-1598