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### PUC DOCKET NO. 55067

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

**BEFORE THE** 

PUBLIC UTILITY COMMISSION

OF TEXAS

#### ACTIONS TO AID THE COMMISSION'S REVIEW

### I. INTRODUCTION

On June 8, 2023, Oncor Electric Delivery Company LLC ("Oncor") filed an application ("Application") to amend its certificate of convenience and necessity ("CCN") for the Ramhorn Hill-Dunham 345 kV transmission line project ("Project") in Denton and Wise counties, Texas. Because ERCOT deems this Project "critical to reliability," under 16 Texas Administrative Code ("TAC") § 25.101(b)(3)(D), the Public Utility Commission of Texas ("Commission") is required to render a decision on the Application within 180 days. To assist the Commission in meeting this deadline, Oncor is affirmatively taking certain actions and requesting the Commission to take further actions, as laid out below. Many of these actions were taken to facilitate consideration of Competitive Renewable Energy Zone ("CREZ") cases on a 180-day timeline, despite many of those cases having hundreds of active intervenors. As such, they constitute proven best practices to facilitate quick and efficient processing of CCN applications while preserving the Commission's ability to carefully consider all of the relevant facts.

### II. ACTIONS TAKEN BY ONCOR TO EXPEDITE COMMISSION REVIEW

Oncor is taking the following actions to assist the Commission in considering the Application on a 180-day basis, and will work with the Commission and the parties to implement other measures that can assist in this regard:

### 1. Oncor is filing its direct testimony and exhibits with the Application.

To assist with the timely consideration of Oncor's Application, and in observance of 16 TAC 22.225(a)(9), Oncor filed all of its direct testimony and exhibits concurrently with the Application. Oncor respectfully requests that the presiding

officer require objections to Oncor's direct testimony and exhibits to be filed within five days after the close of the intervention period.

### 2. Oncor is filing responses to the standard Order No. 1 questions with the Application.

In Order No. 1, issued by the Commission in all CCN dockets, the Commission requests that four standard questions be addressed. This order is commonly issued days or weeks after the CCN application is filed. Applicants are given 10 days to respond, and Commission Staff must then file recommendations or comments on the applicant's responses. To expedite this process, Oncor is providing responses to these standard questions in Section IV below. Submitting responses to these questions at the outset of this proceeding will eliminate a procedural step that is normally not completed for weeks after an application is filed. This, in turn, can expedite the Commission's referral of this matter to the State Office of Administrative Hearings ("SOAH").

### III. ACTIONS REQUESTED OF THE COMMISSION TO EXPEDITE REVIEW

Oncor respectfully requests that the Commission take the following actions to facilitate a 180-day approval timeline:

### 1. Oncor requests immediate referral to SOAH.

Oncor respectfully requests that the Commission refer this matter, and future CCN matters, to SOAH at the earliest opportunity allowed by rule. Historically, referral to SOAH has taken several weeks or months after a CCN application is filed. During this time no SOAH Administrative Law Judge is assigned to the matter, and the case does not progress procedurally. Referring cases to SOAH at the outset of the proceeding will allow for more efficient processing and help facilitate SOAH's timely return of this docket to the Commission for final disposition.

### 2. Shorten the intervention period to 30 days.

Oncor respectfully requests that the Commission shorten the intervention period for future CCN proceedings from 45 days to 30 days. While Oncor does not necessarily object to shortening the intervention period in this docket, doing so may be counterproductive given that the landowner notices Oncor mailed with the application include an intervention deadline based on a 45-day intervention period.

Shortening that period now would require Oncor to re-notice over 1,400 landowners, which would cause significant confusion and take additional time that would eat into the 15 days saved. Nonetheless, a 30-day intervention period was previously utilized in CREZ dockets to process applications on a 180-day timeline and can be adopted in future cases to significantly shorten the procedural schedule.

Each of the actions laid out in Sections II and III will assist the Commission in conducting its review on the accelerated timeline established by 16 TAC § § 25.101(b)(3)(D). Further, in light of the passage of Senate Bill 1076, which makes all CCN proceedings subject to a 180-day approval timeline, Oncor will continue to work with the Commission to seek ways to meet this statutory deadline in future cases. The actions suggested in this docket are best practices, many of which were utilized to great effect to successfully process CREZ dockets on a 180-day timeline. As such, adopting similar measures going forward will aid the Commission in completing its timely consideration of future CCN applications.

### IV. ONCOR'S RESPONSE TO STANDARD CCN QUESTIONS

# 1. Has the Electric Reliability Council of Texas (ERCOT) Independent System Operator (ISO) recommended the proposed transmission project as necessary to alleviate "existing and potential transmission and distribution constraints and system needs within ERCOT" in the annual report filed under PURA<sup>1</sup> § 39.155(b)? If not, is there a need for the proposed transmission project?

Yes, the ERCOT ISO recommended this Project—as one component of the overall Roanoke Area Upgrades Project—as necessary to alleviate "existing and potential transmission and distribution constraints and system needs within ERCOT" in the annual report filed under PURA § 39.155(b).<sup>2</sup> Moreover, ERCOT's Regional Planning Group ("RPG") recommended the Roanoke Area Upgrades Project, as a Tier 1 transmission project that is critical to reliability of the ERCOT transmission system under 16 TAC § 25.101(b)(3)(D). Please see Oncor's response to Question No. 14 in the Application and the direct testimony of Oncor witness Mr. Harsh Naik for additional information regarding the need for the Project.

<sup>&</sup>lt;sup>1</sup> Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016.

<sup>&</sup>lt;sup>2</sup> ERCOT Report on Existing and Potential Electric System Constraints and Needs at 7 & 18, available at: https://www.crcot.com/files/docs/2022/12/22/2022\_Report\_on\_Existing\_and\_Potential\_Electric\_System\_Constraint s\_and\_Needs.pdf (Dec. 2022).

## 2. If such a need exists, is the proposed transmission project the best option to meet the need, based on an analysis taking into account considerations of efficiency, reliability, costs, and benefits?

Yes, in conjunction with the other components of the overall Roanoke Area Upgrades Project, this Project is the best option to meet the identified need. Additional information on the options considered is provided in Oncor's response to Question No. 15 in the Application and in the direct testimony of Oncor witness Mr. Naik. Oncor evaluated three alternatives before selecting this Project as its preferred solution.

Oncor Option #1:

- Establish the Exchange 345/138 kV Switching Station, adjacent to Alliance 345 kV Substation, with two 600 MVA Autotransformers in a 8-breaker 345 kV breakerand-a-half bus arrangement and a 9-breaker 138 kV breaker-and-a-half arrangement;
- Convert the existing Alliance 345 kV load-serving substation to 138 kV operation;
- Establish the Exchange Keller Wall Price 138 kV double-circuit line using a conductor rated at least 3121 A or greater with the following upgrades:
  - Construct the Exchange Keller Magnolia 138 kV double-circuit line
  - Upgrade the Keller Magnolia Keller Wall Price Switch 138 kV line using double-circuit capable structures;
- Establish a new 138 kV switching station at Keller Wall Price in a 6-breaker ring bus arrangement;
- Disconnect the Keller Magnolia Tap Heritage/Keller Magnolia line at Keller Magnolia Tap and terminate at Keller Wall Price by constructing a new 0.3-mile double-circuit 138 kV transmission line;
- Establish the Ramhorn Hill 345 kV switching station in a 10-breaker, breaker-anda-half arrangement;
- Establish Dunham 345 kV switching station with in a 10-breaker, breaker-and-ahalf arrangement;
- Construct an estimated 18.4-mile triple-circuit line between Ramhorn Hill and Dunham with:
  - o Two 345 kV circuits using conductor rated at least 5000 A

- A vacant position for a future 138 kV circuit to support future load serving substations in growth areas;
- Rebuild Exchange Roanoke 345 kV double-circuit line using separate double-circuit capable structures for each line with conductor rated at least 5000 A and establish the Exchange Roanoke 138 kV circuit using one of the Exchange Roanoke 345 kV line double-circuit capable structures rated at least 3200 A; and
- Ensure all new 345 kV terminals at Exchange, Ramhorn Hill, and Dunham are rated 5000 A and 138 kV terminals at Exchange, Keller Wall Price, and Roanoke are rated 3200 A.

### Oncor Option #2:

- Establish Dunham 345 kV switching station in an 8-breaker, breaker-and-a-half arrangement;
- Establish Dunham 138 kV switching station in a 5-breaker, breaker-and-a-half arrangement;
- Establish two new 345/138 kV autotransformers at the proposed Dunham 345 kV switching station ; and
- Construct an estimated 1-mile, 138 kV double-circuit line from Dunham to Cross Timbers with conductor rated 3200 A or greater.

### Oncor Option #3:

- Establish the Ramhorn Hill 345 kV switching station in a 10-breaker, breaker-anda-half arrangement;
- Establish Dunham 345 kV switching station in an 11-breaker, breaker-and-a-half arrangement;
- Construct an estimated 18.4-mile, 345 kV double-circuit line from Ramhorn Hill to Dunham with conductor rated 5000 A or greater;
- Establish Dunham 138 kV switching station in a 5-breaker, breaker-and-a-half arrangement;
- Establish two new 345/138 kV autotransformers at the proposed Dunham 345 kV switching station; and
- Construct an estimated 1-mile, 138 kV double-circuit line from Dunham to Cross Timbers with conductor rated 3200 A or greater.

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Of the alternatives Oncor reviewed, Oncor Option #1 best addresses the identified reliability issues. While both Oncor Option #2 and Oncor Option #3 would reduce some post-contingency thermal overloads, Oncor Option #1 more effectively addresses thermal overloads, resolving such overloads across all case years. Oncor Option #1 also resolves load-serving limitations and voltage criteria exceedances on the Roanoke-Euless/Deen double-circuit transmission line, whereas Oncor Options #2 and #3 do not.

ERCOT's independent review initially evaluated four system improvement options to address the observed reliability issues. The components of these four options are shown in the table below.<sup>3</sup> This Project includes the final three items listed on the table, each of which are components of all four of the options evaluated by ERCOT.

Transmission Upgrade	Approx. Length of Line (miles)	Normal / Emergency Rating (MVA)	Options			
			1	2⁴	3	4
Construct a new Ramhorn Hill 345-kV switching station in a 10- breaker breaker-and-a-half arrangement tapped into existing double-circuit Hicks to Willow Creek 345-kV lines				~	>	~
Construct a new Dunham 345-kV switching station in a 10-breaker breaker-and-a-half arrangement tapped into existing Lewisville to Krum West and Lewisville to Roanoke 345-kV lines				~	~	~
Construct two new Ramhorn Hill to Dunham 345-kV transmission lines, with conductor rated to at least 2987 MVA, in a new (estimated 18.4-mile) right-of-way installed on new triple-circuit towers leaving one 138-kV vacant position	18,4	2987/2987		~	~	~
Upgrade Hicks to Exchange 345-kV double-circuit line with conductors rated to at least 2987 MVA	5.8	2987/2987	~			
Rebuild Exchange to Roanoke 345-kV double-circuit lines, upgrading both with conductors rated to at least 2987 MVA, using separate double-circuit capable structures for each line	3.6	1912/1912 <sup>6</sup>		~		
Construct a new Exchange to Roanoke 138-kV circuit, with conductor rated to at least 764 MVA, using one of the Exchange to Roanoke 345-kV line double-circuit capable structures	3.8	764/764		~		
Upgrade Exchange to Roanoke 345-kV double-circuit lines with conductor rating to at least 2987 MVA	3.6	1912/1912 <sup>5</sup>	$\checkmark$		$\checkmark$	

<sup>&</sup>lt;sup>3</sup> The numbering of the options reviewed by ERCOT does not correspond to the numbering of the options reviewed by Oncor.

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<sup>&</sup>lt;sup>4</sup> ERCOT's Option 2 is substantially the same as Oncor Option #1, the option Oncor recommended after its internal review.

<sup>&</sup>lt;sup>5</sup> Exchange to Roanoke 345-kV conductor will be capable of 2987/2987 MVA, however terminal equipment at Roanoke will limit the line ratings to 1912/1912 MVA.

Transmission Upgrade	Approx. Length of Line (miles)	Normal / Emergency Rating (MVA)	Options			
			1	24	3	4
Construct a new Exchange 345/138-kV Switching Station, adjacent to Alliance 345-kV substation, with two new 600 MVA transformers (nameplate) in an 8-breaker 345-kV breaker-and-a-half bus arrangement and a 9-breaker 138-kV breaker-and-a-half arrangement		700/750	$\checkmark$	~	>	~
Convert the existing Alliance 345-kV load serving substation to 138- kV load serving operation			~	~	<	~
Construct a new Exchange to Alliance 138-kV double-circuit line with conductors rated to at least 746 MVA	0,1	746/746	$\checkmark$	~	~	$\checkmark$
Construct a new Alliance to Keller Magnolia and Alliance to Heritage 138-kV double-circuit line with conductors rated to at least 746 MVA	<ol> <li>1.4 Keller</li> <li>Magnolia</li> <li>2.5 Heritage</li> </ol>	746/746	~	~	~	~
Upgrade the existing Keller Magnolia to Heritage 138-kV line with conductor rated to at least 746 MVA to be installed on the Alliance to Keller Magnolia and Alliance to Heritage 138-kV double-circuit towers	1.0	746/746	~	~	~	~
Upgrade the existing Heritage to Keller Magnolia Tap double-circuit lines with conductors rated to at least 746 MVA	1.3	746/746	~	~	~	~
Construct a new 138-kV switching station at Keller Wall Price in a 6- breaker ring bus arrangement			~	~	~	$\checkmark$
Disconnect the double-circuit Heritage to Keller Magnolia Tap lines at Keller Magnolia Tap and terminate both at Keller Wall Price by constructing two new 0.3-mile 138-kV transmission lines added to the existing Keller Magnolia Tap to Keller Wall Price right-of-way with both new line conductors rated to at least 746 MVA	0.3	746/746	~	v	~	~
Retire the Keller Magnolia Tap			~	~	~	~

ERCOT performed reliability assessments on the four initial options based on NERC Reliability Standard TPL-001-4, the applicable ERCOT Nodal Protocols, and Planning Criteria. ERCOT's initial reliability assessment identified thermal overload violations under ERCOT Option 1, resulting in it being eliminated from further evaluation. No reliability criteria violations were identified for ERCOT Options 2, 3, and 4, so ERCOT short-listed these options for further assessment.

To evaluate the operational flexibility of the short-listed options, ERCOT developed an off-peak scenario for planned maintenance outage (N-1-1) analysis. ERCOT first conducted an N-1-1 contingency analysis based on selected single-circuit prior outages, as well as based on

selected double-circuit common tower prior outages for each short-listed option. Performance was similar for all three options. To estimate and compare the long-term load-serving capabilities of the three short-listed options, ERCOT adjusted load-up in the substations in the Roanoke area. To balance power, ERCOT adjusted down conforming load outside of the North Central weather zone and simulated N-1 contingencies. ERCOT's analysis revealed that one 345 kV and six 138 kV transmission line thermal overloads would need to be addressed for all three of the short-listed options in order to increase long-term load-serving capability. Further, ERCOT Options 3 and 4 would require additional major transmission improvements to address overloading on the two existing 345/138 kV transformers at Roanoke. Because ERCOT Option 2 did not require these additional improvements, ERCOT selected Option 2 as the most favorable path for increasing long-term load serving capability.

Because ERCOT Option 2 offers better long-term load serving capability, better operational flexibility during transformer prior outage conditions, and better flexibility for future utilization associated with transmission between the Exchange and Roanoke stations than the other options that were studied, ERCOT selected Option 2 as its preferred option to address the reliability issues identified in the Roanoke area. Oncor recommended substantially the same solution, which emerged from Oncor's analysis as the superior option to address reliability issues in the Roanoke area. This Project is an essential component of the overall solution recommended by ERCOT and Oncor as the best option to meet the identified reliability need.

# **3.** For utilities subject to the unbundling requirements of PURA § 39.051, is the proposed transmission project the best option when compared to employing distribution facilities to meet the specified need?

Yes. Distribution alternatives are not viable because they would not resolve the reliability issues identified on the transmission system. The Project will address projected post-contingency thermal violations, loading limitations, and voltage criteria exceedances at the transmission level, while providing additional operational flexibility on the transmission system. A distribution alternative cannot accomplish these transmission system benefits or meet the specified transmission system need.

4. For utilities not subject to the unbundling requirements of PURA § 39.051, is the proposed transmission project the best option when compared to employing distribution facilities, distributed generation, and/or energy efficiency to meet the specified need?

Not applicable. Oncor is subject to the unbundling requirements of PURA § 39.051.

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### V. CONCLUSION

Oncor respectfully submits these responses to the Commission's standard CCN questions, along with the CCN Application, direct testimony, and exhibits that constitute its direct case. Oncor respectfully requests that the Commission refer this matter to SOAH as soon as practicable and consider shortening the intervention deadline in future CCN proceedings to 30 days to facilitate a 180-day approval timeline.

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 served by email on all parties of record who have provided an email address on this the 8th day of June, 2023, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/ Michele M. Gibson