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| TRANSMISSION AND DISTRIBUTION | § | BEFORE THE |
| SYSTEMS CIRCUIT SEGMENTATION | § | PUBLIC UTILITY COMMISSION |
| STUDY | § | OF TEXAS |

COMMENTS OF ONCOR ELECTRIC DELIVERY COMPANY LLC

Oncor Electric Delivery Company LLC (“Oncor”) submits these comments in support of the (Draft) Order Directing Transmission and Distribution Utilities to Conduct a Circuit Segmentation Study (“Draft Order”).

In particular, the Draft Order appropriately recognizes the need for Oncor and other TDUs to evaluate the principle of circuit segmentation and sectionalization when applied to the utility’s particular transmission and distribution systems. Oncor agrees that the principle of circuit segmentation and sectionalization for the purpose of improving outage rotations during EEA3 load shed conditions is more easily applied to utility distribution systems—which typically consist of discrete looped or radial feeders—than their transmission systems, which are generally designed to operate as an integrated network. Nonetheless, Oncor is prepared to evaluate both the distribution and transmission systems in its study.

The flexibility to analyze groups of similar circuits rather than solely on a circuit-by-circuit basis, offers an important screening tool that will allow each utility to focus on circuits that have the greatest potential for segmentation or sectionalization. It is also important to recognize that different load shed drivers can result in different load shed strategies and deployments; for example, proactive outages in local areas differ substantially in time and scope from a load shed due to a system-wide short supply of energy.

The Draft Order recognizes, but does not specify, the types of critical customers a utility may serve. This is important because critical status does not and cannot equate to exemption from load shed due to the number and dispersal of critical customers on a utility’s system. If it did, the potential exists that Oncor and other utilities could not fulfill their load shed responsibilities when a grid emergency occurs irrespective of segmentation or sectionalization.

Oncor looks forward to the opportunity to undertake the study and also to provide information regarding other methods Oncor can use to more evenly distribute the burden a load shed event imposes on its customers.

Respectfully submitted,

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