



## **Filing Receipt**

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## Public Utility Commission of Texas

### Annual Report

Required by 16 Texas Admin. Code § 25.97(f)

**PROJECT NO.** 55983

**AFFECTED ENTITY:** Oncor Electric Delivery Company LLC ("Oncor")

#### General Information

Pursuant to 16 Texas Admin. Code § 25.97(f)(1), not later than May 1 of each year, each affected entity must submit this report for the preceding calendar year. The first report must be submitted not later than May 1, 2020.

#### Instructions

Answer all questions, fill-in all blanks, and have the report notarized in the affidavit. If you check no in part 1.a, leave parts 1.b-d blank.

Violations resulting from, and incidents, fatalities, or injuries attributable to a violation resulting from, a natural disaster, weather event, or man-made act or force outside of an affected entity's control are not required to be reported.

#### Affidavit

A representative of the affected entity must swear to and affirm the truthfulness, correctness, and completeness of the information provided by attaching a signed and notarized copy of the Affidavit provided with this form.

#### Filing Instructions

Submit four copies (an original and three copies) of the completed form and signed and notarized Affidavit to:

Central Records Filing Clerk  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
Telephone: (512) 936-7180

**1. This part applies only to an affected entity that owns or operates overhead transmission facilities greater than 60 kilovolts.**

a) Does this part 1 apply to you? Yes ☒ No ☐

b) Provide the number of identified occurrences of noncompliance with Public Utility Regulatory Act (PURA) § 38.004 regarding vertical clearance requirements of the National Electrical Safety Code (NESC) for overhead transmission facilities.

Oncor has collected detailed survey data (i.e., LiDAR), structural imagery, and right-of-way video, and coordinated with subject matter experts to perform structural and spatial modeling of Oncor's overhead transmission system. As described within the Five-Year Report<sup>1</sup> filed with the PUCT on April 30th, 2020, Oncor plans to evaluate 100% of overhead transmission facilities for compliance with NESC vertical clearance requirements by the end of 2024.

In 2023, a total of 46,736 transmission spans (the section of wires of a transmission line circuit between adjacent structures), associated with 374 transmission circuits, and representing more than 5,800 circuit-miles, were analyzed to determine compliance with National Electric Safety Code (NESC) vertical clearance requirements.

While Oncor regularly conducts aerial and ground patrols on transmission circuits, including lake crossings, to identify and mitigate safety and reliability concerns, employing more advanced technology and analytical capabilities resulted in more precise and actionable information. Of the 46,736 spans analyzed, 2,023 spans, associated with 189 transmission circuits, were determined to not meet NESC required vertical clearance. Of the 2,023 spans that were determined to not meet NESC required vertical clearance, 39 spans, associated with 22 transmission circuits, were brought into compliance by the end of 2023.

The vast majority of spans that were determined to not be in conformance with applicable NESC clearances involve minimal deviations less than required NESC vertical clearances to the ground surface beneath a transmission line operating at maximum design capacity. None of these spans are associated with the original water body crossings<sup>2</sup> that were analyzed, remediated, and reported on in previously filed Annual Reports<sup>3</sup>. In the rare instances where significant clearance concerns were confirmed, Oncor has taken, or will take, modifications to ensure the proper clearance; until such permanent modifications can be made Oncor has taken temporary actions such as derating or deenergizing circuits, installing barricades to restrict right of way access, and communicating with impacted landowners.

Project scoping and mitigation activities are underway for the remaining 1,984 spans, associated with 184 transmission circuits, that have not yet been brought into compliance. This includes prioritizing projects by non-compliance impact, and in some cases, performing interim remediation activities for locations that will require more expansive correction work.

<sup>1</sup> PUCT Docket 50594

<sup>2</sup> PURA § 38.004

<sup>3</sup> PUCT Docket 50596, PUCT Docket 51890, PUCT Docket 52938

- c) Do you have actual knowledge that any portion of your transmission system is not in compliance with PURA § 38.004 regarding vertical clearance requirements of the NESC for overhead transmission facilities?

Aside from the one thousand nine hundred eighty-four (1,984) spans mentioned in subpart b), Oncor has knowledge of an additional one hundred fifty-nine (159) spans, originally identified in the 2023 Annual Report<sup>4</sup>, that are not in compliance with PURA 38.004 regarding vertical clearance requirements of the NESC for overhead transmission facilities. As noted previously, most of these spans involve minimal deviations from required NESC vertical clearances to ground. Project scoping and mitigation activities remain in progress to bring all of these spans into compliance with applicable NESC clearance requirements.

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<sup>4</sup> PUCT Docket 54435

- d) Do you have actual knowledge of any violations of easement agreements with the United States Army Corps of Engineers relating to PURA § 38.004 regarding vertical clearance requirements of the NESC for overhead transmission facilities?

Oncor has actual knowledge of one (1) violation of easement agreements with the United States Army Corps of Engineers relating to PURA 38.004 regarding vertical clearance requirements of the NESC for overhead transmission facilities. This violation was identified on one (1) transmission circuit, and includes two (2) spans.

Although these two (2) spans do not meet the clearance values contained within the USACE easement agreement, they meet the applicable vertical clearances which are required by the NESC. Oncor plans to coordinate with the USACE this year to discuss appropriate remediation options.

**2.** This part applies to an affected entity that owns or operates overhead transmission facilities greater than 60 kilovolts or distribution facilities greater than 1 kilovolt.

- a) Provide the number of fatalities or injuries of individuals other than employees, contractors, or other persons qualified to work in proximity to overhead high voltage lines involving transmission or distribution assets related to noncompliance with the requirements of PURA § 38.004.

None.

b) Provide a description of corrective actions taken or planned to prevent the reoccurrence of fatalities or injuries described in subpart a), immediately above.

N/A.

Affected Entity: Oncor Electric Delivery Company LLC ("Oncor") PROJECT NO. 55983

## AFFIDAVIT

I swear or affirm that I have personal knowledge of the facts stated in this report or am relying on people with personal knowledge, that I am competent to testify to them, and that I have the authority to submit this report on behalf of the affected entity. I further swear or affirm that all statements made in this report are true, correct, and complete.

Thomas J. Yamin  
Signature

Thomas J. Yamin, P.E.  
Printed Name

Director - Regulatory Transmission and Planning  
Job Title

Oncor Electric Delivery Company LLC ("Oncor")  
Name of Affected Entity

Sworn and subscribed before me this 30th day of April, 2024  
Month Year

Terril Watts

Notary Public in and For the State of Texas

My commission expires on 07-07-2024

