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APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE
DELIVERY COMPANY LLC FOR	§	PUBLIC UTILITY COMMISSION
APPROVAL OF A SYSTEM	§	OF TEXAS
RESILIENCY PLAN	§	

RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC
TO COMMISSION STAFF'S
THIRD 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. 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,

ONCOR ELECTRIC DELIVERY COMPANY LLC

By: /s/ Tab R. Urbantke

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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 24th day of June, 2024, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/ Stephanie Tenorio

Request

Please refer to page 2 of the Oncor System Resiliency Investment Study (bates page 240). The study states:

This report outlines the methodology employed by 1898 & Co. to identify potential resiliency investments, perform the resiliency benefit-cost analysis for resilience investment activities, and estimate their quantifiable benefits for the following Oncor measures:

- Overhead System Resiliency and Modernization;
- Underground System Resiliency and Modernization;
- Flexible and Self-Healing Distribution System;
- Vegetation Management Plus (VM+);
- Oncor Secure; and
- Enhanced Digital Grid.

The measures proposed in Oncor's SRP also provide qualitative benefit streams, as discussed in more detail below. While these benefits will accrue to Oncor's customers as a result of the proposed resiliency measures, attempting to quantify those benefits is beyond the scope of this report. Oncor's SRP also includes a Wildfire Mitigation measure. This measure was not evaluated by 1898 & Co. but is addressed in other parts of Oncor's filing.

Please explain why the Wildfire Mitigation Measures were not included in the benefit-cost analysis. Please provide the benefit-cost analysis for the Wildfire Mitigation Measures.

Response

The following response was prepared by or under the direct supervision of Ellen E. Buck and Robel Lulseged, the sponsoring witnesses for this response.

Wildfire incidents pose a significant threat to public safety, causing devastation to communities, including substantial damages to properties and assets. It is difficult to quantitatively represent and predict the damages such an event would cause, because each event is unique in nature, and because the level of costs and damages will be contingent on the size, intensity, duration, and location of a wildfire event. Some aspects of wildfire mitigation can be quantifiably analyzed, but there are many qualitative benefits that go beyond benefit-cost analysis. Therefore, performing a similar outage-based benefit-cost analysis for the Wildfire Mitigation measure, as that conducted by 1898 & Co. for the other proposed measures presented in Oncor's SRP would likely not be useful or accurate. Oncor has, however, engaged third-party consultant, EDM International, Inc. ("EDM"), referenced in Ellen E. Buck's testimony (Bates 499-500), to review the proposed approaches within the Wildfire Mitigation measure. Specifically, EDM conducted an in-depth review of the Company's proposed programs, activities, and data sources under the Wildfire Mitigation measure and provided helpful feedback and recommendations on ways to improve upon and enhance the proposals. Oncor incorporated EDM's feedback and recommendations into this measure. EDM has concluded the Oncor current wildfire mitigation approach, and the enhancements proposed in the SRP, are consistent with good utility practice and are

employed by leading utilities implementing wildfire mitigation programs. EDM provides details of its assessment of Oncor's Wildfire Mitigation measure in the letter attached to Robel Lulseged's direct testimony as Exhibit RL-5 (Bates pages 613-619).