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

RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO COMMISSION STAFF'S FOURTH 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

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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 26th 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

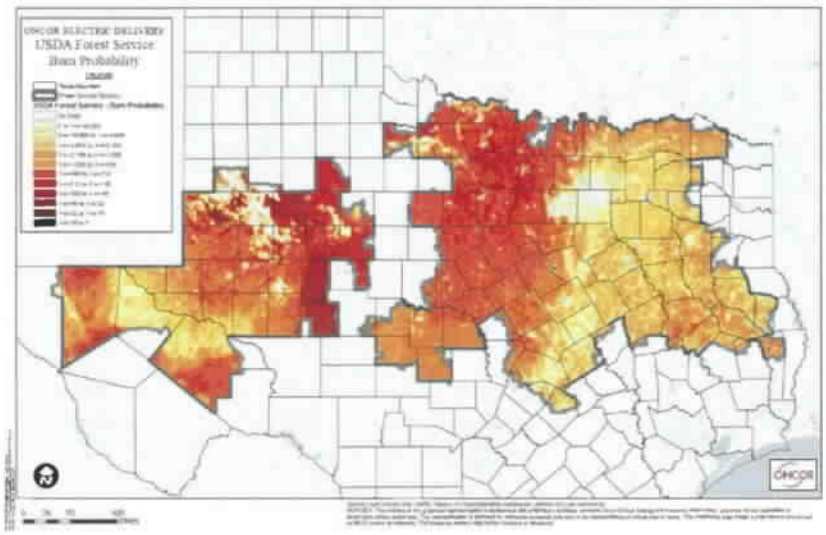
Request

Please refer to Table 8 on page 60 of the Oncor System Resiliency Plan (bates page 79). For Program C: Asset Protection, the plan estimated scope includes 17,574 Pole wraps, 45 Substations/21 Telecom Towers/1,330 Critical Poles defensible spaces, and 12 Wood Substation rebuilds. Please provide maps demonstrating that these assets listed above are in elevated wildfire probability and fire intensity areas or any other documentation used in identifying these assets for Program C: Asset Protection. Regarding the defensible spaces listed in Activity 2, please describe the area (ft^2) and the improvements proposed within this area, for each of the three asset classes identified (Substations, Telecom Towers, and Critical Poles).

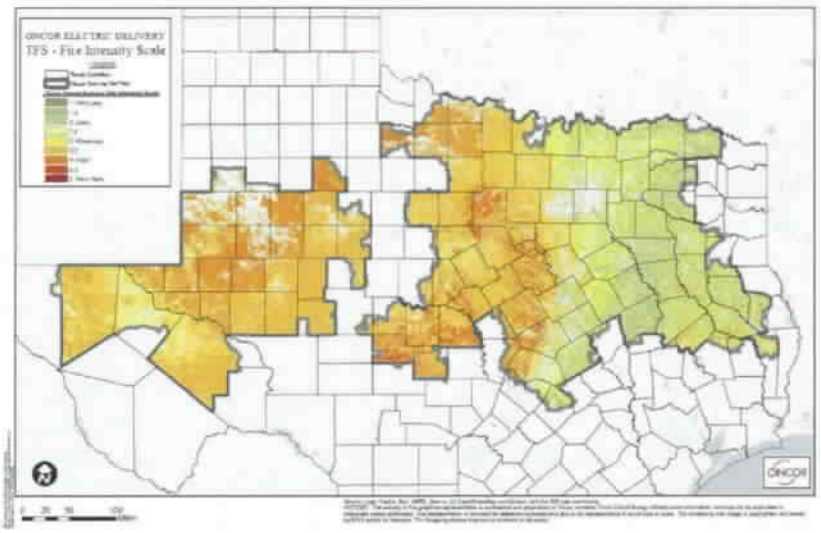
Response

The following response was prepared by or under the direct supervision of Robel Lulseged, the sponsoring witness for this response.

Under Oncor's current risk modeling tool used to determine Wildfire Mitigation Zones ("WMZs"), burn probability (i.e., likelihood of ignition), fire intensity, and susceptibility are considered the fundamental components for quantifying wildfire risk. Burn probability depicts the annual probability of wildfire occurrence at each specific location, based on historical wildfire events and weather patterns (please see RFI Response Figure A below, not contained in the SRP), while fire intensity identifies areas where significant wildfire fuels, topography hazards, and historical weather associated with dangerous fire behavior potential exist (please see RFI Response Figure B below, not contained in the SRP). Susceptibility is modeled by combining the community protection zones (as defined by Texas A&M Forest Service) and critical infrastructure zones (which reflect critical natural gas facilities served by Oncor, as defined by the PUCT).

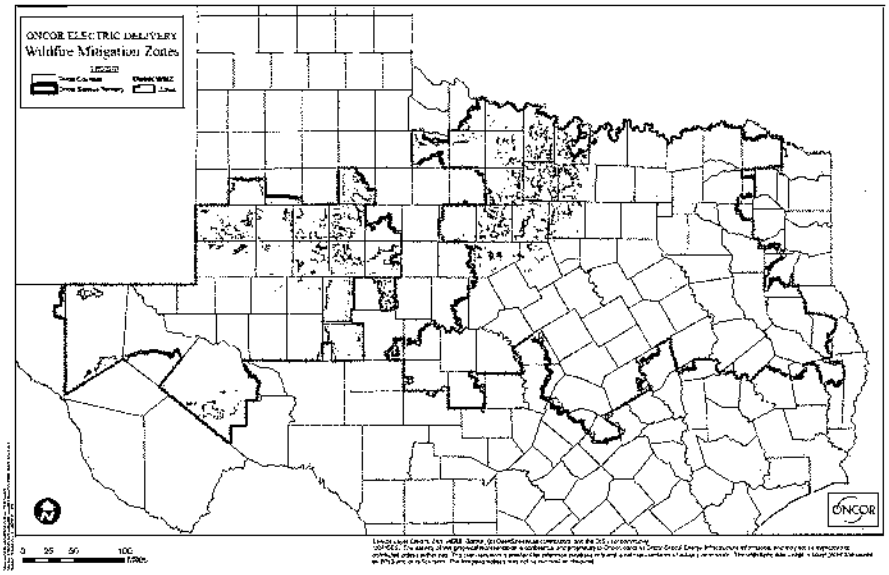


RFI Response Figure A: Burn Probability (Likelihood of Wildfire Occurrence) – Oncor Transmission Information System (OTIS) Wildfire Risk Module (underlying GIS dataset is a spatial dataset from United States Forest Service, clipped at Oncor Service Territory)



RFI Response Figure B: Fire Intensity Scale - Oncor Transmission Information System (OTIS) Wildfire Risk Module (underlying GIS dataset is a TAMFS dataset from the Texas Wildfire Risk Explorer (TxWRAP)
https://texaswildfirerisk.com/)

Burn probability and fire intensity are used to determine Oncor's WMZs, while the susceptibility parameter is used to escalate those assets closest to communities and critical facilities when it comes to prioritization. Oncor has determined thresholds within burn probability and fire intensity scale to define the areas with elevated risk. A spatial intersect analysis is then conducted by overlaying the Oncor asset locations over the elevated burn probability and fire intensity datasets. RFI Response Figure C below (not conained in the SRP) shows the result of combining the two components within Oncor service territory. Activities described in Oncor's proposed System Resiliency Plan, Wildfire Mitigation measure, program C will be done within these WMZs depicted on the map (including the estimated 17,574 pole wraps, 45 substations/21 telecommunications towers/1,330 critical poles defensible spaces, and 12 wood substation rebuilds referenced in this request for information).



RFI Response Figure C: Wildfire Mitigation Zones - Oncor Transmission Information System (OTIS) Wildfire Risk Module

Implementation of the Wildfire Mitigation measure Program A (Wildfire Risk Model Enhancement) could result in changes to areas designated as WMZ, and therefore, asset prioritization will need to be adjusted accordingly.

As described on Bates 195, Defensible space for all three asset classes "... includes the reduction of fuels through the removal or modification of vegetation and other flammable materials, around the structure as well as applying fire-retardant materials as appropriate, to protect facilities and equipment." The area in square feet and the specific improvements implemented in each area will be site-specific based on numerous factors such as adjacent land-use, vegetation types, and amount of land around the perimeter that is within Oncor's control.

For substations and telecom towers, as described on Bates 195, "Oncor's objective is to clear surface vegetation within 30 feet of substations and communications towers to mitigate fire from spreading to these structures." We estimate to improve approx. 3,600 square feet around the perimeter of a typical communications tower and approx. 14,280 square feet around the average substation perimeter. For critical poles, the proposed improvements may include clearing vegetation around the poles for a 10' radius (approx. 314.16 square feet) and installing a fire-retardant pole wrap.

Request

Please refer to Table 8 on page 60 of the Oncor System Resiliency Plan (bates page 79). For Program D: Wildfire Mitigation Response, the plan estimated scope includes 413 Remote operable switches, 15,731 Expulsion lightning arresters & fuse replacements, 2,005 Equipment pole clearing, 8,137 Wildlife guard locations, and 13,650 inspection miles. Please provide maps demonstrating that these assets listed above are in elevated wildfire probability and fire intensity areas or any other documentation used in identifying these assets for Program D: Wildfire Mitigation Response.

Response

The following response was prepared by or under the direct supervision of Robel Lulseged, the sponsoring witness for this response.

As explained in Oncor's response to Staff RFI Set No. 4, Question No. 4-01, Oncor has taken steps to identify WMZs in which the work identified in Oncor's proposed System Resiliency Plan, Wildfire Mitigation measure, Program D, will be performed. These WMZs are depicted in Figure 3 provided and discussed in that response. The installation of an estimated 413 remote operable switches and 15,731 expulsion lightning arresters and fuse replacements, 23,471 equipment pole clearing/brushing, the installation of an estimated 8,137 wildlife guard locations, and the inspection of an estimated 13,650 miles as referenced in this request for information will occur within the WMZs depicted in Figure 3. Implementation of the Wildfire Mitigation measure Program A (Wildfire Risk Model Enhancement) could result in changes to areas designated as WMZs, and therefore, asset prioritization will be need to be adjusted accordingly.

Please note that Oncor inadvertently presented the number of equipment pole brushing as 2,005 equipment pole clearing/brushing on Bates 80, while the correct proposed number is 23,471 as mentioned on Bates 129.

Request

Please refer to the paragraph describing Activity 2 - Defensible Space on page 63 of the Oncor System Resiliency Plan (bates page 82). The description states that the areas of risk will be determined by using the enhanced risk modeling capabilities developed in Program A: Wildfire Risk Model Enhancement. Please explain how the 45 Substations/21 Telecom Towers/1,330 Critical Poles listed in Table 8 were identified if the areas of risk will be determined by the proposed Program A?

Response

The following response was prepared by or under the direct supervision of Robel Lulseged, the sponsoring witness for this response.

As described in Oncor's response to Staff RFI Set No. 4, Question No. 4-01, Oncor's current risk modeling tool is used to identify high wildfire risk areas, or wildfire mitigation zones (WMZs). The proposed, estimated number of locations at which to perform the work described in the Wildfire Mitigation measure, Program C (including the defensible space activity) is determined based on the current number of WMZs and current asset and substation counts within those established WMZs. When enhanced risk modeling becomes available upon the execution of the proposed Wildfire Mitigation measure, Program A (Wildfire Risk Model Enhancement), Oncor recognizes this could change the areas designated as WMZs, and a reprioritization of assets may be appropriate based on those changes in order to best implement the work proposed in the Wildfire Mitigation measure.

Request

Please refer to the paragraph describing Activity 4 - Wildlife Guards on page 64 of the Oncor System Resiliency Plan (bates page 83). The description states that the areas of risk will be based on the results from Program A: Wildfire Risk Model Enhancement. Please explain how the 8,137 Wildlife Guard locations listed in Table 8 were identified if the areas of risk will be determined by the proposed Program A?

Response

The following response was prepared by or under the direct supervision of Robel Lulseged, the sponsoring witness for this response.

As described in Oncor's response to Staff RFI Set No. 4, Question No. 4-03, Oncor's current risk model was used to identify the current wildfire mitigation zones ("WMZs") in which wildlife guards are proposed to be installed. When enhanced risk modeling becomes available upon the execution of the proposed Wildfire Mitigation measure, Program A (Wildfire Risk Model Enhancement), Oncor recognizes this could change the areas designated as WMZs, and a reprioritization of assets may be appropriate based on those changes in order to best implement the work proposed in the Wildfire Mitigation measure.