



Control Number: 35717



Item Number: 212

Addendum StartPage: 0

**SOAH DOCKET NO. 473-08-3681
PUC DOCKET NO. 35717**

**APPLICATION OF ONCOR ELECTRIC § BEFORE THE STATE OFFICE
DELIVERY COMPANY, LLC FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

2008 SEP 10 PM 2:07
FILED - LEAK

**ALLIANCE OF TXU/ONCOR CUSTOMERS'
ELEVENTH SET OF RFIS TO ONCOR ELECTRIC DELIVERY COMPANY**

Alliance of TXU/Oncor Customers' ("ATOC") Eleventh Set of Requests for Information ("RFIs") to Oncor Electric Delivery Company ("Oncor") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Jim Boyle, Herrera & Boyle, PLLC at 816 Congress Avenue, Suite 1120, Austin, Texas 78701, within twenty (20) days of service hereof or no later than September 30, 2008 in conformance with the requirements of PUC Procedural Rule 22.144(c)(16 T.A.C. §22.144(c)). Exhibit A is attached hereto and incorporated herein for all purposes.

Definitions

1. "Oncor," the "Company," and "Applicant" refer to Oncor Electric Delivery Company and its affiliates.
2. "You," "yours," and "your" refer to Oncor (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of Oncor.
5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of Oncor or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.

Instructions

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.

4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If Oncor considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if Oncor objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if Oncor receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA & BOYLE, PLLC
816 Congress Avenue, Suite 1120
Austin, Texas 78701
(512) 474-1492
(512) 474-2507 FAX

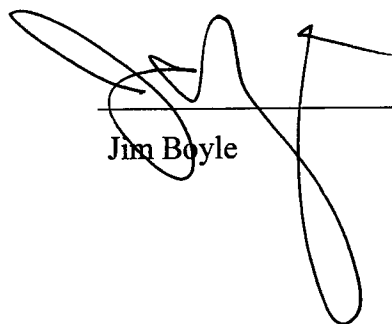
By: 

Alfred R. Herrera
State Bar No. 09529600
Jim Boyle
State Bar No. 02795000
Carly Gallagher
State Bar No. 24062733

**ATTORNEYS FOR ALLIANCE OF
TXU/ONCOR CUSTOMERS**

CERTIFICATE OF SERVICE

I certify that I have served a copy of **ATOC's Eleventh Set of Requests for Information** to **Oncor** upon all known parties of record by fax and/or first class mail on this the 10th day of September 2008.



Jim Boyle

EXHIBIT A

**SOAH DOCKET NO. 473-08-3681
PUC DOCKET NO. 35717**

**ALLIANCE OF TXU/ONCOR CUSTOMERS'
ELEVENTH SET OF REQUESTS FOR INFORMATION TO
ONCOR ELECTRIC DELIVERY COMPANY**

- 11-1. For each lawsuit that the Company included in the property insurance reserve, please provide an explanation of each lawsuit and the basis of each suit for the years 1993 to 2007. Please include in your explanation why each of the lawsuits are properly included in self insurance reserve.
- 11-2. For each lawsuit that the Company included in the property insurance reserve, state the total litigation cost for each lawsuit/litigation.
- 11-3. In reference to the response to ATOC 6-5, Attachment 1, page 56, please explain how this charge relates to the Company distribution and transmission plant.