



Control Number: 38324



Item Number: 349

Addendum StartPage: 0

SOAH DOCKET NO. 473-10-4789
PUC DOCKET NO. 38324

FILED
10 AUG 11 PM 1:34
PUBLIC UTILITIES COMMISSION
FILING CLERK

APPLICATION OF ONCOR § BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY §
LLC TO AMEND A CERTIFICATE OF §
CONVENIENCE AND NECESSITY § OF
FOR THE WILLOW CREEK-HICKS §
345 KV CREZ TRANSMISSION LINE §
IN DENTON, PARKER, TARRANT §
AND WISE COUNTIES § ADMINISTRATIVE HEARINGS

**GROUP OF ALLIED LANDOWNERS'
THIRD SET OF REQUESTS FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY LLC**

The Group of Allied Landowners' ("GOAL's") Third Set of Requests for Information ("RFIs") to Oncor Electric Delivery Company LLC ("Oncor") are hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera & Boyle, PLLC at 816 Congress Avenue, Suite 1250, Austin, Texas 78701, within ten (10) calendar days of service hereof or no later than August 23, 2010,¹ in conformance with the requirements of PUC Procedural Rule 22.144(c)(16 T.A.C. §22.144(c)) and SOAH Order No. 1. Exhibit A is attached hereto and incorporated herein for all purposes.

¹ Ten calendar days from the date of filing and service is August 21, 2010, which is a Saturday. The following Monday is August, 23, 2010.

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

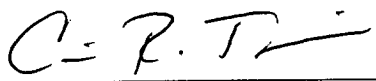
hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.

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 1250
Austin, Texas 78701
(512) 474-1492 (voice)
(512) 474-2507 (fax)

By: 

Jim Boyle
State Bar No. 02795000

Alfred R. Herrera
State Bar No. 09529600

Carrie R. Tournillon
State Bar No. 24053062

Felipe Alonso III
State Bar No. 24045400

**Attorneys for the
Group of Allied Landowners**

CERTIFICATE OF SERVICE

I hereby certify that on this the 11th day of August 2010, a true and correct copy of GOAL's Third Set of Requests for Information to Oncor Electric Delivery Company LLC was served upon Oncor by facsimile and/or First-class mail United States mail, postage paid.

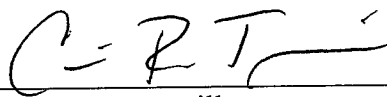
By: 
Carrie R. Tournillon

EXHIBIT A

**SOAH DOCKET NO. 473-10-4789
PUC DOCKET NO. 38324
BOA SORTE LP ET AL.'S
THIRD SET OF REQUESTS FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY LLC**

- 3-1 Please provide Attachment 3 of the Application in electronic format, preferably as an Excel spreadsheet.
- 3-2 Please provide a copy of the spreadsheet Attached to Oncor's Response to Bonds RFI 1-17 in electronic format.
- 3-3 Please provide an electronic copy of the photographs attached to Oncor's Response to Bonds RFI 2-02.