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

**ONCOR ELECTRIC DELIVERY SECOND REQUESTS FOR INFORMATION  
FROM THE WISE TRANSMISSION GROUP, LLC**

COMES NOW Oncor Electric Delivery LLC ("Oncor") by and through its attorneys of record, and requests that the Wise Transmission Group, LLC ("Wise Transmission Group") provide the information and answer the attached questions under oath. It is further requested that the questions be answered in the order in which they are asked with as much detail so as to fully present all of the relevant facts.

**Instructions**

Please answer the attached questions in accordance with the Procedural Schedule, Order No. 1, the Commission's Procedural Rules, and the Texas Rules of Civil Procedure. The Commission's Procedural Rules require that you identify the witness or witnesses who will sponsor each of your answers at the hearing in PUCT Docket No. 38324. The Commission's Procedural Rules also provide that these questions are continuing in nature and, should there be a change in circumstances which would modify or change any of your answers, then, in such case, please change or modify such answer and submit such changed answer as a supplement to the original answer within five (5) working days of your discovery that such change or modification is appropriate.

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In answering these requests for information, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

The singular includes the plural and the plural includes the singular.

Masculine, feminine, or neuter pronouns do not exclude the other genders.

The words "document" and "documents" have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. The words "document" and "documents" mean the final form and all drafts and revisions of any kind of written or graphic matter, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies there from which are different in any way from the original regardless of whether designated "confidential," "privileged," or otherwise restricted. Without limiting the generality of the foregoing, the words "document" and "documents" also include information stored or maintained on, or which could be reproduced from, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape, or similar means.

The words "and" and "or" shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope.

The words "communication" and "communications" include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both

communications and statements which are face-to-face and those which are transmitted by any writing or document or by media such as intercoms, telephones, email, television or radio.

The words "person" and "persons" as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint ventures, corporations, and any other entities, including without limitation, any electric utility, cogenerator, independent power producer, qualifying facility, or any other entity which generates electricity.

The words "regarding," "relate," "related," "relates" and "relating," as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

The term "Commission" refers to the Public Utility Commission of Texas.

If you have any question concerning the attached Questions or any of these instructions, please contact the undersigned.

Respectfully submitted,

VINSON & ELKINS LLP

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ATTORNEYS FOR ONCOR ELECTRIC  
DELIVERY COMPANY LLC

**CERTIFICATE OF SERVICE**

It is hereby certified that a copy of the foregoing has been emailed or sent via overnight delivery or first class United States mail, postage prepaid, to all parties of record in this proceeding on this the 16th day of September, 2010.

Jaren Taylor/ST

### **Additional Definitions**

“Structure” means any building, home, hut, barn, or other facility constructed, installed or placed upon the land.

“Route” means any route filed by Oncor in its application in Docket 38324.

“Link” means any line segment contained in Oncor’s Environmental Assessment and Routing Study filed as part of Oncor’s application.

“Improvement” means any non-naturally occurring change made to the land and its natural state.

“Intervenor” has the same meaning ascribed to it pursuant to P.U.C. PROC. R. 22.2(25).

## REQUESTS FOR INFORMATION

- 2-1 Please identify and produce all documents indicating recorded locations of the species listed on page 9 of Dr. Moore's testimony.
- 2-2 In the Wise Transmission Group's opinion is routing a transmission line through proposed residential or commercial development preferable to routing through existing residential or commercial development?
- 2-3 In the Wise Transmission Group's opinion is routing a transmission line through proposed residential/commercial development or existing residential/commercial development more consistent with the Commission's routing requirements?
- 2-4 In the Wise Transmission Group's opinion is routing a transmission line through proposed residential or commercial development preferable to routing through existing oil and gas fields?
- 2-5 In the Wise Transmission Group's opinion is routing a transmission line through proposed residential/commercial development or existing oil and gas fields more consistent with the Commission's routing requirements?
- 2-6 In the Wise Transmission Group's opinion is routing a transmission line through existing residential and commercial development preferable to routing through existing oil and gas fields?
- 2-7 In the Wise Transmission Group's opinion is routing a transmission line through proposed residential/commercial development or existing oil and gas fields more consistent with the Commission's routing requirements?
- 2-8 Admit or deny that residential subdivisions exist adjacent to transmission line corridors in Texas.
- 2-9 Admit or deny that transmission line corridors are commonly used as greenbelt areas in residential subdivisions.