



Control Number: 38597



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SOAH DOCKET NO. 473-11-0072  
P.U.C. DOCKET NO. 38597

APPLICATION OF ONCOR §  
ELECTRIC DELIVERY §  
COMPANY, LLC TO AMEND A §  
CERTIFICATE OF CONVENIENCE §  
AND NECESSITY FOR THE KRUM §  
WEST TO ANNA 345-KV CREZ §  
TRANSMISSION LINE IN COLLIN, §  
COOKE, DENTON, AND §  
GRAYSON COUNTIES §

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

2019/12/19 11:10:17

**ONCOR ELECTRIC DELIVERY FIRST REQUESTS FOR INFORMATION  
FROM THE CELINA GROUP 2 (R22)**

COMES NOW Oncor Electric Delivery LLC (“Oncor”) by and through its attorneys of record, and requests that Harold and Donnette Murphy, Edward and Lynette Sandidge, Sharon Scott, Michael and Christy Gooch, Johnnie and Pat Robinson, Robinson Ranch, Marcus and Donna Schaefer, Kent Adams, Lone Star Partners, and Richard Thompson (collectively, the “Celina Group 2 (R22)”) 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 individually to each of the above named entities or parties.

**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. 38597. 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.

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**

By: DAN KELLY <sup>w/ PERMISSION</sup> JSS

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**ATTORNEYS FOR ONCOR ELECTRIC  
DELIVERY COMPANY LLC**

**CERTIFICATE OF SERVICE**

This is to certify that on this 18th day of November, 2010, a true and correct copy of the foregoing document was served via facsimile, overnight mail, and/or email to counsel or the authorized representative for the party to whom the discovery is served.

DAN KELLY <sup>w PERMISSION</sup> JSS

### 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 38597.

“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).

“The Celina Group 2 (R22)” includes Harold and Donnette Murphy, Edward and Lynette Sandidge, Sharon Scott, Michael and Christy Gooch, Johnnie and Pat Robinson, Robinson Ranch, Marcus and Donna Schaefer, Kent Adams, Lone Star Partners, Richard Thompson, and any other party intervening in Docket 38597 aligned with and associated with this group of intervenors.

## REQUESTS FOR INFORMATION

- 1-1 Please list each Route or Link that you contest in this proceeding.
- 1-2 Please provide the general factual bases for why you contest each Route and Link that you contest.
- 1-3 Please list and describe all Structures that exist on any property you own that will be crossed by one of Oncor's proposed transmission line routes and provide the date the structures were installed or constructed and the height of each structure and describe where each structure is located, where each structure is located in relation to the proposed transmission line and its distance from the proposed transmission line.
- 1-4 Please provide a copy of any documents concerning communications or correspondence you have had with any other Intervenor related to this docket or the issues arising in this docket.
- 1-5 Is any witness on your behalf testifying as an expert in this docket? If so, please provide the following:
  - a. the expert's name, address and telephone number;
  - b. the subject matter on which the expert will testify;
  - c. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this docket regardless of which and how the factual information was acquired;
  - d. the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them;
  - e. all documents, tangible things, reports, models or data compilations that have been provided to, reviewed by or prepared by or for the expert in anticipation of a testifying expert's testimony;
  - f. the expert's current resume and bibliography;

- g. a listing of cases in which the expert has submitted testimony. Further, provide the docket number, jurisdiction, the company for whom testimony was submitted and the topics addressed in his testimony;
  - h. a complete copy of all prior testimonies submitted by the expert relating to the topic the expert will address in this docket. This should include all exhibits and rebuttal testimony; and
  - i. all articles, speeches, published materials and peer-reviewed material written by the expert.
- 1-6 If in response to RFI 1-5 above, you identified a testifying expert witness in this docket, please provide the following for any consulting expert in this docket employed by you whose mental impressions or opinions have been reviewed by a testifying expert:
- a. the expert's name, address and telephone number;
  - b. the facts known by the expert that relate to or form the basis of the expert's mental impressions and opinions formed or made in connection with this docket regardless of when and how the factual information was acquired;
  - c. the expert's mental impressions and opinions formed or made in connection with this docket and any methods used to derive them;
  - d. all documents, tangible things, reports, models or data compilations that have been provided to, reviewed by or prepared by or for the consulting expert in anticipation of a testifying expert's testimony; and
  - e. the consulting expert's current resume and bibliography.
- 1-7 For any non-expert witness testifying on your behalf in this docket, please provide the following:
- a. the witness' name, address and telephone number;
  - b. the witness' resume and work history;
  - c. the subject matter on which the witness will testify;



- d. copies of all articles, speeches, published materials created by or attributed to the witness; and
  - e. a list of all dockets in which the witness has submitted testimony and /or testified.
- 1-8 If you are not the only owner of your property affected by Oncor's proposed transmission line, please identify the other owner(s).