



Control Number: 42087



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SOAH DOCKET NO. 473-14-2252
PUC DOCKET NO. 42087

APPLICATION OF ONCOR ELECTRIC
DELIVERY COMPANY, LLC, TO
AMEND ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR A PROPOSED 138-KV
TRANSMISSION LINE IN DENTON,
TARRANT, AND WISE COUNTIES
(HICKS TO ELIZABETH CREEK CCN)

§ BEFORE THE STATE OFFICE
§
§
§ OF
§
§
§
§ ADMINSTRATIVE HEARINGS

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**RUBY LEA ALLISTON AND TINSLEY ALLISTON RANCHLANDS, LP'S
SECOND SET OF REQUESTS FOR INFORMATION TO
ONCOR ELECTRIC DELIVERY COMPANY, LLC**

To: Oncor Electric Delivery Company, LLC ("Oncor"), by and through its attorneys of record, Jaren A. Taylor, Vinson & Elkins LLP, Trammell Crow Center, 2001 Ross Avenue, Suite 3700, Dallas, Texas 75201.

Pursuant to PUC Procedural Rule 22.144, Ruby Lea Alliston and Tinsley Alliston Ranchlands, LP ("Alliston"), by and through their attorneys of record, make the following Requests for Information.

INSTRUCTIONS

1. Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the witness or witnesses who will sponsor each of your answers at the hearing in the PUC Docket No. 42087. 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.

2. 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

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diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

3. If you are unable to answer any request fully and completely after exercising due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such request. In addition to specifying those portions, you are to state with regard to each portion:

- A. The fact on which you base the contention that you are unable to answer that portion;
- B. The knowledge, information, and belief you have concerning that portion; and
- C. The acts done and inquiries made by you in attempting to answer such request.

4. The singular includes the plural and the plural includes the singular. Masculine, feminine, or neuter pronouns do not exclude other genders.

5. If you have any questions concerning the attached questions please contact Alicia Ringuet at (512) 472-3993.

DEFINITIONS

1. The terms “Documents” and “Records” include, but are not limited to, all handwritten, typed, printed, and photostated matter, drafts, duplicates, carbon copies, photostatic copies, facsimile copies, and all other copies thereof, including, without limitation, all letters, correspondence, photographs, videos, CDs, records, books, journals, ledgers, work papers, drawings, maps, invoices, receipts, deposits, accounts, charts, graphs, maps, evaluations, studies, contracts, deeds, assignments, leases, abstracts, title policies, reports, transcripts, daily logs, spreadsheets, summaries, memoranda, diaries, desk calendars, appointment calendars, agreements, notes, notices, telegrams, mailgrams, telephone statements, and records of telephone calls and other conversations (including any recordings of conversations), or e-mail communications, whether in writing or contained or preserved by any mechanical or electrical recording device, or computer system. **“Documents” and “Records” specifically include any information contained in electronic or magnetic form.** The terms “Documents” and “Records” shall mean each copy which is not identical to the original or to any other copy. Unless otherwise specifically stated in a particular Request, when a document responsive to a Request exists in electronic or magnetic form, please produce it in its native format (other than emails, which are to be produced as set forth in Definition 2, below).

2. “Correspondence” refers not only to written communications, but it also refers to emails. When emails exist and are responsive to any request for correspondence, below, please produce the responsive email correspondence as printed, hard-copies of the email correspondence showing complete “raw” header information (including all cc and bcc recipients) as well as including all related emails in the same “chain,” that is any and all

responses to the emails, or forwards of the emails, or any emails to which the responsive email had replied.

3. “File” means any collection or group of documents maintained, held, stored, or used together, including, without limitation, all collections of documents maintained, held, or stored in folders, notebooks, or other devices for separating or organizing documents.

4. “Person” means any natural person, corporation, firm, association, partnership, joint venture, sole proprietorship, union, federation, governmental body, or any other organization, business, or legal entity, and all predecessors or successors in interest.

5. A reference to any person by its, his or her full or abbreviated name or acronym, or a pronoun referring to a person means that person and, where applicable, its agents, representatives, officers, directors, employees, partners, parents, subsidiaries, affiliates, or any other person acting in concert with it or under its control, whether directly or indirectly, including any attorney.

6. “Identify” (With Respect to Persons). When referring to a person, to “Identify” means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

7. “Identify” (With Respect to Documents). When referring to documents, “Identify” means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; and (iv) author(s), addressee(s), and recipient(s).

8. “Concerning” means in whole or in part, directly or indirectly, referring to, relating to, connected with, showing, describing, analyzing, reflecting, and constituting the subject matter identified in the discovery request.

9. “Communications” includes oral or written communications.

10. “Commission” or “PUCT” refers to Public Utility Commission of Texas.

11. “You,” “Your,” and “Oncor” means Oncor Electric Delivery Company, LLC, and any parent companies or affiliates of such entities and all agents, attorneys, employees or representatives of such entities.

12. The “Project” means the proposed transmission line that is described in the Application of Oncor Electric Delivery Company, LLC to Amend its Certificate of Convenience and Necessity for a proposed 138-KV transmission line in Denton, Tarrant, and Wise Counties, Texas (Hicks to Elizabeth Creek CCN) filed in PUCT Docket No. 42087 on January 7, 2014.

13. “Proposed Transmission Lines” or “Proposed Project” means the transmission facilities associated with and included in the Application.

14. “EA” means the Environmental Assessment and Alternative Route Analysis for the Proposed Project included as Attachment 1 to the Application.

Respectfully submitted,

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By:


Alicia R. Ringuet

**ATTORNEYS FOR RUBY LEA ALLISTON AND
TINSLEY-ALLISTON RANCHLANDS, LP**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on Oncor Electric Delivery Company, LLC by the means shown on May 9th, 2014, in accordance with SOAH Order No. 1.

By:


Alicia R. Ringuet

Matthew C. Henry
Jaren A. Taylor
Winston P. Skinner
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Attorneys for Oncor Electric Delivery Company, LLC

via Electronic Mail (mhenry@velaw.com)
via Electronic Mail (jarentaylor@velaw.com)
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REQUESTS FOR INFORMATION

2-1: Does Oncor contend that any portion of Link H2 parallels an existing compatible right-of-way (including apparent property boundaries)? If so, please identify the portion(s) of Link H2 that Oncor contends parallels an existing compatible right-of-way, the lengths of such parallel portions of Link H2, and the type of right-of-way paralleled, and please generally state the factual bases that support your contention.

2-2: If Oncor contends that any portion of Link H2 parallels an existing compatible right-of-way (including apparent property boundaries), please provide a detailed map indicating the rights-of-way and the portions of Link H2 that parallel such rights-of-way.

2-3: Does Oncor contend that any portion of Link KK3 parallels an existing compatible right-of-way (including apparent property boundaries)? If so, please identify the portion(s) of Link KK3 that Oncor contends parallels an existing compatible right-of-way, the lengths of such parallel portions of Link KK3, and the type of right-of-way paralleled, and please generally state the factual bases that support your contention.

2-4: If Oncor contends that any portion of Link KK3 parallels an existing compatible right-of-way (including apparent property boundaries), please provide a detailed map indicating the rights-of-way and the portions of Link KK3 that parallel such rights-of-way.

2-5: Please provide a schematic of the turning structure that would be located at the connection point between Links H1 and H2, if Oncor's proposed transmission line were constructed on any alternative route that includes Links H1 and H2.

2-6: Please describe the easement that would be required at the connection point between Links H1 and H2, if Oncor's proposed transmission line were constructed on any alternative route that includes Links H1 and H2.

2-7: Please describe the location of the turning structure that would be located at the connection point between Links H1 and H2, if Oncor's proposed transmission line were constructed on any alternative route that includes Links H1 and H2.