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COMPLAINT OF KENNETH M. §
JASINSKI AGAINST ONCOR §
ELECTRIC DELIVERY COMPANY LLC §

BEFORE THE PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
OF TEXAS

**ONCOR ELECTRIC DELIVERY COMPANY LLC'S OBJECTIONS
TO COMPLAINANT'S FIRST REQUEST FOR INFORMATION**

TO THE HONORABLE STEPHANIE MORSE FEY, ADMINISTRATIVE LAW JUDGE:

COMES NOW Oncor Electric Delivery Company LLC ("Oncor"), and files these Objections to the First Request for Information ("RFIs") filed by Mr. Kenneth Jasinski ("Complainant"), and would respectfully show the following:

I. PROCEDURAL HISTORY

Complainant served his First RFIs to Oncor on March 24, 2015 after 3:00 PM. Pursuant to Commission Procedural Rules 22.144(b)(2), 22.144(d), and 22.4(a), these Objections are timely filed on or before April 6, 2015.

II. NEGOTIATIONS

Complainant and counsel for Oncor have negotiated the discovery dispute in good faith and agree that Complainant and Oncor will not seek in discovery information that constitutes attorney-client communication and/or work product. These Objections relate to matters that Complainant and Oncor were not able to resolve.

III. SPECIFIC OBJECTIONS

As the Commission is aware, there are pending motions before the Commission, the outcome of which will determine what claims, if any, are actionable in this proceeding. Until it is determined what viable claim exists in this proceeding, if any, then Oncor objects to each and every discovery request in its entirety¹ as not being relevant or reasonably calculated to lead to the discovery of admissible evidence See Tex. R. Civ. P. 192.3(a); and P.U.C. PROC. R. 22.141(a).

¹ Oncor is attaching Complainant's First RFIs for the Commission's convenience.

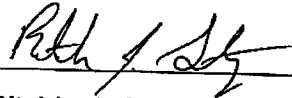
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IV. CONCLUSION AND PRAYER

WHEREFORE, Oncor respectfully requests that the Commission sustain these Objections and relieve Oncor of any duty to respond to Complainant's First RFIs, and grant Oncor such other relief to which it may show itself justly entitled.

Respectfully submitted,

Oncor Electric Delivery Company LLC



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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been served on all parties of record in this proceeding on this the 6th of April, 2015.



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- COMPLAINANT RFI 1-1:** Since the filing of Oncor's Annual Vegetation Management Report, has any Oncor person prepared, or approved, any document authorizing, directing or approving any Oncor person to engage in, direct, order, or contract for services for, any tree pruning to a ten feet (or more) clearance distance from any Oncor conductors energized at 600 volts or more? Provide a true copy of any such document.
- COMPLAINANT RFI 1-2:** What report, study, analysis, or other document has any Oncor person prepared, performed or relied upon that expressly supports Oncor's use of a clearance distance concerning "a minimum of seven to ten feet from conductors energized at 600 volts or more" as stated in Oncor's Annual Vegetation Management Report? Provide a true copy of any such document.
- COMPLAINANT RFI 1-3:** What are all of the circumstances and the standards under which Oncor prunes, authorizes or directs the pruning of Oncor customer trees to: (a) a minimum clearance distance of seven feet from Oncor conductors energized at 600 volts or more; and (b) a clearance distance of ten feet from Oncor conductors energized at 600 volts or more. Provide a true copy of any document concerning such circumstances and standards.
- COMPLAINANT RFI 1-4:** Did Oncor have on February 11, 2015 any vegetation management contract, or other tree pruning understanding or agreement, with Wright Tree Service Company concerning the clearance distance to achieve regarding Oncor's electric lines or other facilities? Provide a true copy of any such contract and all documents concerning any such contract, understanding or agreement.
- COMPLAINANT RFI 1-5:** Did any Oncor person provide directly or indirectly to Oncor employees Michele Warner or Grant Winans any order, direction or instruction concerning the pruning of the Complainant's live oak tree? Identify any such person and provide a true copy of any document concerning any such order, direction or instruction.
- COMPLAINANT RFI 1-6:** Has any Oncor person prepared any document, since January 1, 2015, concerning: (a) the Complainant in this proceeding; (b) Complainant's wife; or (c) Complainant's property (in whole or in part and including but not limited to Complainant's live oak tree) located at 6319 Westchester Drive, Dallas, Texas 75205. Provide a true copy of any such document.

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COMPLAINANT RFI 1-7: What is the normal voltage level of the primary Oncor electric line nearest Complainant's property at 6319 Westchester Drive, Dallas, Texas 75205?

COMPLAINANT RFI 1-8: What is the identification number assigned to the Oncor electric feeder serving the properties near Complainant's aforesaid property?

COMPLAINANT RFI 1-9: Has Complainant's live oak tree at his aforesaid property ever damaged or caused an outage of any Oncor electric facilities according to any Oncor document? Provide a true copy of any such document.

COMPLAINANT RFI 1-10: What were all of the reasons Oncor caused Complainant's live oak tree to be side-pruned on February 11, 2015 to a clearance distance of ten feet from Oncor's nearest primary electric line? Provide a true copy of any document concerning such reasons.