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PUC DOCKET NO. 52455

APPLICATION OF ONCOR ELECTRIC	§	
DELIVERY COMPANY LLC TO AMEND	§	
ITS CERTIFICATE OF CONVENIENCE	§	PUBLIC UTILITY COMMISSION
AND NECESSITY FOR THE OLD	§	
COUNTRY SWITCH 345-KV TAP	§	OF TEXAS
TRANSMISSION LINE IN ELLIS	§	
COUNTY	§	

**CHAMBERS CREEK RANCH’S FIRST SET OF REQUESTS FOR INFORMATION TO
ONCOR ELECTRIC DELIVERY COMPANY**

Chambers Creek Ranch’s, (“Chambers Creek Ranch”), First Set of Requests for Information ("RFIs") to Oncor Electric Delivery Company, LLC (“Oncor” or “Company”) is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) days of service hereof or no later than **October 21, 2021** or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. “Oncor Electric Delivery Company, LLC,” “Oncor,” the “Company,” and “Applicant” refer to Oncor Electric Delivery Company and its affiliates.
2. “You,” “yours,” and “your” refer to Oncor Electric Delivery Company, LLC (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 Electric Delivery Company.

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 Electric Delivery Company 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.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

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 Electric Delivery Company, LLC 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 Electric Delivery Company, LLC 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 Electric Delivery Company, LLC 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 LAW & ASSOCIATES, PLLC

PO Box 302799
Austin, Texas 78703
4524 Burnet Road
Austin, Texas 78756
(512) 474-1492 (voice)
(512) 474-2507 (fax)

By: /s/Alfred R. Herrera

Alfred R. Herrera
State Bar No. 09529600
aherrera@herreralawpllc.com

Sergio E. Herrera
State Bar No. 24109999
sherrera@herreralawpllc.com

service@herreralawpllc.com

**ATTORNEYS FOR CHAMBERS CREEK
RANCH**

CERTIFICATE OF SERVICE

I hereby certify that on this the 1st day of October 2021, a true and correct copy of the *Chambers Creek Ranch's First Set of RFIs to Oncor* was served upon all parties of record in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/Leslie Lindsey

Leslie Lindsey

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- 1-1. Please provide a complete electronic copy of the Geographic Information System (“GIS”) Shapefiles/Geodatabase used by Freese and Nichols, Inc., to perform the Environmental Assessment and Alternative Route Analysis presented as Attachment 1 of the Application.
- 1-2. Please provide a complete electronic copy, preferably in Microsoft Excel format, of the cost model utilized to create the estimated costs shown in Application Attachment 2. Please leave all formulae and links intact. In addition, please provide a detailed explanation of the methodology utilized to arrive at the costs shown in Application Attachment 2.
- 1-3. Where not provided elsewhere in response to this request for information, please provide all Application Attachments in their complete, electronic, and native format. If applicable, please provide in Microsoft Excel format with all formulas and links intact.
- 1-4. Please provide in electronic format, preferably Microsoft Excel, Attachment 7 to the Application.
- 1-5. Please provide in electronic format, preferably Microsoft Excel, Table 7-2, the Environmental Data for the Alternative Evaluation, which are contained in Application Attachment 1.
- 1-6. Please provide the Environmental Data for Alternative Route Evaluation for each of the proposed segments in Microsoft Excel format. This table should be in the same format at Table 7-2, but with data for each segment.
- 1-7. Please provide a detailed narrative explaining the decisions, circumstances, and rationale for selecting the Study Area presented in Oncor’s Application.

- 1-8. Please provide:
- a. A detailed narrative explaining if Oncor considered any alternative Study Areas. If alternative Study Areas were considered, please identify these locations on a map or with GIS data;
 - b. For any alternative Study Areas were considered but not selected, please provide a detailed narrative explaining rejection of any/all such Study Areas.
- 1-9. Please provide a detailed narrative explaining the decisions, circumstances, and rationale for selecting the location of the proposed Oystercatcher substation.
- 1-10. Please provide a detailed narrative explaining the decisions, circumstances, and rationale for selecting the location of the proposed Old Country switch station.
- 1-11. Please provide a detailed narrative explaining the decisions, circumstances, and rationale for selecting the location of the proposed Old Country switch station
- 1-12. Please provide:
- a. A detailed narrative explaining if Oncor considered any alternative locations of either the Oystercatcher substation or the Old Country switch station. If alternative locations were considered, please identify these locations on a map or with GIS data;
 - b. For any alternative locations considered but not selected, please provide a detailed narrative explaining rejection of any/all such locations.
- 1-13. Please provide all correspondence, including e-mails and texts, between Oncor and Oystercatcher Solar, LLC, including such correspondence to or from any of Oystercatcher Solar, LLC's owners, partners, members, and affiliates, as it relates to the proposed project.
- 1-14. Please state whether Oystercatcher Solar, LLC, including any of Oystercatcher Solar, LLC's owners, partners, members, or affiliates offered to provide a contribution to Oncor related to the proposed transmission-line project. If so, please provide a detailed narrative explaining such offer and whether Oncor accepted the offer or rejected the offer.
- 1-15. Please provide a detailed narrative explaining if Oncor gave consideration to the Old Country Switch being located at or near the intersection of Segments GGG and ZZ1.
- 1-16. Please provide a detailed narrative explaining if it is feasible for the Old Country Switch to be located at or near the intersection of Segments GGG and ZZ1.

- 1-17. Please consider an alternate route, named Route 158, consisting of the following combination of segments, A-T-EEE-EEE1-CCC-XX-WW-VV-JP-NN-OO.
- Please provide Oncor's best available estimates of the route evaluation criteria for this alternative route in the same format as Table 7-2, Environmental Data for Alternative Route Evaluation, which is contained in Application Attachment 1, Environmental Assessment and Route Analysis.
 - Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 2, Cost Estimates.
 - If Oncor is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.
- 1-18. Please consider an alternate route, named Route 159, consisting of the following combination of segments, A-T-U1-DDD-EEE1-CCC-XX-WW-VV-JP-NN-OO.
- Please provide Oncor's best available estimates of the route evaluation criteria for this alternative route in the same format as Table 7-2, Environmental Data for Alternative Route Evaluation, which is contained in Application Attachment 1, Environmental Assessment and Route Analysis.
 - Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 2, Cost Estimates.
 - If Oncor is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.
- 1-19. Please consider an alternate route, named Route 160, consisting of the following combination of segments, A-T-EEE-EEE1-GGG, which terminates at a new hypothetical location of the Old Country Switch at the intersection of GGG and ZZ1.
- Please provide Oncor's best available estimates of the route evaluation criteria for this alternative route in the same format as Table 7-2, Environmental Data for Alternative Route Evaluation, which is contained in Application Attachment 1, Environmental Assessment and Route Analysis.
 - Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 2, Cost Estimates.
 - If Oncor is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.

- 1-20. Please consider an alternate route, named Route 161, consisting of the following combination of segments, A-T-U1-DDD-EEE1-GGG, which terminates at a new hypothetical location of the Old Country Switch at the intersection of GGG and ZZ1.
- a. Please provide Oncor's best available estimates of the route evaluation criteria for this alternative route in the same format as Table 7-2, Environmental Data for Alternative Route Evaluation, which is contained in Application Attachment 1, Environmental Assessment and Route Analysis.
 - b. Please provide Oncor's best available cost estimate for this alternative route in the same format as the cost estimates provided in Application Attachment 2, Cost Estimates.
 - c. If Oncor is not willing to construct its proposed transmission line on this alternative route, please explain in detail why not.