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#### **PUC DOCKET NO. 52455**

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

# SUPPLEMENTAL RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO CHAMBERS CREEK RANCH'S FIRST REQUEST FOR INFORMATION, QUESTION NO. 1-13

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Oncor Electric Delivery Company LLC ("Oncor") files this supplemental response to the aforementioned requests for information.

# I. Written Responses

Attached hereto and incorporated herein by reference are Oncor's written supplemental responses to the aforementioned requests for information. Each such response is set forth on or attached to a separate page upon which the request has been restated. Such responses are also made without waiver of Oncor's right to contest the admissibility of any such matters upon hearing. Oncor hereby stipulates that its responses may be treated by all parties exactly as if they were filed under oath.

# II. Inspections

In those instances where materials are to be made available for inspection by request or in lieu of a written response, the attached response will so state. For those materials that a response indicates may be inspected at the Austin voluminous room, please call at least 24 hours in advance for an appointment in order to assure that there is sufficient space and someone is available to accommodate your inspection. To make an appointment at the Austin voluminous room, located at 1005 Congress, Suite 700,

Austin, Texas, or to review those materials that a response indicates may be inspected at their usual repository, please call Joni Price at 214-486-2844. Inspections will be scheduled so as to accommodate all such requests with as little inconvenience to the requesting party and to company operations as possible.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

It is hereby certified that a copy of the foregoing has been served by email on all parties of record who have provided an email address, on this the 5th day of November, 2021, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

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#### SUPPLEMENTAL RESPONSE

#### Request

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.

#### **Supplemental Response**

The following supplemental response was prepared by or under the direct supervision of Brenda J. Perkins, the sponsoring witness for this response.

Pursuant to an agreement between Oncor and counsel for Chambers Creek Ranch, Oncor is providing emails and texts identified as responsive to this request by November 5, 2021.

The information requested is voluminous and will be made available electronically to the propounding party and any other party after execution of a certification to be bound by the modified protective order to be issued in this docket. Portions of the information are confidential or highly sensitive and will be made available only after execution of a certification to be bound by the modified protective order to be issued in this docket. Indices of the voluminous, confidential, and highly sensitive information are included in Attachments 1, 2 and 3.

#### **ATTACHMENTS**

ATTACHMENT 1 – Voluminous Index – 1 page

ATTACHMENT 2 – Voluminous Confidential Index – 1 page

ATTACHMENT 3 - Voluminous Highly Sensitive Index - 1 page

DOCKET 52455 ATTACHMENT 1
TO CHAMBERS CREEK RANCH'S RFI SET NO. 1
QUESTION NO 1-13
SUPPLEMENT (11-5-2021)

#### **VOLUMINIOUS INDEX**

- 1. Emails and attachments of Bao Pham 14 pages
- 2. Emails and attachments of Eileen Weaver 1718 pages
- 3. Emails and attachments of Henry Ugbekile 6 pages
- 4. Emails and attachments of Ife Adetoro 25 pages
- 5. Emails and attachments of Jacob Lewis 54 pages
- 6. Emails and attachments of Thomas Yamin 76 pages
- 7. Emails and attachments of Chris Reily 212 pages
- 8. Emails and attachments of Sandy Bowen 44 pages
- 9. Emails and attachments of Stacy Corrie 2 pages
- 10. Emails and attachments of Travis Besier 61 pages
- 11. Eileen Weaver text messages 3 pages
- 12. Travis Besier text messages 5 pages

DOCKET 52455 ATTACHMENT 2 TO CHAMBERS CREEK RANCH'S RFI SET NO. 1 QUESTION NO 1-13 SUPPLEMENT (11-5-2021)

## **VOLUMINIOUS CONFIDENTIAL INDEX**

- 1. Emails with attachments of Bill Moorse 16 pages
- 2. Emails with attachments of Eileen Weaver 245 pages
- 3. Emails with attachments of Jacob Lewis 121 pages

DOCKET 52455 ATTACHMENT 3 TO CHAMBERS CREEK RANCH'S RFI SET NO. 1 QUESTION NO 1-13 SUPPLEMENT (11-5-2021)

#### **VOLUMINIOUS HIGHLY SENSITIVE INDEX**

- 1. Emails and attachments of Bill Moorse 49 pages
- 2. Emails and attachments of Eileen Weaver 1633 pages
- 3. Emails and attachments of Henry Ugbekile 15 pages
- 4. Emails and attachments of Ife Adetoro 110 pages
- 5. Emails and attachments of Jacob Lewis 167 pages
- 6. Emails and attachments of Alex Mace 35 pages
- 7. Emails and attachments of Thomas Yamin 260 pages
- 8. Emails and attachments of Keeton Bailey 16 pages
- 9. Emails and attachments of Ramsey Ayass 8 pages
- 10. Emails and attachments of Chris Reily 599 pages
- 11. Emails and attachments of Sandy Bowen 32 pages