



## Filing Receipt

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**SOAH DOCKET NO. 473-22-0768**  
**PUC DOCKET NO. 52455**

<b>APPLICATION OF ONCOR ELECTRIC</b>	§	
<b>DELIVERY COMPANY LLC TO AMEND</b>	§	<b>BEFORE THE STATE OFFICE</b>
<b>ITS CERTIFICATE OF CONVENIENCE</b>	§	
<b>AND NECESSITY FOR THE OLD</b>	§	<b>OF</b>
<b>COUNTRY SWITCH 345-KV TAP</b>	§	<b>ADMINISTRATIVE HEARINGS</b>
<b>TRANSMISSION LINE IN ELLIS</b>	§	
<b>COUNTY</b>	§	

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

Chambers Creek Ranch’s, (“Chambers Creek Ranch”), Second 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 **December 1, 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](mailto:aherrera@herreralawpllc.com)

Sergio E. Herrera  
State Bar No. 24109999  
[sherrera@herreralawpllc.com](mailto:sherrera@herreralawpllc.com)

[service@herreralawpllc.com](mailto:service@herreralawpllc.com)

**ATTORNEYS FOR CHAMBERS CREEK  
RANCH**

## CERTIFICATE OF SERVICE

I hereby certify that on this the 10th day of November 2021, a true and correct copy of the *Chambers Creek Ranch's Second 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

**SOAH DOCKET NO. 473-22-0768  
PUC DOCKET NO. 52455**

<b>APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE OLD COUNTRY SWITCH 345-KV TAP TRANSMISSION LINE IN ELLIS COUNTY</b>	§ § § § § § §	<b>BEFORE THE STATE OFFICE  OF  ADMINISTRATIVE HEARINGS</b>
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**CHAMBERS CREEK RANCH’S SECOND SET OF REQUESTS FOR INFORMATION  
TO ONCOR ELECTRIC DELIVERY COMPANY**

- 2-1 Please refer to Oncor’s response to Chambers Creek RFI 1-12.
- a. Please provide all information, studies, reports, analyses, etc., that support Oncor’s decision to not construct the substation at Option 3.
  - b. Please confirm that Oncor owns or has an easement along the ROW of the existing Venus Switch – Navarro Switch 345 kV transmission Line.
  - c. Please confirm that Oncor could access Substation Option 3 via the ROW of the existing Venus Switch – Navarro Switch 345-kV transmission line.
  - d. Please provide any and all photographs Oncor has of the site near Substation Option 3.
  - e. Please provide any topographical maps Oncor has of the site near Substation Option 3, that would support Oncor’s characterization of the site have “undesirable topography.”
  - f. Please provide a detailed narrative explaining what makes the topography of Substation Option 3 “undesirable.”
  - g. Please confirm that Substation Option 3 is not in a FEMA floodplain. If this cannot be confirmed, please provide a detailed narrative explaining the response.
  - h. Please provide the Google Earth files used to create ATTACHMENT 1 - Old Country Switch Station Locations Map.
- 2-2 Please refer to Oncor’s response to Chambers Creek RFI 1-19b.
- a. Please confirm that Route 160 is \$2.1 million (20%) less expensive than Route 54, the least expensive route included in Oncor’s Application.
  - b. Please provide all studies and/or analyses that support Oncor’s claim that the hypothetical substation location would result in “substantial additional costs.”
  - c. Please provide a detailed narrative explaining the “unique topography” of the hypothetical substation location.

- d. Please provide Oncor's estimate of the cost of the hypothetical substation such that it can be directly compared to the \$7.825 million cost estimate of Oncor's proposed location of the Old Country Switch.
  - e. Please confirm that Oncor has access to the ROW on the Venus Switch – Navarro Switch 345-KV transmission line.
  - f. Please explain why this substation location would require a different layout than the location selected by Oncor.
  - g. Please provide the detailed engineering design/layout of the Old Country Switch at the location selected by Oncor.
- 2-3 Please refer to Oncor's response to Chambers Creek RFI 1-16.
- a. Please provide a detailed explanation of what makes this substation location "less reliable."
  - b. Please provide any and all studies, reports, analyses, etc., that support Oncor's assertion that this substation location is less reliable.
  - c. Please provide any and all studies, reports, analyses, GIS data, etc., that support Oncor's assertion that this substation location has sub-optimal terrain.
  - d. Please provide any and all studies, reports, analyses, GIS data, etc. that supports Oncor's assertion that this substation location is "more flood prone than the location selected by Oncor."
  - e. Please confirm that if the Commission required Oncor to construct the Old Country Switch at this location, it would do so.
- 2-4 Please provide Application Attachment 1 and all of its Appendices in the complete and original native PDF format. Note that this is not on the PUC Interchange in complete or native format.