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

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

INTERVENOR LONE STAR TEXAS LAND & CATTLE COMPANY, LLC’S
FIRST REQUEST FOR INFORMATION FROM ONCOR ELECTRIC DELIVERY
COMPANY LLC

Pursuant to Sections 22.141 and 22.144 of the Public Utility Commission’s Procedural Rules, Intervenor Lone Star Texas Land & Cattle Company, LLC (“Lone Star”) requests that ONCOR Electric Delivery Company LLC (“ONCOR”) provide responses to the following Requests for Information (RFI) and stipulate in writing that all responses can be treated exactly as though they were filed under oath. Under Section 22.144(c)(1), ONCOR must fully respond to these RFIs within twenty (20) days of receipt of the Requests. If any RFI appears ambiguous, please contact counsel for Lone Star to obtain clarification.

Pursuant to P.U.C. PROC. R. § 22.144(c), each response must identify the preparer or person under whose direct supervision the response was prepared, and the sponsoring witnesses, if any. In addition, each request must be answered separately and be preceded with the appropriate question.

Pursuant to P.U.C. PROC. R. § 22.144(i), ONCOR is under a duty to supplement any response that, in light of newly discovered information, modifies or makes incomplete an answer already supplied to Lone Star within five days of the discovery of the new information.

The answers must have sufficient detail to fully present all the relevant facts. Lone Star requests that ONCOR provide the answers in the order in which they are listed in this request for information. If responses to all the requests cannot be provided quickly, Lone Star requests that each item of information be provided as it is available or completed.

Unless written requests for clarification are received by the undersigned, it shall be presumed that all requests are fully and completely understood.

If the items requested to be produced herein have already been provided in other discovery answers to any party, it shall not be necessary to duplicate such production. It shall be sufficient that the answer containing the requested information is clearly identified. Where only a portion of the requested information has been previously provided, this shall be disclosed and all information necessary to fully and completely answer this discovery request shall be provided in your answer.

If the requested document is found in the public records of the PUC or other governmental agency, the answering party shall describe the exact location, file name, and custodian from whom the specific referenced document can be obtained.

DEFINITIONS

1. “Applicant,” “you,” “the utility”, “ONCOR” refers to ONCOR Electric Delivery Company LLC. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

2. “Application” means the application by ONCOR Electric Delivery Company LLC to amend its certificate of convenience and necessity for the Old Country Switch 345-kV Tap Transmission Line Project in Ellis County Texas, docketed as SOAH Docket No. 473-22-0768, PUC Docket No. 52455.

3. “Communication” means any oral, written, or electronic statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, or symposium of which ONCOR has knowledge, information or belief.

4. “Concerning” means, in whole or in part, directly or indirectly, referring to, relating to, being connected with, commenting on, responding to, showing, describing, analyzing, reflecting embodying, mentioning, or constituting the subject matter identified in the request.

5. “Date” means the exact day, month, and year, if ascertainable or, if not, the best approximation.

6. “Describe” or “identify” when used in reference to a document, means you must state, to the fullest extent possible, the following:

- a. The nature (e.g. letter, handwritten note) of the document;
- b. The title or heading that appears on the document;
- c. The date of the document and the date of each addendum, supplement, or other addition or change;
- d. The identity of the author of the document; any signatory or signatories of the document; and the person on whose behalf or at whose request or direction the document was prepared or delivered; and
- e. The present location of the document, and the name, address, position or title, and telephone number(s) of the person(s) having custody of the document.

7. The terms “document” or “documents” are used in their broadest sense to include, but not be limited to, all written or graphic matter of every kind and description whether printed, produced, or reproduced, by any process whether visually, magnetically, mechanically, electronically, or by hand, whether final or draft, original or reproduction, whether privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody or control. These shall also be construed to include every copy of a document where the copy contains any commentary or notation of any kinds that does not appear on the original or any other copy.

8. The words “link” and segment” reference the individually numbered/lettered portions of the preferred and alternative routes described in the Application.

9. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

10. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

11. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

12. The term “including” means “including, but not limited to.”

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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**ATTORNEYS FOR LONE STAR TEXAS
LAND & CATTLE COMPANY, LLC**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on December 21, 2021 in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/Patrick L. Reznik

Patrick L. Reznik

REQUESTS FOR INFORMATION

Lone Star RFI No. 1-1.

Please review **Attachment 1** to this First Request for Information where in the pinkish line represents a modification to Segment DDD. Please consider an alternate route, named “Route 145-Mod” constructed using Segments A, T, **DDD-Mod**, EEE1, CCC, XX, WW, UU, TT, QQ, OO.

- 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.

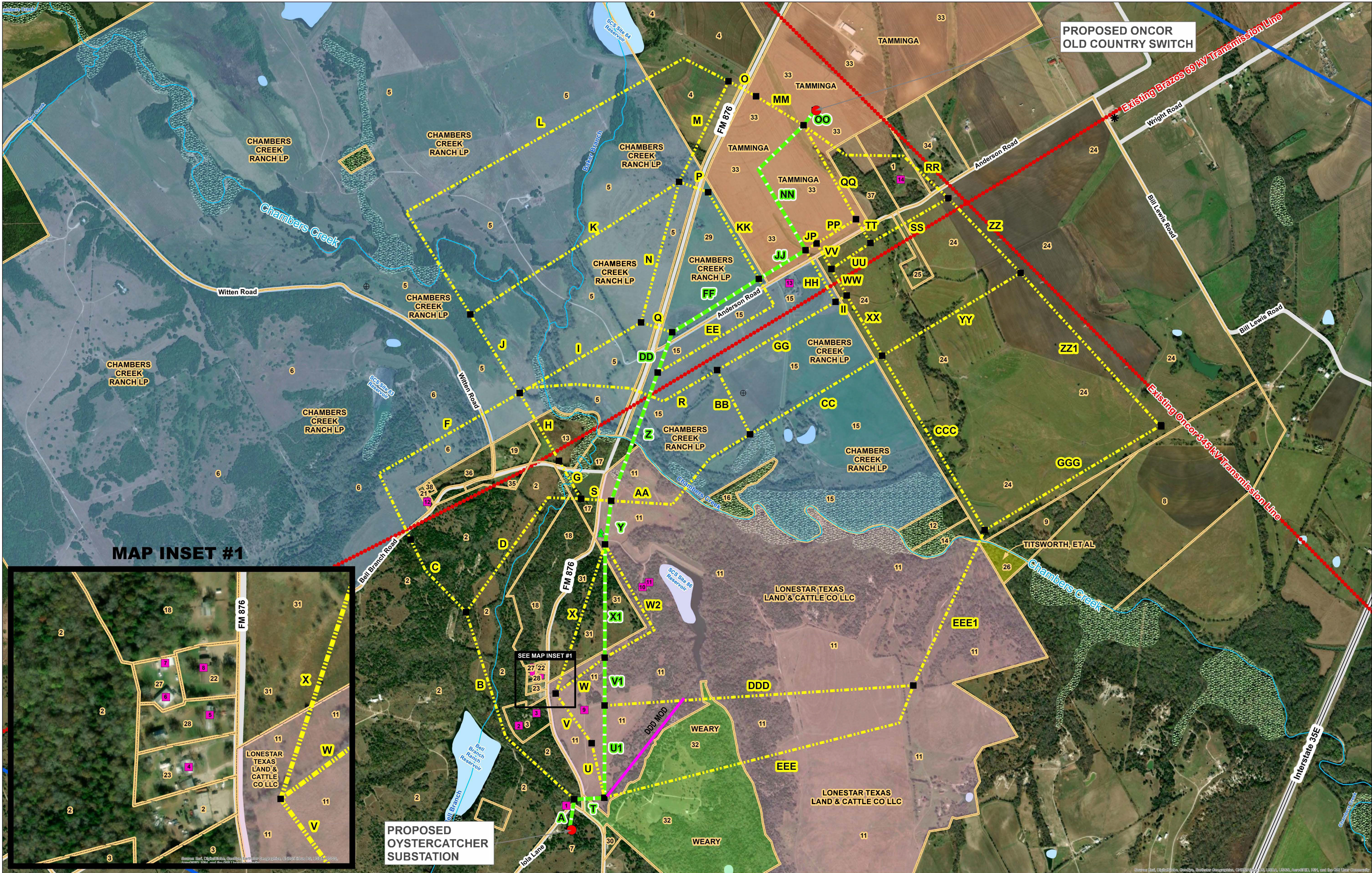
Response:

Lone Star RFI No. 1-2.

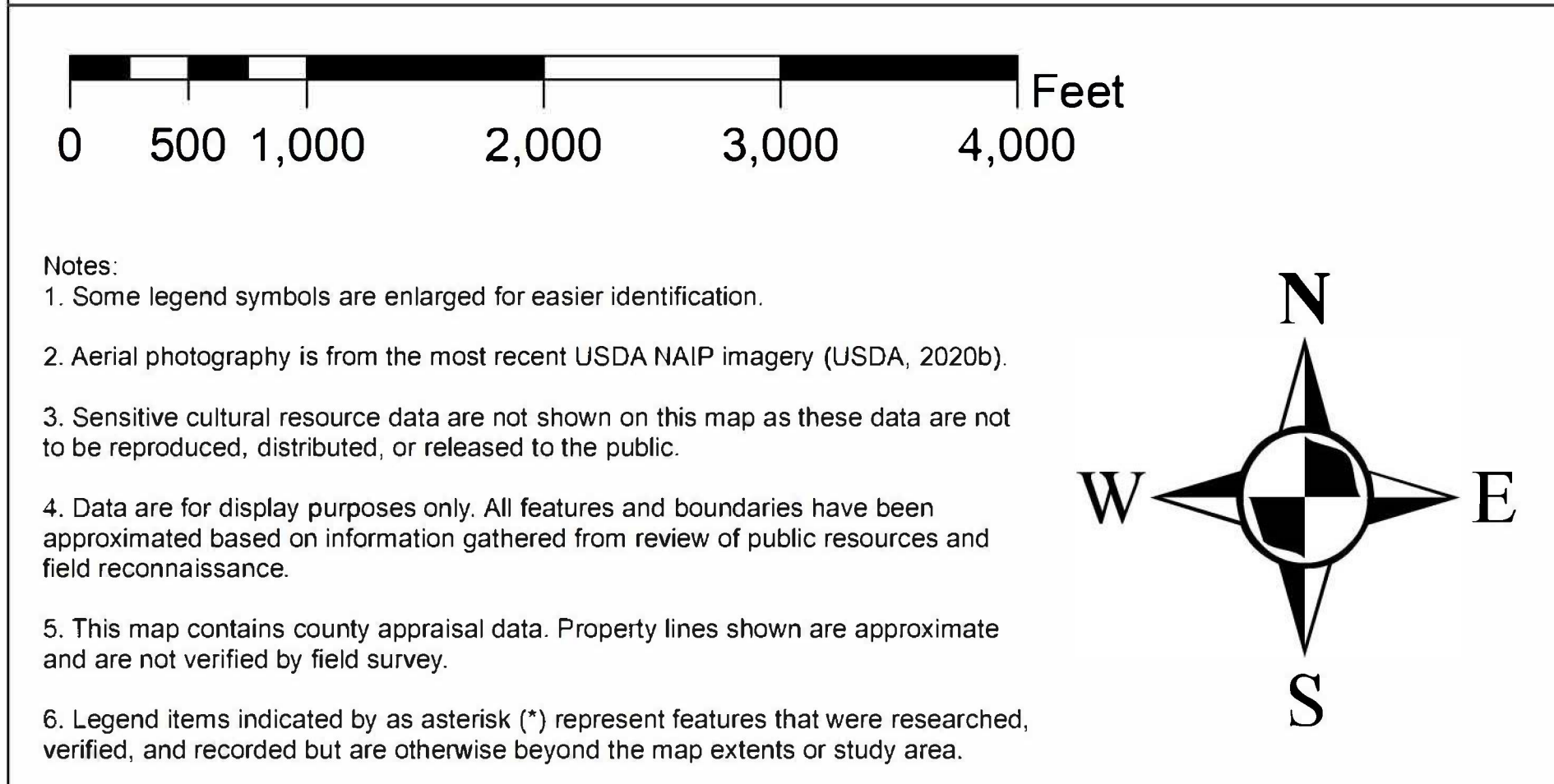
Please consider an alternate route, named “Route 152” constructed using Segments A, T, U1, DDD, EEE1, CCC, XX, WW, UU, TT, QQ, OO.

- 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.

Response:



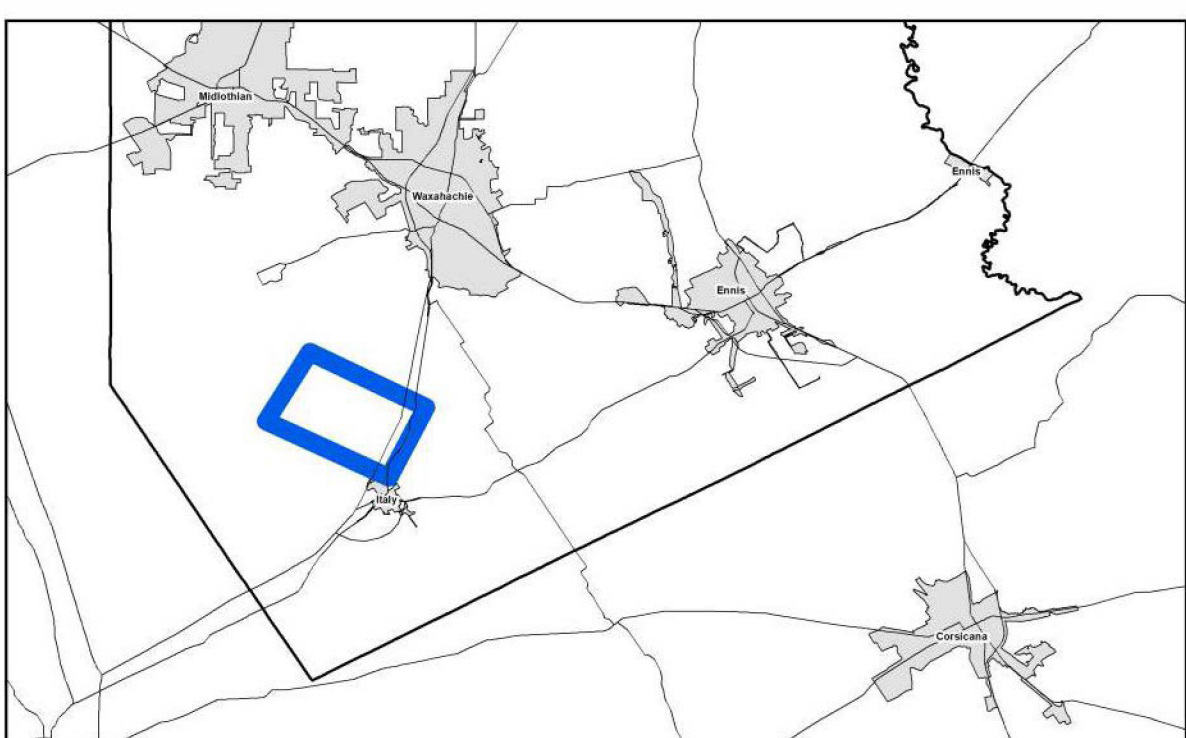
OLD COUNTRY SWITCH 345 kV TAP TRANSMISSION LINE PROJECT INTERVENOR MAP



Legend

- | | | |
|--------------------------|--|---------------------------------------|
| Habitable Structures | Project Endpoints | Waterbody/Open Water |
| Electronic Installation* | Proposed Alternative Route Links | Tract Boundary and Number |
| Water Well* | Recommended Route 54 (A-T-U1-V1-X1-Y-Z-DD-FF-JJ-NN-OO) | Potential wetland areas (USFWS, 2020) |
| Historical Marker* | Existing Transmission Line | City Limits* |
| Cemetery | Major Roads | Study Area |
| Airport/Airstrips* | Minor Roads | |
| Helicopter Pad* | Rivers and Streams | |
| Traveling Irrigation* | | |

Extent Map



Vicinity Map

