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APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE RAMHORN HILL – DUNHAM 345 KV TRANSMISSION LINE IN DENTON AND WISE COUNTIES	§ § § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**LA ESTANCIA INVESTMENTS, L.P.’S FIRST SET OF REQUESTS FOR
INFORMATION TO ONCOR ELECTRIC DELIVERY COMPANY, LLC**

La Estancia Investments, L.P. (“La Estancia”) serves this First Set of Requests for Information (“RFI”) on Oncor Electric Delivery Company, LLC.

DEFINITIONS

The following definitions apply to each of the RFIs, instructions, and definitions set forth in this document:

1. The term “Oncor” shall mean Oncor Electric Delivery Company, LLC and its representatives.
2. The term “La Estancia” shall mean La Estancia Investments, L.P. and its representatives.
3. The term “Transmission Line” shall mean Oncor’s proposed transmission line from the Ramhorn Hill Substation to the Dunham Substation
4. The term “representatives,” as used in Definitions 1-3 above, includes all employees, officers, directors, independent contractors, in-house counsel, outside counsel, or other persons acting on the entity’s behalf, including without limitation, representatives of the entity’s parent company, subsidiary, affiliates, members, or managers.
5. The term “communication” shall include all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters, electronic mail (e-mail), modem transfers, and all memoranda or other documents concerning the requested item. When 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 or its representatives.
6. “Documents” refers to all writings and records of every type, including e-mails or other

electronic media, in the possession, control, or custody of Oncor, whether produced or stored by any process, including magnetically or electronically. "Documents" shall also refer to copies of documents, even though the originals of those documents are not in the possession, custody, or control of Oncor, every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy, and all attachments to any documents.

7. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, La Estancia specifically requests production of electronic or magnetic data (included in the definition of document) that is responsive to a request be produced on CD-ROM, DVD, or USB in a format that is compatible with Adobe Acrobat, Microsoft Word, or Microsoft Excel. If a particular type of data cannot be made compatible with these formats, please confer with the attorney(s) listed in the General Instructions to determine a mutually agreeable format.
8. The term "e-mail" includes the entire string and all attachments found anywhere in the e-mail string.
9. The term "concerning" includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

GENERAL INSTRUCTIONS

The following General Instructions apply to each of the RFIs by La Estancia:

1. Please provide all narrative responses in hard copy, on separate pages for each response, with the question restated at the top of the page. Where possible, please also provide responses via e-mail including all exhibits that are electronically available.
2. For each responsive answer, please identify the individual(s) responsible for its preparation, and the witness sponsoring the answer provided.
3. If a data request can be answered in whole or in part by reference to the response to a preceding or subsequent data request, including data requests of Commission Staff and other parties, so indicate. Specify the preceding or subsequent data request by participant or party and by number, and state whether it is claimed that the response to the preceding or subsequent data request is a full response to the instant data request. If not, furnish the balance of the response needed to complete a full reply.
4. In the event any document requested in this request is unavailable, describe in detail the reasons the document is unavailable.
5. When an RFI requests copies of previously filed testimony, please provide either: (a) an electronic or paper copy of the testimony itself; or (b) sufficient information for La Estancia to retrieve the testimony from a publicly available source, including: (i) the jurisdiction in which the testimony was filed; (ii) the docket number of the proceeding in which the testimony was filed; (iii) the date the testimony was filed; and (iv) if available,

an electronic link to the testimony itself, rather than just a link to the jurisdiction's website.

6. When producing documents pursuant to these RFIs, designate on the document or group of documents the RFI(s) in response to which the document(s) are produced.
7. In answering any of these RFIs, if there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact Ron Moss at:

Winstead P.C.
401 Congress Avenue, Suite 2100
Austin, Texas 78701
Telephone: (512) 370-2867
Facsimile: (512) 370-2850
Email: rhmos@winstead.com

If that is not possible, set forth the language deemed to be ambiguous and the interpretation chosen or used in responding to the request.

8. These data requests are continuing in nature and require supplemental responses when further or different information with respect to any of them is obtained.
9. Use of the singular or plural word form in a data request is not to be interpreted to exclude information or documents from the scope or intent of the specific request.
10. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these requests any information or documents which might otherwise be considered to be beyond their scope.
11. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner
 - (a) the reason for withholding;
 - (b) the date of the document;
 - (c) a brief description of the document;
 - (d) the name of each author or preparer;
 - (e) the name of each person who received the document; and
 - (f) a statement constituting the basis for withholding the document.
12. If Oncor declines to respond to any request for information or data on the basis of privilege, please state as to each such request an explanation for the refusal. Identify those documents and communications that are withheld from the response to each specific data request. The identification shall be served within the time specified by the presiding examiner for this proceeding and in accordance with the Rules of the Commission, and shall:
 - (a) specify the date of the document, its author(s) (with title and designation if an attorney), and recipients (with title and designation if an attorney);
 - (b) contain a brief summary of the subject matter of the document; and
 - (c) contain a brief statement of the reason that, in your opinion, the assertion of privilege is justified.

13. Please provide responses as they become available.

Respectfully submitted,

WINSTEAD PC

By: /s/ Ron H. Moss

Ron H. Moss

State Bar No. 14591025

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512.370.2800 phone

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ATTORNEYS FOR LA ESTANCIA

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 22nd day of August, 2023, in accordance with the Order Suspending Rules in Project No. 50664.

By: /s/ Ron H. Moss

LA ESTANCIA'S FIRST SET OF REQUESTS FOR INFORMATION TO ONCOR

Question No. La Estancia 1-1:

In the eastern quadrant of the Transmission Line, please assume a route that proceeds from Link C1 to C21, but instead of the route continuing to Link 23, please assume that immediately after the railroad track, Link C21 turns and proceeds in a southeasterly direction parallel to the railroad track until it intersects with Link 3. Please also assume that the route proceeds along Link C3 directly along the north side of FM 1171 to Link C6. For a visual representation of that route, which is referred to herein as "La Estancia Alternative Route 1," please refer to Attachment A to these RFIs. La Estancia Alternative Route 1 is depicted on Attachment A by the black dotted line. Please provide:

- a. the cost of La Estancia Alternative Route 1 as compared to the corresponding links for Route 179;
- b. all environmental data for La Estancia Alternative Route 1;
- c. all land planning data for La Estancia Alternative Route 1; and
- d. the engineering feasibility for La Estancia Alternative Route 1.

Question No. La Estancia 1-2:

In the eastern quadrant of the Transmission Line, please assume a route that proceeds along Links E-6, G-5, and F-1. Please assume that Link E-6 is placed directly along the right of way of FM 1171, and please assume that Links G-5 and F-1 are placed directly along the right of way of IH 35W, as shown by the black dotted line on Attachment B to these RFIs. For that alternative route, which is referred to herein as "La Estancia Alternative Route 2," please provide:

- a. the cost of La Estancia Alternative Route 2 as compared to the corresponding links for Route 179;
- b. all environmental data for La Estancia Alternative Route 2;
- c. all land planning data for La Estancia Alternative Route 2; and
- d. the engineering feasibility for La Estancia Alternative Route 2.



