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**SOAH DOCKET NO. 473-23-21216
PUC DOCKET NO. 55067**

APPLICATION OF ONCOR ELECTRIC DELIVERY 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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**DENTON COUNTY LAND AND CATTLE LP AND DENTON COUNTY
LAND AND CATTLE 2’S REQUEST FOR INFORMATION TO
ONCOR ELECTRIC DELIVERY COMPANY LLC**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, Denton County Land and Cattle LP and Denton County Land and Cattle 2, (“Denton”) files their First Set of Requests for Information (“RFI”) to the Oncor Electric Delivery Company LLC (“Oncor”).

Pursuant to 16 TAC § 22.144(c)(2), Denton requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to 16 TAC § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. Denton further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested. All information responsive these requests

should be sent to the following persons via e-mail or overnight courier, on a piecemeal basis as individual items become available:

Respectfully submitted,

JACKSON WALKER LLP

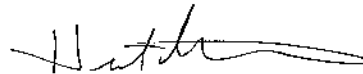


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**ATTORNEY FOR DENTON COUNTY
LAND AND CATTLE LP AND DENTON
COUNTY LAND AND CATTLE 2**

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on the 25th day of August, 2023 via the Commission's Interchange in accordance with the Commission's Second Order in Docket No. 50664 suspending PUC Procedural Rule 22.74.



Heath D. Armstrong

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APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE STATE OFFICE
DELIVERY LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE AND	§	
NECESSITY FOR THE	§	OF
RAMHORN HILL – DUNHAM 345 KV	§	
TRANSMISSION LINE IN DENTON AND	§	
WISE COUNTIES	§	ADMINISTRATIVE HEARINGS

DEFINITIONS AND INSTRUCTIONS

A. “Oncor,” “Applicant,” and “you” refers to the Oncor Electric Delivery Company LLC and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons, its affiliates and subsidiaries, and any successors or assigns of either entity.

B. The terms “document” or “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced, reproduced or stored by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. The definition includes electronic information that has been deleted. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Denton specifically request that any electronic or magnetic information (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-ROM in a format that is compatible with Adobe Acrobat, Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable .pdf copy of the entire email string. Attachments to emails should be provided with the email in searchable .pdf form, unless it is stored in a different format, in which the attachment should be produced in its native format and provided on CD-Rom.

D. The terms “and” or “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

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

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, 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.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. 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.

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

K. 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 of copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, work papers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

N. The term “emails” includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph C. regarding specific instructions for producing such items.

O. “Communications” refers to correspondence of any kind, including emails.

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REQUESTS FOR INFORMATION

DCLC 1-1 Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 1 below. Also assume in your response that any and all landowners directly impacted by the proposed route segment modifications have consented to the modifications presented. Based on the segment modifications presented below, please provide the following:

- a. The difference in cost associated with Oncor constructing modified route segments M1 and M5 compared to the segments as originally proposed by Oncor in its application as well as the total cost of the modified segments;
- b. Any and all associated land use data for modified route segment M1 and M5, including any impediment identified by Oncor or Halff to constructing modified segments M1 and M5 as depicted in Figure 1 that was not present for segments M1 and M5 as originally proposed by Oncor;
- c. Any and all associated environmental data for modified route segments M1 and M5, including any impediment identified by Oncor or Halff to constructing modified segments M1 and M5 as depicted in Figure 1 that was not present for segments M1 or M5 as originally proposed by Oncor.

DCLC 1-2 Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 1 below. Also assume in your response that any and all landowners directly impacted by the proposed route segment modifications have consented to the modifications presented. Admit or deny that the proposed modifications to segments M1 and M5 are viable and constructible by Oncor if a route utilizing segments M1 or M5 were approved by the Public Utility Commission of Texas.

DCLC 1-3 Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 2 below. Also assume in your response that any and all landowners directly impacted by the proposed route segment modification have consented to the modification presented. Based on the segment modifications presented below, please provide the following:

- a. The difference in the total cost associated with Oncor constructing the proposed alternate M3 route segments proposed compared to the segment as originally proposed by Oncor in its application as well as the total cost of the alternate M3 route segments presented;
- b. Any and all associated land use data for alternate M3 route segments proposed, including any impediment identified by Oncor or Halff to constructing either of the alternate M3 route segments depicted in Figure 2 that was not previously present for segment M3 as originally proposed by Oncor;
- c. Any and all associated environmental data for the alternate M3 route segments, including any impediment identified by Oncor or Halff to constructing the alternate M3 route segments as depicted in Figure 2 that was not present for segments M3 as originally proposed by Oncor;

DCLC 1-4 Please refer to page 24 of the rebuttal testimony of Russell Marusak; pages 12-13 of the rebuttal testimony of Amy Zapleta; and Figure 1 below. Admit or deny that the proposed modifications to segment M3 are viable and constructible by Oncor if a route utilizing segment M3 were approved by the Public Utility Commission of Texas.

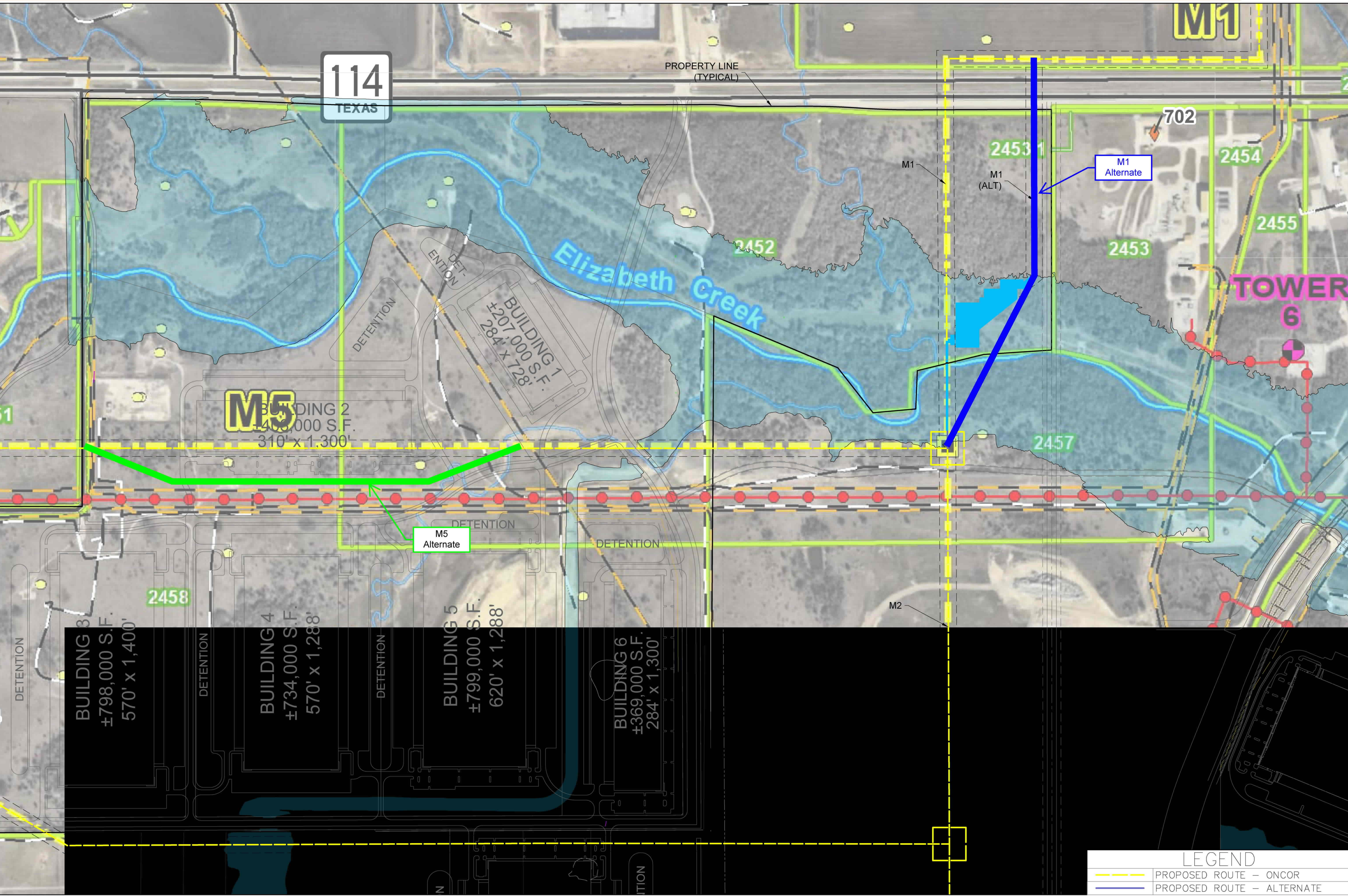
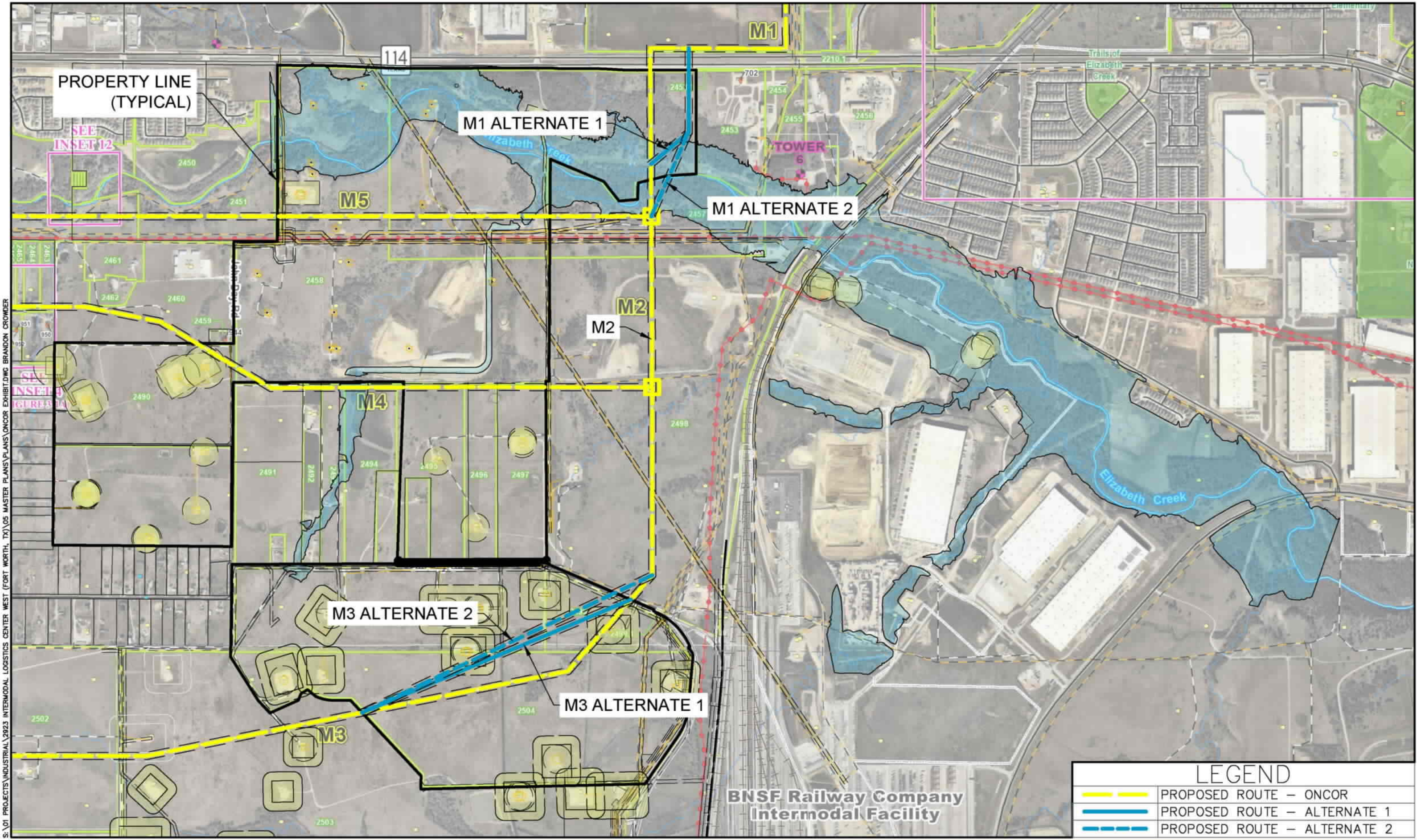


FIGURE 2



S:\01 PROJECTS\INDUSTRIAL\2023 INTERMODAL LOGISTICS CENTER WEST (FORT WORTH, TX)\05 MASTER PLANS\PLANS\ONCOR EXHIBIT.DWG BRANDON CROWDER



S:\01 PROJECTS\INDUSTRIAL\2023 INTERMODAL LOGISTICS CENTER WEST (FORT WORTH, TX)\05 MASTER PLANS\PLANS\ONCOR EXHIBIT.DWG BRANDON CROWDER

