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

APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE
DELIVERY LLC TO AMEND ITS	§	
CERTIFICATE OF CONVENIENCE	§	PUBLIC UTILITY COMMISSION
AND NECESSITY FOR THE	§	
RAMHORN HILL – DUNHAM 345-KV	§	OF TEXAS
TRANSMISSION LINE IN DENTON	§	
AND WISE COUNTIES	§	

**DHL SUPPLY CHAIN'S
FIRST REQUEST FOR INFORMATION TO
ONCOR ELECTRIC DELIVERY LLC**

Pursuant to 16 Tex. Admin. Code §§ 22.141 and 22.144 and SOAH Order No. 2 in this proceeding, Exel Inc., d/b/a DHL Supply Chain (USA) (hereinafter “DHL Supply Chain” or “DHL”) requests Oncor Electric Delivery, L.L.C. (hereinafter “Oncor”) provide the information requested in Attachment A within ten (10) working days of the filing hereof.

Respectfully submitted,



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**ATTORNEY FOR
DHL SUPPLY CHAIN**

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of June 2023, a true and correct copy of the foregoing document was electronically filed with the Commission via the PUC Interchange in accordance with SOAH Order No. 2 in this proceeding and the Commission's Second Order Suspending Rules in Docket No 50664, with a copy submitted directly to Oncor by email.

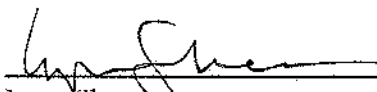
By: 
Lynn Sherman

EXHIBIT A

I. DEFINITION OF TERMS

For these discovery requests ("Requests"), the terms set forth below have the following meanings:

1. The terms "Oncor" or "you" means the applicant in this proceeding and its parent, subsidiaries, affiliates, past or present; any predecessor or successor in interest; any merged or consolidated predecessor or successor in interest; and all employees, officers, directors, agents, consultants (including Halff Associates, Inc.), expert and other witnesses, investigators, and attorneys; and all persons acting under contractual obligations with or acting or purporting to act for you.

2. The terms "and" and "or" as used shall be construed as either conjunctive or disjunctive to make the Request inclusive rather than exclusive.

3. The term "any" shall be construed to include "all" and "all" shall be construed to include "any."

4. The term "each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."

5. The term "concerning" includes the following meanings: relating to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; comprising; supporting; contradicting; 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.

6. The term "including" means and refers to "including, but not limited to,".

7. The term "communication" includes, but is not limited to, all forms of communication, whether written, printed, oral, pictorial, or otherwise, including, but not limited to, testimony or sworn statements, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions, and symposia. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio or computer. 9. The terms "document" or "documents" are used in their broadest sense in Tex. R. Civ. P. 192.3(b) and, as described in Rule 196.4 include electronic or magnetic data (included in the definition of "document"). These words mean and include any written, printed, typed, recorded or graphic matter of every kind or description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms "document" and "documents" shall include all analyses, agreements, contracts, communications,

correspondence, drawings, letters, opinion letters, telegrams, faxes, messages, e-mails, memoranda, records, reports, books, studies, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries or other records of meetings or conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, press releases, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants' and expert reports, appraisals, bulletins, notes, meeting notes, telephone conversation notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs, data, and data compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer generated, computer-stored, magnetically stored, optically-stored, or electronically stored matter, however produced, prepared, reproduced, disseminated, or made, on any medium of any description in your actual or constructive possession, custody or control, or of which you have knowledge, upon which intelligence or information is recorded from or from which intelligence or information can be retrieved; and every copy of such writing or record where the original is not in your possession, custody, or control. The words "document" and "documents" also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that contain no markings, additions, or deletions different from the original do not have to be separately produced. 10. "Identify," when used in connection with an act, shall mean to state a description of the act, including the place, date, and time of its occurrence, and the identity of the person, persons, or entities that engaged in or witnessed the act. 11. "Identify," when used regarding a "document," shall mean to state the type of document (e.g., book, magazine, article, circular, ledger, letter, memoranda, chart, computer run information, microfilm, etc.), its present location and custodian, a description of its form, title, author/addresser (including all persons who participated in the writing of the document), addressee, indicated or blind copies, subject matter, volume and page number or other means of general identification, approximate size and number of pages, any attachments or appendices, and the date on which it was made or prepared. Identification of the document includes identifying all documents known or believed to exist, whether or not in the custody of its attorneys or other representatives.

The final version and each draft of each document should be identified and produced separately. If a document is no longer in your possession or control, state what disposition was made of it. A document need not be identified if it is produced. 12. "Identify," when used regarding a natural person shall mean to state the person's first and last names, title, employer and business address. 13. "Person" means any natural person, firm, corporation, association, partnership, or other organization or form of legal entity. 14. "PUC" and "Commission" refer to the Public Utility Commission of Texas.

15. "Relate, refer, mention or pertain" means documents containing, showing, relating, mentioning, referring or pertaining, directly, or indirectly to, or in legal, logical or factual way or connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in preparing any document called for by such Request.

II. INSTRUCTIONS

1. Under 16 TAC § 22.144(i), the respondent to these Requests must supplement within five (5) days of the discovery of new information any response that newly discovered information modifies or makes incomplete a response already supplied.

2. Under 16 TAC § 22.144(C)(2), please answer these Requests under oath or stipulate in writing that the responses can be treated as if they were filed under oath. Each answer should identify the person or persons most knowledgeable about such response, the person or persons responsible for preparing such response, and the name of the witness in this proceeding who will sponsor the answer and guarantee the accuracy of the response.

3. In producing documents under these Requests, number each document and indicate the Request(s) to which the document(s) is/are responsive. If any document falls within multiple Requests, multiple productions are not contemplated, and one production referencing the multiple Requests is sufficient.

4. When a Request asks for the production of a study, report, schedule, analysis, an/or supporting inputs for assumptions made relative to a particular subject, statement, averment, conclusion, study, analysis, and/or report, such data should be in a Microsoft Office, Adobe Acrobat, or other useable PC-based electronic format, when available, on CD-ROM and be produced with your response to these Requests.

5. For any information you claim is unavailable, state specifically the reason(s) it is unavailable. If you cannot respond to the Request precisely as it is stated, provide any information that is available that would respond to the Request at a different level, manner or degree of specificity than actually stated in the Request.

6. A Request for "documents," "all documents," or "any documents" contemplates a complete production of materials relating to the referenced subject but is not intended to seek a duplicative or cumulative production of documents. If the production of one set of documents responds to the information requested, duplicate sets of hard-copy documents that also address the same matters do not need to be produced. This instruction does not excuse you of your obligation to produce documents in both written and electronic format where available, under Instruction No. 4, above.

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

8. When a Request requests a study, report, schedule, or analysis, the response should also provide the work papers, underlying facts, inferences, suppositions, assumption, estimates, and conclusions to support each study, report, schedule, or analysis.

9. Please produce the requested documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business, and organize and label them to correspond to the categories specified in the Request(s) to which the document(s) is/are responsive. If any part of a document responds to any Request, the whole document is to be produced. If there has been any alteration, modification or addition to a document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts or revisions, each such alteration, modification or addition is to be considered as a separate document and it must be produced.

10. These Requests are directed to all documents and information in your custody or control. A document is deemed in your custody or control if you have possession of the document or may secure such document from another person having possession. If you cannot produce a document or information based on a claim the document is not in your custody or control, state the location of such document or information when it was last in your possession, custody or control, and provide a detailed description of the reason the document is no longer in your possession, custody or control, and the manner in which it was removed from your possession, custody or control.

11. In responding to each Request, provide information available from all of your corporate and individual files, and from past and present employees, officers, directors, and board members.

12. The singular form of a word shall be interpreted to mean and include the plural. Words used in the plural form of a word shall be interpreted mean and include the singular.

13. The past tense of a word shall be interpreted to include the present tense and the present tense shall be construed to include the past tense.

14. If any document is withheld under any claim of privilege, furnish a list identifying each document for which a privilege is claimed, with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

15. Under 16 TAC § 22.144(h)(4), if the response to any Request is voluminous, provide a detailed index of the voluminous material.

16. Please serve your responses hereto electronically or in person to:

Lynn Sherman
3505 Greenway
Austin, Texas 78705
lsherman@h2otx.com

III. REQUESTS FOR INFORMATION

DHL Supply Chain RFI 1-

Please provide native-file, electronic copies of the Application, its "Environmental Assessment and Alternative Route Analysis" (*i.e.*, the "Environmental Assessment" or "EA") filed as Attachment 1 thereto, and any attachments (including tables) to the Application and/or its EA.

DHL Supply Chain RFI 1-2

To the extent not produced in response to RFI-1, please produce in .xlsx format or .csv format Table 7-2, entitled "Environmental Data for Route Evaluation," contained in Attachment 1, Appendix E, of the Application.

DHL Supply Chain RFI 1-3

To the extent not produced in response to RFI-1, please produce in .xlsx format or .csv format Table 7-3, entitled "Environmental Data for Alternative Link Evaluation," contained in Attachment 1, Appendix E, of the Application.

DHL Supply Chain RFI 1-4

To the extent not produced in response to RFI-1, please produce in Google Earth kmz format Figure 6-1, entitled "Link Removals," contained in Attachment 1, Appendix C, of the Application.

DHL Supply Chain RFI 1-5

To the extent not produced in response to RFI-1, please produce in Google Earth kmz format Figure 5-1, entitled "Public Meeting Comments Map," contained in Attachment 1, Appendix H, of the Application.

DHL Supply Chain RFI 1-6

To the extent not produced in response to RFI-1, please provide a complete electronic copy of the Geographical Information System ("GIS") Shapefiles/Geodatabase used by Halff Associates, Inc. and/or you to develop, perform, evaluate and/or produce the Environmental Assessment filed with the Application as Attachment 1.