1	operations, need to dedicate resources to maintaining and complying with
2	Texas SET requirements on an ongoing basis

4 Q. HOW DOES THE DEVELOPMENT AND IMPLEMENTATION OF
5 ERCOT'S SYSTEMS COMPARE TO THE EFFORT REQUIRED BY
6 EGSI?

7 A. There are two principal differences between ERCOT's implementation effort and the effort required by the Company: the functional scope and the implementation timeline.

Regarding the functional scope, the difference between ERCOT and EGSI is that the Company, like ERCOT itself, had to develop systems and capabilities to perform for ESAT the same centralized functions performed by ERCOT, but EGSI *also* had to provide all the labor, systems and processes necessary to put itself in a position of becoming an *unbundled participant* in that same market.

Specifically, the Company was similar to ERCOT in that it had to build and provide the load profiling and data aggregation functionality for the ESAT region in the same fashion that ERCOT performs these functions for retail choice in the ERCOT region. In addition to the Company performing the data aggregation and load profiling that ERCOT provides for the ERCOT IOUs, in parallel with ERCOT's system development, the Company was also developing a new system to support the new Texas market retail transaction requirements. It is important to

note that electric utilities in the ERCOT region served a dual role during the pilot project—as vertically-integrated utilities providing electricity to retail customers who did not participate in the pilot, and as TDSPs to deliver power to customers who switched to REPs. EGSI maintained those two roles and also a third role to apply load profiles and aggregated meter data for the ESAT region in the same fashion that ERCOT does.

ERCOT and EGSI also had vast differences in functional requirements. For example, ERCOT was consolidating control areas and implementing significant wholesale market operations functions and changes to its Energy Management System where the Company was not required to implement similar functions. On the other side, however, EGSI was preparing for business separation and asset unbundling that ERCOT did not have to perform.

The second principal difference is the implementation timeline. While the official start of the pilot project was June 1, 2001, with full retail access on January 1, 2002, there were many activities that started for ERCOT before that date, such as the development of market rules and protocols, and the design and testing of computer and communications systems. As I discussed earlier in my testimony, ERCOT developed bid documents during the fall of 1999 to acquire the systems necessary to support the restructuring of the Texas electric market. This equates to approximately 26 months of defining the requirements and completing the design, development and testing of the retail applications before

transitioning to full retail choice. In contrast, EGSI also underwent an aggressive development and testing program to participate in the pilot by June 1, 2001, but was then required to maintain its ongoing communications and technical connectivity to keep its pilot operational until July 2004, equating to 60 months from initiation through termination of pilot operations.

Α.

8 Q. HOW MUCH DID ERCOT SPEND TO MEET THE REQUIREMENTS OF9 SB 7?

In my research, I found a statement by Sam Jones, the Chief Operating Officer for ERCOT, made at a FERC Conference on Standard Market Design held January 23, 2002. Mr. Jones stated that "[t]he total wholesale and retail conversion cost was in the neighborhood of \$120 million for facilities and systems." The excerpt of this discussion is included in Exhibit VGC-7, FERC SMD Conference Transcript Excerpt. Mr. Jones also stated "[t]he retail and the wholesale was so intermixed," indicating that it is very difficult to distinguish the costs between wholesale or retail functions. While this presents an apples-to-oranges comparison to the Company because the functional scope was different in many regards, I include this number to provide a frame of reference of the costs ERCOT incurred to launch the ERCOT market.

- 1 Q. ARE THERE ASPECTS OF ERCOT'S EFFORT TO MEET THE
- 2 REQUIREMENTS OF SB 7 THAT ARE COMPARABLE TO THE
- 3 COMPANY?

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Yes. Both ERCOT and the Company were on very tight implementation Α. design and aggressive system timescales, each initiating an implementation schedule to meet a targeted June 1, 2001 start of a retail choice pilot shortly after SB 7 was signed by the Texas Legislature. In fact, all Texas market participants were undergoing development efforts to build systems and processes to support the new market. This intense implementation effort throughout the state created a shortage of resources available with energy restructuring expertise. For example, in the 2001 ERCOT Readiness update, attached to my testimony at Exhibit VGC-3, ERCOT System Overview, ERCOT reported that during the peak of development, nearly 300 developers, engineers, and analysts were working on the new ERCOT systems. Likewise, EGSI also was in need of, and relying on outside experts and developers, in part, to prepare the systems necessary to participate in the pilot and, ultimately. ROA. This indicates to me that entities preparing for retail choice in Texas were largely competing for outside expertise, and I factor this condition into the assumptions that I have made in creating an estimation model that I discussed in Section III of my testimony.

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- 1 Q. AFTER THE COMPLETION OF THE PILOT AND THE START OF FULL
- 2 RETAIL CHOICE ON JANUARY 1, 2002, DID ERCOT SEE A DECLINE
- 3 IN ITS COSTS?
- 4 A. No. ERCOT's operational costs continued to rise through 2004. Margot
- 5 Lutzenheiser, an associate economist for the Public Power Council
- 6 performed a "Comparative Analysis of RTO/ISO Operating Costs,"
- 7 attached to my testimony as Exhibit VGC-8, RTO Comparative Analysis.
- 8 In Ms. Lutzenheiser's report, she captures how ERCOT's Annual
- 9 Operating Expenses skyrocketed from approximately \$20 million in the
- year 2000 to over \$138 million budgeted in 2004, representing over a six-
- 11 fold increase.

- 13 Q. ARE ERCOT'S RISING COSTS RELEVANT TO THIS PROCEEDING?
- 14 A. Yes. I think the increasing costs of supporting a retail market and the
- volume of changes that have occurred, and continue to occur, indicate
- that effective market implementation has cost more than originally
- 17 anticipated and tasks were harder to do than expected. The Texas
- 18 competitive market is the result of an on-going, stakeholder driven,
- evolutionary process. Over 328 protocol change requests alone were
- submitted between the actual start of the retail pilot on July 31, 2001 and
- 21 the end of 2004. In a nutshell, the intensity and the workload continued
- 22 after the market started.

1 Q. WHY ARE ERCOT'S CHANGING MARKET REQUIREMENTS
2 RELEVANT TO THE COMPANY'S TRANSITION TO RETAIL CHOICE?

A. Every retail transaction change, system change, or protocol change that occurred in the ERCOT market that impacted *retail* operations had to be monitored, mirrored, and tested by the Company because ERCOT centrally administered retail transactions statewide. In essence, even though the EGSI pilot had much smaller customer participation than full ROA in ERCOT, the Company was subject to all of the retail requirements that were driven and modified in the ERCOT stakeholder process. The workload that ERCOT required to sustain a robust retail market is corollary to the effort the Company incurred to maintain pilot operations.

Α.

Q. SHOULD THE NUMBER OF UTILITY CUSTOMERS BE A PRINCIPAL
 OR SOLE DRIVER OF A UTILITY'S TRANSITION COSTS?

No. The number of customers served by a utility is neither the principal nor the sole driver of the amount of transition costs incurred by a utility. The more significant cost drivers with regard to transitioning from a regulated market to a competitive market is "time to implement" the systems and the complexity of the market structure. The transition costs I compare fall into two broad categories: (1) regulatory-related costs, and (2) utility business processes and systems changes. I understand that Company witness May discusses at length in his testimony the regulatory process in Texas as enormous, complex, and lengthy. The Company's

EGSI TTC Cost Case

3-55

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TTC costs were incurred over a six-year period, rather than a shorter two and one-half-year period, as was originally anticipated through SB 7. Further, I understand that this effort required significant support by outside counsel, with regard to both time and expense, for the over 50 dockets and rulemakings in which the Company was involved. In that regard, SB 7 placed a similar regulatory burden on the Texas portion of EGSI as it did for TXU Electric Company and Reliant Energy Inc., despite the significantly greater size of the latter two companies.

The second driver of cost is the change needed in the utility business processes and systems. The Texas market structure and the ERCOT Protocols are complex and created large volumes of transactions. The volume of transactions and the complexity of rules demanded robust systems and controls to appropriately support the level of service envisioned by the Commission. Given the comprehensive requirements of the Texas market rules and ERCOT Protocols, and the volume of transactions and customers, the creation of a comprehensive retail market solution was a very significant effort.

A.

#### V. REASONABLENESS OF EGSI TRANSITION COSTS

20 Q. HOW IS THIS SECTION OF YOUR TESTIMONY ORGANIZED?

In this section, I discuss the reasonableness of EGSI's transition costs, and cost control and reductions mechanisms that I understand the

Company used to manage the total transition costs.

Q.

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2 Yes. In comparing just the two categories of EGSI TTC cost on which I A. have focused (approximately \$144 million)<sup>1</sup> to the results of my estimation 3 model for implementing ROA in ESAT (approximately \$169 million), 4 5 EGSI's request is significantly lower than the estimate. When considering this range and the nature of the more than five-year transition that EGSI 6 experienced from 1999 through June 2005, I conclude that EGSI's TTC 7 8 costs are reasonable. Furthermore, compared to the estimate I derived, the Company acted prudently to manage costs of its expenditures as its 9 requested costs in these categories were below my estimate. If I were to 10 11 include an AFUDC component in my estimate model figures, which would be reasonable in light of the length of the transition period experienced by 12 EGSI, my figures would be even larger in comparison to EGSI's TTC 13 14 requested costs.

ARE THE TRANSITION COSTS REQUESTED BY EGSI REASONABLE?

- 16 Q. WHY DO YOU BELIEVE EGSI HAD TRANSITION COSTS BELOW17 YOUR COST ESTIMATE?
- 18 A. The Company used a combination of cost controls, project ramp-down and outsourcing as mechanisms to effectively manage their overall project costs.

<sup>&</sup>lt;sup>1</sup> Again, the two categories of EGSI's TTC costs on which I focused do not include the Company's System Benefit Fund & RECs class; the Energy Efficiency class, or the Rates/Riders Preparation class.

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First, addressing cost controls, I understand the Company reviewed the time and expenses of internal resources for reasonableness and adherence to travel and accounting policies. I also know from direct experience that invoices of outside services were reviewed for reasonableness prior to authorizing payment. This audit and review mechanism generally assists in mitigating unexpected costs that sometimes arise over long-term projects without adequate checks and balances. Secondly, during times when the near-term commencement of ROA in ESAT became less certain, EGSI significantly reduced the resources allocated to transition efforts, allowing for cost savings. While my estimation model does have a natural ramp-down and decline of resources allocated to the project, I understand that EGSI took a more dramatic approach to reducing headcount during these times of uncertainty, thus reducing the resource costs. Finally, the Company outsourced its Information Technology function. The Company successfully moved 350 former Entergy employees and 100 contractors to an outsource company's payroll, and the outsourcing agency also agreed to provide direction to 160 Entergy-retained employees whose services and costs are part of its contractual incentives. This structural change leads me to believe that the Company was able to better manage its transition costs by reducing its operational and infrastructure costs through outsourcing agreements.

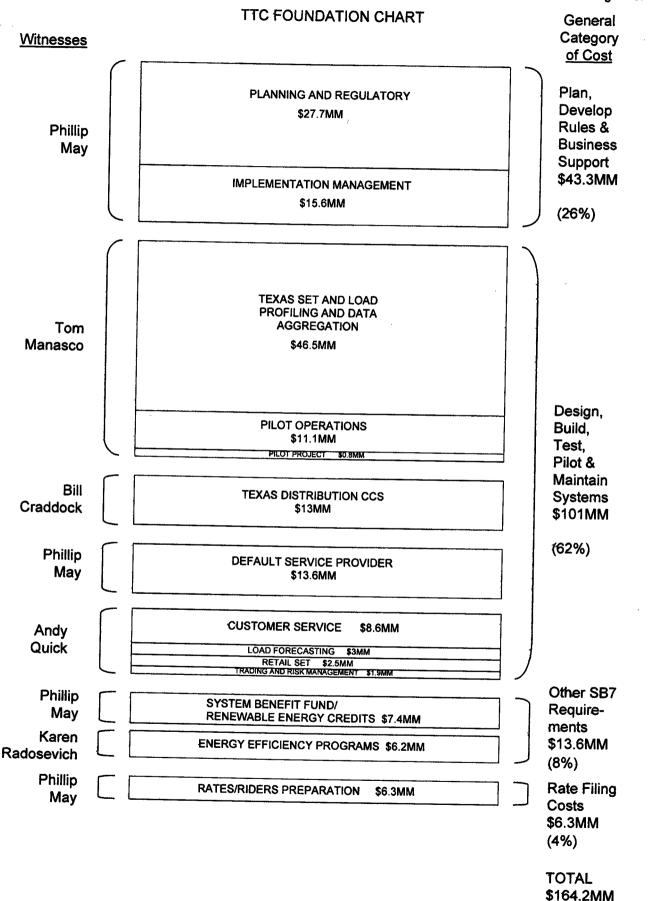
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1 VI. <u>CONCLUSION</u>

- 2 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
- 3 A. Yes, at this time.

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Exhibit VGC-1 2005 TTC Cost Case Page 1 of 1



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EGSI TTC Cost Case

# **EGSI Comparative Cost Estimate**

## Workbook Overview and Guidelines

This workbook is organized as follows;

Contents shows the table of contents for all Schedules and Workpapers.

Each major area of analysis is represented by a Schedule.

The results and inputs on the Schedules will reference their source, primarily with references to Workpapers. Each Workpaper will provide drill-down detail for the information summarized on Schedules.

The Schedules are numbered S1, S2 etc.

The Factors tab containts input variables that are used on multiple Workpapers or have a high liklihood of sensitivity analysis. Other input variables that are only used in one Workpaper will be housed in that Workpaper.

This workbook is guided by the following objectives:

The workbook will be simple and flexible, yet thorough. It is intended to present cost estimate.

Impact assessment for changes in inputs will be quick.

Benchmark data from other markets will be provided where relevant.

### Cost Analysis Assumptions:

All currency is presented in US dollars.

Dollars are undiscounted and in 2005 dollars

Transition costs are represented as total dollars

Transition costs are represented as total dollars Timeline covers 1-Jun-1999 to 1-Sep-2004

#### EGSI Comparative Cost Estimate Index of Schedules and Workpapers

Roll-up estimate by year of Transition and Operating Costs	Detailed cost estimate of external FTE resources Detailed cost estimate of internal FTE resources Detailed cost summary of facilities Detailed cost summary of systems by division Summary of other transition costs	Input variables that are used on multiple Schedules and Workpapers Salary Scale and steps based on labor statistics Hiring Rate and Salary Correlation Document sources for benchmarks and comparison data Data used by charts in reference section Chart of number of internal FTBs by project and quarter	Chart of number of FTE resources by employee type Chart comparison of internal to External FTE loadings Chart of total resources by project
S1 Schedule 1: Summary of Total Transition Costs Workpapers	W1 Workpaper 1: External Resource Consulting and Development W2 Workpaper 2: Internal Resource Loading Detail by Role W3 Workpaper 3: Facilities Summary W4 Workpaper 4: Systems Summary W5 Workpaper 5: Other Transition Expenses Summary Input and Reference Tables 11 Input 1: Estimating Factors		K6 Reference 7: FTE Resource Loading Comparison R7 Reference 8: Total FTE Resource Count by Project  Version Notes:

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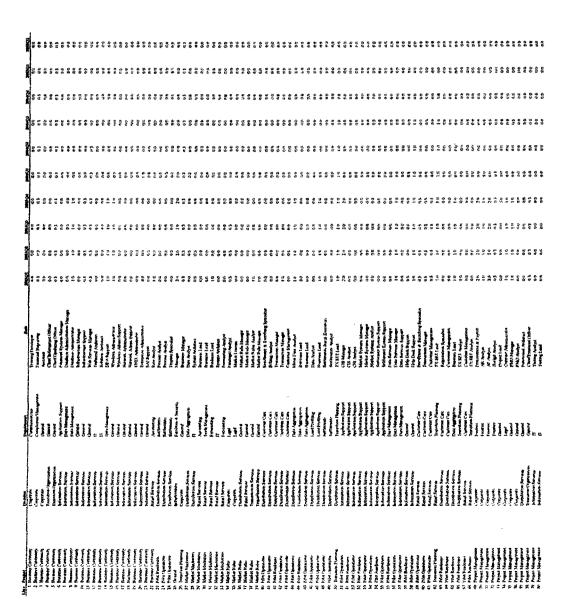
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EGS! Comparative Cost Estimate Input 3: Internal Resource Londing Detail by Role

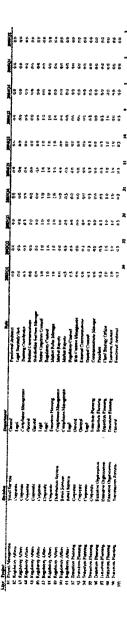


Exhibit VGC-2 5 TTC Cost Case Page 9 of 31

EGSI Comparative Cost Estimate Schedule 1: Sumnary of Total Transition Costs

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		Project Lead	•	7	8	75000 1999Q1	200104	•	5
	Copal	Contract Administrator	•	-	z	15000 1999Q1	20030	4	į
	Centra	PMO Manager	~	~	X	40000 1999QJ	2003Q4	s	ŝ
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Piero Analyse	•	~	£	£06661 00009	70007	<b></b>	28,000
	Capazi	Functional Archiece	•	-	2	\$5000 1999Q1	₹ 7000	**	106,250
		Chef Phancal Offer	Exec?	0.25	z	225000 1999Q3	2003Q4	'n	281,250
		Training Analysi	•	***	<b>:</b>	506661 00009	2001(2)	u	75,000
	Conces	Consideral Ambient	•	~	<b>:</b>	82000 1666E	200103	<b>.</b>	06,250
	1001	Local Sections/Asset	• •		<b>*</b> ;	60666 199009	2002	<b></b>	25,000
	Compliance Management	Training Confinence	•	- ;	₹ ;	13000 199903	2000	<b>.</b>	93.750
	Concrat	laternal Communications	•	-	2 5	COOL 10007	200304		75,000
	Coneral	Stateholder Services Manager	, ,		3 2	CONTRACT CONTRACT	790103	, ·	75,000
to Regulatory Affairs Corporate	Legal	Souier Corporate Counsel	• •	-	ā \$	SOURCE STOREGY	50000		20.20
	Legal	Regulatory Countel	. •		3	24000 JOHO 1	0.00		23,43
	Transition Planning	Markes Rules Manager	•	-	: =	10000 20052	2000		174.10
	Compliance Management	Market Reports	•	50	2	10001 00009	C) loc		24.00
	Compliance Management	Market Reports	^	9.0	*	100000 200103	20040		
F. Regulary Amery	Legal	Regulatory Counsel	7	0.5	=	40000 199903	200002		9
	General	Web Conton Management	•	-	2	201002 200102	200202	·	75.000
	Central	Enternal Contenuations	•	0.15	=	85000 200101	200202	٠	106.2%
95 Transition Planting	repair	General Counsel	•	0 35	3	\$0000 1999Q3	2004Q3	**	75,000
	Transfer Demonstra	Contrastications Manage		6.25	2	30000 200101	200104	•••	37,300
	Transition Plensies		Exec	978	63	350000 [5860]	2004Q3		437.300
	Tressition Plenaine	Exercise Assistant	-		<b>\$</b> ;	101007 00005	2004(0)		137.500
99 Trensition Planting Treasmission Services	Coveral	Functional Architect		. 50	5 3	COSOS SOUS	20000		000'051
66			Grand Tetah	111.76	3	chesses amount	C) LINE		3

EGSI Comparative Cost Estimate Workpaper 2: Internal Resource Loading Detail by Role

Factors Reference.											
% annual salary escalation		3.5%									
S_expenses_per_fle	•	5,000									
S_other_expenses_per_fle	••	905									
S supplies per fle	•	1,000 Laber & Benefits	icht.								
Line Project	Division	۰	9	•	•					~	•
1 Business Continuity	Cornerate	199901	199902	1999Q3	199904	100001	200002	300eQ3	PO002	301000	200102
2 Businers Centinuity	Corporate		•		•			١.	  -	24,609	24,609
3 Business Continuity	Corporate	•		•		٠ ;		•		4,102	4,102
4 Business Continuity	Encoutive Organization	•			*C****	(70.97	24,023	24,023	24.023	14,609	24.609
5 Beasthers Continuity	Executive Organization			17.578	17.57k	. 41				36,914	36,914
2 Desired Contactor	Information Services	•			,	12.813	10.01	10,81	10'21	18,457	18,457
Blatters Continues	Information Services	•	٠			72.670	27.070	72.870	72 070	67) E	52,12
9 Business Confinalty	Information Contra	•	•		•		•				4 R44
10 Businers Continuity	Information Consider	•		٠		\$6,09	750'96	\$60'96	96,094	98,438	98.418
11 Business Continuity	Information Services	•		•			4,805	4,805	4,805	4,922	4.922
12 Buriness Continuity	Information Services	•		•	•			٠			
1.3 Posiners Continuity	Jaformation Services			. ;					•	189'61	19,688
	Information Services	•		23,438	23,438	24,023	24,023	24,023	24,073	24,609	24,609
1.5 Burivess Continuity	Information Services			679'61	529'51	16,016	16,016	16.016	16.016	16,406	16,406
16 Business Continuity	Information Services	• •		2 00%	23,438	24,923	24,023	24,023	24,023	24,609	14,609
17 Business Continuity	Information Services	•			0 K 'r	400,4	<b>6</b> ,	¥.	4,004	4,102	4,102
18 Business Continuity	Information Services	•					•		•		
19 Business Continuity	Information Services	•				•	•		•		
20 Busheass Continuity	Information Services	٠		•	. ,					•	•
22 Establish Conducting	Information Services	•		15.625	16631	* 7	. }	. :	• ;	16,406	16,406
22 bit b. A.	Retail Services			•		10.01	910'8)	90,01	910.91	90.400	16.406
23 Bibe Chambers	Distribution Services	•			. ,				•	389'61	19,618
24 Pilot Cheminas	Date(bution Services		•			,			•	13,086	19,688
25 General	Distribution Services		٠							•	
26 Transition Planning	A PROPERTY.			37,500	37,500	38,438	38,438	38.438	11.4.11	30 134	101
27 Market Mechanics	Company of the Compan			9,375	9,375	609'6	609	609	609 6	0.844	0 640
28 Market Mechanics	Dietalbation Consider	•	•	31,250	31.250	12,031	32,031	32,031	32,031	32.013	12.8.11
29 Marker Mochanics	Retail Services	•	•	53,125	53,125	54,453	54,453	54,453	\$4,453	55,781	35.781
30 Market Mochanics	Retail Services	•		•		,				19,648	889'61
31 Market Mochanics	Retail Services			•						32,813	32,813
32 Market Mechanics	Retail Services	•	٠.	•						24,609	24,609
35 Market Mechanics	Retail Services	•	•		12.75	010 01		. :		74,609	24,609
24 Market Bules	Corporate	•		\$71.6	9.375	6096	609	9776	6(7)6	19,648	. ;
36 Marter Rates	Componente	•		26,563	26,563	17,227	71,117	17.77	27,227	77 80	4,844
37 Market Rules	Retail Services	•									14.01.7
38 Market Rules	Transmission Serviers		•				•		•	,	
39 Market Rules	Transmission Services							•			,
40 Pilot Operations	Distribution Services	•		4	e e	6000	609'6	\$,609	609'6	9.844	9,844
42 Pitor Operations	Distribution Services	•			•				•		•
4) Pipe Keedness	Distribution Services	•		18,750	18.750	. 67	. 10	. 61	. :	. ;	
An Inches Committees	Distribution Services	•		•				417	6776	19,688	19,688
A STREET CHARACTERS	Distribution Services		•								
As males to the same as	Distribution Services	•	•			•					
A Brite Chambers	Chitribution Services	•	,	70,313	70.313	72.070	453.67	. 0.01		. ;	
46 Pilot Operations	Distribution Services	•			,			A/A'4;	0/0'7/	828'EJ	73,826
47 Pilot Operations	Charleton Services						•				
48 Buriness Continuity	Distribution Consises	•									٠.
49 Piksi Operations	Distribution Services	•	•		,						
	After the second section 1 and 1		•		•	19,219	19,219	19,219	19,219	19.688	19,68

1,522,285

EGSI Comparative Cost Estimate Workpaper 2: Internal Resource Loading Detail by Role

Factors Reference:											
5 expenses per the	•	2.5%									
S other expenses per fle	ı w	906									
S_supplies_per_fle	•	1,000 Labor & Benefits	aefis								
Liar Projeet	Division	6	9	5	9	-		-	-	~	~
50 Transition Planning	Distribution Services	in.	13%()	199903	1990	100001	19993	200003	100001	2001Q1	160103
51 Pitot Operations 51 Britos Bountains	Information Services	•	•	•	) .		617.KI	612'61	19.219	19,688	19,688
52 Pilol Operations	Information Services	•	•		•	76,875	76.875	76,875	76.875	78,750	78.750
52 Pilot Readings	Information Services		•	•		. ;			•		
53 Pilot Operations	faformation Services	•		, ,		\$10°91	16,016	16,016	16,016	16,406	16,406
54 Pilos Cyarations 54 Pilos Readings	Information Services	•	•	•							
SS Bild Operations	Information Services	•	٠	•	•	19.219	19,219	19,219	19,219	19,688	19.65
55 Pilot Readings	Information Services	•		•		٠	•				
56 Pifot Operations	Information Services			15,625	15,625	16,016	910'91	16.016	16.016	16,406	16,406
57 Pitol Operations	Information Services		٠.	٠.						•	
5) PhO Residents 58 Piles Chessiens	Information Services	31,250	31,250	31,250	31,256	12,031	32,031	32.031	. 20		. :
59 Pitol Operations	This practice Services	•		•			•		,		25.413
60 Pilos Operations	Retail Services	•	•				٠			•	
	Retail Services	. ,		•		,				•	,
62 Transition Plenning	Retail Services	•		. ,	18.750	. 61	. 61		. :	. ;	. !
6.4 City Burneys	Distribution Survices	•		•				417'61	13,269	110'61	19.624
65 Pilot Readiness	Distribution Services	•		•		•		•		12.04h	19,06\$
66 Pilot Readings	Distribution Services	•	•	•	•		,	•	•		24.609
67 Pilos Readinoss	Resell Services	•		18,750	12,750	19.219	19,219	19,219	19,219	19,688	19,61
68 Mior Readings	Retail Survices			100.	4.688	4.805	4.805	4,805	4,805	4,922	4.922
69 Project Management	Corporate	•		15,025	15.623	910'91	16,016	910'91	910'91	16,406	16,466
70 Project Management	Corporate	•		37,500	37.500	38.63	16 438	45,047	3	49,219	49,219
23 Project Management	Carponele	٠		46,875	46,875	10.04	48.047	48.047	20,938 AB 047	01.00	676.95
73 Project Management	Comparate	•		9,375	9,375	609'6	609'6	609'6	609'6	74.6	9.844
74 Project Menagetrum	Contrate	•		46,875	46,875	48,047	48,047	48,047	48,047	49,219	49,219
75 Project Management	Corporate	. •	•	23,438	23,438	24,023	24,023	24,023	24,023	24,609	34,609
76 Project Management	Corporate	•		12,500	12,500	(18,51	12.833	12.813	12,813	13,125	13.125
77 Project Management	Distribution Services	٠	•	26.561	26.563	417,41	19,219	19,219	19,219	19,688	19.628
79 Project Management	Executive Organization			\$72,578	17,578	11.01	18.018	18.018	17'/7	164,13	167.891
40 Project Management	Information Services	•		150,000	150,000	153,750	153,750	153,750	153,750	187.500	52 500
#1 Project Management	Retail Services	•		53,125	53,125	54,453	54,453	54,453	54,453	187,281	55,781
52 Regulatory Affairs	Corporate	•	•	33,750	18,750	19,219	19,219	19,219	19,219	189'61	189'61
13 Regulatory Affairs	Corporate	•		******	16467	24,023	24,023	24.023	24.023	\$4.609	24,609
54 Regulatory Affairs 54 Beenfales Affairs	Corporate	•		18.750	18,750	19.219	19219	. 61	. 41	4,922	4,922
	Corporate	•				16,016	16,016	16.016	16.016	16.406	19,048
17 Regulatory Affairs	Corporate	•	•	23,438	23,438	24,023	24,023	24,023	24,023	24,609	24,609
BE Regulatory Affairs	Corporate	. ,		•						24,609	24,609
89 Reguletory Affairs	Distribution Services	•	. ,		. 0	. 4	, ;	. ;	•	•	
90 Regulatory Affairs	Retail Services	•			٠,	, 000,	609'5	609	609	9,844	9.844
97 Kepainton Allaira	Retail Services	•		6.230	6,250	90409	, 90	977	, 707	. 25. 7	957'91
93 Transition Planning	Corporate	•		•	. •					50c' <b>a</b>	0,303
94 Transition Planning	Carporate	•			٠					6.973	6 673
95 Transition Planning	Contract			4,688	4,618	4,805	4.805	4.805	4.805	4,922	4,932
96 Transition Plenning	Executive Organization	• •			. ;			• :		2,461	2.461
97 Transition Planning	Executive Organization	•				/70"97	78.027	28,027	78.027	28.71	11.11
74 transition Planning 99 Timplifies Planning	Executive Organization	•								114,844	778.7
901	Transmission Services	. :	. ;	7,8(3	7,813	8,008	8003	8,00	1,008	£,203	8.293
		947'15	31,750	1.010.469	1.160.156	1 417.488	1 613 786	*****			1

Factors Reference:																	
% annual salary escalation		2.5%															
S. expenses per fle	w	5,000															
S other expenses per fle	v.	\$00															
S supplies per fle	•	000'1															
Line Project	Netter		~	~	^	~	^	-	•	•	•	-		•			
Business Continuity	Corporate		200103	PO1002	200201	200202	100203	100204	2003Q3	206302	20000	2063Q4	300(0)	200402	5 200403	× 464.	9
2 Businers Continuity	Corporate		100		. !	. !	•	•									
9 Business Continuity	Corporate		24.609	24 609	100		<u>\$</u>	£1,36	4,297	4,297	4,797	4,297	4,395	4,395	£393	4.395	٠.
- Business Consensy	Executive Organization		36.914	36.914	37,783	37.793	107.01	. 17.70				•			. •		٠
6 Retirem Continued	Executive Organization		18,457	18,457	18.896	18,896	10.806		. 01	. :	. !	• }				•	•
2 Budjace Conjunity	Information Services		13,125	13,125					96.	965,71	19,336	9,336	19,775	19,775	19.775	19,775	20.21
8 Business Continuety	Integration Services		13.828	73,528		•				. ,					•	,	•
9 Businers Continuity	Information Services		9,844	9,844	10,01	10,078	10,078	10,01	10,313	10.313	10.313	. 101	•				•
10 Pasiness Continuity	Information Services		98.438	98,438				•					•				•
13 Business Continuity	Information Services		4.922	4.922	\$,039	5,039	\$.039	5,039	3,156	\$.156	5,156	5.156					•
12 Business Constructy	taformation Services		. 01	. 9	. }		\$,019	6£0'\$	5.156	5,156	5,156	5.136	5.273	\$273		•	•
13 Business Continuity	Information Services		24 609	14'01	<u>8</u>				•		•						•
14 Business Continuity	<b>Differnation Services</b>		16.406	. 40%	. 41	. 20	. !	, ;	•			•					
5. Business Continuity	Information Services		24.609	24 609	34 194	10,797	16,797	16,797	17.18	17,188	17.18	17,188			٠		•
10 Burness Consisting	Information Services		7.102	4,102	3	4 199	25,195	28,193 28,193	25,731	25,781	25.781	25,781			•	•	•
If Resistant Construction	Intermetion Services			•													٠
19 German Contact	Information Services			•	,		•	•		•	•		•				•
20 Business Constanting	Information Services		•											•		٠	•
25 Business Continuity	Information Services		16.406	16,406				•	. ,		•			٠			٠
22 Business Companies	HASHINGTON SERVICES		16,406	16,406	٠		,						•	•			•
22 Pila Readiness	Dietribution Consisua		13,61	19,688	20,156	20,156	29,156	20,156	20,625								٠
23 Pilot Operations	Distribution Services														•		•
24 Pilot Operations	Distribution Services			***													•
25 General	Infrestructure		39.575	36 275	. 61.07	. :	. :	• }			•		•		٠		
26 Transition Planning	Corporate		9.84	9.844	10,01	10.513	<b>40313</b>	40,313	41,250	41,250	41,250	41,250		ŗ			
27 Market Mechanics	Distribution Services		32,813			2/2/01	R/0'01	10.07	10,313	10,313	10,313	10,313	10,547	10,547	10,547	10,547	10.78
26 Address Mechanics	Distribution Services							•	•	•							٠
TO MARKET MECHANICA	Retail Services		19,61	189'61	20.156	201.05	30.06			1	•			•	٠	•	•
3) Market Market Marketics	Retail Services		32,813	32,813	33,594	33.594	33.594	. ,	•								٠
32 Market Mechanica	Medall Services		24,609	54 609	25,195	25.195	25,195	15,195	25.781	٠.		•					•
33 Market Mechanics	Resail Services		24,609	<b>2</b>	25,195	25,195	13,195							• •			•
34 Market Raigs	Corporate		. 6			. !	•		•		٠					•	•
35 Market Rubes	Corpurate		27.891	27.891	28 555	30,07	10.01	10.07	10,313	10,313	10,313			•			٠ ،
27 Market Rates	Distribution Services		198,75	27,891	28.555	28.555	. 22.				•						•
38 Market Rules	Retail Services				. •		5,039	5036								•	•
39 Market Rufes	Tangeraspon Nervices				33,594	33,594	33,594	33,594	34.375		•		•		•		٠
40 Pilot Operations	Distribution Services		7,6	9.844	10.078												•
41 Pilot Operations	Distribution Services		400,42	54,609	% :	25,195	25,195	25,195									
61 Pilot Rendineus	Distribution Services			670°47	S	<b>3</b> 2	25,193	25,195		٠		•				٠,	•
42 Pilot Operations	Distribution Services		19,688	19.688	. 92	, 100	. 27. 54	. ;	. :								
43 Pitch Operations	Distribution Services		. •		3 1 0 E	901.04	61,03	40.156	20,625								•
44 Pilot Operations	Distribution Services		12,631	19.628	30.00	10.100	395.4	398		•		٠		,		•	
44 Pity Restincts	Distribution Services				04.170	961,92	70,154	20,156	20,625	20,625	20,625	20,625		,	•		,
45 Pice Operations	Distribution Services		73.828								•						•
45 Prior Operations	Distribution Services		18,681	119.61	20,156	20.156	. 5	. 01							٠	٠	
48. Berinner Confession	Distribution Services		24,609	34,609	25.195	28,185	25.185	361,43		. ;	•	•			٠		٠
49 Pilot Cheration	Distribution Services		16,406	16,406	16.797	16.797	16.797	۲.	F/G	19/V2	13/38	25.783	•			•	•
the same and same as	Distribution Services		,				****			ı							

Workpaper 2: Internal Resource Loading Detail by Role

EGSI Comparative Cost Estimate

EGSI Comparative Cost Estimate
Workpaper 2: Internal Resource Loading Detail by Role

				•	2004Q4 2085Q1																				•								,																2		05	Т	Ī	xl C	C	0	st		Ì
				•	2004()3	21,094													35.56	200			. 1001	K6.17					,											• •						76,367	26,367	24.367					5.173		30,762	123,047		8,789	359,033
				ď	700402	21,094													35.156				21 694															. ,								26,367	26,367	20.307				, .	5.273		30,762	123,047	42, FBB	8,789	406.494
				~	100401	78.094											,	,	35.156			. ,	23 094										10,547													26.367	26,367	195'97	17 474				5,273		30,762	123,047	45,188	E.789	434,619
				•	TO STATE	5,000	41,230									17,158			34,375	14.609	10.313	12 891	20,625			25,781				\$1.563	41.250	\$1,563	10,313	. ;	19.07			19,336		,			5,156		• ;	23,781	27.67		17.114				5.156		30,078	120,313	41,250	6,594	901,484
				+	C CONTRACT	41.350	000			•						17.188			34,375	14,609	10.313	12.891	20,625			25,781			•	\$1,563	41,250	51,563	10.313		92.63			19,336	•				5,156		. :	23,781	25.76		17,188				5.15e		36,078	120,313	41,350	96.394	141,171
					30,636	43.750										17,188			34.375	14,609	10,313	12.891	20,625			25,781				51.563	41,250	51.563	10.343	24.781	13.750			19,336					5,156		. į	25.781	25.781		17,188	6.878			3,136		30,074	120,313	1,250	18 673	
			•	101101	20,07	41.250		•			•					17,181		,	34.375	14,609	10,313	12.891	20.625			25,781				51,563	007'14	51.363	11.01	25.741	13,750	. 1		19.336					5,156		76.763	75.72	25,78		17,189	6,875			5,156	. !	30,078	120313	4 404	1.020.072	
				2002.04	20.156	40.313		10.625		16.797				70.130		10,797		• ;	13,594	14,277	10,078	12,598	20,156			25,195				160.00	40.00	16000		25,195	13,438			18,896				. !	\$.039		24.100	25,195	25.195		16,797	6.719		. :	8,039	. 90	48,48	46.11	101	1,169,004	
			-	200203	20,156	40,313		80,625		16.797			20.00	100		16,191		. ;	A 2.5	14.277	10,078	12,598	20,156			25,195			, 64	10.391	10.30	1001		25,195	13,436			18,396				. 9	3,0,19		25.195	25,195	25,195		16,797	6,719		٠ (	5.039	7 20	17 474	40.313	8.391	1,364,746	
			~	100202	20,156	40.313		80.625	•	16,797	•		20156		14.743		•		25,234	4,277	10,071	12,598	50,136			25,195			, 101	40.113	160 95	10.071		25,195	13,438		•	366,81				. 1	450.5		25,195	25,195	25,195		16.797	6,719	20,156	40.	3.039	79.30	117.578		1,398	1,376,105	
			^	200201	20,156	40,313		\$0,625		16,797			20,136		16 797		•	33 604		// 7/91	2/0'04	12.598	961,92		. !	(2),137			50 191	40.313	50,391	10.078		25,195	13,43\$		. :	11,196				\$ 014			25,195	25,195	25,195		16.797	6,719	20,156	4 010	6000	29.395	117,578		8,398	1,425,635	
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EGSI Comparative Cost Estimate
Workpaper 2: Internal Resource Loading Detail by Role

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EGSI TTC Cost Case 3-81

EGSI Comparative Cost Estimate Workpaper 3: Facilities Summary

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	2	ŏ	2001	314,640 82,800 157,113 201,486	51,750 310,666 803,814	1,118,454 \$
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Line Description	1 Facilities	2 Primary Facility	3 Lease	4 Administration furnishings 5 Utilities 5 Data Service (non-WAN) 7 WAN Cost	8 Voice Service 9 Building Services 10 Non-Lense Subrotal 11	

Market Changes Total 9,664,200 5,798,520 4,602,000 1,196,520 2,485,080 2,076,900 414,180 466,200 460,200 460,200 460,200 214,589 49,599 30,000 15,000 4,500 865,000 100,000 50,000 239,100 100,000 239,100 1,880,606 230,100 1,380,600 1,5176,718 1,940,510 1,917,500 1,917,500 1,917,500 1,917,500 2,761,200 3,200 2,761,200 2,761,200 330,166 100,000 230,100 .,046,996 1,046,999 800,000 Non-Division Specific Services 1,656,720 1,656,720 1,380,600 276,120 1,940,510 1,940,510 1,917,500 23,010 8etall 3,599,360 2,899,360 2,301,000 598,260 230,100 230,100 2,855,600 500,000 1,380,600 175,000 330,100 100,000 230,100 1,040,000 1,040,000 800,000 4,417,920 2,899,560 2,301,000 598,260 828,360 690,300 138,060 214,506 49,500 30,000 15,000 4,500 165,000 100,000 50,000 15,000 239,100 230,100 230,100 230,100 . 230,100 230,100 330,100 330,100 100,000 230,100 1,880,600 500,000 .780,600 %\_hourly\_m %\_hourly\_noncomplis #\_ESI\_ID %\_hourly\_nonci \$\_meter\_operaling\_α #\_ESI\_ID 5\_profiling\_per\_mont #\_ESI\_ID S profiling per month # ESI ID S CIS fee per ESI 1D % om rute 5\_per\_meter\_fee S\_per\_meter\_fee % om rate \* ESI ID # ESI ID \* ESL TO Customer Enrollment and Switching (Texas SET) 49 Counterparty Trading System 50 Deal Capture, Trade Capture, Risk Management 51 Icense 18 Competitive Retailer Information System
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20 license 28 Load Profiling and Data Aggregation 29 Profiling Application 30 Horne Customer Care System (CCS)
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EGSI Comparative Cost Estimate

Workpaper 4: Systems Summary

EGSI Comparative Cost Estimate Workpaper 4: Systems Summary

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64 IT Infrastructure Monkoring 65		\$62,172	328,107	359,723	1,923,621		
66 Employee Workstations 67 Teisb	# workstations \$ workstation			341,500	342,500		

EGSI TTC Cost Case

EGSI Comparative Cost Estimate
Workpaper 5: Other Transition Expenses Summary

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EGSI Comparative Cost Estimate Reference 1: Benchmark References

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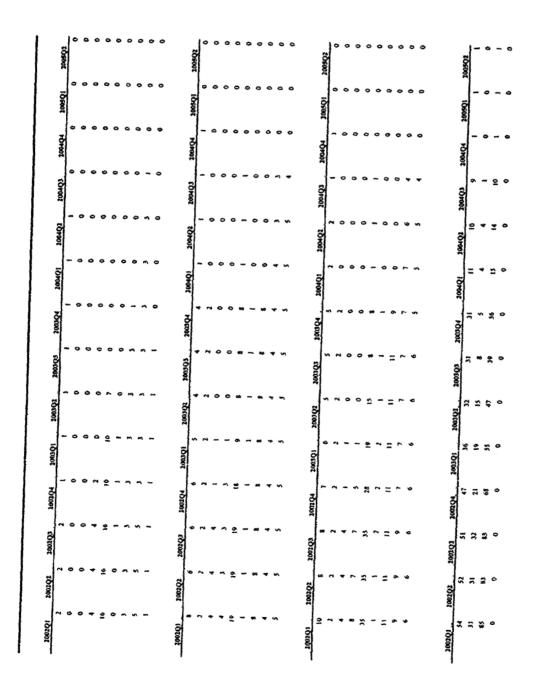
TMG Consulting: "CIS Pricing Considerations", Greg Galluzi, September 2003

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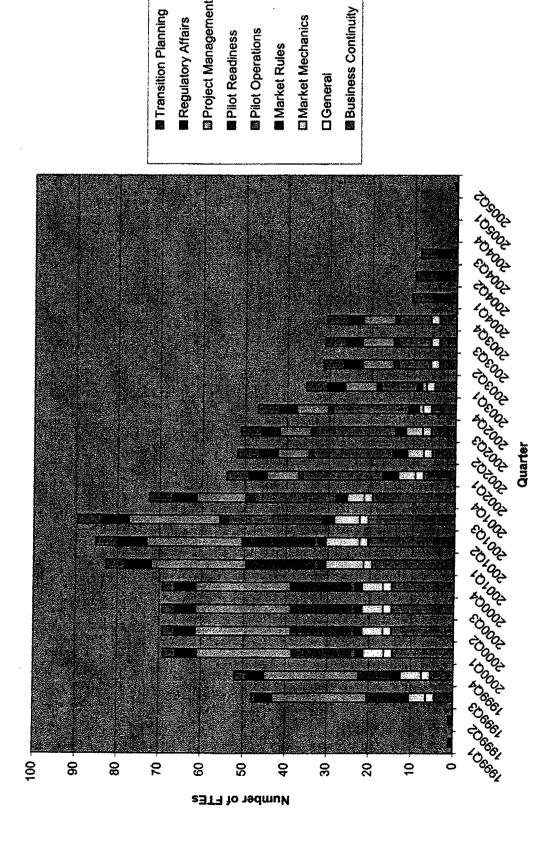
ECSI Comparative Cost Estimate	Reference 2: Chart Supporting Material

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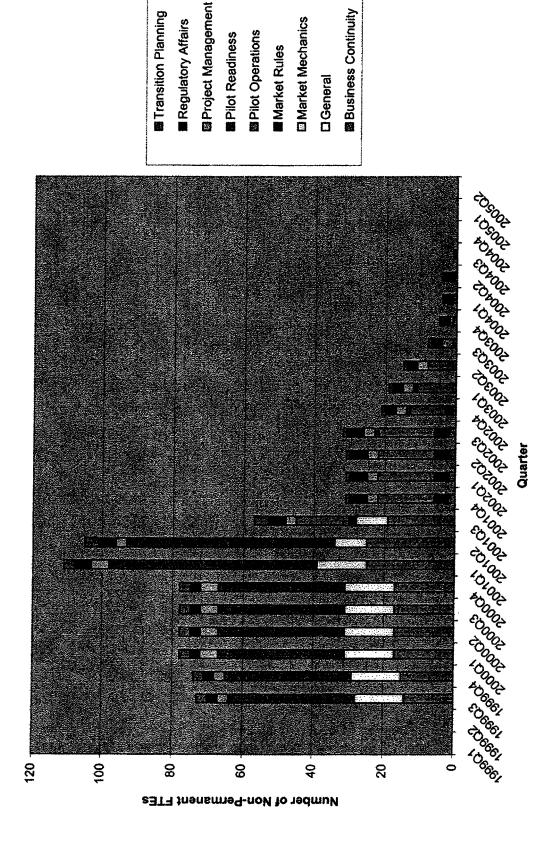


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Reference 3: Internal FTE Resource Loading by Project



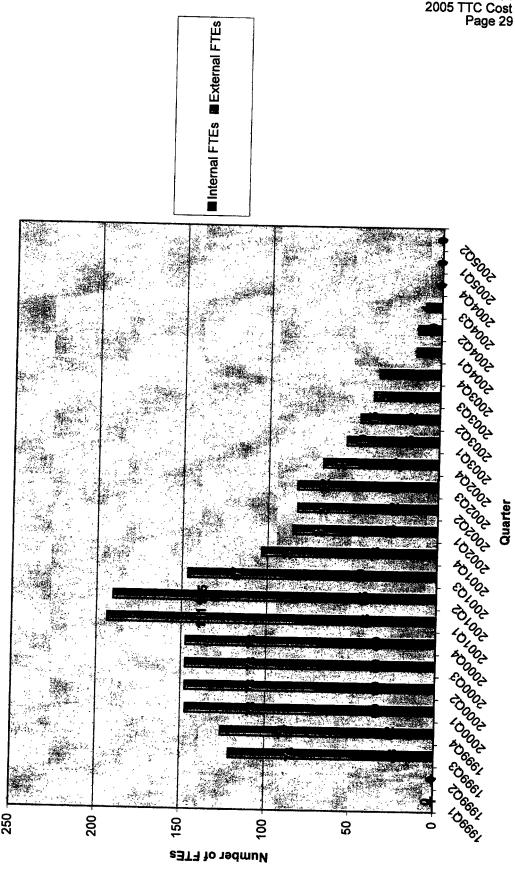
Reference 4: External FTE Resource Loading by Project



**EGSI TTC Cost Case** 3-90

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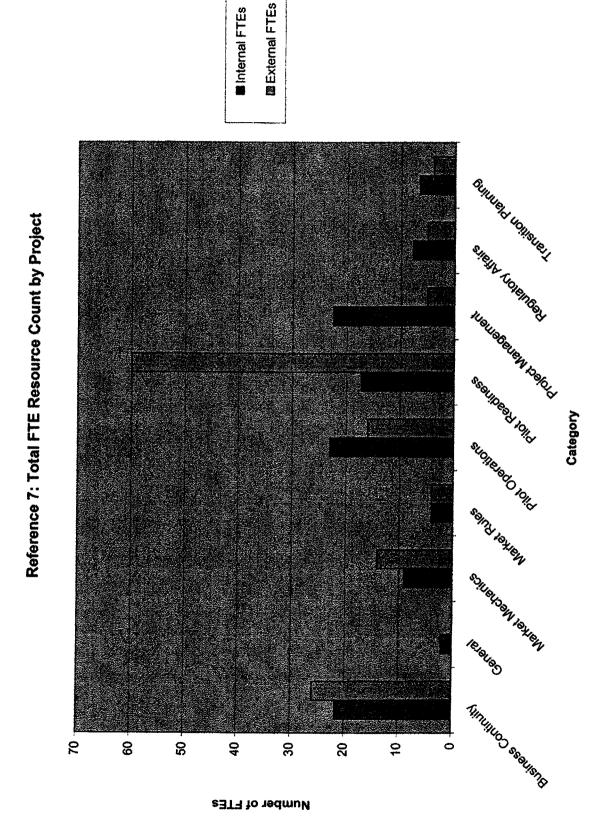
Exhibit VGC-2 2005 TTC Cost Case Page 29 of 31



Reference 5: Internal and External FTE Resource Loading by Employee Type

Exhibit VGC-2 2005 TTC Cost Case Page 30 of 31 \$ 8 → External FTEs Internal FTEs 2000 5 5 5 7 7 2 2003 3 2003 O2 Reference 6: FTE Resource Loading Comparison 8 5 2803 38 49 \$ 8 47 7 දි දි 32 54 2002 2002 Q1 Q2 31 22 28 8 5 3 2 2 2001 2001 Q2 Q3 2 8 105 82 2001 Q1 83 E 5 5 5 8 8 8 2000 2000 2 Q2 Q3 69 *8* 8 8 8 8 1999 Q4 52 98 8 8 23 66 66 70 1999 120 100 8 4 External FTEs 20 Internal FTEs 9

# FTEs



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Exhibit VGC-3 2005 TTC Cost Case Page 1 of 9

## Systems



# Timeline of system development

SB7 passed in 1999

During the Fall of 1999, ERCOT developed bid documents to acquire the systems necessary to support the Restructuring of the Texas electric market

Through a process involving the ERCOT Staff, PUC staff, Market Participants, and a number of vendors, a system was designed to support the implementation of the Protocols which define the Texas market

Anderson Consulting (now Accenture) was selected as ERCOT's prime vendor for the development of systems needed to support the new Texas electric market

Systems were designed and built by January 1, 2001 at which time system testing was initiated

Market Trials began on April 1 2001 and the New Market was initiated on July 3 198 2001

On August 1st, 2001 ERCOT became the largest control area in North America

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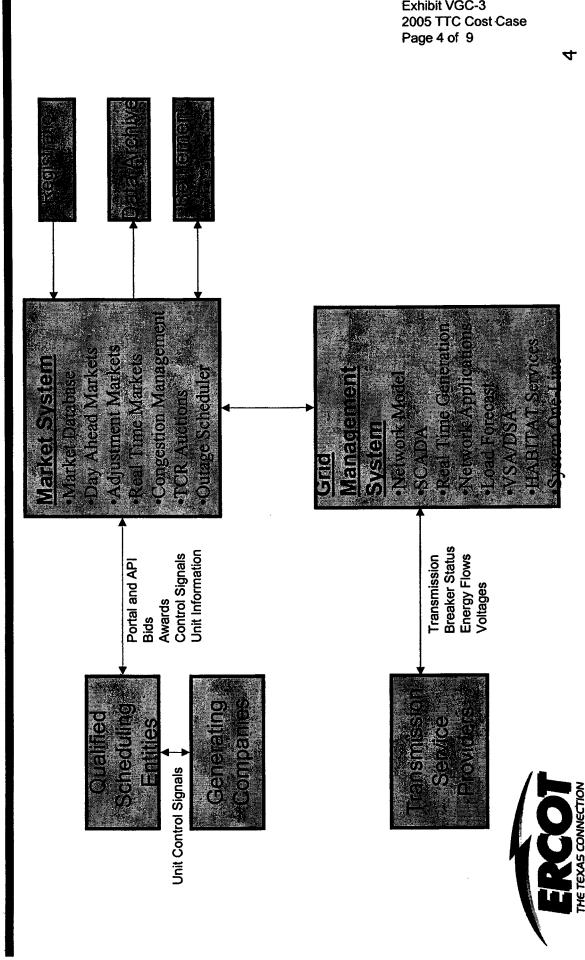
## Exhibit VGC-3 2005 TTC Cost Case Page 3 of 9

## 3 Commercial Operations **ERCOT Wide Area Network**

ERCOT Systems Overview

## **Exhibit VGC-3**

# Market and Power Systems Overview



## Exhibit VGC-3

2005 TTC Cost Case Page

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## Commercial Systems Overview



Daily settlement

Development and

maintenance of

profiles

Market reports

Application of T&D

Dispute research

A/R maintenance

statement review

Invoice preparation

and validation

Billing &

Invoice transmittal

and confirmation

Manual calculations

Dispute resolution and mplementation

UFE determination

and allocation

Zone aggregation

· Generation metering Metering standards installation review system operation Data acquisition and inspection Market Participant Switch oversight registration and Customer care maintenance services

 Issue resolution Reporting

· Generation metering validation, editing and estimation

