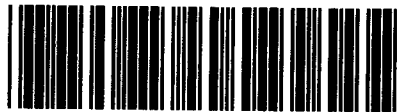




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Addendum StartPage: 0

SOAH DOCKET NO. 473-11-2330
DOCKET NO. 38929

APPLICATION OF ONCOR ELECTRIC §
DELIVERY COMPANY, LLC FOR § BEFORE THE
AUTHORITY TO CHANGE RATES § PUBLIC UTILITY COMMISSION
OF TEXAS

**TEXAS INDUSTRIAL ENERGY CONSUMERS' SIXTH SET OF REQUESTS
FOR INFORMATION TO ONCOR ELECTRIC DELIVERY COMPANY, LLC**

Pursuant to § 22.144 of the Commission's Procedural Rules, Texas Industrial Energy Consumers ("TIEC") requests that Oncor Electric Delivery Company ("Oncor" or "the Company"), by and through its attorneys of record, provide all of the information requested on the attached Exhibit A, within ten working (10) days of receipt thereof pursuant to Order No. 2.

Pursuant to P.U.C. PROC. R. 22.144(c)(2), TIEC further 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 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 P.U.C. PROC. R. 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. TIEC 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 to the requests on the attached Exhibit "A" should be sent to the following persons via overnight courier, on a piecemeal basis as individual items become available:

Lino Mendiola
Meghan Griffiths
Michael Boldt
Ben Hallmark
Andrews Kurth LLP
111 Congress Avenue, Suite 1700
Austin, Texas 78701
(512) 320-9200
(512) 320-9292 FAX

Jeffrey Pollock
12655 Olive Blvd., Suite 335
St. Louis, Missouri 63141
(314) 878-5814

DEFINITIONS AND INSTRUCTIONS

A. "Oncor," "the Company," or "you" means Oncor Electric Delivery Company and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

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 or reproduced 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. "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, TIEC specifically requests that any electronic or magnetic data (which is included in the definition of "document") that is responsive to a request herein be produced on CD-Rom in Excel or native format and in a format that is compatible with Microsoft, Macintosh and/or Word Perfect.

D. The terms "and" and "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.

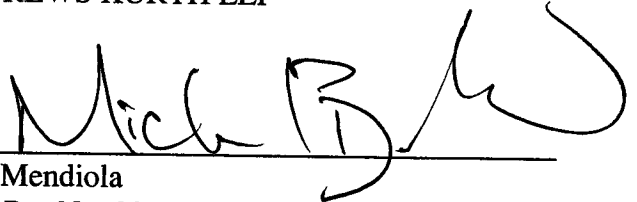
L. Pursuant to P.U.C. Proc. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, 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. Provide all requested documents in native format.

Respectfully submitted,

ANDREWS KURTH LLP

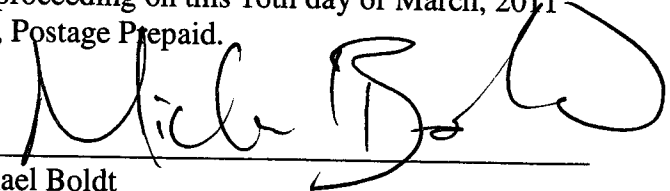
A handwritten signature in black ink, appearing to read "Lino Mendiola", is written over a horizontal line.

Lino Mendiola
State Bar No. 00791248
Meghan Griffiths
State Bar No. 24045983
Michael Boldt
State Bar No. 24064918
Ben Hallmark
State Bar No. 24069865
111 Congress Avenue, Suite 1700
Austin, Texas 78701
(512) 320-9200
(512) 320-9292 FAX

ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS

CERTIFICATE OF SERVICE

I, Michael Boldt, Attorney for TIEC, hereby certify that a copy of the foregoing instrument was served on all parties of record in this proceeding on this 16th day of March, 2011 by electronic mail, facsimile or First Class, U.S. Mail, Postage Prepaid.



Michael Boldt

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DELIVERY COMPANY, LLC FOR	§	PUBLIC UTILITY COMMISSION
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**TEXAS INDUSTRIAL ENERGY CONSUMERS' SIXTH SET OF REQUESTS
FOR INFORMATION TO ONCOR ELECTRIC DELIVERY COMPANY, LLC**

- TIEC 6-1.** Referring to Oncor's response to TIEC 1-5:
- a. Please explain why the sum of the kWh sales for the Primary > 10 kW and Primary Substation classes do not match the adjusted test year sales shown in RFP Schedule II-H-1.1?
 - b. Please provide a schedule showing the Primary > 10 kW sales that were reclassified to the Primary Substation class.
 - c. Please provide a revised response using adjusted test year sales.
- TIEC 6-2.** Please provide all documents you have received from any other Texas jurisdictional investor-owned utility (including anyone representing any other Texas investor-owned utility) that relates to your rate case.
- TIEC 6-3.** Please provide all documents you have provided to any other Texas jurisdictional investor-owned utility (including anyone representing any other Texas investor-owned utility) that relates to your rate case.
- TIEC 6-4.** Please describe the substance of any communications you have had with any other Texas jurisdictional investor-owned utility (including anyone representing any other Texas investor-owned utility) that relates to your rate case.
- TIEC 6-5.** Please identify the individuals involved in the communications described in TIEC 6-4, and state when the communications occurred.
- TIEC 6-6.** Pursuant to P.U.C. Procedural Rule 22.144(c)(2)(A), for any RFI response you have produced in this rate case that does not contain the required information, please supplement those responses to identify "the preparer or person under whose direct supervision the response was prepared, and the sponsoring witness, if any."