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SOAH DOCKET NO. 473-13-4657
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PUBLIC UTILITY COMMISSION
FILING CLERK

ONCOR ELECTRIC DELIVERY
COMPANY LLC'S APPLICATION
FOR 2014 ENERGY EFFICIENCY
COST RECOVERY FACTOR

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BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS

**STEERING COMMITTEE OF CITIES SERVED BY ONCOR'S
FIRST REQUEST FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY, LLC**

The Steering Committee of Cities Served by Oncor ("Cities") files this first information request to Oncor Electric Delivery Company, LLC ("Oncor" or "Company") in the above-styled docket. Oncor is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, (512) 322-5800, the undersigned attorney, within ten (10) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if Oncor receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

DEFINITIONS AND INSTRUCTIONS

A. 'Oncor Electric Delivery Company' or 'Oncor' refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons. To the extent that the request for information addresses a time period prior to the inception of Oncor, the term refers to TXU Electric Delivery Company unless specifically noted.

B. The term 'document' shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design

specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Cities 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 a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. Cities further requests that Oncor produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

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

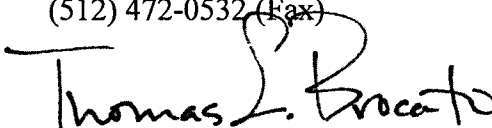
L. Pursuant to P.U.C. PROC. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

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.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800
(512) 472-0532 (Fax)


THOMAS L. BROCATO

State Bar No. 03039030 w/permission

MELISSA A. LONG
State Bar No. 24063949

ATTORNEYS FOR THE STEERING
COMMITTEE OF CITIES SERVED BY ONCOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by e-mail, fax, hand-delivery and/or regular, first class mail on this 7th day of June, 2013 to the parties of record.


THOMAS L. BROCATO

State Bar No. 03039030 w/permission

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CITIES' FIRST RFI
TO ONCOR

- KN 1-1 Please provide in native format (Excel or Word) each of the tables contained in the Direct Testimony of Michael R. Stockard, Exhibit MRS-1 (the Oncor 2013 Energy Efficiency Plan and Report).
- KN 1-2 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 1) Will Oncor's future performance bonus be based on the MW Goal based on the 30% Growth in Demand or on the MW Demand measured as 0.4% of Peak Demand?
- KN 1-3 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 4) Please describe the changes made to the weather adjustment process to better match the ERCOT Settlement method.
- KN 1-4 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 8) For the Commercial Government Facilities MTP, the kW Savings were projected to be 1,139 kW but 1,117 kW were actually reported and verified. While the verified kW savings decreased, the kWh savings increased by 87%. Please provide the underlying documentation for the billing unit projection and explain how the projected and verified kWh savings were determined.
- KN 1-5 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 8) For the Commercial SOP (Basic), the Company projected a 49% load factor ($34,153,618 / (8,000 * 8760)$). However, the reported and verified savings kW and kWh achieved a 64% load factor ($31,667,675 / (5,662 * 8760)$). Please provide the underlying documentation for the billing unit projection and explain how the projected and verified kWh savings were determined.
- KN 1-6 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 8) For the Residential ENERGY STAR Homes MTP, the Company projected a 11% load factor ($500,000 / (500 * 8760)$). However, the reported and verified savings kW and kWh achieved a 27% load factor ($1,332,485 / (557 * 8760)$). Please provide the underlying documentation for the billing unit projection and explain how the projected and verified kWh savings were determined.
- KN 1-7 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 8) For the Residential Targeted Weatherization LI SOP, the Company projected a 41% load factor ($4,381,000 / (1,231 * 8760)$). However, the reported and verified savings kW and kWh achieved a 72% load factor ($3,956,697 / (631 * 8760)$). Please provide the underlying documentation for the billing unit projection and explain how the projected and verified kWh savings were determined.

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- KN 1-8 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 9) Please explain if this table includes R&D expenditures, and, if so, provide R&D expenditures separately by customer class. If not, provide the R&D expenditures by year by customer class.
- KN 1-9 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 10) Please explain why the Commercial SOP (Custom) and Commercial Load Management SOP expenses were higher than the projected budget.
- KN 1-10 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, Table 10) R&D funding for Calendar Year 2012 was budgeted at \$750,000 and \$518,496 was expended. What is the budgeted amount of funding included in the 2013 and 2014 program years for R&D projects?
- KN 1-11 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, page 15) Please provide any analysis available to the Company that supports the assumption that the percentage of families within the Oncor service area that fall below 200% of the poverty threshold is the same as the percentage of all Texas families. If no analysis is available, describe what other measures Oncor has undertaken to validate its assumption, such as contacting local government or social agencies for information.
- KN 1-12 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-1, page 30) Please describe how Research and Development projects are evaluated and the amount of funding determined.
- KN 1-13 For each energy efficiency program please provide the deemed kW and kWh savings and a reference to the PUC project number establishing those values.
- KN 1-14 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-2) Please explain the negative \$105,050 expenditure associated with the Residential Energy Star Low Rise MTP.
- KN 1-15 (Please refer to the Direct Testimony of Michael R. Stockard, Exhibit MRS-3) Please discuss the reasons that the Targeted Low Income Weatherization program ("LIP") has a benefit cost ratio significantly below 1, and describe ways this ratio can be improved.
- KN 1-16 (Please refer to the Direct Testimony of J. Michael Sherburne, WP_JMS_3) Please provide the following information for each customer that qualified to Opt-Out from EECRF Charges under Substantive Rule 25.181(w):
- a. ESID
 - b. Customer Class

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- c. Description of industrial process taking place at the consuming facility
 - d. 2012 Actual MWh
 - e. 2013 Actual MWh
 - f. 2014 Forecast MWh
- KN 1-17 Please provide workpapers supporting the calculation of the projected 2014 kWh by class.
- KN 1-18 For each class of service, please provide a comparison of projected kWh in the 2009, 2010, 2011, and 2012 EECRF filings with the subsequently recorded actual billing units.
- KN 1-19 Please explain if the Company is allocating any costs or revenues using a class allocation methodology that differs from previous EECRF filings.
- KN 1-20 Please provide workpapers supporting the Company's actual energy efficiency programs costs expended in all years prior to 2013. The workpapers should be sufficiently detailed to allow a determination that the costs were reasonable and necessary expenditures in accordance subsection (f) of the revised Energy Efficiency Rule.
- KN 1-21 Please provide receipts supporting any expenses requested for recovery in any of the energy efficiency programs prior to 2013 associated with:
- a. Outreach meetings, program marketing, or other similar contacts with energy efficiency service providers or third-party contractors;
 - b. Energy efficiency-related conferences and other similar meetings attended by Oncor personnel; and
 - c. Entertainment, meals, or travel expenses not otherwise identified in (a) or (b).