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APPLICATION OF SHARYLAND  
UTILITIES, L.P. FOR APPROVAL  
OF AN ADVANCED METERING  
SYSTEM DEPLOYMENT PLAN,  
SURCHARGE, AND NON-  
STANDARD METERING SERVICE  
FEES

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BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**PIONEER NATURAL RESOURCES USA, INC.'S  
THIRD SET OF REQUESTS FOR INFORMATION  
TO SHARYLAND UTILITIES, L.P.**

COMES NOW Pioneer Natural Resources USA, Inc. ("Pioneer" or "Company") and requests that you provide the information and answer the attached questions under oath. It is further requested that the questions be answered in the order in which they are asked with as much detail so as to fully present all of the relevant facts.

**Instructions**

Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the witness or witnesses who will sponsor each of your answers at the hearing in this PUC Docket No. 44361. These questions are continuing in nature and, should there be a change in circumstances that would modify or change any of your answers, then, in such case, please change or modify such answer and submit such changed answer as a supplement to the original answer within five (5) working days of your discovery that such change or modification is appropriate.

In answering these requests for information, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

If you are unable to answer any request fully and completely after exercising due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such request. In addition to specifying those portions, you are to state with regard to each portion:

1. The fact on which you base the contention that you are unable to answer that portion;

2. The knowledge, information, and belief you have concerning that portion; and
3. The acts done and inquiries made by you in attempting to answer such request.

The singular includes the plural and the plural includes the singular.

Masculine, feminine, or neuter pronouns do not exclude the other genders.

The words “document” and “documents” have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. Among other things, the words “document” and “documents” mean the final form and **all drafts and revisions of any kind** of written or graphic matter, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies there from that are different in any way from the original regardless of whether designated “confidential,” “privileged,” or otherwise restricted. Without limiting the generality of the foregoing, the words “document” and “documents” also include information stored or maintained on, or which could be reproduced from, any form of storage or storage device including, without limitation, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape, compact disk, DVD, or similar means.

The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope.

The words “communication” and “communications” include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both communications and statements that are face-to-face and those that are transmitted by any writing or document or by media such as intercoms, telephones, television or radio. These words also include any communications and statements that are transmitted electronically or wirelessly, through means such as, but not limited to, email or text messages.

The words “identify” and “identification,” when used with respect to a natural person or persons, mean to state the name, address(es) and telephone number(s) of each such person. If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “identification,” when used in reference to a person other than a natural person, mean to set forth its:

- (1) full name or title;

- (2) nature or organization, including the state under which the same was organized or incorporated;
- (3) address and telephone number (with area code prefix); and
- (4) principal line of business.

If any of the foregoing information is not available, state any other available means of identifying such person.

The words "identify" and "describe," when used in reference to a fact, mean to state not only the fact itself, but also:

- (1) its date, time, and place;
- (2) the name, address, and telephone number of each person with knowledge of the fact;
- (3) whether the act is supported by an oral communication, a document, or other event; and
- (4) any other evidence that supports such fact.

The words "identify" and "identification," when used in reference to a document, mean to state:

- (1) its date;
- (2) its author;
- (3) its addressee;
- (4) the type of document (e.g., letter, memorandum, receipt, invoice, schedule, report, telegram, chart, photograph, etc.); and
- (5) its present location and identity of its custodian. If any document was, but is no longer, in your possession, custody, or control, or is no longer in existence, explain why.

If any of the foregoing information is not available, state any other available means of identifying such document. If a document is one of a series of pages contained in a book, pamphlet, binder, folder, microfilm (or other storage device), include in your identification of such document(s) any available numerical reference (or other aid) to the pages and line or other portion thereof at which the information referred to can be found. A true and correct copy of any document may be produced and filed with your Answers hereto in lieu of the above information.

The words "identify" and "describe," when used with respect to an oral communication, mean:

- (1) to state the substance of each such oral communication;
- (2) to state the exact words used by each person participating in the oral communication;

- (3) to identify each speaker;
- (4) to identify each person present at the making or reception of such oral communication;
- (5) to specify the date, time, and place of each oral communication;
- (6) to identify each person repeating such oral communication;
- (7) to identify every document which records, memorializes, or relates to all or part of such communication; and
- (8) to identify the mode of such communication (e.g., telephone, face-to-face, etc.).

The words "person" and "persons" as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint ventures, corporations, and any other entities.

The words "relate," "related," "relates," and "relating," as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

All computer readable data should be provided on CD ROMs or DVDs for use on PC-compatible machines. Pioneer will provide a sufficient amount of CDs or DVDs if requested by you before time for your response.

If you have any question concerning the attached Questions or any of these instructions, please contact Kirk Rasmussen at (512) 615-1203.

Unless the specific question permits a longer time period, answers to this Request for Information should be served on Pioneer and filed with the Public Utility Commission of Texas **within 14 calendar days** of your receipt of said request. Service on Pioneer should be made as follows:

Kirk Rasmussen  
Enoch Kever PLLC  
600 Congress Ave., Suite 2800  
Austin, Texas 78701

A single copy of answers should be served upon Mr. Rasmussen by Federal Express and, for **this** purpose, you are authorized to use the following Federal Express Number: 2833 7767 9.

**Respectfully submitted,**

**ENOCH KEVER PLLC**

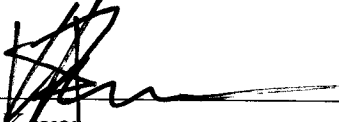
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ATTORNEYS FOR PIONEER NATURAL  
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**CERTIFICATE OF SERVICE**

It is hereby certified that a copy of the foregoing has either been delivered by electronic mail, faxed, hand delivered, sent first class U.S. mail, or sent via Federal Express overnight mail, to all parties on the 2nd day of April 2015.

  
Kirk D. Rasmussen

## **ADDITIONAL DEFINITIONS**

1. The words “SU,” “Sharyland,” “you,” and “your” refers to Sharyland Utilities, L.P., and its attorneys, employees, consultants, contractors, or representatives.
2. “DG” and “distributed generation” mean on-site distributed generation, as defined in P.U.C. Substantive Rule 25.211.
3. “PUC” or “Commission” means the Public Utility Commission of Texas.
4. “AMS” means Advanced Metering System, including the meters and all associated facilities and equipment that make up the AMS, as described in the PUC’s substantive rules and Sharyland’s Request for Approval of An AMS Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fees in this docket.
5. “Standard meter” means an advanced meter.
6. “CIS” means customer information system.
7. “ESI ID” means electric service identifier.
8. “IDR” means Interval Data Recorder, as the term is used in the ERCOT Nodal Protocols.

## QUESTIONS

- 3.1. Refer to the Direct Testimony of Mr. Daniel Price, page 3, lines 5-7.
- a. Does the advanced meter at the customer's premise measure and record the customer's time-differentiated delivered energy, received energy, and demand usage?
  - b. Define "received energy."
  - c. Does "received energy" refer to energy and power received from distributed generation ("DG")?
  - d. Explain fully whether "received energy" can be introduced into Sharyland's distribution system from sources other than DG.
  - e. Identify how many of Sharyland's customers currently qualify as being able to produce "received energy," i.e., from how many customers does Sharyland expect to receive energy as defined in the earlier parts of this question?
- 3.2. Describe any and all modifications that must be made to the standard AMS meter (and operating software and/or any other components, as applicable) to enable the AMS meter and operating software to measure and record received energy.
- 3.3. Identify any and all costs that Sharyland would incur to enable the AMS meter to measure and record received energy. Separately identify software costs, hardware costs, and vendor costs. Provide any and all support for your response.
- 3.4. Refer to the Direct Testimony of Mr. Price, page 3, line 10.
- a. Define and explain fully what is meant by an "appropriate HAN device."
  - b. Will a typical household already have a HAN device in operation? If the answer is no, of what use is the ability to communicate usage data recorded by the meter to a HAN device? Explain fully.
- 3.5. Refer to the Direct Testimony of Mr. Price, page 3, lines 29-31.
- a. Will the collectors store, retain, and then transmit **all** data measured and recorded by the meter, including energy received by a non-DG resource?
  - b. If the answer to part a above is no, explain fully why any data (specifically including energy received by a non-DG source, if applicable) will not be stored, retained, and/or transmitted by the collector.
- 3.6. Refer to the Direct Testimony of Mr. Price, page 10, lines 1-11.
- a. Will all information that is currently being collected and maintained by Sharyland's existing CIS be collected and maintained in the new CIS associated with the AMS?



- b. If the answer to part a above is no, specifically identify what information will not be collected and maintained and explain why such information will not be collected and maintained.
- 3.7. Refer to the testimony of Ms. BJ Flowers, pages 6-7. With respect to customer education and notice, will non-residential customers be notified when their current meter(s) will be replaced and sent the new meter number with the corresponding ESI ID and premise name and old meter number?
  - a. If the answer is yes, how far in advance will the notice be given?
  - b. If the answer is no, explain fully why only residential customers will be directly notified.
- 3.8. Refer to the Direct Testimony of Ralph Goodlet, page 49. Explain fully whether an advanced meter replacing an existing IDR meter will be exempt from the AMS surcharges for the full 12-year surcharge period.
- 3.9. What is Sharyland's proposed settlement procedure in the event of missing usage or demand data or meter or telemetry or database failure? Describe fully.
  - a. Will any form of data estimation or load profile segment be used in place of missing data?
  - b. If data estimation will be used, will Sharyland adhere to the Edison Electric Institute's Uniform Business Practice Rules? If so, please explain that process fully. If not, explain fully what alternative procedure will be used. Provide any and all support for the use of this alternative procedure.
- 3.10. Will Sharyland be metering demand using fixed block, rolling, or other demand intervals for demand measurements and settlement of charges? Explain fully the Sharyland demand calculation or measurement process for settlement following activation of the AMS.
- 3.11. Will Sharyland make available to the customer interval and summary data for IDR meters for data that is not posted to the Smart Meter Texas portal? If so, identify the format Sharyland will use to make the data available, how it can be requested, and to whom (including the email address and other contact information) the request for the data should be sent.
- 3.12. How long will Sharyland store usage, demand, and other billed data in its own database? Explain fully how this data will be made available to customers if the data is not posted to the Smart Meter Texas portal.
- 3.13. Fully describe what customer support Sharyland will provide to customers to assist in resolving any problems they have with the Smart Meter Texas portal.
- 3.14. How will the geographical coordinates of each advanced meter base be recorded? Will that data be made available to the customer? Explain fully.

- 3.15. What performance metrics will Sharyland measure and calculate to determine data quality of each advanced meter after installation?
- 3.16. Provide a full and complete narrative explanation as to why, with respect to the Secondary >10 kW rate case, Sharyland proposes to receive fees for AMS that are 2.45 times greater than the cost of the meter for which the fee was developed.