



Control Number: 44620



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RECEIVED

APPLICATION OF SHARYLAND UTILITIES, L.P. TO REVISE ITS TCRF CLASS ALLOCATION FACTORS AND REQUEST FOR GOOD CAUSE EXCEPTION FROM PUC SUBST. R. § 25.193(c) § § § § § §

BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS PUBLIC UTILITY COMMISSION FILING CLERK 2015 AUG -3 PM 2:39

OFFICE OF PUBLIC UTILITY COUNSEL'S SECOND REQUEST FOR INFORMATION TO SHARYLAND UTILITIES, L.P.

The Office of Public Utility Counsel (OPUC) files and submits this Second Request for Information to Sharyland Utilities, L.P. (Sharyland) in the captioned proceeding.

Under Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22, OPUC requests that Sharyland, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

Definitions

As used in this introduction and in these questions,

- (1) "Sharyland", the "Company", and "Applicant" refer to Sharyland Utilities, L.P. and its affiliates;
(2) "You", "yours" and "your" refer to Sharyland Utilities, L.P. (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
(3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (e-

mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your

- control, please explain why not, and give the present location and custodian of any copy or summary of the document.
6. If any question appears confusing, please request clarification from the undersigned counsel.
 7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
 8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.
 9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
 10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
 11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks

confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If the information requested is included in previously furnished exhibits, workpapers, or 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.
14. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

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

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OPUC's Second Request For Information To
Sharyland

- 2-1. Separately state for <10 kW and >10 kW secondary classes: how many meters or accounts serve residential/household service in addition to barns, wells, pumps, and other agricultural or commercial structures. Provide an estimate of the percentage of accounts within each of those classes that includes service to residential/household structures.
- 2-2. Please explain Sharyland's policy with respect to including residential/household service on accounts served by <10 kW or >10 kW service. To the extent that residential structures associated with farms or ranches are billed under the <10 kW or >10 kW secondary tariffs, please explain whether this is due to tariff policy, historical practice, or error.
- 2-3. Do any of the load research meters for the <10 kW class sample include service for residential/household use? If yes, quantify the percentage of the load research sample affected.
- 2-4. Please provide the dollar per kW cost of Sharyland's embedded net transmission cost (non-McAllen) compared to the dollar per kW of ERCOT transmission cost paid by Sharyland.
- 2-5. Please provide the embedded net transmission cost per kW for Sharyland prior to unbundling.
- 2-6. Is the ERCOT transmission cost per kW increasing on a per annum basis? If yes, provide the rate of increase over the previous five years.
- 2-7. With respect to transmission construction projects undertaken by Sharyland in the former Cap Rock division subsequent to or in anticipation of entering ERCOT, how much of the cost is primarily caused by wholesale load compared to native load?
- 2-8. Please provide Sharyland's coincidence factor for ERCOT peaks.
- 2-9. Please provide Sharyland's diversity ratio for summer peak months.
- 2-10. Please provide copies of all complaints and other correspondence that Sharyland has received from customers regarding the rate increase resulting from Sharyland's Docket No. 41474 rate case.

August 3, 2015

Respectfully submitted,

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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE

PUC Docket No. 44620

I hereby certify that today, August 3, 2015, a true copy of the Office of Public Utility Counsel's Second Request for Information to Sharyland Utilities, L.P. was served on all parties of record via hand delivery, facsimile, or United States First-Class Mail.



Cassandra Quinn