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DOCKET NO. 44620

RECEIVED

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

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PUBLIC UTILITY COMMISSION
2015 APR 15 PM 2:16
PUBLIC UTILITY COMMISSION OF TEXAS
CLERK

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO SHARYLAND UTILITIES, LP (SHARYLAND) QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Sharyland Utilities, LP (Sharyland or Company) by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.


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Dated: April 15, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division


Jason Haas
Attorney-Legal Division
State Bar No. 24032386
(512) 936-7295
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on April 15, 2015 in accordance with Public Utility Commission of Texas Procedural Rule 22.74.


Jason Haas

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
SHARYLAND UTILITIES, LP (SHARYLAND)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

DEFINITIONS

- A. **"Sharyland", "the Company" or "you"** refers to Sharyland Utilities, LP and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. **"Document"** includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

INSTRUCTIONS

- 1) Pursuant to P.U.C. Proc. R. 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) 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.
- 7) Pursuant to P.U.C. Proc. R. 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 1-1 Provide all workpapers, in native format with formulas intact, used to develop the estimated 2014 4CP demand coincident with the ERCOT peak for each rate class.
- Staff 1-2 Please confirm that Sharyland's Transmission Service rate class is entirely composed of power generators.
- Staff 1-3 Please confirm that Sharyland assumes that the Lighting Service rate class contains no customers (such as parking garages) that consume power during the daytime. If Sharyland does make this assumption, please provide any information that supports or addresses this assumption.
- Staff 1-4 For each rate class, please provide the estimation statistics resulting from the 2012 load research study, including the standard error for the estimation of 4CP demand coincident with the ERCOT peak.