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Item Number: 79

Addendum StartPage: 0

PUC DOCKET NO. 44620

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

PUBLIC UTILITY COMMISSION FILING CLERK

OF TEXAS

TEXAS INDUSTRIAL ENERGY CONSUMERS' ERRATA TO THE CROSS-REBUTTAL TESTIMONY OF JEFFRY POLLOCK

Texas Industrial Energy Consumers (TIEC) files the following errata to the Cross-Rebuttal Testimony of Jeffry Pollock. Mr. Pollock's testimony is revised as follows:

**Exhibit JP-1:** The 2015 Billing Determinants originally used were obtained from the "TCRF Projection Summary Updated Allocations WP" as filed by Sharyland Utilities, L.P., which contains different Billing Determinants than provided for in the 2015 September TCRF Update.

A redline and clean version of page 7 and Exhibit JP-1 is attached.

Respectfully submitted,

THOMPSON & KNIGHT LLP

*Katie Coleman* w/permission *Kellee* *Keahore*

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79

**CERTIFICATE OF SERVICE**

I, Katie Coleman, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 17<sup>th</sup> day of September, 2015 by electronic mail, facsimile and/or First Class, U.S. Mail, Postage Prepaid.

Katie Coleman *w/permission*  
Katie Coleman *Kellie*  
*Buahaha*

1 Q MR. JOHNSON ASSERTS THAT SHARYLAND IS DIFFERENT BECAUSE OF ITS  
2 SMALL SIZE RELATIVE TO OTHER LARGER INVESTOR-OWNED UTILITIES IN  
3 TEXAS, WHICH HE SAYS TEND TO HAVE A GREATER LOAD DIVERSITY. DO  
4 YOU AGREE?

5 A No. Sharyland's size is not relevant to determining whether the current TCRF  
6 allocation factors are unjust and unreasonable. What is relevant is whether changes  
7 in relative class loads alone require taking the unprecedented step of changing the  
8 TCRF allocation factors outside of a full base rate case. As discussed later,  
9 Sharyland is not unique, and there is no compelling reason to change the TCRF  
10 allocation factors at this time.

11 Q WHAT HAS BEEN SHARYLAND'S EXPERIENCE WITH RESPECT TO LOAD  
12 GROWTH?

13 A All of Sharyland's delivery rate classes have experienced load growth since  
14 Sharyland's last rate case. This is shown in **Exhibit JP-1**.

15 Q PLEASE EXPLAIN EXHIBIT JP-1.

16 A **Exhibit JP-1** compares the annual TCRF billing determinants by delivery rate class  
17 for two time periods:

- 18 • Sharyland's 2015 TCRF filings (column 1); and  
19 • Sharyland's last rate case (Docket No. 41474), which was based on a  
20 2012 test-year (column 2).

21 As can be seen, all delivery rate classes have experienced load growth, with the  
22 exception of Secondary ≤ 10 kW. The amount of load growth has ranged from -  
23 2.84.9% to 17.818.7% per year (column 3).

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21 As can be seen, all delivery rate classes have experienced load growth, with the  
22 exception of Secondary  $\leq$  10 kW. The amount of load growth has ranged from -2.8%  
23 to 17.8% per year (column 3).

**SHARYLAND UTILITIES, L.P.**  
**Comparison of Average Growth Rates**  
Sharyland Utilities, L.P.

Line	TCRF Class	Billing Determinants		Avg. Annual Growth Rate
		2015 Filings (1)	2012 Rate Case (2)	
1	Residential Service	352,270,124	315,684,186	3.7%
2	Secondary ≤ 10 kW Secondary > 10 kW	128,227,420	139,474,498	-2.8%
3	IDR	6,532		
4	Non-IDR	1,957,765	1,525,895	8.7%
5	Primary Service	179,308		
6	Non-IDR	<b>1,843,824</b>	<b>1,127,619</b>	<b>17.8%</b>
7	Lighting Service	59,532	44,808	9.9%