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Addendum StartPage: 0

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REVIEW OF THE RATES OF § BEFORE THE STATE OFFICE
§
§ OF
§
SHARYLAND UTILITY COMPANY ADMINISTRATIVE HEARINGS


**CITY OF MISSION'S RESPONSES TO SHARYLAND UTILITIES, L.P. AND
SHARYLAND DISTRIBUTION & TRANSMISSION SERVICES, LLC'S
SECOND REQUEST FOR INFORMATION**

The City of Mission ("Mission") files this response to Sharyland Utilities L.P. ("Sharyland") and Sharyland Distribution & Transmission Services, L.L.C.'s ("SDTS") (collectively "Sharyland") Second Request for Information. Mission received this Second Request for Information on March 2, 2017. All parties may treat these answers as if they were filed under oath.

Respectfully submitted,

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Alton J. Hall, Jr.
ATTORNEYS FOR CITY OF MISSION

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March, 2017, a true and correct copy of the foregoing document was served upon on all parties of record by email, facsimile and/or First Class Mail.



Alton J. Hall, Jr.

SU-MISSION 2-1

Please describe the source of the software Mr. Garrett uses to perform depreciation studies.

RESPONSE: Mr. Garrett uses a proprietary software program licensed by AUS Consultants. The software program has been used to develop numerous depreciation studies for utility companies in various jurisdictions for many years.

Preparer: David Garrett

Sponsor: David Garrett

SU-MISSION 2-2

What is the basis for the Iowa Curve points used by Mr. Garrett's software? (e.g. book references, authoritative treatises, etc.

RESPONSE: Mr. Garrett explains and cites the various sources of the Iowa curves in Appendix B of his testimony.

Preparer: David Garrett

Sponsor: David Garrett

SU-MISSION 2-3

Please provide all support and justification for Mr. Garrett's dispersion recommendations for accounts 353, 354, and 355.

RESPONSE: Please see Section V of Mr. Garrett's testimony along with the appendices, exhibits, workpapers, source documents, and other materials cited to and incorporated therein.

Preparer: David Garrett

Sponsor: David Garrett

SU-MISSION 2-4

Is Mr. Garrett aware of any electric utility companies with a life at or below the 50 years Mr. Watson recommends for Account 352? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett

Sponsor: David Garrett

SU-MISSION 2-5

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 352 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-6

Is Mr. Garrett aware of any electric utility companies with a life at or below the 45 years Mr. Watson recommends for Account 353? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-7

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 353 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-8

Is Mr. Garrett aware of any electric utility companies with a life at or below the 60 years Mr. Watson recommends for Account 354? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-9

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 354 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-10

Is Mr. Garrett aware of any electric utility companies with a life at or below the 54 years Mr. Watson recommends for Account 355? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-11

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 355 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-12

Is Mr. Garrett aware of any electric utility companies with a life at or below the 50 years Mr. Watson recommends for Account 356? If so, please provide the company name, jurisdiction, and the docket number approving those lives

RESPONSE: No

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-13

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 356 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-14

Is Mr. Garrett aware of any electric utility companies with a life at or below the 35 years Mr. Watson recommends for Account 362? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-15

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 362 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-16

Is Mr. Garrett aware of any electric utility companies with a life at or below the 39 years Mr. Watson recommends for Account 365? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-17

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 365 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-18

Is Mr. Garrett aware of any electric utility companies with a life at or below the 37 years Mr. Watson recommends for Account 367? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-19

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 367 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-20

Is Mr. Garrett aware of any electric utility companies with a life at or below the 41 years Mr. Watson recommends for Account 368? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-21

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 368 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-22

Is Mr. Garrett aware of any electric utility companies with a life at or below the 35 years Mr. Watson recommends for Account 369? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-23

Is Mr. Garrett aware of any electric utility companies with a life at or above Mr. Garrett's recommended life for Account 369 in this proceeding? If so, please provide the company name, jurisdiction, and the docket number approving those lives.

RESPONSE: Yes. Public Service Company of Oklahoma, Oklahoma, Cause No. PUD 201500208

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-24

Did Mr. Garrett consider any geographical differences between Idaho, Oklahoma, the Texas Panhandle and the various Sharyland service areas? If yes, please describe the geographical criteria that Mr. Garret considered.

RESPONSE: No.

Preparer: David Garrett
Sponsor: David Garrett

SU-MISSION 2-25

In Exhibit DJG-4, Mr. Garrett shows a life of 66 R4 for Account 359 in column 2. What is Mr. Garrett's life recommendation for that account? Please provide all support and workpapers for Mr. Garrett's recommendation.

RESPONSE: Mr. Garrett recommends an average life of 66 years and a remaining life of 61.8 years for this account, as shown in columns [2] and [7] in Exhibit DJG-4. Please see Exhibit DJG-9 for detailed remaining life calculation.

Preparer: David Garrett

Sponsor: David Garrett

SU-MISSION 2-26

In Exhibit DJG-4, Mr. Garrett shows a life of 59 R4 for Account 361 in column 2. What is Mr. Garrett's life recommendation for that account? Please provide all support and workpapers for Mr. Garrett's recommendation

RESPONSE: Mr. Garrett recommends an average life of 59 years and a remaining life of 55.2 years for this account, as shown in columns [2] and [7] in Exhibit DJG-4. Please see Exhibit DJG-9 for detailed remaining life calculation.

Preparer: David Garrett

Sponsor: David Garrett

SU-MISSION 2-27

In Exhibit DJG-4, Mr. Garrett shows a life of 67 R3 for Account 366 in column 2. What is Mr. Garrett's life recommendation for that account? Please provide all support and workpapers for Mr. Garrett's recommendation.

RESPONSE: Mr. Garrett recommends an average life of 67 years and a remaining life of 59.4 years for this account, as shown in columns [2] and [7] in Exhibit DJG-4. Please see Exhibit DJG-9 for detailed remaining life calculation.

Preparer: David Garrett

Sponsor: David Garrett

SU-MISSION 2-28

In Exhibit DJG-4, Mr. Garrett shows a life of 49 L3 for Account 368 in column 2. Mr. Garrett's testimony recommends 53 L2.5. Please explain this discrepancy. What is Mr. Garrett's recommendation for that account? Please provide all support and workpapers for Mr. Garrett's recommendation.

RESPONSE: There is no discrepancy. Mr. Garrett's testimony states: "Although the L2.5-53 curve qualifies as "good" under both the CI and REI scales, I propose using the L3-49 curve for this account. . ." Thus, Mr. Garrett recommends an L3-49 curve for this account, as stated in his testimony and Exhibit DJG-4. All supporting workpapers and exhibits are attached to Mr. Garrett's testimony.

Preparer: David Garrett

Sponsor: David Garrett