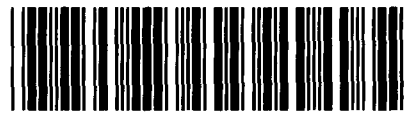




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DOCKET NO. 47576

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APPLICATION OF THE CITY OF §
LUBBOCK THROUGH LUBBOCK §
POWER AND LIGHT FOR AUTHORITY §
TO CONNECT A PORTION OF ITS §
SYSTEM WITH THE ELECTRIC §
RELIABILITY COUNCIL OF TEXAS §

PUBLIC UTILITY COMMISSION
OF TEXAS

ONCOR ELECTRIC DELIVERY COMPANY LLC'S STATEMENT OF POSITION

Pursuant to Order No. 7, Oncor Electric Delivery Company LLC ("Oncor") timely files its Statement of Position in this proceeding under 16 Tex. Admin. Code ("TAC") § 22.124.¹

I. STATEMENT OF POSITION

As the Preliminary Order issued by the Public Utility Commission of Texas ("Commission") in this docket recognizes, this proceeding involves unique questions of policy.² The numerous issues of first impression that will be discussed in this proceeding may potentially establish precedent regarding the future integration of new systems into the Electric Reliability Council of Texas, Inc. ("ERCOT") region.

Oncor has reviewed the application, supporting materials, direct testimony, and discovery filed to date by the City of Lubbock through Lubbock Power and Light ("LP&L") and the other parties. At this time, Oncor takes no position on the factual, legal, and policy issues identified in the Preliminary Order. However, this proceeding has not yet benefited from testimony filed by intervenors or Commission Staff, rebuttal testimony from LP&L, or further discovery. The potential policies, procedures, and precedents established in this proceeding will benefit from those parties' insights. Oncor reserves its right to continue participating in this proceeding as a party, including but not limited to its right to potentially cross-examine witnesses at hearing and brief the issues presented following hearing.

¹ Order No. 7 Memorializing Prehearing Conference, Adopting Revised Protective Order, Adopting Procedural Schedule, and Addressing Service by Email (Oct. 20, 2017) (establishing Nov. 28, 2017 as the deadline for filing intervenor testimony). Oncor notes that the procedural schedule did not explicitly establish a different deadline for filing statements of position than the one set by 16 TAC § 22.124, but files this Statement of Position at this time out of an abundance of caution.

² Preliminary Order at 2 (Sept. 29, 2017).

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II. CONCLUSION & PRAYER

WHEREFORE, PREMISES CONSIDERED, Oncor respectfully requests that the parties and Commission take notice of its Statement of Position and that Oncor may continue participating in this proceeding as a party.

Respectfully submitted,

VINSON & ELKINS LLP

By: Jaren Taylor *by w/s
w/perm*

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**ATTORNEYS FOR ONCOR ELECTRIC
DELIVERY COMPANY LLC**

CERTIFICATE OF SERVICE

Pursuant to 16 TAC § 22.74 and Order No. 7, I certify that on November 28, 2017, a true and correct copy of the foregoing document was served on all parties of record in this matter either in person; by agent; by courier receipted delivery; by first class mail; by certified mail, return receipt requested; by facsimile; or by email.

Jaren Taylor *by w/s
w/perm*