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**PUC DOCKET NO. 48325
SOAH DOCKET NO. 473-18-4478**

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APPLICATION OF ONCOR § BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY §
LLC FOR AUTHORITY TO § OF
DECREASE RATES BASED ON THE §
TAX CUTS AND JOBS § ADMINISTRATIVE HEARINGS
ACT OF 2017 §

**ONCOR ELECTRIC DELIVERY COMPANY LLC'S
FIRST SET OF REQUESTS FOR INFORMATION
TO ALLIANCE OF ONCOR CITIES**

Oncor Electric Delivery Company LLC ("Oncor") requests that the Alliance of Oncor Cities ("AOC"), by and through its attorneys of record, provide the information requested and answer the attached questions under oath. It is further requested that the questions be answered in the order in which they are asked with as much detail so as to fully present all of the relevant facts.

Instructions and Definitions

Please answer the attached questions in accordance with the Public Utility Commission of Texas ("Commission") Procedural Rules and the Texas Rules of Civil Procedure. In answering these requests for information, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

The singular includes the plural and the plural includes the singular. Masculine, feminine, or neuter pronouns do not exclude the other genders.

The words "document" and "documents" have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. The words "document and "documents" mean the final form and all drafts and revisions of any kind of written or graphic matter, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies there from which are different in any way from the original regardless of whether designated "confidential," "privileged," or otherwise restricted. Without limiting the generality of the foregoing, the words "document" and "documents" also

include information stored or maintained on, or which could be reproduced from, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape, USB drive or similar means.

The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope. The words “communication” and “communications” include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both communications and statements which are face-to-face and those which are transmitted by any writing or document or by media such as intercoms, telephones, email, television or radio.

The words “person” and “persons” as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint ventures, corporations, and any other entities, including without limitation, any electric utility, cogenerator, independent power producer, qualifying facility, or any other entity which generates electricity.

The words “regarding,” “relate,” “related,” “relates” and “relating,” as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

The term “Commission” refers to the Public Utility Commission of Texas.

If you have any question concerning the attached Requests for Information or any of these instructions, please contact the undersigned.

Respectfully submitted,

By:



Tab R. Urbantke

State Bar No. 24034717

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Oncor Electric Delivery Company LLC

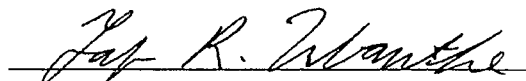
1616 Woodall Rodgers Freeway

Dallas, Texas 75202

**ATTORNEYS FOR ONCOR ELECTRIC
DELIVERY COMPANY LLC**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been e-mailed, hand delivered, or sent via overnight delivery or first class United States mail, postage prepaid, to all parties of record in this proceeding, on this the 3rd day of August, 2018.



Oncor's First Request for Information to AOC

- 1-1. Please provide the following information for AOC witness Constance T. Cannady:
 - (a) all documents, tangible things, reports, models or data compilations that have been provided to the witness in anticipation of his or her testimony. For the rate filing package filed by Oncor in this proceeding, do not provide the documents but instead list the portions of the rate filing package (including any updates) provided to the witness, including the specific pages provided (provide Bates Stamp numbers). For discovery responses that have been provided by Oncor in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided to the witness (provide Bates Stamp numbers);
 - (b) all documents, tangible things, reports, models or data compilations that have been reviewed by the witness in anticipation of his or her testimony. For the rate filing package filed by Oncor in this proceeding, do not provide the documents but instead list the portions of the rate filing package (including any updates) reviewed by the witness, including the specific pages reviewed (provide Bates Stamp numbers). For discovery responses that have been provided by Oncor in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided or reviewed (provide Bates Stamp numbers);
- 1-2 Please provide and describe the financial analyses, if any, that were performed by or for Ms. Cannady to determine the impact of her recommendations in this proceeding on Oncor's financial health or metrics, or its credit profile.
- 1-3 Please list and provide all ratings agency reports reviewed by Ms. Cannady in connection with the preparation of her testimony in this proceeding.
- 1-4 Please list the Commission precedent, final orders, or other Commission decisions, besides the final order in Docket No. 9300, that Ms. Cannady is aware of that address an appropriate amortization period for unprotected excess accumulated deferred federal income taxes.