

Control Number: 48371



Item Number: 387

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2018 AUG 16 PM 2:33

ENERGY TEXAS, INC.'S STATEMENT § BEFORE THE STATE OFFICE
OF INTENT AND APPLICATION FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

**OFFICE OF PUBLIC UTILITY COUNSEL'S
SECOND REQUEST FOR INFORMATION TO
PUBLIC UTILITY COMMISSION STAFF**

The Office of Public Utility Counsel (OPUC) propounds this Second Request for Information (RFI) to Public Utility Commission Staff (Staff). Under P.U.C. Procedural Rules 22.141-145, OPUC requests that Staff, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

Definitions

As used in this introduction and in these questions,

- (1) "Staff" refers to the Staff of the Public Utility Commission;
- (2) "You", "yours" and "your" refer to Staff (as defined above), including its employees, consultants, agents, and attorneys.
- (3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts,

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agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.
6. If any question appears confusing, please request clarification from the undersigned counsel.

7. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.
9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.

13. If the information requested is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
14. Data should be provided in native electronic format including active EXCEL workbooks and all linked workbooks, with all formulas, cell references, links, etc., intact, functioning, and complete for all tables, figures, and attachments in the testimony.
15. To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

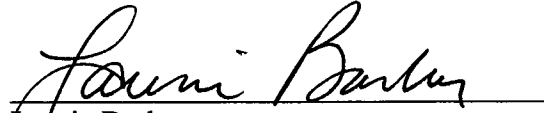
Claim of Privilege

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

August 16, 2018

Respectfully submitted,

Tonya Baer
Public Counsel
State Bar No. 24026771



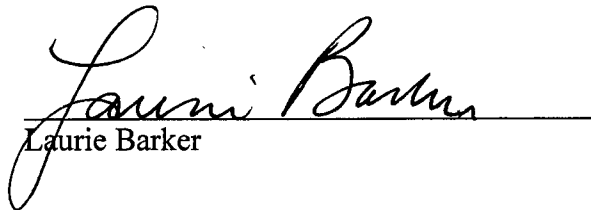
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CERTIFICATE OF SERVICE

SOAH Docket No. 473-18-3733
PUC Docket No. 48371

I certify that today, August 16, 2018, a true copy of the Office of Public Utility Counsel's Second Request for Information to Public Utility Commission Staff was served on all parties of record via electronic delivery, hand-delivery, facsimile, or United States First-Class Mail,



Laurie Barker

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- 2-1.** Referencing the errata filed by Mr. Gervais on August 16, 2018:
- a. Please describe the errata related to the FERC rider, including what errors are being corrected, how the methodology has changed, and provide any documents or workpapers (in native format) provided to, reviewed by, relied upon, or created by Mr. Gervais with regard to this errata.
 - b. Please describe the errata related to Ms. Stark's depreciation adjustment, including what errors are being corrected, how the methodology has changed, and provide any documents or workpapers (in native format) provided to, reviewed by, relied upon, or created by Mr. Gervais with regard to this errata.
 - c. Please describe how and indicate when Mr. Gervais became aware that there was an error with regard to the FERC rider.
 - d. Please describe how and indicate when Mr. Gervais became aware that there was an error with regard to the depreciation adjustment. How did Mr. Gervais learn of this error?
- 2-2.** Please identify whether Staff has reviewed the cost allocation and rate design testimony of Mr. Pollock?
- 2-3.** Is Staff in agreement with the proposal by Mr. Pollock to change the refund allocator for the unprotected non-storm related excess ADFIT? If yes, why? If not, why not? Please provide the facts relied upon in support of your answer.
- 2-4.** Is Staff in agreement with the proposal by Mr. Pollock to retain the Schedule LIPS voltage adjustments? If yes, why? If not, why not? Please provide the facts relied upon in support of your answer.
- 2-5.** Is Staff in agreement with Mr. Pollock's recommendation that ETI's proposed change to schedule IS that would eliminate the off-peak provision in determining the amount of Firm Contract Power during a curtailment should be rejected? If yes, why? If not, why not? Please provide the facts relied upon in support of your answer.
- 2-6.** Is Staff in agreement with Mr. Pollock's recommendation that ETI's proposal to limit the frequency and duration of maintenance service provided under Schedule SMS to only sit times and/or 30 days per Contract Year be rejected? If yes, why? If not, why not? Please provide the facts relied upon in support of your answer.
- 2-7.** Please identify whether Staff has reviewed the cost allocation and rate design testimony of Mr. Tillman?
- 2-8.** Is Staff in agreement with Mr. Tillman's recommendation to adopt his recommended rate design for the GS Rate Class? If yes, why? If not, why not? Please provide the facts relied upon in support of your answer.
- 2-9.** Please identify whether Staff has reviewed the cost allocation and rate design testimony of Mr. Maduzia, Jr?

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- 2-10.** Is Staff in agreement with Mr. Maduzia, Jr.'s recommended changes to the Schedule SMS tariff? If yes, why? If not, why not? Please provide the facts relied upon in support of your answer.