

Control Number: 48929



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DOCKET NO. 48929

**JOINT REPORT AND APPLICATION
OF ONCOR ELECTRIC DELIVERY
COMPANY LLC, SHARYLAND
DISTRIBUTION & TRANSMISSION
SERVICES L.L.C., SHARYLAND
UTILITIES, L.P., AND SEMPRA ENERGY
FOR REGULATORY APPROVALS
PURSUANT TO PURA §§ 14.101, 37.154,
39.262, AND 39.915**

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2019 MAR 15 AM 9:42
BEFORE THE

FILING CLERK

PUBLIC UTILITY COMMISSION

OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO SHARYLAND UTILITIES, L.P. AND SHARYLAND DISTRIBUTION &
TRANSMISSION SERVICES, L.L.C.
QUESTION NOS. STAFF 1-1 THROUGH 1-4**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Public Utility Commission of Texas (Commission) Staff, representing the public interest, requests that Sharyland Utilities, L.P. and Sharyland Distribution & Transmission Services, L.L.C., by and through their attorneys of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

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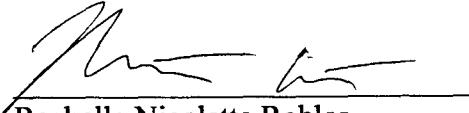
Date: March 15, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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Division Director

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on March 15, 2019 in accordance with 16 TAC § 22.74.


Matthew A. Arth

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DEFINITIONS

- A. "Hunt" or "Hunt organizations" refers to Hunter L. Hunt, InfraREIT Partners, L.P., InfraREIT, Inc., Sharyland Distribution & Transmission Services, L.L.C., Sharyland Utility, L.P., SU Investment Partners, L.P., Shary Holdings, L.L.C., and any of their affiliates, including but not limited to Hunt Power, or any person or entity acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- B. "City," "Lubbock," or "LP&L" refers to the City of Lubbock, Lubbock Power & Light, and any person or entity acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- C. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information (RFI) have been transferred beyond the City's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 1-1 THROUGH 1-4**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Commission Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Commission Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 1-1 Admit or deny that Hunt or a Hunt organization was the originator of the idea to integrate Lubbock's load into the Electric Reliability Council of Texas (ERCOT). If the answer is "deny," then explain which person or entity originated the idea for Lubbock to joint ERCOT.
- Staff 1-2 Provide a copy of all documents, presentations, or analyses developing or pitching the idea to integrate Lubbock into ERCOT and the plans for physical interconnection of infrastructure.
- Staff 1-3 Confirm whether there were any agreements between the Hunt organizations and Lubbock for Lubbock to support in proceedings before the Commission the selection of Sharyland for transmission build-out following approval of Lubbock's integration into ERCOT. If so, provide a copy of any such agreements.
- Staff 1-4 Confirm whether there were any agreements between the Hunt organizations and Lubbock for Lubbock to support in proceedings before ERCOT the selection of Sharyland for transmission build-out following approval of Lubbock's integration into ERCOT. If so, provide a copy of any such agreements.