



Control Number: 49594



Item Number: 29

Addendum StartPage: 0

SOAH DOCKET NO. 473-19-5246
PUC DOCKET NO. 49594

RECEIVED

PETITION OF ONCOR ELECTRIC
DELIVERY COMPANY LLC FOR
2020 ENERGY EFFICIENCY COST
RECOVERY FACTOR

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2019 JUN 28 PM 2:51
BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK
ADMINISTRATIVE HEARINGS

**STEERING COMMITTEE OF CITIES SERVED BY ONCOR'S
FIRST REQUEST FOR INFORMATION TO
ONCOR ELECTRIC DELIVERY COMPANY, LLC**

The Steering Committee of Cities Served by Oncor (Cities) file this First Request for Information (RFI) to Oncor Electric Delivery Company, LLC (Oncor or Company) in the above-styled docket. Oncor is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701, within eleven (11) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if Oncor receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

DEFINITIONS AND INSTRUCTIONS

A. "Oncor" or "Company" refers to Oncor Electric Delivery Company, LLC, its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons. To the extent that the request for information addresses a time period prior to the inception of Oncor, the term refers to TXU Electric Delivery Company unless specifically noted.

B. The term "document" shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design

specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

C. Pursuant to Tex. R. Civ. P. 196.4, Cities specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. Cities further requests that Oncor produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. 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.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. 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.

L. Pursuant to 16 Tex. Admin. Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, 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.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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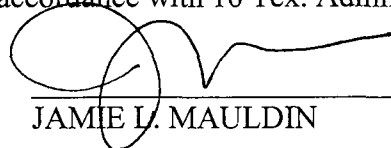
JAMIE L. MAULDIN

State Bar No. 24065694

ATTORNEYS FOR THE STEERING
COMMITTEE OF CITIES SERVED BY ONCOR

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2019, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with 16 Tex. Admin. Code § 22.74.



JAMIE L. MAULDIN

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CITIES' FIRST RFI TO ONCOR

- Cities 1-1. Refer to Exhibit MRS-1, Table 4:
- a. The average annual growth in weather-adjusted peak demand from 2013 to 2017 was 0.9%. From 2017 to 2018, the growth was 3.6%. Please provide an explanation for the significant increase in peak demand in 2018 compared to previous years.
 - b. The average annual growth in weather-adjusted energy consumption from 2013 to 2017 was 1.7%. From 2017 to 2018, the growth was 7.4%. Please provide an explanation for the significant increase in energy consumption in 2018 compared to previous years.
- Cities 1-2. Refer to Exhibit MRS-1, Table 5:
- a. Please explain the program changes or any other drivers for the projected 15% increase in Commercial program demand savings from 2019 to 2020.
 - b. Please explain the program changes or any other drivers for the projected 10% increase in Residential program demand savings from 2019 to 2020.
- Cities 1-3. Refer to Exhibit MRS-1, Table 6. Please provide the basis for the shift of approximately \$1.6 million from Commercial program incentives to Residential program incentives in 2020.
- Cities 1-4. Refer to Exhibit MRS-1, Table 9. Please explain why Commercial program administrative expenses in 2018 were \$552,227 or 24% more than the expenses incurred in 2017, 16% more than projected for 2019 and 23% more than projected for 2020.
- Cities 1-5. Refer to Exhibit MRS-6. Please provide the Targeted Low Income Program (LIP) costs by individual program (i.e. air infiltration, ceiling insulation, heat pump, etc.).
- Cities 1-6. Refer to WP_JMS_3. Please explain the basis and underlying assumptions why Oncor's forecast for the 2019 weather-adjusted energy consumption will be less than 2018 weather-adjusted energy consumption.