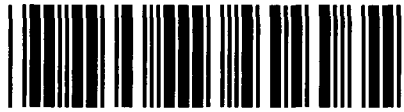


Control Number: 50404



Item Number: 5

Addendum StartPage: 0

DOCKET NO. 50204

**APPLICATION OF FAYETTE
ELECTRIC COOPERATIVE, INC.
TO CHANGE RATES FOR
WHOLESALE TRANSMISSION
SERVICE**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO FAYETTE ELECTRIC COOPERATIVE, INC. QUESTIONS NO. STAFF 2-1-2-2**

The Commission Staff of the Public Utility Commission of Texas (Staff) requests that Fayette Electric Cooperative, Inc. (Applicant) provide the following information and answer the following question(s) under oath. The question(s) 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. These question(s) are continuing in nature, and if there is a relevant change in circumstances, Applicant must submit an amended answer, under oath, as a supplement to its original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of that 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.

5

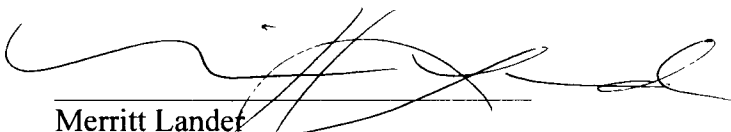
Dated: January 31, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Thomas S. Hunter
Division Director

Rachelle Nicolette Robles
Managing Attorney

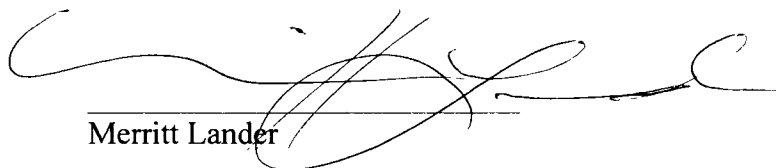


Merritt Lander
State Bar No. 24106183
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7290
(512) 936-7268 (facsimile)
merritt.lander@puc.texas.gov

DOCKET NO. 50204

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on January 31, 2020 in accordance with 16 TAC § 22.74.



Merritt Lander

DOCKET NO. 50204

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO FAYETTE ELECTRIC COOPERATIVE, INC. QUESTIONS NO. STAFF 2-1-2-2**

DEFINITIONS

- 1) "You" refers to Fayette Electric Cooperative, Inc. and any person acting or purporting to act on its behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

DOCKET NO. 50204

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO FAYETTE ELECTRIC COOPERATIVE, INC. QUESTIONS NO. STAFF 2-1-2-2**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), 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) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

DOCKET NO. 50204

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO FAYETTE ELECTRIC COOPERATIVE, INC. QUESTIONS NO. STAFF 2-1-2-2**

Staff 2-1 Please refer to page 32 of the Transmission Cost of Service Rate Filing Package for Non-Investor Owned Transmission Service Providers in the Electric Reliability Council of Texas¹ (Non-IOU TCOS-RFP):

“TSP's share of the total ERCOT wide revenues (based on the ERCOT wide ISO forecast) from transmission of electric energy out of ERCOT over DC ties and revenue from monthly, weekly, and daily planned transmission service, that is not recovered through rates for annual planned transmission service [(Share of Export Revenues) however, shall be credit to Transmission revenue requirement of TSP.”

- a. Has Fayette Electric Cooperative, Inc. (Applicant) credited the Share of Export Revenues referenced above to the Applicant-requested total revenue requirement of \$52,715 as shown in Schedule A?
- b. If the answer to part “a” of this question is “yes,” please provide the amount of such Share of Export Revenues and provide the workpapers used to estimate such Share of Export Revenues, in electronic spreadsheet format with cell references and formulae intact;
- c. If the answer to part “a” of this question is “no,” please explain in appropriate detail why; and
- d. Regardless of Applicant’s response to part “c” of this question, please provide the calculation of Applicant’s Share of Export Revenues as referenced above.

Staff 2-2 Please explain the distinction between 5.4699% rate of return and total rate base of \$78,272,940 in Schedule B, and 5.8804% rate of return and total rate base of \$78,721,300 in schedule C-2 of the Application.

¹ See http://www.puc.texas.gov/industry/electric/forms/rfp/Non_IOU_TCOS_Instr.pdf