



Control Number: 50886



Item Number: 33

Addendum StartPage: 0



Ritchie J. Sturgeon
Counsel

September 1, 2020

Stephen Journey
Commission Counsel
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, TX 78711-3326

Re: *Application of Oncor Electric Delivery Company LLC to Adjust Its Energy Efficiency Cost Recovery Factor*, PUC Docket No. 50886; SOAH Docket No. 473-20-3886

Dear Mr. Journey:

Oncor Electric Delivery Company LLC files this letter on behalf of itself, the Public Utility Commission of Texas Staff, and the Steering Committee of Cities Served by Oncor (collectively the "Parties"). The Parties appreciate and agree with the Proposed Order, with minor clarifications regarding applicant's name in Conclusions of Law (CoL) 20 and 25 and regarding Finding of Fact (FoF) 45.

Specifically, the Parties respectfully request that "TNMP" be changed to "Oncor" in the proposed CoL 20 as follows: "Under PURA § 33.023(b), ~~TNMP~~Oncor is required to reimburse Cities for its reasonable rate-case expenses incurred in this proceeding."

Similarly, the proposed CoL 25 also inadvertently references "TNMP" and should be changed as follows consistent with the proposed FoF 50: "Oncor's net cost recovery of ~~\$735,989~~\$13,161,585-which consists of the EM&V expenses allocated to Oncor for the evaluation of program year 2020; an adjustment for the net over-recovery of program year 2019 energy-efficiency costs with interest; ~~TNMP's~~Oncor's performance bonus earned in 2019; and ~~TNMP's and Cities'~~ rate-case expenses incurred in Docket No. 49594-complies with PURA § 39.905 and 16 TAC § 25.182(d)."

Lastly, FoF 45 states that the \$5,500,954 in necessary administrative costs incurred for the 2019 energy-efficiency program amount to 11.4% of the total program costs. The Parties believe that the \$5,500,954 in administrative costs amount to 11.2% of the \$49,000,927¹ of total program funds expended for calendar year 2019 when adding \$748,525 in evaluation, measurement, and verification (EM&V) costs for evaluation of program year 2019 (but subtracting \$735,989 for EM&V costs for evaluation of program year 2020) required by 16 Texas Administrative Code (TAC) §§ 25.181(d)(1) and 25.181(g) and Ordering Paragraph 2 in the Final Order in Docket No. 49594, Sept. 27, 2019. The Parties believe that the 11.4% figure may have inadvertently been calculated by reducing the \$49,000,927 total program cost by the \$735,989 in EM&V costs, as \$5,500,954 is 11.4% of \$48,264,938. Accordingly, the Parties respectfully request that FoF 45 be amended as

¹ Oncor Electric Delivery Company LLC 2020 Energy Efficiency Plan and Report, Exhibit GDJ-1 at 26.

Oncor
1616 Woodall Rodgers Freeway
Dallas, Texas 75202
Tel 214 486 6345
ritchie.sturgeon@oncor.com

follows: "Oncor incurred \$5,500,954 in necessary administrative costs and \$151,015 in research and development costs for the 2019 energy-efficiency programs to meet Oncor's goals. These amounts were ~~41.4%~~11.2% and 0.3%, respectively, of the total program costs for the previous year. Therefore, Oncor's cumulative cost of administration and research and development was ~~41.7%~~11.5% of the total program costs."

The Parties greatly appreciate the Proposed Order and the opportunity to provide the foregoing suggested clarifications. The undersigned is authorized to represent the concurrence of the Parties to this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Ritchie J. Sturgeon". The signature is written in a cursive style with a horizontal line extending from the end.

Ritchie J. Sturgeon

Cc: All Parties