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SOAH DOCKET NO. 473-21-2606
PUC DOCKET NO. 52195

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO CHANGE	§	OF
RATES	§	ADMINISTRATIVE HEARINGS

OFFICE OF PUBLIC UTILITY COUNSEL’S
FIRST REQUEST FOR INFORMATION TO
FREEPORT-MCMORAN, INC.

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this First Request for Information to Freeport-McMoRan, Inc. (“Freeport”). OPUC requests that Freeport provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that Freeport-McMoRan provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “Freeport,” the “Company,” the “Intervenor”, “You,” and “Your” refer to Freeport-McMoRan, Inc. and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
2. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, 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, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, 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 sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. 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 to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information 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 to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including 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 provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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- 1-1. Please provide copies of all testimony and associated exhibits or attachments filed by Mr. Jeffry Pollock since 2011 in which he specifically addressed loss studies or loss adjustment factors for fully integrated electric utilities.
- 1-2. Has Mr. Pollock ever conducted or directed the development of a system loss study for a fully integrated electric utility? If so, please identify how many system loss studies for fully integrated electric utilities Mr. Pollock has performed, identifying any regulatory proceedings in which the results of those loss studies or the resulting loss factors were filed.
- 1-3. With respect to transmission voltage energy loss factors:
 - (a) Does Mr. Pollock only recommend that transmission voltage energy loss factors be reduced?
 - (b) Does Mr. Pollock also recommend that distribution primary and secondary voltages be reduced consistent with his proposed reduction in transmission voltage energy loss factors?
 - (c) If so, please describe Mr. Pollock's recommended adjustment to the distribution voltage loss factors.
- 1-4. If Mr. Pollock does not recommend that distribution voltage energy loss factors be reduced consistent with his proposed reduction to the transmission voltage energy loss factors, would that cause modifications to the calculation of the 4CP-A&E and energy cost allocators among customer classes?
- 1-5. If Mr. Pollock does not recommend that distribution voltage energy loss factors be reduced consistent with his proposed reduction to the transmission voltage energy loss factors, would that cause more base rate costs to be allocated to distribution voltage-level customers?
- 1-6. If Mr. Pollock does not recommend that distribution voltage energy loss factors be reduced consistent with his proposed reduction to the transmission voltage energy loss factors, would that cause more fuel and purchased power costs to be allocated to distribution voltage-level customers in fuel reconciliation proceedings?
- 1-7. Does Mr. Pollock propose that all energy loss factors be adjusted to ensure that losses will continue to equal the difference between net system energy inflows less metered system energy outflows, including company use and other unmetered energy? Please provide a detailed explanation for why Mr. Pollock does or does not recommend adjusting all energy loss factors.
- 1-8. Are there any reasons that Mr. Pollock is aware of that would cause transmission energy losses to be greater than transmission demand losses? If so, please identify all such reasons.
- 1-9. Please refer to the Direct Testimony and Exhibits of Mr. Pollock at 3:6 – 10. Has Mr. Pollock reviewed the relationships between energy and demand loss adjustment factors

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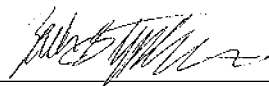
applicable to the various service voltage levels for other fully-integrated electric utilities? If so, please provide any analysis or reports indicating the relationships for those loss factors he analyzed.

- 1-10. Please refer to the Direct Testimony and Exhibits of Mr. Pollock at 3:6 – 10. Does Mr. Pollock have any reports, analyses, or other supporting documentation that the relationships between demand and energy loss factors typically remains constant across all voltage levels? If so, please provide any such reports, analyses, or other supporting documentation.
- 1-11. Please refer to the Direct Testimony and Exhibits of Mr. Pollock at 2:21 – 26. Is it Mr. Pollock's testimony that a loss study must be flawed if it produces energy loss factors higher than demand loss factors? If so, please provide any reports, analyses, or other documentation that supports that testimony.
- 1-12. Please refer to the Direct Testimony and Exhibits of Mr. Pollock at 2:21 – 26. Please provide any authoritative articles, studies, reports, or other documents that state that energy loss factors cannot exceed demand loss factors for an electric utility.
- 1-13. Please provide a detailed list of the factors that Mr. Pollock believes can significantly affect losses on an electric utility system.

October 27, 2021

Respectfully submitted,

Chris Ekoh
Interim Public Counsel
State Bar No. 06507015

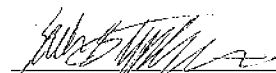


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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 27th day of October 2021 by facsimile, electronic mail, and/or first class, U.S. Mail.



Zachary Stephenson