



## Filing Receipt

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**PUC DOCKET NO. 52321**

<b>APPLICATION OF ELECTRIC</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>RELIABILITY COUNCIL OF TEXAS,</b>	<b>§</b>	
<b>INC. FOR A DEBT OBLIGATION</b>	<b>§</b>	<b>OF TEXAS</b>
<b>ORDER PURSUANT TO CHAPTER 39,</b>	<b>§</b>	
<b>SUBCHAPTER M, OF THE PUBLIC</b>	<b>§</b>	
<b>UTILITY REGULATORY ACT</b>	<b>§</b>	

**EXELON GENERATION COMPANY LLC’S FIRST SET OF REQUESTS FOR INFORMATION TO ERCOT**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, Exelon Generation Company LLC (“Exelon”) files its First Set of Requests for Information (“RFI”) to the Electric Reliability Council of Texas, Inc. (“ERCOT”).

Pursuant to 16 TAC § 22.144(c)(2), Exelon further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to 16 TAC § 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. Exelon further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested. All information responsive these requests should be sent to the following persons via e-mail or overnight courier, on a piecemeal basis as individual items become available.

Respectfully submitted,

JACKSON WALKER LLP

*/s/ Meghan Griffiths*

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**ATTORNEYS FOR EXELON GENERATION  
COMPANY LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this pleading has been forwarded to all parties of record via electronic mail on August 6, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50064. Pursuant to Order No. 2, filing this document on the Commission's Interchange constitutes service of the document on all parties to this proceeding.

*/s/ Meghan Griffiths*

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Meghan Griffiths

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**DEFINITIONS AND INSTRUCTIONS**

- A. “ERCOT,” “Applicant,” and “you” refers to the Electric Reliability Council of Texas and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons, its affiliates and subsidiaries, and any successors or assigns of either entity.
  
- B. The terms “document” or “documents” are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced, reproduced or stored by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mail, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. The definition includes electronic information that has been deleted. “Document” or “documents” shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.
  
- C. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, Exelon specifically requests that any electronic or magnetic information (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 Adobe Acrobat, Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable .pdf copy of the entire email string. Attachments to emails should be provided with the email in searchable .pdf form, unless it is stored in a different format, in which the attachment should be produced in its native format and provided on CD-Rom.
  
- D. The terms “and” or “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 of copies, subject matter of the document, and the basis upon which such privilege is claimed.
- L. 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.
- M. If the information requested is included in previously furnished exhibits, workpapers, and 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.
- N. The term “emails” includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph C. regarding specific instructions for producing such items.
- O. “Communications” refers to correspondence of any kind, including emails.

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**REQUESTS FOR INFORMATION**

EXELON 1-1            Please provide any discovery responses to requests for information in this proceeding that were not filed publically on the PUC interchange, including but not limited to confidential responses and data provided in native Excel format with formulas and calculations intact.