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APPLICATION OF ONCOR ELECTRIC § BEFORE THE DELIVERY COMPANY LLC FOR § PUBLIC UTILITY COMMISSION AUTHORITY TO CHANGE RATES § OF TEXAS

RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC TO GOOGLE LLC'S THIRD REQUEST FOR INFORMATION

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Oncor Electric Delivery Company LLC ("Oncor") files this Response to the aforementioned requests for information.

I. <u>Written Responses</u>

Attached hereto and incorporated herein by reference are Oncor's written responses to the aforementioned requests for information. Each such response is set forth on or attached to a separate page upon which the request has been restated. Such responses are also made without waiver of Oncor's right to contest the admissibility of any such matters upon hearing. Oncor hereby stipulates that its responses may be treated by all parties exactly as if they were filed under oath.

II. Inspections

In those instances where materials are to be made available for inspection by request or in lieu of a written response, the attached response will so state. For those materials that a response indicates are voluminous, materials will be provided in electronic format through an Oncor FTP file sharing site upon request. Requests for voluminous materials should be directed to Regulatory@oncor.com. To review materials that a response indicates may be inspected at their usual repository, please call Joni Price at 214-486-2844. Inspections will be scheduled so as to accommodate all such requests

with as little inconvenience to the requesting party and to company operations as possible.

Respectfully submitted,

ONCOR ELECTRIC DELIVERY COMPANY LLC

By: /s/ Tab R. Urbantke

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been served by email on all parties of record who have provided an email address, on this the 8th day of August, 2022, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/ Tab R. Urbantke

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Request

If not already provided, for all of the schedules associated with Schedules II-B, II-C, II-D, II-E, II-F, II-H, II-L and III-A and for each of the cells that contain only numeric input in all of these Excel spreadsheets, please replace the numbers in the cells with the links to the data sources for the numbers.

Response

The following response was prepared by or under the direct supervision of Bonnie L. Clutter, Kevin R. Fease, James A. Greer, Angela Y. Guillory, W. Alan Ledbetter, Darryl E. Nelson, Robert A. Schmidt, Wesley R. Speed, Ashley Thenmadathil, Matthew A. Troxle and Dane A. Watson the sponsoring witnesses for this response.

The RFP contains all links within Excel spreadsheets to other Excel spreadsheets. Information in schedules obtained from other Oncor computer systems/databases are not "linkable" by Excel, and thus the numbers are manually entered into the appropriate Excel spreadsheets for those schedules.

Request

Please refer to all of the schedules associated with Schedule II-B and explain in detail the methodologies used to allocate costs included in each of the following FERC accounts for the different functions (Transmission, Distribution, Metering, and Customer Service functions):

- a) A303
- b) A352
- c) A353
- d) A361
- e) A362
- f) A374
- g) A388 through A396
- h) A398
- i) A397
- j) A105

Response

The following response was prepared by or under the direct supervision of W. Alan Ledbetter, the sponsoring witness for this response.

Please see pages 32-47 of Mr. Ledbetter's direct testimony (Bates pages 596-611) for discussion of the methodologies for assigning plant in service investment to the different functions (Transmission, Distribution, Metering, and Customer Service functions).

Please see pages 48-49 of Mr. Ledbetter's direct testimony (Bates pages 612-613) for discussion regarding the functional assignment of Federal Energy Regulatory Commission ("FERC") account 105-*Electric plant held for future use* to the transmission and distribution functions.

The following workpapers provide the methodologies used to assign costs in each of the following FERC accounts for the different functions (Transmission, Distribution, Metering, and Customer Service functions):

- a) A303 Reference workpapers WP/II-B-1/01 and WP/II-B-1/02 (Bates pages 3837-3841).
- b) A352 Direct assigned 100% to Transmission.
- c) A353 Reference workpapers WP/II-B-1/03 through WP/II-B-1/06 (Bates pages 3842-3868).
- d) A361 Reference workpapers WP/II-B-1/11 and WP/II-B-1/12 (Bates pages 3902-3979).
- e) A362 Reference workpapers WP/II-B-1/03, WP/II-B-1/08, WP/II-B-1/09, and WP/II-B-1/10 (Bates pages 3842-3843, 3873-3901).
- f) A374 Reference workpapers WP/II-B-1/11 and WP/II-B-1/12 (Bates pages 3902-3979).

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- g) A388 through A396 Reference workpapers WP/II-B-2/01 and WP/II-B-2/04 (Bates pages 3980-3991 and 4053).
- h) A398 Reference workpapers WP/II-B-2/01 and WP/II-B-2/04 (Bates pages 3980-3991 and 4053).
- i) A397 Reference workpaper WP/II-B-3/01 (Bates page 4054-4095).
- j) A105 Reference workpapers WP/II-B-1/09 and WP/II-B-6/01 (Bates pages 3876-3900 and 4197-4198).

Request

Please refer to all of the schedules associated with Schedule II-D and explain in detail the methodologies used to allocate costs included in each of the following FERC accounts for the different functions (Transmission, Distribution, Metering, and Customer Service functions):

- a) A45X
- b) A904
- c) A588
- d) A921
- e) A923
- f) A930.2

Response

The following response was prepared by or under the direct supervision of W. Alan Ledbetter, the sponsoring witness for this response.

Please see pages 108-116 of Mr. Ledbetter's direct testimony (Bates pages 672-680) for discussion of the methodology Oncor employed to assign Other Revenues (*i.e.*, Account "A45X") included in RFP Schedule II-E-5 to the appropriate functions.

Please see pages 75-85 of Mr. Ledbetter's direct testimony (Bates pages 639-649) for discussion of the methodology Oncor employed to assign operation and maintenance expense, including administrative and general expenses, reflected in rate filing package ("RFP") Schedule II-D to the appropriate functions.

Additional information regarding functionalization is provided in the following workpapers:

- WP/II-D Functionalization, Pages 1 through 66 (Bates pages 4502-4567),
- WP/II-D Labor Functionalization, Pages 1 through 31 (Bates pages 4568-4598), and
- WP/II-E-5, Page 1 of 1 (Bates page 4720).