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**SOAH DOCKET NO. 473-22-2695
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APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC
TO TEXAS ENERGY ASSOCIATION FOR MARKETERS'
SECOND 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.
Written Responses**

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 25th 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

Request

Reference generally Oncor's responses to TEAM's first set of RFIs. Please provide the definition of "bulk power system" as that term is used throughout Oncor's responses and the reference for that definition.

Response

The following response was prepared by or under the direct supervision of Collin M. Martin and Keith Hull, the sponsoring witnesses for this response.

The term "bulk power system" was used throughout Oncor's responses to TEAM RFI Set No. 1 because that term is used in PURA § 39.918, which is referenced in TEAM RFI Set No. 1. Oncor's understanding of the term "bulk power system" is that it generally refers to the transmission system. The bulk power system is required for serving customers on the distribution system. Regardless of whether an issue has occurred on the bulk power system or downstream on the distribution system, if a customer is determined to be disconnected from the distribution system, they are also considered as not being fully served by the bulk power system.

Request

Reference the response to TEAM 1-1, which states: "There is no single megawatt (MW) reduction threshold at which Oncor is no longer able to rotate load during a load-shed event ordered by ERCOT." Please provide the range of megawatt reduction that is most likely to prevent Oncor from being able to rotate load during a load-shed event ordered by ERCOT. Please provide any documents or analysis supporting your answer.

Response

The following response was prepared by or under the direct supervision of Collin M. Martin, the sponsoring witness for this response.

There is no single MW threshold or range that prevents Oncor from rotating load during a load-shed event. Oncor can rotate outages until the point at which ERCOT's load-shed directive amounts to 100% of Oncor's load that is available for rotation. At that point, rotation among loads that are designated for load-shed purposes would temporarily cease. In this event, Oncor would assess all other options for load-shed to augment rotation capabilities and respond to any additional load-shed directives. As the amount of load-shed increases, the length of outages and/or number of customers affected must increase proportionally.

Request

Reference the response to TEAM 1-1. During the seven most recent load-shed events ordered by ERCOT, please provide the total MW reduction order by ERCOT to Oncor and the MW reduction threshold at which: (a) Oncor was no longer able to rotate load: and (b) Oncor was no longer able to rotate load at its target of 15-30 minute outage rotations.

Response

The following response was prepared by or under the direct supervision of Collin M. Martin, the sponsoring witness for this response.

a) Oncor is not aware of any event where it has been unable to rotate load in response to ERCOT directives.

b) No data is available on the duration of outages in the 1989 event. For the 2006 (1000 MW) and 2011 (4000 MW) events, Oncor maintained outage rotations at its target interval. During Winter Storm Uri, Oncor was not able to maintain outage rotations on a system-wide basis as of sometime between 4:30 am and 5:30 am on Monday, February 15, 2021 when ERCOT load shed instructions transitioned from 9000 MW to 13500 MW. Oncor never reached a point where it could not rotate outages. However, due to generation shortfall, the rotations were longer than its target of 15-30 minute intervals on a system-wide basis.

Request

Reference the response to TEAM 1-5. Of the nine suppliers that Oncor sent the request for pricing documents, how many suppliers responded?

Response

The following response was prepared by or under the direct supervision of Ellen E. Buck, the sponsoring witness for this response.

Responses were submitted by eight of the nine suppliers that received Oncor's request for pricing related to the procurement of Oncor's leased mobile generation facilities.

Request

Reference the response to TEAM 1-7. Please provide any documents relevant to Oncor's evaluation of the "use cases on Oncor's system that meet the requirements of Tex. Util. Code § 39.918."

Response

The following response was prepared by or under the direct supervision of Ellen E. Buck and Keith Hull, the sponsoring witnesses for this response.

The following information is provided in accordance with the agreement of the requesting party in lieu of the requested information. The information, as agreed to be provided, will include copies of non-privileged documents relevant to Oncor's evaluation of the use cases on Oncor's system that meet the requirements of Tex. Util. Code § 39.918. Documents that are partially attorney-client privileged have been redacted to the extent necessary to protect the privileged material.

A portion of the information requested was previously provided in Oncor's voluminous and confidential response to TEAM RFI Set No.1, Question No. 1-06.

Other information requested is confidential and will be made available on the Oncor FTP site and only after execution of a certification to be bound by the protective order in this docket. An index of the confidential information is included in Attachment 1 to this response.

The information provided with this response includes emails that include internal discussions on the evaluation of possible use cases under Tex. Util. Code § 39.918 and an internal presentation outlining the deployment processes, logistics, and operational readiness for temporary generation facilities.

ATTACHMENT:

ATTACHMENT 1 - Non-Voluminous Confidential Index, 1 page.

NON-VOLUMINOUS CONFIDENTIAL INDEX

- 1.) Temporary Generation: Deployment Processes, Logistics and Operational Readiness- Formal PowerPoint Presentation PDF, dated May 18, 2022, 47 pages
- 2.) Email dated August 8, 2022, 4 pages

Request

Reference the response to TEAM 1-7. Please describe the "use cases on Oncor's system" that Oncor has determined do not meet the requirements of Tex. Util. Code § 39.918.

Response

The following response was prepared by or under the direct supervision of Ellen E. Buck and Keith Hull, the sponsoring witnesses for this response.

Use cases on Oncor's system that do not meet the requirements of Tex. Util. Code § 39.918 include events that do not result in (1) a loss of electric power that: (a) affects a significant number of distribution customers and (b) has lasted or is expected to last for at least eight hours; and (2) a risk to public safety. Examples include overload situations where the customer is not yet without power, minor storms that would not meet the "widespread" outage threshold, and contingencies for dual feed customers during planned maintenance activities.

Request

Reference the response to TEAM 1-8. Please describe the issues preventing the normal operations of the bulk power system such that the distribution facilities needed to serve the hospital were not fully served.

Response

The following response was prepared by or under the direct supervision of Keith Hull, the sponsoring witness for this response.

The Faith Community Hospital in Jacksboro, Texas was served by a single distribution feeder and had no alternate feed available. The tornado that hit Jacksboro on March 21, 2022 resulted in the destruction of 34 poles, 32 crossarms, and four transformers on that single distribution feeder that served the Faith Community Hospital. As a result, the hospital could not be served by the distribution system, and by extension, the bulk power system, under normal operations.

Request

Reference the response to TEAM 1-11, which states: "Outage events that are created within OMS are then dispatched by the distribution system operators to our Distribution Operations field personnel to confirm the outage and determine that the distribution facilities are not being fully served by the bulk power system under normal operations." Please describe the process used by Oncor's Distribution Operations field personnel to identify the issues preventing the normal operation of the bulk power system such that Oncor's distribution facilities are not fully served.

Response

The following response was prepared by or under the direct supervision of Collin M. Martin and Keith Hull, the sponsoring witnesses for this response.

Oncor's Distribution Operations field personnel are not responsible for identifying problems on the transmission system. Distribution Operations field personnel perform on-site inspections of affected areas to identify issues causing distribution facilities to not be fully served by the distribution system, and by extension, the bulk power system, under normal operations.

Request

Reference the response to TEAM 1-20. Please admit or deny that once the Inadvertent Gain (IAG) Process in Section 7.3 of ERCOT's Retail Market Guide is complete, the gaining retail electric provider (REP) is no longer the REP serving the affected end-use customer/ESIID.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall, the sponsoring witness for this response.

Admitted.

Request

Reference the response to TEAM 1-26 and ERCOT's Retail Market Guide at Section 7.3.4 Transmission and/or Distribution Service Provider Inadvertent Gain Process. Does this provision address the IAG process for which Oncor applies Charge No. DD24 (and for which the proposed increase to that charge will apply)?

Response

The following response was prepared by or under the direct supervision of Matthew A. Troxle, the sponsoring witness for this response.

Yes.

Request

Reference the response to TEAM 1-27, which states in part: "From Oncor's perspective, the source of the information provided in a move-in or switch transaction that results in an inadvertent gain is the gaining [REP]." Please provide any studies, analyses, or data compilations performed to confirm that the gaining REP was the root cause of the IAGs to which Charge No. DD24 was applied during the test year.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall, the sponsoring witness for this response.

Oncor has not performed any analyses or data compilations to confirm that the gaining REP was the root cause of the IAGs. Oncor does not apply Charge No. DD24 to the Gaining REP until both the Losing REP and the Gaining REP agree within the MarkeTrak system that the customer was inadvertently gained.

Request

Reference the response to TEAM 1-27 and consider the following hypothetical: An applicant living at 123 Main Street, Apt. 12 enrolls for service with REP A and states that their service address is 123 Main Street, Apt. 21. The person living at 123 Main St., Apt. 21 is inadvertently switched to REP A. It is Oncor's position that REP A (the gaining REP) is the source of the information that resulted in this IAG?

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall, the sponsoring witness for this response.

Yes. In the hypothetical scenario presented in the request, the source of the information that resulted in this IAG with respect to REP A is the applicant. However, Oncor does not have access to the application correspondence between REP A and the applicant. Therefore, from Oncor's perspective, REP A is the source of the information that resulted in this IAG.

Request

Reference ERCOT's retail Market Guide at Section 7.2(3), which states in part: "MarkeTrak is the primary tool used by CRs, TDSPs and ERCOT to resolve retail market transaction issues, request manual service order cancellations, request ERCOT assistance with inadvertent ESI ID transfers, and file Data Extract Variance (DEV) issues." Please identify the entities that provide the data that can lead to a DEV issue.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall, the sponsoring witness for this response.

The Competitive Retailer (CR), Transmission and Distribution Service Provider (TDSP), and/or ERCOT provide(s) the data that can lead to a DEV issue.

Request

Reference Schedule IV-J-2. Please explain how Oncor determined that 0.38 hours was the amount of time spent by a Revenue Management Specialist on tasks specifically related to processing an IAG for a single ESIID and provide any supporting time studies or other documents.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall and Matthew A. Troxle, the sponsoring witnesses for this response.

The 0.38 hours was based on discussions with the people performing the required tasks on a daily basis. The 0.38 hours was originally included in the rate case filed in 2011 (PUC Docket No. 38929) and also included in the rate case filed in 2017 (PUC Docket No. 46957).

Request

Reference Schedule IV-J-2. Please explain how Oncor determined that 0.45 hours was the amount of time spent by a Market Solutions Specialist on tasks specifically related to processing an IAG for a single ESIID and provide any supporting time studies or other documents.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall and Matthew A. Troxle, the sponsoring witnesses for this response.

The 0.45 hours was based on discussions with the people performing the required tasks on a daily basis. The 0.45 hours was originally included in the rate case filed in 2017 (PUC Docket No. 46957).

Request

Reference Schedule IV-J-2. Please explain how the \$43.57 rate for the Revenue Management Specialist is determined, including the factors considered and provide all underlying data.

Response

The following response was prepared by or under the direct supervision of, Daniel E. Hall and Matthew A. Troxle, the sponsoring witnesses for this response.

Please refer to WP IV-J-2 2 of the RFP.

Request

Reference Schedule IV-J-2. Please explain how the \$43.57 rate for the Market Solutions Specialist is determined, including the factors considered and provide all underlying data.

Response

The following response was prepared by or under the direct supervision of, Daniel E. Hall and Matthew A. Troxle, the sponsoring witnesses for this response.

Please refer to WP IV-J-2 2 of the RFP, listed as Market Trak Specialist.

Request

Please explain how Oncor ensures that none of the time or costs for processing a MarkeTrak for a customer rescission are included in the calculation of Charge No. DD24 IAG Charge. Please address both timely and untimely customer rescissions in your response.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall and Matthew A. Troxle, the sponsoring witnesses for this response.

If Oncor receives a valid rescission in MarkeTrak from a REP, the IAG charge is not applied. Oncor only applies the IAG charge in instances where we receive an inadvertent gain in MarkeTrak.

Request

Please identify any discretionary service charges, other than Charge No. DD24, that are included in the proposed Tariff for Retail Delivery Service and are based in part or in whole on the time spent by a Market Solutions Specialist.

Response

The following response was prepared by or under the direct supervision of, Daniel E. Hall and Matthew A. Troxle, the sponsoring witnesses for this response.

No discretionary service charge other than Charge No. DD24 includes time spent by a Market Solutions Specialist in the calculation of the charge amount.

Request

Please explain how Oncor separately tracks the costs recovered via Charge No. DD24 from costs to provide system services and provide all documents used to separately track these costs.

Response

The following response was prepared by or under the direct supervision of Matthew A. Troxle and Daniel E. Hall, the sponsoring witnesses for this response.

Oncor utilizes reporting software to retrieve data from its billing system to track discretionary service charge revenue. Please refer to Attachment 1 to this response.

ATTACHMENT:

ATTACHMENT 1 – Monthly discretionary service revenue summaries for 2021, 12 pages.

The following files are not convertible:

2-20_Att 1.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.

Request

Please admit or deny that the process for resolving an unauthorized change of REP as described in 16 TAC § 25.495 is a process for error investigation and resolution. If the response is anything other than an unqualified admit, please explain.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall, the sponsoring witness for this response.

Admitted.

Request

Please admit or deny that the process for resolving an unauthorized change of REP as described in 16 TAC § 25.495 is an administrative activity necessary to maintain REP billing accounts and records. If the response is anything other than an unqualified admit, please explain.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall, the sponsoring witness for this response.

Qualified admit. The process corrects REP billing accounts and records.

Request

Has Oncor performed any studies or analyses comparing the number of IAGs per year (or other defined time period such as quarter, month, etc.) that it processed before receiving approval of Charge No. DD24 to the number of IAGs processed after implementing Charge No. DD24? If the answer is yes, please provide copies of the studies or analyses as well as the supporting documents.

Response

The following response was prepared by or under the direct supervision of Daniel E. Hall and Matthew A. Troxle, the sponsoring witnesses for this response.

No.