



Filing Receipt

Received - 2022-09-02 10:29:32 AM
Control Number - 53601
ItemNumber - 465

**SOAH DOCKET NO. 473-22-2695
PUC DOCKET NO. 53601**

APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC FOR AUTHORITY TO CHANGE RATES	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
---	----------------------------	---

**ONCOR ELECTRIC DELIVERY COMPANY LLC'S
SECOND SET OF REQUESTS FOR INFORMATION
TO TEXAS INDUSTRIAL ENERGY CONSUMERS**

Pursuant to §22.144 of the Commission's Procedural Rules, Oncor Electric Delivery Company LLC ("Oncor") requests that the Texas Industrial Energy Consumers ("TIEC"), by and through its attorneys of record, provide all of the information requested on the attached Exhibit A.

Pursuant to §22.144(c)(2) of the Commission's Procedural Rules, Oncor further requests that answers to the requests for information be made under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts. Exhibit A is attached hereto and incorporated herein for all purposes.

Definitions

1. "Document" and "documents" are used in their broadest sense to include, by way of illustration and not limitation, any and all written, recorded, filmed, or graphic matter of every kind and description, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether printed, produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but no limited to, memoranda, notes, emails, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, surveys, 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 and summaries of

interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form. "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.

2. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters, emails and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of respondent.
3. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of respondent or in the custody of its attorneys or other representatives or agents.
4. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
5. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or

ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.

Instructions

1. If any request appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.
3. As part of the response to each question, please state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer.
4. If TIEC considers any request to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if TIEC objects to any of the questions on the grounds that the question seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
5. These requests shall be deemed continuing in nature so as to require further and supplemental responses if TIEC receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.
6. All information responsive to the requests on the attached Exhibit A should be sent to the undersigned via email.

Respectfully submitted,

ONCOR ELECTRIC DELIVERY COMPANY LLC

By: /s/ Tab R. Urbantke

Tab R. Urbantke
State Bar No. 24034717
Myles F. Reynolds
State Bar No. 24033002
Lauren Freeland
State Bar No. 24083023
Hunton Andrews Kurth LLP
1445 Ross Avenue, Suite 3700
Dallas, Texas 75202
214.979.3095
214.880.0011 (fax)
turbantke@HuntonAK.com
mreynolds@HuntonAK.com
lfreeland@HuntonAK.com

Matthew C. Henry
Senior Vice President, General Counsel,
and Secretary
Oncor Electric Delivery Company LLC
1616 Woodall Rodgers Freeway
Dallas, Texas 75202
matt.henry@oncor.com

**ATTORNEY FOR ONCOR ELECTRIC
DELIVERY COMPANY LLC**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been emailed to all parties of record on this the 2nd day of September, 2022, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Docket No. 53601.

/s/ Tab R. Urbantke

Exhibit A

Oncor's Second Request for Information to Texas Industrial Energy Consumers

REQUESTS

- 2-1 On page 39, lines 15-16 of Mr. Gorman's direct testimony, he states that, "[i]n contrast, the marginal cost of debt right now for an A- rated utility is around 4.0%." Please identify the source for this statement and provide all documents supporting or evidencing such statement. Please include the name of each utility and the corresponding date of issuance, tenor and principal amount of the note(s) if this statement is based on a debt offering made by a utility.