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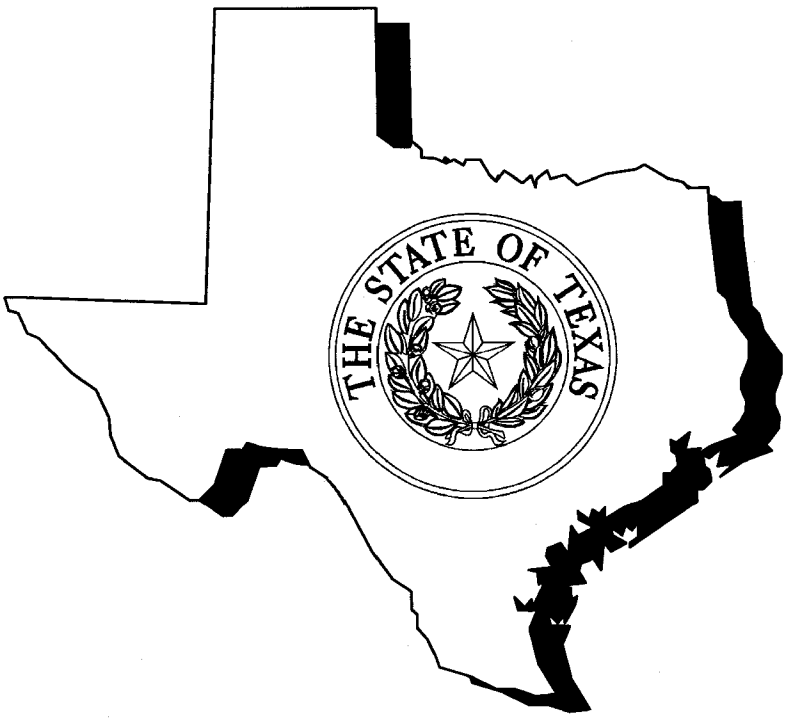
APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY FOR AUTHORITY TO CHANGE RATES	**§ § § §**	**BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**



DIRECT TESTIMONY OF

ADRIAN NARVAEZ

RATE REGULATION DIVISION

PUBLIC UTILITY COMMISSION OF TEXAS

September 2, 2022

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ATTACHMENTS:

I. PROFESSIONAL QUALIFICATIONS

Q. Please state your name and business address.

A. Adrian Narvaez, Public Utility Commission of Texas (Commission), 1701 N. Congress Avenue, Austin, TX 78701.

Q. By whom are you employed and in what capacity?

A. I am employed by the Commission as a Senior Rate Analyst in the Tariff and Rate Analysis Section of the Rate Regulation Division.

Q. What are your responsibilities as a Rate Analyst for the Commission?

A. My principal responsibility involves analyzing utility filings on matters relating to rate design and cost allocation. My responsibilities include analyzing utility industry regulatory policy, reviewing tariffs to determine compliance with Commission requirements, and preparing and presenting testimony as an expert witness on cost allocation and rate design issues in contested proceedings before the Commission and the State Office of Administrative Hearings (SOAH).

Q. Please state your educational background and professional experience.

A. Attachment AN-1 contains a summary of my regulatory experience and educational background.

Q. Have you previously filed testimony before the Commission?

A. Yes. Attachment AN-1 contains a listing of direct testimony I have filed at the Commission.

II. PURPOSE AND SCOPE OF TESTIMONY

Q. What is the purpose of your testimony in this proceeding?

A. My testimony regarding Oncor Electric Delivery Company's (Oncor) application will address cost allocation and rate design issues. My testimony will also address, in whole or in part, the following issues from the Commission's Preliminary Order:

46. What are the just and reasonable rates calculated in accordance with PURA and Commission rules? Do the rates comport with the requirements in PURA § 36.003?

49. What are appropriate allocations of Oncor's revenue requirement to functions and rate classes?

57. Should baseline amounts be determined in this proceeding for future TCRF, DCRF, generation recovery factor, or interim transmission cost of service filings? If so, what are the investment and expense components and amounts?

Q. Please describe your role in this proceeding.

A. In addition to the specific issues I address further in my testimony, I have prepared Commission Staff's Class Cost of Service Study (CCOSS). In preparing Staff's proposed CCOSS, I incorporated the recommended adjustments presented by Staff witnesses John Poole, Jorge Ordonez, Heidi Graham, and Mark Filarowicz. Based on Staff's proposed CCOSS, I calculated Staff's proposed retail and wholesale rates, transmission cost of service (TCOS), and distribution cost recovery factor (DCRF) baselines.

III. SUMMARY OF RECOMMENDATIONS

Q. What is your recommendation?

A. I recommend that:

- Oncor's Staff-adjusted functional cost of service study, as seen in Attachment AN-2 be adopted.
- The Commission approve Oncor's Staff-adjusted Transmission Cost of Service (TCOS), wholesale transmission service (WTS) rate, and associated export rates as seen in Attachment AN-3.
- The Commission reject Oncor's request to update TCRF rates in this proceeding, and that on a going forward basis, the average ERCOT 4CP class allocation factors used to calculate Oncor's TCRF rates be updated annually in order to reflect the most recently available ERCOT 4CP data for each class. If the Commission does not adopt this recommendation, I alternatively recommend that all TCRF-related costs be included in the base rates established in this proceeding, and thus that the TCRF rates be set to zero.
- Oncor's Staff-adjusted class cost of service study, as seen in Attachment AN-4 be adopted and used to set rates.
- That the Commission approve Staff's proposed rates for retail service and wholesale transmission service at distribution voltage as seen in Attachment AN-5.
- Consistent with Commission precedent, Oncor's proposed DCRF baselines be rejected and that the Commission-approved methodology used to calculate baselines in Docket No. 46449 be used in this proceeding.

- Oncor's Staff-adjusted distribution cost recover factor baselines, as seen in Attachment AN-6, be adopted and used to set rates in any future DCRF proceedings

Q. What material did you use to prepare your testimony?

A. In preparation for my testimony, I reviewed the application submitted by Oncor, the testimony of various Oncor witnesses, prior Commission dockets, testimony filed by other Staff witnesses in this case, and the Commission's rate filing package.

IV. WHOLESALE TRANSMISSION RATES

Q. Has Staff performed any adjustments to Oncor's requested TCOS?

A. Yes. Various staff witnesses recommended adjustments to Oncor's revenue requirement, as discussed in the direct testimony of Staff witness Mark Filarowicz. Including these adjustments in Staff's functional cost of service study produced the Staff-adjusted transmission function used to determine the Staff-adjusted Oncor TCOS.

Q. What is Oncor's Staff-adjusted TCOS?

A. The Company's Staff-adjusted TCOS is $1,328,680,661, which represents a decrease of $116,495,075 as compared to Oncor's requested TCOS, which was $1,445,176,354.

Q. Please describe wholesale transmission rates.

A. There are two types of wholesale transmission rates: access fees for wholesale transmission service within ERCOT, and transmission service for delivery of power to be exported from the ERCOT region.

Oncor's annual access fee for transmission service within ERCOT is calculated as its TCOS, less the appropriate level of export charge revenues, divided by the 2021 ERCOT Average 4CP load.

The transmission service rates for exports from ERCOT are seasonally differentiated. There is an on-peak rate which is effective during the months of June, July, August, and September that is equal to the Oncor's annual access fee divided by four. There is also an off-peak rate which is effective during all other calendar months and is based on Oncor's annual access fee divided by twelve.

Q. What are Oncor's wholesale transmission rates, consistent with Staff's recommendations?

A. Oncor's Staff-adjusted WTS rates are:

Figure 1

	Oncor Requested	Staff Recommended	Billing Basis
Annual Access Fee	$ 19.936127	$ 18.329076	Per Kilowatt of ERCOT AVGCP demand
Monthly On-Peak Export Rate	$ 4.984032	$ 4.582269	Per kilowatt-month
Monthly Off-Peak Export Rate	$ 1.661344	$ 1.527423	Per kilowatt-month

V. TRANSMISSION COST RECOVERY FACTOR RIDER

A. Annual Update of TCRF Class Allocation Factors

Q. What are wholesale transmission expenses?

A. Wholesale transmission expenses are expenses that Oncor incurs as a distribution service provider (DSP). These expenses are assessed to Oncor by all transmission service providers (TSP) in ERCOT for Oncor's use of the ERCOT transmission system.

Q. How does Oncor currently recover wholesale transmission expenses?

A. Oncor currently recovers wholesale transmission expenses exclusively through its TCRF.

Q. Are there any concerns with recovering wholesale transmission expenses exclusively through the TCRF?

A. Yes. While the TCRF allows DSPs to recover incremental amounts of wholesale transmission expenses, the class allocation of these expenses that was established in the last rate-base proceeding does not typically change outside of a rate case, unless otherwise ordered by the Commission.[1] This means that, unless otherwise ordered by the Commission, transmission costs are allocated among classes based on the ERCOT 4CP allocation factor that was established in the DSP's last rate case. However, these ERCOT 4CP allocation factor values may no longer reflect the current ERCOT 4CP values for each class that are driving the wholesale transmission expenses that DSPs are incurring. In contrast to the class allocation proportions that are frozen between rate cases, the billing determinants used to set TCRF rates are based on the latest available billing determinants for each class. The TCRF rule specifically requires that billing determinants be based on "each class's billing determinant (kilowatt-hour (kWh), or kilowatt (kW), or kilovolt-ampere (kVa)) for the previous March 1 through August 31 period for the March 1 TCRF update, and for the previous September 1 through February 28 period for the September 1 TCRF update."[2]

When a class's TCRF billing determinants increase, that class's load coincident with the 4CP is typically also increasing. Higher loads coincident with the 4CP also means that Oncor is incurring more transmission expenses as a DSP. However, the class allocation proportions have historically been frozen between cases. As a result, classes that have

[1] 16 TAC §25.193(c)

[2] *Id.*

experienced more load growth are allocated less than the actual amount of transmission expenses they are causing Oncor to incur as a DSP, while the TCRF rates for these classes are set lower due to the use of the higher, updated billing determinants. This scenario results in TCRF rates that no longer reflect the classes' costs of service and often results in significant subsidization of classes that have experienced more load growth by other classes that have experienced less load growth or load reductions.

Q. Can you provide a simplified hypothetical example that illustrates how the TCRF mechanism can result in non-cost-based rates?

A. Yes. Suppose that a DSP files an application to change rates. This DSP recovers wholesale transmission expenses exclusively through the TCRF. This DSP only has two retail classes, Class A and Class B. The test year ERCOT 4CP demand for each class was 10,000, resulting in a class allocation of 50% for both classes, as seen in Figure 2.

Figure 2

Transmission 4CP Allocation		
4CP	**Alloc**	**Class**
10,000	50.00%	Class A
10,000	50.00%	Class B

The test-year wholesale transmission expenses were $200,000, and both classes have billing determinants of 10,000 kW. This results in a TCRF revenue requirement of $100,000 and TCRF rate of $10.00 for each class, as seen in Figure 3.

Figure 3

Base Rate Case				
	Alloc	**Revenue Requirement**	**Billing Determinants**	**Rate**
Class A	50%	$ 100,000	10,000	$ 10.0
Class B	50%	$ 100,000	10,000	$ 10.0
Total	100%	$ 200,000		

Suppose that after four years, this DSP files one of its semiannual applications to update TCRF rates. Wholesale transmission expenses have increased by 50% since the previous rate case to $300,000. The 4P load and billing determinants for Class A have not changed, and the 4CP load and billing determinants for Class B have doubled to 20,000 kW. Since the same allocation that was established in the DSP's last base rate case is used, both classes are allocated 50% of wholesale transmission expenses, and as a result the TCRF revenue requirements for both classes have increased by 50% to $150,000 even though Class A's load did not increase, as seen in Figure 4.

Figure 4

TCRF Update				
	Alloc	**Revenue Requirement**	**Billing Determinants**	**Rate**
Class A	50%	$ 150,000	10,000	$ 15.0
Class B	50%	$ 150,000	20,000	$ 7.5
Total	100%	$ 300,000		

Now suppose that after filing for this TCRF update, the DSP files another application to change rates. The ERCOT 4CP allocation is updated to reflect the most recently available ERCOT 4CP demand for each class, which is 10,000 for Class A and 20,000 for Class B. The resulting ERCOT 4CP class allocators are 33.33% for Class A and 66.67% for Class B. Thus, Class A is allocated $100,000 of transmission costs while Class B is allocated $200,000, as seen in Figure 5.

Figure 5

TCRF Update					
	4CP	**Alloc**	**Revenue Requirement**	**Billing Determinants**	**Rate**
Class A	10,000	33.33%	$ 100,000	10,000	$ 10.0
Class B	20,000	66.67%	$ 200,000	20,000	$ 10.0
Total	30,000	100.00%	$ 300,000		

As a result of applying the current ERCOT 4CP allocation, which better reflects cost causation, the amount of transmission costs allocated to Class A decreased by $50,000, or 33.33%. Conversely the amount of transmission expenses allocated to Class B increased by $50,000 or 33.33%. This means that Class B was subsidized by Class A by $50,000, before the DSP returned to cost-based rates, as seen in Figure 6 below.

Figure 6

	Last Base Rate Case 4CP Allocation	Updated 4CP Allocation	Difference	Percentage Increase
Class A	$15*10,000 = $150,000	$10*10,000 = $100,000	-50,000	-33.33%
Class B	$7.5*20,000 = $150,000	$10*20,000 = $200,000	50,000	33.33%

Q. Why is it important for rates to be cost-based?

A. In addition to the requirement in 16 TAC §25.234(a) that rates be based on cost, cost-based rates are equitable and essential in advancing economic efficiency and rate stability. When rates are set at cost, the revenues that a utility collects through these rates recover the costs that customers impose on a utility's system. Cost-based rates will more closely match the costs incurred as customer usage changes over time. When rates are set below cost, the revenues recovered through the below-cost rates will be insufficient to recover the cost to serve that group of customers. Furthermore, as seen in the example illustrated above, setting subsidized rates for some customers requires that the rates for other customers be set above cost. Consequently, maintaining a rate structure based on non-cost-based rates would provide price signals that no longer reflect the actual cost to serve each group of customers, thus promoting inefficient usage of the utility's system by encouraging usage of the utility system by those customers whose rates are below-cost while discouraging usage of the utility system by those customers whose rates are above-cost. Over time, this can lead to a growing gap between revenue recovery and costs.

This is of particular concern in this proceeding considering that the Primary Substation Service class has experienced a substantial increase in cost responsibility due to the increase in their transmission demand (its share of Oncor's average ERCOT 4CP load increased by about 84.7%).[3] Considering that the last base rate cases for Oncor had a test-year that ended on December 31, 2016, the TCRF class allocators currently in effect for Oncor are 6 years old. This means that since wholesale transmission expenses are recovered exclusive through the TCRF, all wholesale transmission expenses were allocated across classes in a way that was not fully cost based, while the billing determinants were updated to reflect the most recent billing determinants. As a result, it is highly likely that such non-cost-based rates have contributed to the large rate increase faced by the Primary Substation Service class, approximately 89.3% under Oncor's request.[4] In other words, the status quo operation of the TCRF updates has led to rates for the Primary Substation class continuously drifting below cost over several years, while the costs the class cause to be incurred have been shifted to other classes over time, resulting in the need for a large rate increase for Primary Substation customers in this proceeding.

Q. Have other recent rate cases involving ERCOT transmission and distribution utilities also seen non-cost based TCRF rates due to the use of outdated ERCOT 4CP allocators?

A. Yes. In AEP Texas's last base rate case, Docket No. 49494, certain classes experienced substantial load growth in the more than thirteen years since AEP Texas's prior rate case.[5]

[3] Primary Substation Service's share of Oncor's average ERRCOT 4CP load approved in Oncor's last rate case was 1.48722098%. It's share of the average ERCOT 4 CP load increased to 2.74636637%

[4] Application at Exhibit 1 (May 13, 2022).

[5] *Application of AEP Texas Inc. for Authority to Change Rates,* Cross-Rebuttal Testimony of Adrian Narvaez at 18-19 (Aug. 13, 2019).

As discussed above, the TCRF expenses were allocated based on outdated ERCOT 4CP class allocation values while the TCRF rates were set using updated billing determinants. Similar to the situation in this proceeding, this resulted in TCRF rates significantly below cost for classes with high load growth. Consequently, these classes were subsidized by classes that experienced substantially lower load growth, or load reduction, as explained above.

Q. What is your recommendation regarding Oncor's proposed methodology for wholesale transmission cost recovery?

A. I recommend that the class allocation factors used in the TCRF be updated annually in order to reflect the most recently available (unadjusted, at-source, 15-minute interval) ERCOT 4CP data for each class.

Q. How do you recommend that Oncor's average ERCOT 4CP class allocation factors be updated?

A. Annually, as soon as Oncor is able to determine the most recent average ERCOT 4CP demands by class, Oncor will file a compliance filling wherein Oncor provides the average ERCOT 4CP class allocation factors consistent with the latest average ERCOT 4 CP demand. This filing should include the unadjusted, 15-minute interval class peak demand data at source (calculated using the latest line loss factors approved by the Commission) used to determine the most recent class average ERCOT 4CP demand. Once approved by the Commission, the updated average ERCOT 4CP class allocation factors should be used to set TCRF rates in the subsequent semiannual updates of Oncor's TCRF until a new ERCOT 4CP class allocation factor is established.

Q. Has the Commission approved updated ERCOT 4CP allocators for a TCRF outside of a base rate case?

A. Yes. The TCRF rule states that the class allocator shall be based on the "class allocator approved by the commission to allocate the transmission revenue requirement among classes in the DSP's last rate case, unless otherwise ordered by the commission."[6] The Commission has approved changing TCRF class allocators outside of a base rate case due to significant load growth for certain classes in Docket Nos. 44620 and 49494.[7]

Q. What is your alternative recommendation regarding wholesale transmission expense recovery in the event the Commission does not adopt your recommendation to periodically adjust the ERCOT 4CP class allocation outside of a full rate case?

A. If the Commission does not adopt my recommendation to adjust the TCRF class allocation factors annually, I recommend that all the current wholesale transmission expenses be included in the base rates established in this proceeding. Under this alternative recommendation, the TCRF will be zeroed out in this proceeding and will be updated in future TCRF proceedings to collect incremental transmission expenses that arise after this case.

Q. Why would it be reasonable to move transmission cost recovery from the TCRF into base rates?

A. As discussed above, the mismatch that arises between the fixed ERCOT 4CP class allocation factors and the updated billing determinants under the TCRF rider often results

[6] 16 TAC § 25.193(c).

[7] *Application of Sharyland Utilities, L.P. to Revise its TCRF Class Allocation Factors and Request for Good Cause Exception from P.U.C. Subst. R. 25.193(c)*, Docket No. 44620, Order at 3-4 (Oct. 15, 2015); *Application of AEP Texas Inc. for Authority to Change Rates,* Docket No. 49494, Order at Ordering Paragraph No. 32 (Apr. 6, 2020).

in non-cost-based rates, which lead to cost shifting from classes with high load growth, to classes that have experienced relatively low or negative load growth. This effect is magnified when wholesale transmission expenses are recovered exclusively through the TCRF. Under this scenario, the distorted TCRF rates recover all wholesale transmission expenses, rather than only the incremental amounts of transmission rate increases. When a portion of wholesale transmission expenses remain in base rates, classes that experience load growth are charged more in base rates as their load grows. For this reason, moving transmission cost recovery from the TCRF into base rates reduces the magnitude of any mismatch that may arise between the fixed ERCOT 4CP class allocation factors and the updated billing determinants under the TCRF rider.

Q. Is your alternative recommendation consistent with the existing TCRF rule and Commission precedent?

A. Yes. The existing TCRF rule allows DSPs to recover wholesale transmission expenses through base rates.

B. Oncor's Proposed TCRF Rates

Q. Do you agree with Oncor's proposal to update its TCRF in this proceeding?

A. No. As an initial matter, Oncor's wholesale transmission expenses recovered through its TCRF are 'pass-through' expenses associated with Commission-approved wholesale transmission rates, and so are not under Oncor's control. Additionally, 16 TAC § 25.193 provides for a rolling true-up of TCRF charges on a semiannual basis in addition to updating TCRF rates for changes in wholesale transmission charges. The March 1st TCRF update includes adjustments for actual over- or under-recoveries for the preceding period

of May 1st through October 31st. The September 1st TCRF update includes adjustments for actual over- or under-recoveries for the preceding period of November 1st through April 30th. Updating the TCRF outside of the biannual updates provided in the TCRF rule would unnecessarily complicate the process of accounting for over- or under-recoveries. Oncor's proposed TCRF rates do not account for prior period over or under recoveries.

Q. What is your recommendation regarding Oncor's proposed TCRF tariff?

A. I recommend that the Commission reject Oncor's proposal to update its TCRF in this proceeding. Oncor's TCRF should continue to be updated on a biannual basis consistent with 16 TAC § 25.193.

VI. STAFF'S PROPOSED RATES

Q. Have you calculated rates for each rate class consistent with Staff's recommendations?

A. Yes. Staff's recommended rates for retail service and wholesale transmission service at distribution voltage can be found in Attachment AN-6.

VII. DCRF BASELINES

Q. What are baseline values?

A. Baseline values represent a detailed snapshot of certain base-rate related parameters for the DCRF rate formula to be used in Oncor's future DCRF proceedings. The aforementioned proceedings involve a determination of certain incremental costs that are not being recovered in base rates. Establishing baseline values in the present rate case facilitates the process of determining incremental costs in future DCRF proceedings.

Q. Did Oncor derive its proposed DCRF baselines consistent with 16 TAC § 25.243?

A. No. Oncor's proposed baseline net distribution invested capital was determined to be the total distribution rate base for each class, adjusted to reduce distribution rate base by the net distribution plant in service that is not eligible to be recovered through the DCRF. This methodology includes as net distribution invested capital components of rate base that are not eligible to be recovered under the DCRF rule.

Q. How do you recommend that baselines be calculated for Oncor's DCRF?

A. I recommend that the Commission adopt the DCRF baseline methodology approved by the Commission in Docket Nos. 43695, 45524, and 46449. This method calculates the DCRF baseline values by using the detailed line-item-by-line-item class information in the Commission-approved class cost of service model in order to clearly establish that the DCRF baselines only include the elements of the distribution revenue requirement that are eligible for recovery under the DCRF rule.

The methodology approved by the Commission in the previous dockets mentioned above encourages transparency and facilitates the processing of future cost recovery factor proceedings by establishing the DCRF baseline values line by line, and class by class using detailed information from the Commission-adopted cost of service study. It is therefore easy for parties to any potential future Oncor DCRF proceeding to follow the intact formulas in Oncor's DCRF baselines in order to audit how each baseline value is pulled directly from the CCOSS adopted by the Commission in this case. This contrasts with the methodology proposed by Oncor, which aggregates data in a manner that fails to include detail that might be relevant to potentially contested issues in future DCRF proceedings and would thus potentially increase the likelihood of, and costs associated with, litigation.

Additionally, I incorporated Staff witness Mark Filarowicz's incentive compensation adjustment, which is an adjustment to plant in service.

Q. What is your recommendation?

A. I recommend that the Commission approve Oncor's Staff-adjusted DCRF baselines.

VIII. CONCLUSION

Q. Are there any additional adjustments to Oncor's filed case that may be reasonable?

A. Yes. The recommendations above are based on my review of Oncor's application and the recommended adjustments of other Staff witnesses provided to me as of this date. I do not imply that additional adjustments to Oncor's filed case are not appropriate and should not be made.

Q. If you do not address an issue or position in your testimony, should that be interpreted as Staff supporting Oncor's position on that issue?

A. No. The fact that I do not address an issue in my testimony should not be construed as agreeing, endorsing, or consenting to any position taken by Oncor.

Q. Does this conclude your direct testimony?

A. Yes.

Adrian Narvaez Canto

Public Utility Commission of Texas
1701 North Congress Avenue
Austin, TX 78711-3326

REGULATORY EXPERIENCE

Senior Rate Analyst, Tariff and Rate Analysis Section

Public Utility Commission of Texas Rate Regulation Division

Employed: June 2015 to present.

Duties: Perform analysis of tariff filings, cost allocation, and rate design. Review tariffs of regulated utilities to determine compliance with Commission requirements. Analyze cost allocation studies and rate design issues for regulated electric and water utilities. Analyze policy issues associated with the regulation of the utility industry. Work on or lead teams in contested cases, reports, the development of market rules, and research concerning pricing and related issues. Prepare and present testimony as an expert witness on rate and related issues in docketed proceedings before the Commission and the State Office of Administrative Hearings.

EDUCATION:

2014 The University of Texas at Austin, Austin, TX
Bachelor of Arts in Economics and French

List of Testimony Filed at the Public Utility Commission of Texas:

Docket No. 45712 - *Application of Southwestern Electric Power Company for Approval of a Distribution Cost Recovery Factor,* May 4, 2016.

Docket No. 45787 – *Application of AEP Texas Central Company for Approval of a Distribution Cost Recovery Factor,* May 23, 2016.

Docket No. 45788 - *Application of AEP Texas North Company for Approval of a Distribution Cost Recovery Factor,* May 23, 2016.

Docket No. 46357 - *Application of Entergy Texas for Approval to Amend its Transmission Cost Recovery Factor,* December 6, 2016.

Docket No. 46449 - *Application of Southwestern Electric Power Company for Authority to Change Rates,* May 2, 2017.

Docket No. 47235 - *Oncor Electric Delivery Company LLC's Application for 2018 Energy Efficiency Cost Recovery Factor*, July 20, 2017

Docket No. 47527 - *Application of Southwestern Public Service Company for Authority to Change Rates,* Revenue Requirement Direct Testimony, May 2, 2018.

Docket No. 47527 - *Application of Southwestern Public Service Company for Authority to Change Rates,* Cost Allocation and Rate Design Direct Testimony, May 2, 2018.

Docket No. 47527 - *Application of Southwestern Public Service Company for Authority to Change Rates,* Cost Allocation and Rate Design Cross-Rebuttal testimony, May 22, 2018.

Docket No. 48231 – *Application of Oncor Electric Delivery Company for a Distribution Cost Recovery Factor,* May 24, 2018.

Docket No. 48401- *Application of Texas-New Mexico Power Company for Authority to Change Rates,* Direct Testimony, August 20, 2018.

Docket No. 48401- *Application of Texas-New Mexico Power Company for Authority to Change Rates,* Cross-Rebuttal testimony, August 28, 2018.

Docket No. 48325 - *Application of Oncor Electric Delivery Company LLC for Authority to Decrease Rates Based on the Tax Cuts and Jobs Act of 2017,* September 11, 2018.

Docket No. 48325 - *Review of Rate Case Expenses Incurred by Southwestern Electric Power Company and Municipalities in Docket No. 46449,* December 14, 2018.

Docket No. 49057 - *Application of Entergy Texas for Approval of Transmission Cost Recovery Factor*, March 25, 2019.

Docket No. 49427 – *Application of Oncor Electric Delivery Company to Amend its Distribution Cost Recovery Factor,* May 30, 2019.

Docket No. 49494 - *Application of AEP Texas Inc. for Authority to Change Rates,* Direct Testimony, August 1, 2019.

Docket No. 49494 - *Application of AEP Texas Inc. for Authority to Change Rates,* Cross-Rebuttal Testimony, August 13, 2019.

Docket No. 50200 - *Application of Undine Texas, LLC and Undine Environmental, LLC for Authority to Change Rates,* June 10, 2020.

Docket No. 49923 - *Application of Corix Utilities (Texas) Inc. to Implement Federal Tax Reduction Credit Riders*, July 31, 2020.

Docket No. 50944 - *Application of Monarch Utilities I, L.P. for Authority to Change Rates,* October 27, 2020.

Docket No. 51100 - *Application of the City of Lubbock, by and Through Lubbock Power & Light, for Authority to Establish Initial Wholesale Transmission Rates and Tariffs*, November 12, 2020.

Docket No. 51611 - *Application of Sharyland Utilities, L.L.C. for Authority to Change Rates, Direct Testimony,* March 12, 2021.

Docket No. 51611 - *Application of Sharyland Utilities, L.L.C. for Authority to Change Rates, Supplemental Testimony,* March 24, 2021.

Docket No. 51415 - *Application of Southwestern Electric Power Company for Authority to Change Rates,* Direct Testimony, April 7, 2021.

Docket No. 51415 - *Application of Southwestern Electric Power Company for Authority to Change Rates,* Cross-Rebuttal Testimony, April 23, 2021.

Docket No. 52195 - *Application of El Paso Electric Company for Authority to Change Rates,* Direct Testimony, October 29, 2021.

The following files are not convertible:

AN-2 - AN-6.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.