



## **Filing Receipt**

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**Control Number - 55867**

**Item Number - 105**

**SOAH DOCKET NO. 473-24-09296  
PUC DOCKET NO. 55867**

<b>APPLICATION OF LCRA</b>	<b>§</b>	
<b>TRANSMISSION SERVICES</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE OF</b>
<b>CORPORATION FOR AUTHORITY TO</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>
<b>CHANGE RATES</b>	<b>§</b>	

**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE  
TO LCRA TRANSMISSION SERVICES CORPORATION'S  
SECOND SET OF REQUESTS FOR INFORMATION**

Texas Industrial Energy Consumers ("TIEC") files the following responses to the First Requests for Information ("RFI") to TIEC filed by LCRA Transmission Services Corporation (LCRA TSC). The request was filed at the Commission and received by TIEC on March 22, 2024. Accordingly, pursuant to the procedural schedule entered in this case and the Commission's procedural rules, TIEC's response is timely filed. TIEC's responses to specific questions are set forth as follows, in the order of the questions asked. Pursuant to P.U.C. Proc. R. 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

O'MELVENY & MYERS LLP

*/s/ Michael A. McMillin*

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**ATTORNEYS FOR TEXAS INDUSTRIAL  
ENERGY CONSUMERS**

**CERTIFICATE OF SERVICE**

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 29<sup>th</sup> day of March, 2024 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

*/s/ John R. Hubbard*

\_\_\_\_\_  
John R. Hubbard

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**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE**  
**TO LCRA TRANSMISSION SERVICES CORPORATION'S**  
**SECOND SET OF REQUESTS FOR INFORMATION**

**LCRA TSC 2-1:**

Identify all dockets in which Mr. Jonathan Ly, Mr. Jeffry Pollock, or any other employee of J. Pollock Incorporated addressed the ERCOT 4CP to be used in a PUC cost of service rate proceeding.

**RESPONSE:**

Pursuant to an agreement between counsel, the scope of this request has been narrowed to identifying proceedings where Jeff Pollock or Jonathan Ly have provided testimony.

Mr. Ly's list of appearances was previously provided as Appendix B to his direct testimony. Mr. Pollock's list of appearances can be downloaded *via* [this link](#). Within the last five years, Mr. Pollock has previously addressed the use of an ERCOT 4CP in a rate proceeding in Docket No. 51100.

Preparer: Jonathan Ly

Sponsor: Jonathan Ly

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**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE**  
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**SECOND SET OF REQUESTS FOR INFORMATION**

**LCRA TSC 2-2:**

Identify all dockets in which Mr. Jonathan Ly, Mr. Jeffry Pollock, or any other employee of J. Pollock Incorporated addressed the billing units to be used in a cost of service rate proceeding outside of Texas.

**RESPONSE:**

Pursuant to an agreement between counsel, the scope of this request has been narrowed to identifying proceedings where Jeff Pollock or Jonathan Ly have provided testimony.

Please refer to TIEC's Response to LCRA TSC 2-1.

Preparer: Jonathan Ly

Sponsor: Jonathan Ly

**SOAH DOCKET NO. 473-24-09296  
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**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE**  
**TO LCRA TRANSMISSION SERVICES CORPORATION'S**  
**SECOND SET OF REQUESTS FOR INFORMATION**

**LCRA TSC 2-3:**

Identify all dockets in which Mr. Jonathan Ly, Mr. Jeffry Pollock, or any other employee of J. Pollock Incorporated testified in which a different ERCOT 4CP was developed and approved by the PUC after a PUC cost of service rate application had been filed.

**RESPONSE:**

Pursuant to an agreement between counsel, the scope of this request has been narrowed to identifying proceedings where Jeff Pollock or Jonathan Ly have provided testimony.

Please refer to TIEC's Response to LCRA TSC 2-1.

Preparer: Jonathan Ly

Sponsor: Jonathan Ly

**SOAH DOCKET NO. 473-24-09296  
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**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE**  
**TO LCRA TRANSMISSION SERVICES CORPORATION'S**  
**SECOND SET OF REQUESTS FOR INFORMATION**

**LCRA TSC 2-4:**

Of the dockets identified in response to Question 2-3, identify all of the dockets in which Mr. Jonathan Ly, Mr. Jeffry Pollock, or any other employee of J. Pollock Incorporated provided testimony recommending use of a different ERCOT 4CP than was in existence at the time of the filing of the application in question.

**RESPONSE:**

Pursuant to an agreement between counsel, the scope of this request has been narrowed to identifying proceedings where Jeff Pollock or Jonathan Ly have provided testimony.

Please refer to TIEC's Response to LCRA TSC 2-1.

Preparer: Jonathan Ly

Sponsor: Jonathan Ly

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**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE**  
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**SECOND SET OF REQUESTS FOR INFORMATION**

**LCRA TSC 2-5:**

Identify all dockets in which Mr. Jonathan Ly, Mr. Jeffry Pollock, or any other employee of J. Pollock Incorporated testified outside of Texas in which different billing units were developed and approved by the governing regulatory body after a cost of service rate proceeding had been filed.

**RESPONSE:**

Pursuant to an agreement between counsel, the scope of this request has been narrowed to identifying proceedings where Jeff Pollock or Jonathan Ly have provided testimony.

Please refer to TIEC's Response to LCRA TSC 2-1.

Preparer: Jonathan Ly

Sponsor: Jonathan Ly



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**SECOND SET OF REQUESTS FOR INFORMATION**

**LCRA TSC 2-6:**

Of the dockets identified in response to Question 2-5, identify all of the dockets in which Mr. Jonathan Ly, Mr. Jeffry Pollock, or any other employee of J. Pollock Incorporated provided testimony outside of Texas recommending use of different billing units than were in existence at the time of the filing of the application in question.

**RESPONSE:**

Pursuant to an agreement between counsel, the scope of this request has been narrowed to identifying proceedings where Jeff Pollock or Jonathan Ly have provided testimony.

Please refer to TIEC's Response to LCRA TSC 2-1.

Preparer: Jonathan Ly

Sponsor: Jonathan Ly