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COMPLAINT OF VALERO REFINING- TEXAS, L.P. AGAINST TEXAS-NEW MEXICO POWER COMPANY	§ § §	PUBLIC UTILITY COMMISSION OF TEXAS
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**TEXAS-NEW MEXICO POWER COMPANY'S
FOURTH REQUEST FOR INFORMATION TO
VALERO REFINING-TEXAS, L.P.**

Pursuant to 16 Tex. Admin. Code ("TAC") § 22.144, Texas-New Mexico Power Company ("TNMP") files its Fourth Requests for Information to Valero Refining-Texas, L.P. ("Valero"). Valero is hereby requested to answer the questions in the order in which they are asked with as much detail as is required to fully present all of the relevant facts.

Definitions and Instructions

Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the witness or witnesses who will sponsor each of your answers at the hearing in this PUC Docket No. 56045. These questions are continuing in nature and, should there be a change in circumstances that would modify or change any of your answers, then, in such case, please change or modify such answer and submit such changed answer as a supplement to the original answer within five (5) working days of your discovery that such change or modification is appropriate.

In answering these requests for information, you are requested to furnish such information as is available to you. To the extent any information responsive to a general question is also responsive to another more specific question, provide the information in response to the more specific request.

If you are unable to answer any request fully and completely after exercising due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such request.

Unless otherwise noted, the relevant time period for these requests is February 4, 2022 through November 16, 2022.

The singular includes the plural and the plural includes the singular.

Masculine, feminine, or neutral pronouns do not exclude the other genders.

The words “document” and “documents” have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. Among other things, the words “document” and “documents” mean the final form and all drafts and revisions of any kind of written or graphic matter, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies therefrom that are different in any way from the original regardless of whether designated “confidential,” “privileged,” or otherwise restricted. Without limiting the generality of the foregoing, the words “document” and “documents” also include information stored or maintained on, or which could be reproduced from, any form of storage or storage device including, without limitation, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape, compact disk, DVD, or similar means.

Electronically stored information shall be produced in single page TIFF images or PDF format with corresponding load files that include the following fields: “BegProd,” “EndProd,” “Pages” and “Volume,” “Custodian,” “Author,” “Recipients” and “Date.” The documents should be logically unitized (i.e., contain correct document breaks, for instance, a five-page fax consisting of a cover page and a four-page memo should be unitized as a five-page document). The production shall include optical character recognition information. In the case of responsive spreadsheets,

oscillography data, power quality records, event recordings, event files, and other technical files that require specialized software to be viewable, production should be in native form with unique identifying numbers associated with the native documents.

The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope.

The words “communication” and “communications” include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both communications and statements that are face-to-face and those that are transmitted by any writing or document or by media such as intercoms, telephones, television or radio. These words also include any communications and statements that are transmitted electronically or wirelessly, through means such as, but not limited to, email or text messages.

The words “person” and “persons” as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint ventures, corporations, and any other entities.

The words “relate,” “related,” “relates,” and “relating,” as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

The term “TNMP” as used herein, shall refer to Texas-New Mexico Power Company and all people acting or purporting to act on behalf of Texas-New Mexico Power Company for purposes of this proceeding.

The terms “You,” “Your” or “Valero,” as used herein, means Valero Refining-Texas, L.P. and all people acting or purporting to act its behalf for purposes of this proceeding.

The term “Outage” refers to the disruption of TNMP’s electric transmission service that occurred on February 4, 2022, in the Texas City, Texas, industrial corridor.

The terms “Refinery” or “Valero Refinery” refers to Valero’s Texas City refinery allegedly impacted by the Outage.

FOURTH SET OF REQUESTS FOR INFORMATION TO
VALERO TEXAS-REFINING, L.P.

- TNMP 4-1** Please produce a copy of any report, presentation, investigation, or study related to or concerning the Outage.
- TNMP 4-2** Identify all TNMP personnel and third party contractors that Valero and/or Kevin Mara contend were not adequately trained or experienced. For each individual Identified, specify what training or experience Valero and/or Kevin Mara contend was required and the basis for that requirement.
- TNMP 4-3** Refer to the Direct Testimony of Kevin Mara. Identify each “industry standard” referenced in such testimony. In your response, identify the specific provision that Mara claims was not complied with and describe in detail how it was not complied with. This request includes the following references:
- (a) Page 5, Lines 23-26;
 - (b) Page 6, Lines 4-5;
 - (c) Page 6, Lines 10-11;
 - (d) Page 6, Lines 13-15;
 - (e) Page 7, Lines 19-21;
 - (f) Page 8, Lines 7-9;
 - (g) Page 8, Lines 13-14;
 - (h) Page 8, Lines 22-25;
 - (i) Page 34, Lines 9-12;
 - (j) Page 36, Lines 1-2;
 - (k) Page 38, Lines 21-22;
 - (l) Page 38, Lines 25-27;
 - (m) Page 43, Lines 12-13;
 - (n) Page 43, Line 19;
 - (o) Page 43, Lines 22-24;
 - (p) Page 45, Lines 4-5; and
 - (q) Page 47, Lines 6-9.
- TNMP 4-4** Refer to the Direct Testimony of Kevin Mara at Page 35, Line 19. Please explain the basis for Mara’s assertion.
- TNMP 4-5** Refer to the Direct Testimony of Kevin Mara at Page 16, Lines 1-4. Please explain the basis for Mara’s conclusion that the “[REDACTED]”
[REDACTED]”
- TNMP 4-6** Refer to the Direct Testimony of Kevin Mara at Page 45, Lines 8-10. Please Identify the individuals and/or contractors that Mara is referring to when he states that there was a “[REDACTED]” and

Identify the individuals and/or contractors that Mara is referring to as the "[REDACTED]." Please state the basis for his conclusions at Lines 8-10.

- TNMP 4-7** Refer to the Direct Testimony of Kevin Mara at Page 7, Lines 25-28. Please Identify the individuals and/or contractors to which Mara refers as well as the basis for his conclusion at Lines 25-28.
- TNMP 4-8** Refer to the Direct Testimony of Kevin Mara at Page 34, Lines, 7-9. Please explain the basis for the referenced assertion in Mara's testimony.
- TNMP 4-9** Refer to the Direct Testimony of Kevin Mara at Page 37, Lines, 25-27. Please explain the basis for the referenced assertion in Mara's testimony.
- TNMP 4-10** Refer to the Direct Testimony of Kevin Mara at Page 44, Lines, 19-20. Please explain the basis for the following assertion in Mara's testimony:
"[REDACTED]"
- TNMP 4-11** Please explain phase rotation and its role in differential relaying protection applications.
- TNMP 4-12** Please identify the ESI ID(s) for Valero's Texas City Refinery facilities at issue in this proceeding.
- TNMP 4-13** Refer to the Direct Testimony of Kevin Mara. Please explain the basis for Mara's conclusion that ANSI/NETA standards apply to electric utilities in the ERCOT market.
- TNMP 4-14** Refer to the Direct Testimony of Kevin Mara at Page 5, Lines 16-17. Please describe in detail Mara's "review and analysis of TNMP's design, operation, and maintenance of its electric utility system prior to the Outage."
- TNMP 4-15** Please describe in detail the reasonable efforts Valero and/or Mara contend utilities must make to prevent interruptions of service pursuant to 16 Tex. Admin. Code § 25.52(b)(1).

Respectfully submitted,

/s/ Nicole Burleson

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**ATTORNEYS FOR TEXAS-NEW
MEXICO POWER COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January 2025, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with 16 Tex. Admin. Code § 22.74.

/s/ Nicole Burleson

Nicole Burleson