



Filing Receipt

Filing Date - 2024-07-15 02:59:30 PM

Control Number - 56545

Item Number - 104

**SOAH DOCKET NO. 473-24-18029
PUC DOCKET NO. 56545**

**APPLICATION OF ONCOR ELECTRIC
DELIVERY COMPANY LLC FOR
APPROVAL OF A SYSTEM
RESILIENCY PLAN**

**§
§
§
§**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

**ONCOR ELECTRIC DELIVERY COMPANY LLC'S
FIRST SET OF REQUESTS FOR INFORMATION
TO OFFICE OF PUBLIC UTILITY COUNSEL**

Pursuant to §22.144 of the Commission's Procedural Rules, Oncor Electric Delivery Company LLC ("Oncor") requests that Office of Public Utility Counsel ("OPUC"), 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 OPUC 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 OPUC 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 OPUC 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
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
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 15th day of July, 2024, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Docket No. 53601.

/s/ Stephanie Tenorio

Exhibit A

Oncor's First Request for Information to OPUC

REQUESTS

- 1-1 Please provide the following information for each witness that will provide testimony for OPUC in this case:
- a. the subject matter on which the witness will testify;
 - b. the facts known by the witness that relate to or form the basis of the witness's mental impressions and opinions formed or made in connection with the testimony;
 - c. the methods by which the mental impressions and opinions were formed;
 - d. all documents, tangible things, reports, models, or data compilations that have been provided to the witness in anticipation of his or her testimony. For the filing package filed by Oncor in this proceeding, do not provide the documents but instead list the portions of the filing package (including any updates) provided to the witness, including the specific pages provided (provide Bates Stamp numbers). For discovery responses that have been provided by Oncor in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided to the witness (provide Bates Stamp numbers);
 - e. all documents, tangible things, reports, models or data compilations that have been reviewed by the witness in anticipation of his or her testimony. For the filing package filed by Oncor in this proceeding, do not provide the documents but instead list the portions of the filing package (including any updates) reviewed by the witness, including the specific pages reviewed (provide Bates Stamp numbers). For discovery responses that have been provided by Oncor in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided or reviewed (provide Bates Stamp numbers);
 - f. the facts contained in the documents, tangible things, reports, models, or data compilations that have been reviewed by the witness that relate to or form the basis of the witness's mental impressions and opinions formed or made in connection with the pending case. For facts taken from discovery responses that have been provided by Oncor in this proceeding, do not provide the documents but instead list the

discovery response, including the specific pages provided or reviewed (provide Bates Stamp numbers), and the specific facts contained on each page that relate to or form the basis of the witness's mental impressions and opinions;

g. all Public Utility Commission of Texas ("Commission") dockets that have been reviewed by the witness in anticipation of his or her testimony, and a list of the specific documents that he or she reviewed within each such Commission docket;

h. the witness's current resume and bibliography, including, for the period since July 1, 2024, a complete listing of cases in which the witness has submitted testimony. Further, provide the docket number, jurisdiction, the party for whom testimony was submitted, and the topics addressed in the testimony;

i. copies of all articles, speeches, published materials, and peer-reviewed material written by the witness (or, for documents that are publicly available online, a link to access the online document may be provided instead of a copy);

j. the witness's billing rate; and

k. the number of hours spent by the witness on this case by week.

1-2 For each witness that will provide testimony for OPUC, please provide, for the period since July 1, 2024, a complete copy of all prior testimonies submitted or testified to at hearing by the witness relating to the topic(s) the witness will address in this docket. For testimony that is readily available from the Commission website, simply list the docket number, and for documents that are otherwise publicly available online, a link to access the online document may be provided instead of a copy of the document.

1-3 Please provide all documents reviewed by Mr. Nalepa that support the statements made his direct testimony in this docket on page 34 that, "[f]urthermore, there are additional risks to ratepayers that the cost to install a private network may well exceed Oncor's estimate, that it may take more time than expected to plan and deploy the network, and finally, that there will be uncertainty when all of Oncor's communications are switched to the private network that it work it works as intended. These risk could exceed any of the risks the network was intended to mitigate."

- 1-04 With reference to the statement made by Mr. Nalepa in his direct testimony in this docket on page 33, line 29 to page 34, line 6, please explain why Mr. Nalepa believes there could be implementation risks.
- 1-05 With reference to the direct testimony of Mr. Nalepa in this docket, please describe Mr. Nalepa's specific experience with developing, implementing, and/or operating cybersecurity systems for electric utilities. Please include specific information as to the identity of the utility, the utility's service territory, and time frame for this experience.
- 1-06 With reference to the direct testimony of Mr. Nalepa in this docket, please describe Mr. Nalepa's specific experience with developing, implementing, and/or operating communications systems for electric utilities. Please include specific information as to the identity of the utility, the utility's service territory, and time frame for this experience.
- 1-07 With reference to the direct testimony of Mr. Nalepa in this docket, please describe Mr. Nalepa's specific experience with developing, implementing, and/or operating information technology assets for electric utilities. Please include specific information as to the identity of the utility, the utility's service territory, and time frame for this experience.
- 1-08 With reference to the direct testimony of Mr. Nalepa in this docket, please describe Mr. Nalepa's specific experience with developing, implementing, and/or operating operations technology assets for electric utilities, including transmission and distribution Supervisory Control and Data Acquisition ("SCADA"), Distribution Automation ("DA"), Advanced Metering System ("AMS") and mobile workforce assets or applications. Please include specific information as to the identity of the utility, the utility's service territory, and time frame for this experience.