



## **Filing Receipt**

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<b>APPLICATION OF ONCOR</b>	<b>§</b>	
<b>ELECTRIC DELIVERY COMPANY</b>	<b>§</b>	<b>BEFORE THE</b>
<b>LLC FOR APPROVAL OF A SYSTEM</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>RESILIENCY PLAN</b>	<b>§</b>	<b>OF TEXAS</b>

**ONCOR’S STATEMENT OF CONFIDENTIALITY CONCERNING  
RESPONSES TO COMMISSION STAFF’S SECOND REQUESTS FOR INFORMATION**

COMES NOW Oncor Electric Delivery Company LLC (“Oncor”), by and through its attorneys of record, and pursuant to the Protective Order entered in this Docket, submits this Statement of Confidentiality Concerning Responses to the Staff of the Public Utility Commission of Texas’ (“Staff”) Second Requests for Information (“Statement of Confidentiality”).

**I.  
BACKGROUND**

Oncor is providing responses to Staff’s Second Requests for Information. Responses to the requests listed below contain sensitive commercial information that is considered confidential or highly sensitive confidential and, as a result, the responses were provided under the Protected Material or Highly Sensitive Protected Material designation (material designated under either heading hereinafter called “Protected Material”) pursuant to the standard Protective Order entered in this Docket.<sup>1</sup> This statement is being filed to comply with the requirement of Paragraph 4 of that Protective Order related to claims of exemption from public disclosure pursuant to the Public Information Act. Oncor asserts that the information that has been marked as Protected Material is exempt from public disclosure pursuant to sections 552.101 and 552.110 of the Texas Public Information Act (“TPIA”).<sup>2</sup>

**II.  
ARGUMENT**

The Protected Material is exempt from disclosure under the TPIA because it contains confidential competitively-sensitive business operations and commercial or financial information, the public disclosure of which would cause substantial competitive harm to Oncor.

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<sup>1</sup> SOAH Order No. 1 (May 10, 2024).

<sup>2</sup> Texas Public Information Act, Tex. Gov’t Code Ann. §§ 552.001-552.376.

The Protected Material is considered confidential under 16 Tex. Admin. Code § 25.272(c)(3) and is the type of sensitive business information that can be used only for the specified purposes in this Docket. Thus, the Protected Material is also covered by TPIA § 552.101, which excepts material from public disclosure that is considered to be “confidential by law... or by judicial decision.”

The Protected Material is further protected from public disclosure by the provisions of TPIA § 552.110(b), which exempts from public disclosure “commercial or financial information for which it is demonstrated based on specific factual evidence that disclosure would cause substantial competitive harm to the person from whom the information was obtained ....” Oncor has taken measures to maintain the information that has been marked as Protected Material as confidential, both within and outside the company, and has not released this information other than pursuant to protective orders or confidentiality agreements. Broader dissemination will provide an advantage to the company’s competitors, suppliers, or customers, and thereby cause substantial competitive harm to the relevant company.

Counsel for Oncor has reviewed the Protected Material sufficiently to state in good faith that the information contained therein is exempt from public disclosure under the TPIA and merits the Protected Material designation. Oncor has provided the following responses designated as Protected Material:

Staff RFI No. 2, Question 2-09:

Oncor’s response to Question 2-09 discloses the specific dollar amount that Oncor expects to spend per mile in implementing the lightning protection activity proposed in Oncor’s System Resiliency Plan (“SRP”) for its overhead distribution system. This information consists of proprietary, commercially-sensitive, and highly sensitive confidential business and financial information, all of which is excepted from public disclosure under the TPIA as discussed above.

Staff RFI No. 2, Question 2-17:

Oncor’s response to Question 2-17 contains the estimated total unit cost, estimated capital cost, estimated operations and maintenance (“O&M”) cost, and details on scope and quantity for each activity of the proposed programs under each of the measures proposed in Oncor’s SRP. This information was compiled and calculated based on Oncor’s historical experience with pricing and labor costs and/or quotes provided by vendors to Oncor. This information consists of proprietary, commercially-sensitive, and highly sensitive confidential

business and financial information, all of which is excepted from public disclosure under the TPIA as discussed above.

Staff RFI No. 2, Question 2-33:

Oncor's response to Question 2-33 contains the estimated dollar amount that Oncor expects to spend in contract project and employee resource hours for the Oncor Aware System Implementation Program, including the hourly rate and total estimated hours for specific job titles within Oncor. It also contains the amount Oncor expects to spend to purchase, build, test and implement that program. It further includes the amount Oncor expects to spend on O&M costs for monitoring cameras and devices deployed under that program. This information was compiled and calculated based on Oncor's historical experience with pricing and labor costs and/or quotes provided by vendors to Oncor. This information consists of proprietary, commercially-sensitive, and highly sensitive confidential business and financial information, all of which is excepted from public disclosure under the TPIA as discussed above.

Staff RFI No. 2, Question 2-34:

Oncor's response to Question 2-34 contains the estimated dollar amounts that Oncor expects to spend on ballistic barrier installations, the low oil tripping enablement, theft mitigation, station access control systems, and consultant fees for the Critical Asset Protection Program, along with the anticipated O&M costs to be incurred for the program. It further contains details on the cost of specific items and services that will be needed to implement the program. This information was compiled and calculated based on Oncor's historical experience with pricing and labor and material costs and/or quotes provided by vendors to Oncor. This information consists of proprietary, commercially-sensitive, and highly sensitive confidential business and financial information, all of which is excepted from public disclosure under the TPIA as discussed above.

Staff RFI No. 2, Question 2-35:

Oncor's response to Question 2-35 contains the estimated dollar amounts that Oncor expects to spend each year for the next three years, broken down by capital and O&M costs, for each program under the proposed Enhanced Digital Grid measure and for the activities within those programs. This information includes details on the cost for specific equipment, hardware and software, and labor, among other things. This information was compiled and calculated

based on Oncor's historical experience with pricing and labor and material costs and/or quotes provided by vendors to Oncor. This information consists of proprietary, commercially-sensitive, and highly sensitive confidential business and financial information, all of which is excepted from public disclosure under the TPIA as discussed above.

WHEREFORE, PREMISES CONSIDERED, Oncor requests that the Public Utility Commission of Texas accept this Statement of Confidentiality and grant Oncor such other relief to which it may show itself justly entitled.

By: /s/ Tab R. Urbantke  
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**ATTORNEYS FOR ONCOR ELECTRIC  
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**CERTIFICATE OF SERVICE**

It is hereby certified that a copy of the foregoing has been served by email on all parties of record who have provided an email address, on this the 21st day of June, 2024, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/ Joni Price