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PUC DOCKET NO. 56963

APPLICATION OF ONCOR ELECTRIC	§	BEFORE THE
DELIVERY COMPANY LLC FOR	§	PUBLIC UTILITY COMMISSION
APPROVAL TO AMEND	§	OF TEXAS
ITS DISTRIBUTION COST RECOVERY	§	
FACTOR	§	

**RESPONSE OF ONCOR ELECTRIC DELIVERY COMPANY LLC
TO STEERING COMMITTEE OF CITIES SERVED BY ONCOR'S
FIRST REQUEST FOR INFORMATION**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Oncor Electric Delivery Company LLC ("Oncor") files this Response to the
aforementioned requests for information.

**I.
Written Responses**

Attached hereto and incorporated herein by reference are Oncor's written
responses to the aforementioned requests for information. Each such response is set
forth on or attached to a separate page upon which the request has been restated. Such
responses are also made without waiver of Oncor's right to contest the admissibility of
any such matters upon hearing. Oncor hereby stipulates that its responses may be
treated by all parties exactly as if they were filed under oath.

**II.
Inspections**

In those instances where materials are to be made available for inspection by
request or in lieu of a written response, the attached response will so state. For those
materials that a response indicates are voluminous, materials will be provided in
electronic format through an Oncor FTP file sharing site upon request. Requests for
voluminous materials should be directed to Regulatory@oncor.com. To review materials
that a response indicates may be inspected at their usual repository, please call Joni Price
at 214-486-2844. Inspections will be scheduled so as to accommodate all such requests

with as little inconvenience to the requesting party and to company operations as possible.

Respectfully submitted,

ONCOR ELECTRIC DELIVERY COMPANY LLC

By: /s/ Tab R. Urbantke

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**ATTORNEY FOR ONCOR ELECTRIC
DELIVERY COMPANY LLC**

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 9th day of September, 2024, in accordance with the Commission's Second Order Suspending Rules issued on July 16, 2020, in Project No. 50664.

/s/ Stephanie Tenorio

Request

Refer to the Direct Testimony of Coler D. Snelleman at 3.

- a. Please provide the actual number of meters in reserve at each service center and central warehouse by month beginning January 2022.
- b. Please provide the number of meters purchased by month beginning January 2022.
- c. Please provide the number of meters installed by month beginning January 2022.
- d. Please provide the average time a meter is in inventory before it is installed on the system.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman, the sponsoring witness for this response.

For a., b., and c., see Table 1 below, which identifies, by month, the total number of meters in reserve among all service centers and the central warehouse, the total meters installed, and the total meters purchased.

d. The average time a meter is in inventory before it is installed is 123 days. The inventory average age is based on the average number of days a meter is in reserve status from the purchase date to the installation date.

Table 1

Month/Year	Meters in Reserve	Meters Installed	Meters Purchased
JUN24	177712	33353	24000
MAY24	180667	30429	24480
APR24	176467	31530	17376
MAR24	192966	23937	10560
FEB24	202012	23286	27840
JAN24	184718	21882	23739
DEC23	186507	19999	17350
NOV23	184020	29554	25728
OCT23	174304	30199	14592
SEP23	188626	28955	56811
AUG23	161877	31570	28773
JUL23	158157	32520	49296
JUN23	139752	36332	20352
MAY23	146083	35342	23715
APR23	150621	27372	20640
MAR23	158934	30810	32832
FEB23	147201	21772	25440
JAN23	140402	24190	18432
DEC22	132022	28362	27054
NOV22	127880	29818	22560
OCT22	128376	32067	36882
SEP22	121053	38368	27840
AUG22	115693	39826	49728
JUL22	101762	36657	17185
JUN22	115084	39621	26424
MAY22	121646	40548	13344
APR22	145005	34498	12672
MAR22	153369	27398	17956
FEB22	152068	18183	22368
JAN22	143532	23520	8928

Request

Refer to the Direct Testimony of Coler D. Snelleman at 8.

- a. Please provide the actual number of distribution transformers in reserve at each service center and central warehouse by month beginning January 2022.
- b. Please provide the number of distribution transformers purchased by month beginning January 2022.
- c. Please provide the number of distribution transformers installed by month beginning January 2022.
- d. Please provide the average time a distribution transformer is in inventory before it is installed on the system.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman, the sponsoring witness for this response.

For a., b., and c., see Table 1 below, which identifies, by month, the total number of distribution transformers in reserve among all service centers and the central warehouse, the total distribution transformers installed, and the total distribution transformers purchased.

- d. The average time a distribution transformer is in inventory before it is installed is 56 days. The inventory average age is based on the average number of days a transformer is in reserve status from the purchase date to the installation date.

Table 1

Month/Year	Transformers in Reserve	Transformers Installed	Transformers Purchased
JUN24	36228	3442	5294
MAY24	34603	3049	6081
APR24	32073	3454	4359
MAR24	30907	2943	4517
FEB24	28739	3037	5942
JAN24	25727	3174	5935
DEC23	22804	5299	1534
NOV23	23141	3112	2277
OCT23	23643	3348	4268
SEP23	22614	2959	3467
AUG23	22452	4377	3619
JUL23	22488	3476	3546
JUN23	22599	3795	3925
MAY23	22849	3260	3543
APR23	22311	2661	2829
MAR23	22119	3309	2901
FEB23	22330	2665	3917
JAN23	21083	2892	475
DEC22	23127	2940	5645
NOV22	20160	1967	2466
OCT22	19925	3030	3752
SEP22	19373	3181	2951
AUG22	19558	3700	3832
JUL22	19187	3663	2509
JUN22	18496	3872	3100
MAY22	17832	3278	3852
APR22	17248	3081	2552
MAR22	16621	3019	2757
FEB22	15951	2495	2484
JAN22	15638	2581	8347

Request

Refer to the Direct Testimony of Coler D. Snelleman at 9.

- a. Please provide the actual number of capacitors in reserve at each service center and central warehouse by month beginning January 2022.
- b. Please provide the number of capacitors purchased by month beginning January 2022.
- c. Please provide the number of capacitors installed by month beginning January 2022.
- d. Please provide the average time a capacitor is in inventory before it is installed on the system

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman, the sponsoring witness for this response.

For a., b., and c., see Table 1 below, which identifies, by month, the total number of capacitors in reserve among all service centers and the central warehouse, the total capacitors installed, and the total capacitors purchased.

d. The average time a capacitor is in inventory before it is installed is 43 days. The inventory average age is based on the average number of days a capacitor is in reserve status from the purchase date to the installation date.

Table 1

Month/Year	Capacitors in Reserve	Capacitors Installed	Capacitors Purchased
JUN24	2078	55	237
MAY24	1911	81	0
APR24	1972	150	99
MAR24	2003	140	80
FEB24	2068	137	0
JAN24	2268	201	1532
DEC23	931	107	0
NOV23	1069	40	0
OCT23	1136	143	0
SEP23	1214	83	24
AUG23	1304	399	265
JUL23	1354	361	90
JUN23	1646	189	51
MAY23	1818	211	115
APR23	1860	266	350
MAR23	1809	239	916
FEB23	1200	156	240
JAN23	1123	146	597
DEC22	692	210	106
NOV22	780	58	246
OCT22	719	230	279
SEP22	679	103	138
AUG22	641	191	30
JUL22	802	352	385
JUN22	820	278	399
MAY22	702	211	105
APR22	790	233	151
MAR22	908	385	144
FEB22	1146	430	704
JAN22	929	14	462

Request

Refer to WP B-1 _I_2022. Please explain the purpose of Project 3472685E, 2018 CAPEX CARRYOVER: DENDR000, costing \$1,382,963.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman and W. Alan Ledbetter, the sponsoring witnesses for this response.

Project 3472685E, 2018 CAPEX CARRYOVER: DENDR000 is another phase of a larger planned underground facility upgrade program that involved the replacement of 750 Paper Insulated Lead Cable ("PILC") with 500 Ethylene Propylene Rubber Cable on the DENDR0001 feeder at Dallas Love Field Airport. PILC is an older style of cable that is no longer typically used outside of maintenance activity, as it has demonstrated some reliability issues at other locations.

Request

Refer to WP B-1_1_2022. Please explain if Project IT160009, Work and Asset Management, costing \$84,315,918, is assigned 100% to Distribution or is any of the project allocated to Transmission.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman and W. Alan Ledbetter, the sponsoring witnesses for this response.

The Work and Asset Management Project is entirely assigned to the distribution function. Please see Attachments 1 and 2 for information responsive to this request.

ATTACHMENTS:

ATTACHMENT 1 – Oncor's response to OCSC RFI Set No. 1, Question No. 1-09, in Docket No. 55190, 1 page.

ATTACHMENT 2 – Oncor's response to CITIES RFI Set No. 1, Question No. 1-05, in Docket No. 56306, 2 pages.

Oncor - Docket No. 55190
OCSC RFI Set No. 1
Question No. 1-09
Page 1 of 1

Request

Refer to the Direct Testimony of Coler D. Snelleman at 25-26:

- a. Please explain whether the Distribution Asset and Work Management project (WaAM) will be used entirely for the distribution function or is the project also allocated to transmission or other functions. If the project is only allocated to distribution, please explain if transmission has its own work management information system.
- b. Please state the project numbers(s) reflecting the WaAM project and the FERC account(s) to which Oncor booked its WaAM project.
- c. Please state the depreciation rate(s) that Oncor applied to the WaAM project and the basis for using those rates.
- d. Please identify the project number(s) that reflect the retirement of the work management information system that the WaAM project is replacing.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman and W. Alan Ledbetter, the sponsoring witnesses for this response.

- a. The distribution Work and Asset Management ("WaAM") investment is used to support only the distribution function. The transmission function has its own directly assigned investments in work and asset management systems.
- b. IT160009 - Work and Asset Management is the project for the WaAM investment, and it is booked to FERC Plant Account 303 Miscellaneous Intangible Plant.
- c. The depreciation rate for the WaAM investment is 6.46%. The WaAM investment was assigned an intangible plant life of 15 years, based on the anticipated life of the functionality provided by the investment.
- d. WaAM replaced the work and asset management components of the 1996 Distribution Information System ("DIS") which was included in Oncor's contributed computer software applications in order for Capgemini (a third-party service provider) to provide services to Oncor. As the DIS investment was previously removed from plant coincident with the Capgemini outsourcing, there were no retirement projects to recognize when WaAM was placed in service in 2022.

Oncor - Docket No. 56306
CITIES RFI Set No. 1
Question No. 1-05
Page 1 of 2

Request

Refer to Direct Testimony of Coler D. Snelleman at 26.

- a. Please explain what "WaAM" stands for and explain if the Hypercare project was developed internally with Oncor resources or was outsourced. If outsourced, please identify the vendor.
- b. Please provide the WaAM investment separately for 2022 and 2023 identify where the costs are reflected in the DCRF schedules.
- c. Please explain if WaAM is used by both distribution and transmission? If so, how are the project costs allocated between distribution and transmission. If not, please explain why none of the functionality of the project is usable by transmission.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman, the sponsoring witness for this response.

- a. "WaAM" stands for Work and Asset Management. The WaAM Hypercare project was developed and managed by Oncor. During the development process, Oncor supplemented its internal resources with certain third-party resources and consultants to aid in Oncor's development of this collection of functionality across multiple applications.
- b. The WaAM investment for 2022 for Project IT160009 "Work and Asset Management" is \$84.3M. Reference discussion of this investment in the Direct Testimony of Coler D. Snelleman at 25 through 27 in Docket No. 55190 (Oncor's application to amend its DCRF to include distribution invested capital placed in service during 2022). The WaAM investment for 2023 includes additional costs for Project IT160009 of \$0.2M and costs for Project ITWA2204 ("WaAM Hypercare") of \$18.7M. Reference discussion of the WaAM Hypercare project in the Direct Testimony of Coler D. Snelleman beginning at 26 in this DCRF application.

Intangible plant account 303 investment for WaAM and WaAM Hypercare is reflected on DCRF Schedule B-1, Line 1d (intangible plant account 303 with a 15-year life) in the Additions Column (2) and Balance at 12/31/2023 Column (4). Reference Bates page 160 in this DCRF application. DCRF Schedule E-1, Line 1d includes the additional depreciation (amortization) expense on the WaAM plant investment additions at 12/31/2023. Reference Bates page 164 in this DCRF application.

Project IT160009 Work and Asset Management is shown on Bates page 331 (page 113 of WP/Schedule B-1/1/2022) and Bates page 336 or page 2 of WP/Schedule B-1/1/6 ME 06302023 in this DCRF application.

Project ITWA2204 WaAM Hypercare is shown on Bates page 461 or page 62 of WP/Schedule B-1/1/6 ME 12312023 in this DCRF application.

- c. The distribution "WaAM" investment is used to support only the distribution function. The transmission function has its own directly assigned investments in work and asset management systems.

Request

Refer to WPs Schedule B-1_1_2 Substation over \$100k by Property Unit 2022, 6 ME 6-30-23, 6 ME 12.31.23, and 6 ME 6-30-24. Please confirm that for all substation land purchases included in Oncor's requested DCRF, construction has either already commenced or will commence within 24 months from the land purchase date. If Oncor cannot confirm, please provide an explanation why not.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman and W. Alan Ledbetter, the sponsoring witnesses for this response.

Oncor can neither confirm nor deny. Oncor has identified 45 substation land tract purchases over \$100K that have occurred during the 30-month Distribution Cost Recovery Factor ("DCRF") update period ending June 30, 2024. Of these 45 land tract purchases, substation construction activity is not expected within a 24-month period for five of the projects and the investment has been transferred from electric plant in service to electric plant held for future use (Federal Energy Regulatory Commission Uniform System of Accounts number 105). Accordingly, the land investment associated with these five substation construction projects is not included in Oncor's DCRF application.

Of the remaining 40 identified substation land tract purchases over \$100K that are included in Oncor's DCRF update, 20 of the associated substation construction projects have already commenced and/or been completed. In each of these 20 projects, Oncor can confirm that the construction start date was within 24 months of the associated land purchase date.

As to the remaining 20 identified substation land tract purchases over \$100k included in Oncor's DCRF update, six substation construction projects have established construction commencement date estimates, and each of the established, estimated construction start date for these six projects is within 24 months from the associated land purchase date. For the remaining 14 substation land tract purchases, Oncor currently expects that construction will commence within 24 months from the land purchase date, but a construction schedule has not yet been established for the substations associated with those land purchases.

Thus, Oncor cannot confirm with certainty that construction will commence within 24 months from the land purchase date for any of the land purchases described above other than the 20 for which construction has already commenced and/or concluded. As explained on pages 17-18 (Bates pages 143-144) of Mr. Snelleman's direct testimony, construction typically begins up to 24 months after the substation land purchase, but construction schedules may occasionally change due to various factors and result in reasonable delays in the commencement of construction.

Request

Refer to WP Schedule B-1_1_3 Distribution over \$100k by Property Unit 2022.
Please provide an explanation why this workpaper includes projects that have in-service dates in 2020 and 2021 and confirm whether these projects are not already included in rates.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman and W. Alan Ledbetter, the sponsoring witnesses for this response.

Please see Attachment 1 for information responsive to this request.

The costs listed in workpaper WP/Schedule B-1/1/3/2022 reflect only the incremental costs incurred during the 12 months ending December 31, 2022, that were not already included in distribution rates as of the filing date of Oncor's Distribution Cost Recovery Factor ("DCRF") update application in Docket No. 55190 (in other words, it reflects only the distribution and distribution-related costs not reflected in the DCRF baseline as of December 31, 2021, as established in Docket No. 54817.) Coincident with the September 1, 2023 implementation date of interim DCRF rates from Docket No. 55190, the distribution and distribution-related costs reflected in workpaper WP/Schedule B-1/1/3/2022 are currently in rates.

ATTACHMENT:

ATTACHMENT 1 – Oncor's response to OCSC RFI Set No. 1, Question No. 1-10, in Docket No. 55525, 1 page.

Refer to WP Schedule B-1_1_3 Distribution over \$100k for 2022. Please explain why the following projects with in-service dates in 2021 are included in the 2022 DCRF update:

Response

Distribution plant addition projects with in-service dates of 2021 or earlier are included in this DCRF update proceeding because additional trailing construction activities and/or costs were recorded during the interim DCRF update period reflecting the 18-month period ending June 30, 2023. Only the incremental costs (*i.e.*, post-December 31, 2021) are reflected in the requested DCRF revenue requirement increase.

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Request

Refer to WP Schedule B-1_1_3 Distribution over \$100k by Property Unit 6 ME 6-30-23. Please provide an explanation why this workpaper includes projects that have in-service dates in 2021 and 2022 and confirm whether these projects are not already included in rates.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman and W. Alan Ledbetter, the sponsoring witnesses for this response.

Please see Oncor's response to OCSC RFI Set No. 1, Question No. 1-07 filed in this docket for an explanation as to why workpaper WP/Schedule B-1/1/3/6 ME 06302023 includes costs for projects that have in-service dates of 2021 and 2022.

The costs listed in workpaper WP/Schedule B-1/1/3/6 ME 06302023 reflect only the incremental costs incurred during the six months ending June 30, 2023, that were not already included in distribution rates as of the filing date of Oncor's Distribution Cost Recovery Factor ("DCRF") update application in Docket No. 55525. Coincident with the December 28, 2023 implementation date of updated DCRF rates from Docket No. 55525, the distribution and distribution-related costs reflected in workpaper WP/Schedule B-1/1/3/6 ME 06302023 are currently in rates.

Request

Refer to WP Schedule B-1_1_3 Distribution over \$100k by Property Unit 6 ME 12-31-23. Please provide an explanation why this workpaper includes projects that have in-service dates in 2022 and confirm whether these projects are not already included in rates.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman and W. Alan Ledbetter, the sponsoring witnesses for this response.

Please see Oncor's response to OCSC RFI Set No. 1, Question No. 1-07 filed in this docket for an explanation as to why workpaper WP/Schedule B-1/1/3/6 ME 12312023 includes costs for projects that have in service dates of 2022.

The costs listed in workpaper WP/Schedule B-1/1/3/6 ME 12312023 reflect only the incremental costs incurred during the six months ending December 31, 2023, that were not already included in distribution rates as of the filing date of Oncor's Distribution Cost Recovery Factor ("DCRF") update application in Docket No. 56306. Coincident with the July 1, 2024 implementation date of updated DCRF rates from Docket No. 56306, the distribution and distribution-related costs reflected in workpaper WP/Schedule B-1/1/3/6 ME 12312023 are currently in rates.

Request

Refer to WP Schedule B-1_1_3 Distribution over \$100k by Property Unit 6 ME 6-30-24. Please provide an explanation why this workpaper includes projects that have in-service dates in 2022 and 2023 and confirm whether these projects are not already included in rates.

Response

The following response was prepared by or under the direct supervision of Coler D. Snelleman and W. Alan Ledbetter, the sponsoring witnesses for this response.

Please see Oncor's response to OCSC RFI Set No. 1, Question No. 1-07 filed in this docket for an explanation as to why workpaper WP/Schedule B-1/1/3/6 ME 06302024 includes costs for projects that have in service dates of 2022 and 2023.

The costs listed in workpaper WP/Schedule B-1/1/3/6 ME 06302024 reflect only the incremental distribution and distribution-related costs incurred during the six months ending June 30, 2024, that are not already included in existing distribution or distribution cost recovery factor rates.