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PUC DOCKET NO. 56963

**APPLICATION OF ONCOR
ELECTRIC DELIVERY COMPANY
LLC TO AMEND ITS DISTRIBUTION
COST RECOVERY FACTOR**

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§**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

DIRECT TESTIMONY

OF

KARL J. NALEPA

ON BEHALF OF

THE STEERING COMMITTEE OF CITIES

SERVED BY ONCOR

SEPTEMBER 12, 2024

**DIRECT TESTIMONY OF
KARL J. NALEPA**

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Attachment KJN-1	Statement of Qualifications
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WORKPAPERS:

Attachment WP KJN-1

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**DIRECT TESTIMONY OF
KARL J. NALEPA**

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND ADDRESS.

A. My name is Karl J. Nalepa. I am a partner in, and President of, ReSolved Energy Consulting, LLC (REC), an independent utility consulting company. My business address is P.O. Box 90908, Austin, Texas 78709.

Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND?

A. I hold a Master of Science degree in Petroleum Engineering from the University of Houston and a Bachelor of Science degree in Mineral Economics from Pennsylvania State University. I am also a certified mediator.

I have been a partner in REC since July 2011 but joined R.J. Covington Consulting, its predecessor firm, in June 2003. I lead our firm's regulated market practice, where I represent the interests of clients in utility regulatory proceedings, prepare client cost studies, and develop client regulatory filings. Before joining REC, I served for more than five years as an Assistant Director with the Railroad Commission of Texas (RRC). In this position, I was responsible for overseeing the economic regulation of natural gas utilities in Texas, which included supervising Staff casework, advising Commissioners on regulatory issues, and serving as a Technical Rate Examiner in regulatory proceedings.

1 Prior to joining the RRC, I worked as an independent consultant advising clients on
2 a broad range of electric and natural gas industry issues, and before that, I spent five years
3 as a supervising consultant with Resource Management International, Inc. I also served
4 for four years as a Fuels Analyst with the Public Utility Commission of Texas (PUC or the
5 Commission), where I evaluated fuel issues in electric utility rate filings and fuel
6 reconciliation filings, participated in electric utility-related rulemaking proceedings, and
7 took part in the review of electric utility resource plans. My professional career began with
8 eight years in the reservoir engineering department of Transco Exploration Company,
9 which was an affiliate of Transco Gas Pipeline Company, a major interstate pipeline
10 company. My Statement of Qualifications is included as Attachment KJN-1.

11 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN A COMMISSION PROCEEDING?**

12 A. Yes, I have testified many times before both the Commission and the RRC on a variety of
13 regulatory issues and have filed testimony in many of the previous Distribution Cost
14 Recovery Factor (DCRF) cases before the Commission. I have also provided testimony
15 before the Louisiana Public Service Commission, Arkansas Public Service Commission,
16 and Colorado Public Utilities Commission. A summary of my previously filed testimony
17 is included as Attachment KJN-2. In addition, I have provided analysis and
18 recommendations in many city-level regulatory proceedings that resulted in decisions
19 without written testimony.

20 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

21 A. I am offering testimony on behalf of the Steering Committee of Cities Served by Oncor
22 (Cities or OCSC).

1 **II. PURPOSE AND SCOPE**

2 **Q. WHAT IS ONCOR ELECTRIC DELIVERY COMPANY, LLC (ONCOR)**
3 **REQUESTING IN THIS PROCEEDING?**

4 A. This is Oncor's fourth DCRF filing since its last comprehensive base rate proceeding in
5 Docket No. 53601.¹ The Company's prior DCRF filing² reflected distribution-related costs
6 for the period January 1, 2022 through December 31, 2023.³ The test year in the instant
7 DCRF filing ended June 30, 2024.⁴ The Company is requesting that the Commission
8 approve the DCRF requested in its application.⁵

9 **Q. HAS THE COMMISSION ISSUED A FINAL ORDER IN DOCKET NO. 56306?**

10 A. Yes. The Commission issued an interim order in Docket No. 56306 on May 16, 2024,⁶
11 Oncor sought two unrelated forms of relief in Docket No. 56306: (1) to update its DCRF
12 to include costs for the period January 1, 2022 through December 31, 2023, and (2) to
13 update its current mobile generation and wholesale mobile generation riders.⁷ The
14 administrative law judge held that the two forms of relief would be processed on two
15 separate procedural tracks.⁸ The interim order filed in Docket No. 56306 addressed only
16 the update to the DCRF and was approved by the Commission on May 16, 2024.

¹ Application of Oncor Electric Delivery Company Delivery Company LLC to Amend its Distribution Cost Recovery Factor at 1 (Aug. 16, 2024) (Application).

² *Application of Oncor Electric Delivery Company, LLC for Approval to Amend its Distribution Cost Recovery Factor and Mobile Generation Riders*, Docket No. 56306, Application of Oncor Electric Delivery Company LLC to Amend its Distribution Cost Recovery Factor and Update Mobile Generation Riders (Mar. 1, 2024).

³ *Id.* at 5.

⁴ Application at 5.

⁵ *Id.* at 9.

⁶ Docket No. 56306, Interim Order (May 16, 2024).

⁷ *Id.* at 1.

⁸ *Id.*

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

2 A. The purpose of my testimony is to evaluate whether the costs proposed for inclusion in the
3 DCRF and the resulting DCRF rates are consistent with the requirements of the DCRF rule.

4 **III. SUMMARY AND RECOMMENDATIONS**

5 **Q. PLEASE SUMMARIZE THE RESULTS OF YOUR ANALYSIS.**

6 A. I found that Oncor maintains meter, transformer and capacitor reserves in excess of the
7 amounts required to provide adequate service.

8 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS REGARDING ONCOR'S**
9 **PROPOSED DCRF.**

10 A. I am recommending that distribution invested capital be reduced by \$4,830,240 related to
11 meters, \$80,521,065 related to transformers, and \$4,192,360 related to capacitors pending
12 a further review in Oncor's next base rate proceeding, at which time Oncor will have an
13 opportunity to provide support for these costs and the costs can be reconciled.

14 **IV. DISTRIBUTION COST RECOVERY FACTOR**

15 **Q. WHAT IS A DISTRIBUTION COST RECOVERY FACTOR OR DCRF?**

16 A. The DCRF was authorized by the Commission in its Order in Project No. 39465 to allow
17 a utility to adjust its rates for changes in certain distribution-related costs.⁹ The resulting
18 rule (16 Texas Administrative Code (TAC) § 25.243) ("DCRF Rule") allowed a utility to
19 change its rates on an annual basis to account for changes in return, depreciation and taxes
20 on the change in net distribution invested capital since its last base-rate proceeding, offset

⁹ *Rulemaking Relating to Periodic Rate Adjustments*, Project No. 39465, Order Adopting New § 25.243 as approved at the September 15, 2011 Open Meeting (Sept. 27, 2011).

1 by corresponding load growth revenues.¹⁰ The Legislature subsequently modified the
2 DCRF to allow an adjustment not more than twice per year.¹¹

3 **Q. WHAT COSTS IS ONCOR SEEKING TO RECOVER IN THIS PROCEEDING?**

4 A. Oncor claims to have invested \$3,176,811,471 in net distribution system invested capital
5 from January 1, 2022 through June 30, 2024.¹² The total revenue requirement associated
6 with allowed return, depreciation, income and other taxes on the net distribution invested
7 capital during that period is \$408,745,142.¹³ Adjusted for load growth, the Total DCRF
8 Revenue Requirement is \$377,657,423.¹⁴

9 **Q. WHAT IS THE CHANGE SINCE ONCOR'S LAST DCRF FILING?**

10 A. Compared to the incremental revenue requirement of \$287,369,280 approved in Docket
11 No. 56306, this filing seeks to increase the Company's total distribution revenue
12 requirement by approximately \$90,288,143.¹⁵

13 **Q. DO YOU HAVE ANY ISSUES WITH ONCOR'S PROPOSED DCRF REVENUE**
14 **INCREASE?**

15 A. Yes. Oncor's meter, transformer and capacitor reserves exceed the amounts necessary to
16 provide reliable service. Oncor's purchases of meters, transformers and capacitors should
17 be removed from the DCRF plant in service to reduce the reserves.

¹⁰ 16 Tex. Admin. Code § 25.243 (TAC).

¹¹ Public Utility Regulatory Act, Tex. Util. Code Ann § 36.210 (PURA).

¹² Application at 5-6.

¹³ *Id.* at 6.

¹⁴ *Id.*

¹⁵ *Id.*

1 **V. METER INVESTMENT**

2 **Q. WHAT ISSUE ARE YOU ADDRESSING IN THIS SECTION OF YOUR**
3 **TESTIMONY?**

4 A. I am addressing Oncor's meter investment.

5 **Q. HOW DOES ONCOR DECIDE HOW MANY METERS TO PURCHASE?**

6 A. Each year, Oncor reviews the growth experienced within its service territory, the number
7 and type of meters that have failed over the course of the year, and any other circumstances
8 that may impact its meter requirements. Oncor also determines the number and type of
9 meters it will need to keep on hand across its service territory.¹⁶

10 **Q. HOW DOES GROWTH INFLUENCE THE NUMBER OF METERS NEEDED?**

11 A. Oncor asserts it added, on average, 71,258 new electricity distribution points of delivery
12 over each of the past four years (June 2020 through June 2024).¹⁷ In the twelve months
13 ended June 2024, Oncor claims it added 74,200 new electricity distribution points of
14 delivery and projects that it will add approximately 75,000 new electricity distribution
15 points of delivery in calendar year 2024.¹⁸ As of the end of June 2024, Oncor contends
16 that its customer's five-year compound annual growth rate was 1.9%.¹⁹ As Oncor
17 continues to serve new premises, it must purchase and install new meters at those new
18 locations and maintain a reserve of meters should one or more need to be replaced.²⁰

¹⁶ Application, Direct Testimony of Coler D. Snelleman at 3-4 (Snelleman Direct).

¹⁷ *Id.* at 4.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.*

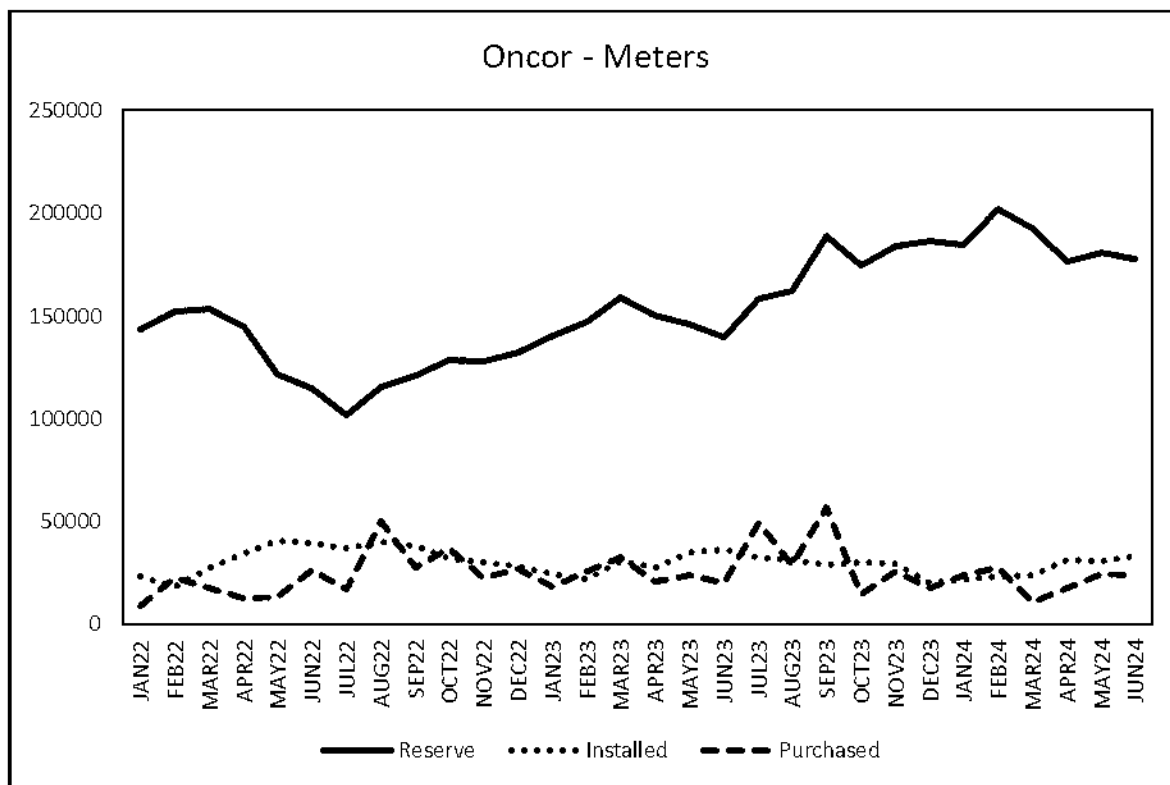
1 **Q. IS IT APPROPRIATE FOR ONCOR TO MAINTAIN A METER RESERVE?**

2 A. Yes, it is appropriate.

3 **Q. WHAT LEVEL OF METER RESERVES DOES ONCOR MAINTAIN?**

4 A. Figure 1 reflects the level of reserves by month, along with the number of meters installed
5 and meters purchased, since January 2022:²¹

Figure 1



6 **Q. WHAT CAN BE LEARNED FROM FIGURE 1?**

7 A. Figure 1 shows that since January 2022 Oncor has installed on average about 30,000 meters
8 per month, while it has purchased on average about 25,000 meters per month. However,
9 despite the relative balance between its installations and purchases, Oncor has continued

²¹ Oncor Response to OCSC RF1 1-1 (provided as Attachment KJN-3).

1 to increase its meter reserves, from 101,762 meters in July 2022 to 177,712 meters in June
2 2024. While Oncor claims its average customer growth rate is 1.9%, the Company has
3 increased its meter reserves by 21% in the twelve months ending June 2023 and another
4 27% in the twelve months ending June 2024.

5 **Q. DID ONCOR PROVIDE A REASON FOR INCREASING ITS METER RESERVE?**

6 A. No. Oncor explained that it maintains a working reserve of meters to ensure customer and
7 market participant requirements are met given variable manufacturing lead times,
8 customer-service dates, and replacement needs,²² but provided no reason for the increasing
9 meter reserve.

10 **Q. CAN YOU ESTIMATE THE APPROPRIATE METER RESERVE?**

11 A. The average number of meters in reserve since January 2022 is 154,000. This is an
12 appropriate level of reserves considering it represents an approximate five month supply
13 of meters at current installation rates, and lead times to obtain meters from the manufacturer
14 are about 5.5 months.²³

15 **Q. WHAT IS THE IMPACT OF REDUCING THE METER RESERVE TO 154,000**
16 **METERS?**

17 A. The meter reserve at the end of the DCRF test period, June 2024, was 177,712. Reducing
18 this to 154,000 meters means removing approximately 24,000 meters from the reserve.

19 **Q. WHAT IS THE COST OF REMOVING 24,000 METERS FROM THE METER**
20 **RESERVE?**

²² Snelleman Direct at 6.

²³ *Id.*

1 A. Oncor reported \$25,759,887.54 booked to FERC account 370, Meters, during the six
2 months ending June 2024.²⁴ Oncor also reported purchasing 127,995 meters during the
3 same time period.²⁵ Thus, the average cost per meter is \$201.26,²⁶ and the total cost of
4 24,000 meters is \$4,830,240.

5 **Q. ARE YOU RECOMMENDING A DISALLOWANCE OF THIS AMOUNT?**

6 A. No. The issues of whether distribution invested capital included in an application for a
7 DCRF adjustment is prudent, reasonable, and necessary is not addressed in a DCRF
8 proceeding unless the presiding officer finds that good cause exists to address these
9 issues.²⁷ However, I am recommending that distribution invested capital be reduced by
10 \$4,830,240 pending a further review in Oncor's next base rate proceeding.

11 **Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?**

12 A. It is unfair to ratepayers to bear the cost of meters in reserve that Oncor has not
13 demonstrated provide a reliability benefit. This issue can be further addressed in the next
14 Oncor proceeding, and if Oncor can provide sufficient support for the excess meters, the
15 meters can be added to distribution invested capital at that time. The DCRF rule provides
16 for a reconciliation of investments recovered through a DCRF in an electric utility's next
17 base rate proceeding. However, while the rule contemplates a refund to customers if the
18 invested capital is found to be imprudent or unreasonable, this can lead to intergenerational
19 inequities as the customers paying the higher rates may not be the same customers

²⁴ Application, WP_Schedule B_1_1_3 Distribution Over \$100,000 by Property Unit 6 ME 06.30.2024.

²⁵ Attachment KJN-3.

²⁶ Note that the \$25,759,887.54 that Oncor reported for the six months ending June 2024 divided by the 127,995 meters Oncor purchased during that same time period, results in each meter costing \$201.26.

²⁷ 16 TAC § 25.243(e)(5).

1 receiving the refund. Withholding the invested capital from rates until the costs are
2 reconciled ensures that customers only pay the appropriate rates, and Oncor is still made
3 whole for its investment.

4 **VI. DISTRIBUTION TRANSFORMER INVESTMENT**

5 **Q. WHAT ISSUE ARE YOU ADDRESSING IN THIS SECTION OF YOUR**
6 **TESTIMONY?**

7 A. I am addressing Oncor's distribution transformer investment.

8 **Q. DOES ONCOR MAINTAIN A TRANSFORMER RESERVE?**

9 A. Yes. Given the cost and the 12 to 40 week lead time for delivery of transformers from the
10 manufacturer,²⁸ as well as the large variability in types of transformers on Oncor's system,
11 Oncor concludes it is not feasible from either an operational perspective or a reliability
12 perspective for the Company to wait to purchase the asset until it has an immediate need
13 to install and energize it.²⁹ For these reasons, Oncor maintains a working reserve supply
14 of distribution transformers.³⁰

15 **Q. HOW DOES ONCOR DETERMINE HOW MANY TRANSFORMERS IT NEEDS**
16 **IN RESERVE?**

17 A. Oncor reports that there are approximately 1,300 unique styles of distribution transformers
18 on its distribution system.³¹ However, to minimize the amount of working reserve needed,
19 Oncor currently uses approximately 500 unique transformer styles specifically designed to

²⁸ Snelleman Direct at 8.

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.* at 10.

1 serve as compatible working reserve to back stand all transformer styles in the event of
2 equipment failure, as well as to provide service to new customers.³² Oncor claims that in
3 any given year, 40% to 60% of its total demand for transformers is reactive in nature and
4 varies based on the style of the transformer and seasonal adverse weather conditions.³³

5 To provide for the possibility of a significant increase in demand due to weather,
6 Oncor increases working reserve target levels for the summer and winter seasons and then
7 reduces the targets during the spring and fall. In addition to the weather, Oncor also
8 considers national demand and accounts for limited production capacity of the four major
9 distribution transformer manufacturers in North America to respond to a national weather
10 demand event.³⁴ In addition, Oncor ensures that adequate working reserves are available
11 at all of its field service centers, based on the particular needs within a given service area.³⁵

12 **Q. HOW MANY TRANSFORMERS HAS ONCOR INSTALLED IN 2024?**

13 A. Oncor has purchased approximately 32,000 transformer units, and approximately 8,700 of
14 those transformer units were installed so far in 2024.³⁶ In total, including units purchased
15 prior to 2024, a total of approximately 19,100 transformer units were installed during the
16 six months ending June 30, 2024.³⁷ The Company held the remainder in reserve to meet
17 emergency and customer needs.³⁸ On average, in the last twelve months Oncor installed

³² *Id.*

³³ *Id.*

³⁴ *Id.* at 10-11.

³⁵ *Id.* at 11.

³⁶ *Id.* at 8-9.

³⁷ *Id.* at 9.

³⁸ *Id.*

approximately 113 distribution transformers a day, but this could be substantially higher during storms and other times when the need for replacements on the system is higher.³⁹

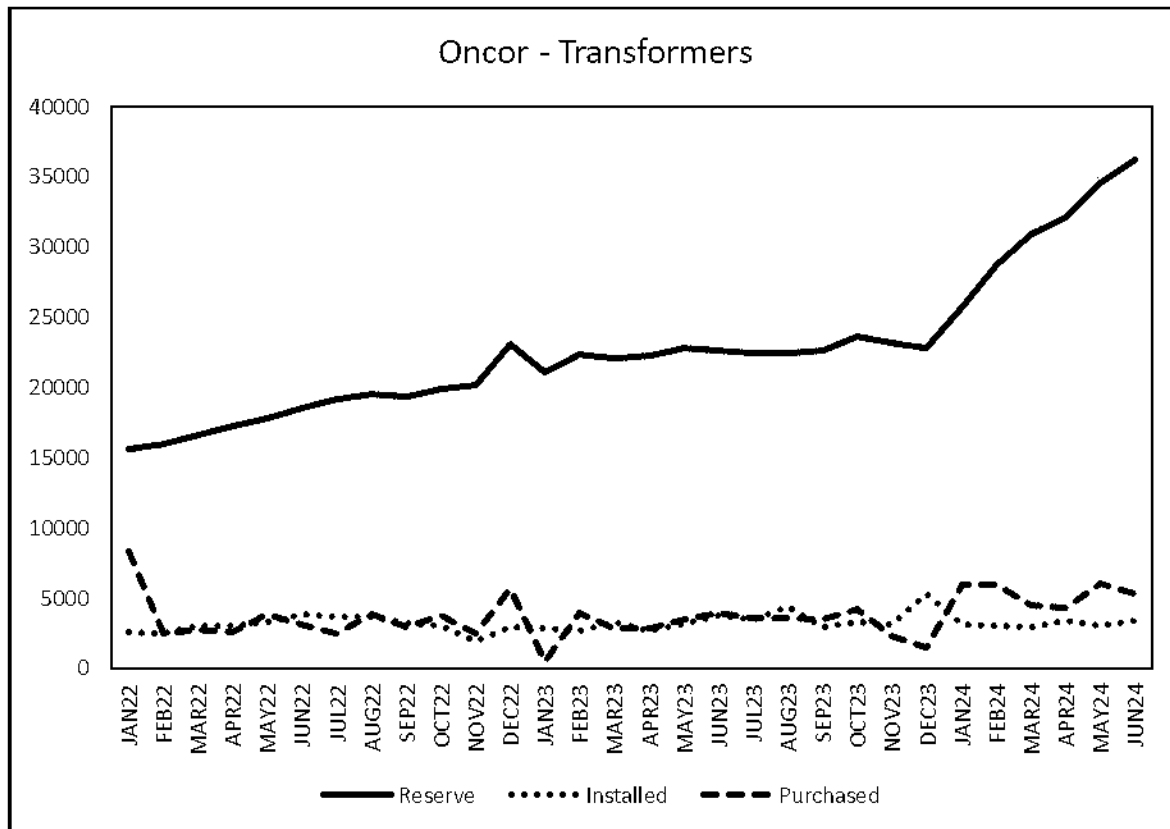
Q. IS IT APPROPRIATE FOR ONCOR TO MAINTAIN A METER RESERVE?

A. Yes, it is appropriate.

Q. WHAT LEVEL OF TRANSFORMER RESERVES DOES ONCOR MAINTAIN?

A. Figure 2 reflects the level of reserves by month, along with the number of transformers installed and purchased, since January 2022.⁴⁰

Figure 2



³⁹ *Id.*

⁴⁰ Oncor Response to OCSC RF1 1-2 (provided as Attachment KJN-4).

1 **Q. WHAT CAN BE LEARNED FROM FIGURE 2?**

2 A. Figure 2 shows that since January 2022, Oncor has installed on average about 3,200
3 transformers per month, while it has purchased on average about 3,800 transformers per
4 month. However, despite the relative balance between its installations and purchases,
5 Oncor began to increase its transformer reserves after December 2023, from 22,804
6 transformers in December 2023 to 36,228 transformers in June 2024. While Oncor claims
7 its average customer growth rate is 1.9%,⁴¹ the Company has increased its transformer
8 reserves by nearly 60% in just the six months ending June 2024.

9 **Q. DID ONCOR PROVIDE A REASON FOR INCREASING ITS TRANSFORMER**
10 **RESERVE?**

11 A. No. Oncor argued that by maintaining an adequate working reserve of transformers, it is
12 able to both serve new customers in a timely fashion and quickly address equipment
13 failures sustained during storms or extreme weather,⁴² but provided no reason for the
14 increasing transformer reserve.

15 **Q. CAN YOU ESTIMATE THE APPROPRIATE TRANSFORMER RESERVE?**

16 A. Oncor maintained an average number of transformers in reserve throughout 2023 of
17 22,500. This is an appropriate level of reserves considering it was adequate until
18 January 2024. In addition, it represents an approximate seven month supply of
19 transformers at current installation rates, which is sufficient given that lead times to obtain
20 transformers from the manufacturer are about three to nine months.⁴³

⁴¹ Snelleman Direct at 4.

⁴² *Id.* at 10.

⁴³ *Id.* at 8.

1 **Q. WHAT IS THE IMPACT OF REDUCING THE TRANSFORMER RESERVE TO**
2 **22,500 TRANSFORMERS?**

3 A. The transformer reserve at the end of the DCRF test period, June 2024, was 36,228.⁴⁴
4 Reducing this to 22,500 transformers means removing approximately 13,700 transformers
5 from the reserve.

6 **Q. WHAT IS THE COST OF REMOVING 13,700 TRANSFORMERS FROM THE**
7 **TRANSFORMER RESERVE?**

8 A. Oncor reported \$188,830,597.57 booked to FERC account 368, Line Transformers for
9 transformers booked during the six months ending June 2024.⁴⁵ Oncor also reported
10 purchasing 32,128 transformers during the same time period.⁴⁶ Thus, the average cost per
11 transformer is \$5,877.45,⁴⁷ and the total cost of 13,700 transformers is \$80,521,065.

12 **Q. ARE YOU RECOMMENDING A DISALLOWANCE OF THIS AMOUNT?**

13 A. No. As with Oncor's meter reserve, the issues of whether distribution invested capital
14 included in an application for a DCRF adjustment is prudent, reasonable, and necessary is
15 not addressed in a DCRF proceeding unless the presiding officer finds that good cause
16 exists to address these issues.⁴⁸ However, I am recommending that distribution invested
17 capital be reduced by \$80,521,065 pending further review in Oncor's next base rate
18 proceeding.

⁴⁴ Attachment KJN-4.

⁴⁵ Application, WP_Schedule B_1_1_3 Distribution Over \$100,000 by Property Unit 6 ME 06.30.2024.

⁴⁶ Attachment KJN-4.

⁴⁷ Note that the \$188,830,597.57 that Oncor reported for the six months ending June 2024 divided by the 32,128 transformers Oncor purchased during that same time period, results in each transformer costing \$5,877.45.

⁴⁸ 16 TAC § 25.243(e)(5).

1 **Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?**

2 A. For the same reasons I explained related to the excess meter reserve, withholding the
3 invested capital from rates until the costs are reconciled ensures that customers only pay
4 the appropriate rates and Oncor is still made whole for its investment.

5 **VII. CAPACITOR INVESTMENT**

6 **Q. WHAT ISSUE ARE YOU ADDRESSING IN THIS SECTION OF YOUR**
7 **TESTIMONY?**

8 A. I am addressing Oncor's capacitor investment.

9 **Q. DOES ONCOR MAINTAIN A CAPACITOR RESERVE?**

10 A. Yes, Oncor claims the average lead time for capacitors exceeds the lead time for some
11 transformers and currently, the lead time for capacitors is roughly 20-23 weeks.⁴⁹ As with
12 transformers, for these types of long-lead-time assets, Oncor argues it cannot wait to
13 purchase the assets until there is an immediate need to install and energize them.⁵⁰ Instead,
14 it must keep a working reserve quantity to meet unexpected failures or emergency needs
15 in order to maintain system power quality.⁵¹

16 **Q. HOW DOES ONCOR DETERMINE HOW MANY CAPACITORS IT NEEDS IN**
17 **RESERVE?**

18 A. For the majority of Oncor's capacitor needs, Oncor explains it determines its working
19 reserve requirements based on annually planned power factor correction and system
20 improvement project requirements, as well as historically projected quantities needed to

⁴⁹ Snelleman Direct at 9.

⁵⁰ *Id.*

⁵¹ *Id.*

1 serve new customers and to meet reactive capacitor demand.⁵² For all approved, planned
2 projects, the Company orders capacitors for a first quarter delivery date in order to provide
3 adequate time for installation before summer peak demand.⁵³ For serving new customers
4 and meeting reactive capacitor requirements, Oncor explains it provides monthly forecasts
5 to the manufacturer in order to reduce lead times.⁵⁴ The Company asserts it typically
6 maintains eight to twelve weeks' demand of capacitor products at its central warehouse to
7 provide for maintenance and reactive demand throughout the year.⁵⁵

8 **Q. HOW MANY CAPACITORS HAS ONCOR INSTALLED IN 2024?**

9 A. In the first six months of 2024, Oncor reports it purchased approximately 1,950 capacitor
10 units. Oncor also installed 768 capacitors during this same period.⁵⁶

11 **Q. IS IT APPROPRIATE FOR ONCOR TO MAINTAIN A CAPACITOR RESERVE?**

12 A. Yes, it is appropriate.

13 **Q. WHAT LEVEL OF CAPACITOR RESERVES DOES ONCOR MAINTAIN?**

14 A. Figure 3 reflects the level of reserves by month, along with the number of capacitors
15 installed and purchased, since January 2022.⁵⁷

⁵² *Id.* at 12.

⁵³ *Id.*

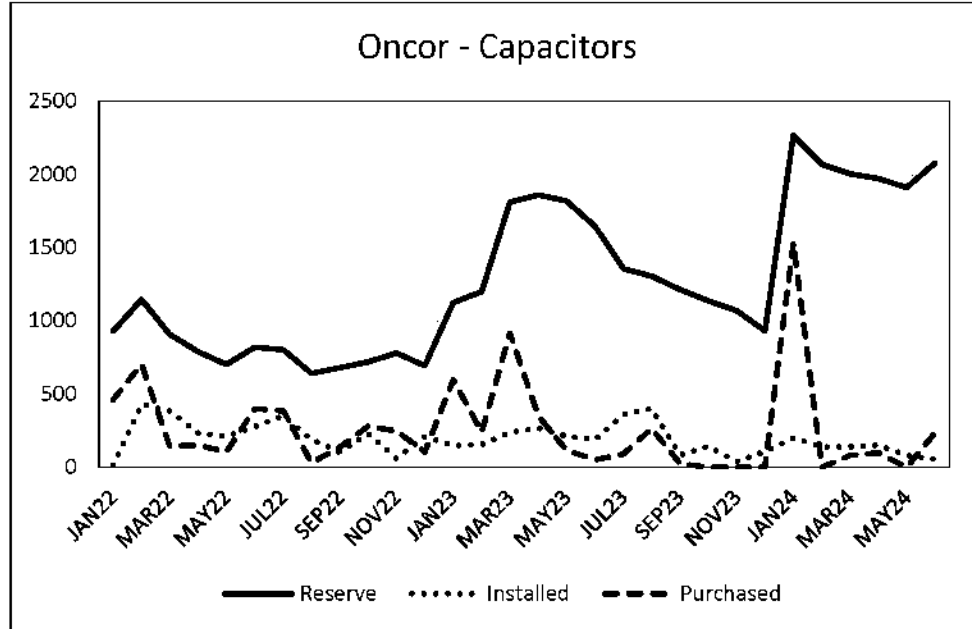
⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ Oncor Response to OCSC RFI 1-3 (provided as Attachment KJN-5).

⁵⁷ *Id.*

Figure 3



Q. WHAT CAN BE LEARNED FROM FIGURE 3?

A. Figure 3 shows that since January 2022, Oncor has installed on average about 190 capacitors per month, while it has purchased on average about 260 capacitors per month. However, despite the relative balance between its installations and purchases, Oncor began to increase its transformer reserves first in early 2023 and again in early 2024. While these may be seasonal increases, each peak has been higher than the last. For example, the 2022 peak in February was 1,146 capacitors, the March 2023 peak was 1,809 capacitors, and the January 2024 peak was 2,268 capacitors. While Oncor claims its average customer growth rate is 1.9%,⁵⁸ the Company increased its peak capacitor reserves by 58% from 2022 to 2023 and then by another 25% from 2023 to 2024.

⁵⁸ Snelleman Direct at 4.

1 **Q. DID ONCOR PROVIDE A REASON FOR INCREASING ITS CAPACITOR**
2 **RESERVE?**

3 A. No. Oncor argued that by maintaining an adequate working reserve of capacitors, it is able
4 to both serve new customers in a timely fashion and quickly address equipment failures
5 sustained during storms or extreme weather,⁵⁹ but provided no reason for the increasing
6 capacitor reserve.

7 **Q. CAN YOU ESTIMATE THE APPROPRIATE CAPACITOR RESERVE?**

8 A. The average number of capacitors in reserve through 2022 and 2023 was approximately
9 1,100. This is an appropriate level of reserves considering it was adequate until
10 January 2024. In addition, it represents an approximate six month supply of capacitors at
11 current installation rates, which is sufficient given that the lead time to obtain capacitors
12 from the manufacturer is about five months.⁶⁰

13 **Q. WHAT IS THE IMPACT OF REDUCING THE CAPACITOR RESERVE TO 1,100**
14 **CAPACITORS?**

15 A. The capacitor reserve at the end of the DCRF test period, June 2024, was 2,078. Reducing
16 this to 1,100 capacitors means removing approximately 1,000 capacitors from the reserve.

17 **Q. WHAT IS THE COST OF REMOVING 1,000 CAPACITORS FROM THE**
18 **CAPACITOR RESERVE?**

19 A. Oncor reported \$8,166,716.53 booked to FERC account 368, Line Transformers for
20 capacitors booked during the six months ending June 2024.⁶¹ Oncor also reported

⁵⁹ *Id.* at 10.

⁶⁰ *Id.* at 9.

⁶¹ Application, WP_Schedule B_1_1_3 Distribution Over \$100,000 by Property Unit 6 ME 06.30.2024.

1 purchasing 1,948 capacitors during the same time period.⁶² Thus, the average cost per
2 capacitor is \$4,192.36⁶³ and the total cost of 1,000 capacitors is \$4,192,360.

3 **Q. ARE YOU RECOMMENDING A DISALLOWANCE OF THIS AMOUNT?**

4 A. No. As with Oncor's meter and transformer reserves, the issues of whether distribution
5 invested capital included in an application for a DCRF adjustment is prudent, reasonable,
6 and necessary is not addressed in a DCRF proceeding unless the presiding officer finds that
7 good cause exists to address these issues.⁶⁴ However, I am recommending that distribution
8 invested capital be reduced by \$4,192,360 pending a further review in Oncor's next base
9 rate proceeding.

10 **Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?**

11 A. For the same reasons I explained related to the excess meter and transformer reserves,
12 withholding the invested capital from rates until the costs are reconciled ensures that
13 customers only pay the appropriate rates and Oncor is still made whole for its investment.

14 **VIII. RATE-CASE EXPENSES**

15 **Q. WHAT IS THE PURPOSE OF ADDRESSING RATE-CASE EXPENSES IN THIS**
16 **PROCEEDING?**

17 A. The purpose of addressing rate-case expenses in this proceeding is to comply with the
18 Commission's rate case expense rule, 16 TAC § 25.245(b):

19 A utility or municipality requesting recovery of or reimbursement for
20 its rate-case expenses shall have the burden to prove the reasonableness

⁶² Attachment KJN-5.

⁶³ Note that the \$8,166,716.53 that Oncor reported for the six months ending June 2024 divided by the 1,948 capacitors Oncor purchased during that same time period, results in each capacitor costing \$4,192.36.

⁶⁴ 16 TAC § 25.243(e)(5).

of such rate-case expenses by a preponderance of the evidence.⁶⁵

Q. WHAT AMOUNT OF OCSC'S REQUESTED RATE-CASE EXPENSES ARE ATTRIBUTABLE TO RESOLVED ENERGY CONSULTING?

A. REC's actual fees through August 31, 2024, of \$1,568 correspond to time reviewing the application, testimony, schedules and workpapers, developing discovery, reviewing previous DCRF dockets, and participating in discussions with counsel. I have provided REC's invoice for fees through August 31, 2024, as Attachment KJN-6.

Q. HAS LLOYD GOSSELINK ALSO INCURRED RATE-CASE EXPENSES ON BEHALF OF OCSC IN THIS PROCEEDING?

A. Yes. It is my understanding that Mr. Thomas Brocato will file an affidavit addressing the rate case expenses incurred by Lloyd Gosselink in this proceeding thus far.

Q. PLEASE IDENTIFY THE REC STAFF WHO CHARGED REC'S EXPENSES, THEIR HOURLY RATES, AND THE TOTAL HOURS BILLED.

A. I conducted the review, and my billing rate is \$280 per hour. The total hours billed through August 31, 2024, was 5.6 hours. I anticipate I will incur additional hours after August 31, 2024, as the case continues to be processed, including time to review responses to discovery, prepare testimony, and support settlement discussions and case filings.

Q. WHAT CRITERIA MUST BE MET UNDER THE COMMISSION'S RATE CASE EXPENSE RULE (16 TAC § 25.245)?

A. The following criteria are set out in the rule:

Whether the fees paid to, tasks performed by, or time spent on a task by an attorney or other professional were extreme or excessive,

⁶⁵ 16 TAC § 25.245(b).

1 Whether the expenses incurred for lodging, meals and beverages, transportation, or
2 other services or materials were extreme or excessive,

3 Whether there was duplication of services or testimony,

4 Whether the utility's or municipality's proposal on an issue in the rate case had no
5 reasonable basis in law, policy, or fact and was not warranted by any reasonable
6 argument for the extension, modification, or reversal of commission precedent,

7 Whether rate-case expenses as a whole were disproportionate, excessive, or
8 unwarranted in relation to the nature and scope of the rate case addressed by the
9 evidence pursuant to subsection (b)(5) of this section, or

10 Whether the utility or municipality failed to comply with the requirements for
11 providing sufficient information pursuant to subsection (b) of this section.

12 **Q. IN LIGHT OF THE FIRST CRITERION SET OUT IN YOUR PREVIOUS**
13 **ANSWER, IS YOUR BILLING RATE AND THE TIME SPENT ON THE TASKS**
14 **IN THIS CASE REASONABLE?**

15 A. Yes. My billing rate is reasonable. This is my normal billing rate for services provided to
16 similar clients. This rate is in the range of rates charged by other consultants with similar
17 experience and is reasonable for a consultant providing these types of services before utility
18 regulatory agencies in Texas. My hourly rate is especially reasonable, given that I have
19 more than 40 years of utility rate regulatory experience.

20 Furthermore, the DCRF rule anticipates an expedited review, so the time spent on
21 issues such as preparation of discovery and analysis of issues is limited, as evidenced by
22 the relatively small 5.6 hours spent on the case thus far.

23 **Q. IN LIGHT OF THE SECOND CRITERION, DO REC'S EXPENSES INCLUDE**
24 **ANY TYPE OF IDENTIFIED CHARGES OR CHARGES THE COMMISSION**
25 **HAS EXCLUDED IN THE PAST?**

26 A. No. REC's charges are entirely for professional fees. There are no other expenses included

on our invoices.

Q. IN LIGHT OF THE THIRD CRITERION, WAS THERE ANY DUPLICATION OF SERVICES OR TESTIMONY?

A. No. The city groups participating in this case have no unreasonable duplication of services or testimony.

Q. IN LIGHT OF THE FOURTH CRITERION, DID THE ISSUES YOU RAISED HAVE A REASONABLE BASIS IN LAW, POLICY, OR FACT?

A. Yes. The issues raised in my testimony focus directly on whether the resulting DCRF rate is reasonable, and my proposed adjustments are consistent with the requirements of the DCRF rule.

Q. IN LIGHT OF THE FIFTH CRITERION, WHAT IS YOUR CONCLUSION REGARDING REC'S ACTUAL CHARGES?

A. In my opinion, REC's actual fees of \$1,568 incurred through August 31, 2024, are reasonable and necessary and are not disproportionate, excessive, or unwarranted in relation to the nature and scope of the DCRF filing. Furthermore, to the best of my knowledge, I have fully complied with the information requirements set out in the sixth criterion.

IX. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?

A. Yes, it does.

KARL J. NALEPA

Mr. Nalepa is an energy economist with more than 40 years of private and public sector experience in the electric and natural gas industries. He has extensive experience analyzing utility rate filings and resource plans with particular focus on fuel and power supply requirements, quality of fuel supply management, and reasonableness of energy costs. Mr. Nalepa developed peak demand and energy forecasts for public utilities and has forecast the price of natural gas in ratemaking and resource plan evaluations. He led a management and performance review of the Texas Public Utility Commission and has conducted performance reviews and valuation studies of municipal utility systems. Mr. Nalepa previously directed the Railroad Commission of Texas' Regulatory Analysis & Policy Section, with responsibility for preparing timely natural gas industry analysis, managing ratemaking proceedings, mediating informal complaints, and overseeing consumer complaint resolution. He has prepared and defended expert testimony in both administrative and civil proceedings and has served as a technical examiner in natural gas rate proceedings.

EDUCATION

1998	Certificate of Mediation Dispute Resolution Center, Austin
1989	NARUC Regulatory Studies Program Michigan State University
1988	M.S. - Petroleum Engineering University of Houston
1980	B.S. - Mineral Economics Pennsylvania State University

PROFESSIONAL HISTORY

2011 -	ReSolved Energy Consulting Partner
2003 - 2011	RJ Covington Consulting Managing Director
1997 – 2003	Railroad Commission of Texas Asst. Director, Regulatory Analysis & Policy
1995 – 1997	Karl J. Nalepa Consulting Principal
1992 – 1995	Resource Management International, Inc. Supervising Consultant
1988 – 1992	Public Utility Commission of Texas Fuels Analyst
1980 – 1988	Transco Exploration Company Reservoir and Evaluation Engineer

AREAS OF EXPERTISE

Regulatory Analysis

Electric Power: Analyzed electric utility rate, certification, and resource forecast filings. Assessed the quality of fuel supply management, and reasonableness of fuel costs recovered from ratepayers. Projected the cost of fuel and purchased power. Estimated the impact of environmental costs on utility resource selection. Participated in regulatory rulemaking activities. Provided expert staff testimony in a number of proceedings before the Texas Public Utility Commission.

As consultant, represent interests of municipal clients intervening in large utility rate proceedings through analysis of filings and presentation of testimony before the Public Utility Commission. Also assist municipal utilities in preparing and defending requests to change rates and other regulatory matters before the Public Utility Commission.

Natural Gas: Directed the economic regulation of gas utilities in Texas for the Railroad Commission of Texas. Responsible for monitoring, analyzing and reporting on conditions and events in the natural gas industry. Managed Commission staff representing the public interest in contested rate proceedings before the Railroad Commission, and acted as technical examiner on behalf of the Commission. Mediated informal disputes between industry participants and directed handling of customer billing and service complaints. Oversaw utility compliance filings and staff rulemaking initiatives. Served as a policy advisor to the Commissioners.

As consultant, represent interests of municipal clients intervening in large utility rate proceedings through analysis of filings and presentation of testimony before the cities and Railroad Commission. Also assist small utilities in preparing and defending requests to change rates and other regulatory matters before the Railroad Commission.

Litigation Support

Retained to support litigation in natural gas contract disputes. Analyzed the results of contract negotiations and competitiveness of gas supply proposals considering gas market conditions contemporaneous with the period reviewed. Supported litigation related to alleged price discrimination related to natural gas sales for regulated customers. Provided analysis of regulatory and accounting issues related to ownership of certain natural gas distribution assets in support of litigation against a natural gas utility. Supported independent power supplier in binding arbitration regarding proper interpretation of a natural gas transportation contract. Provided expert witness testimony in administrative and civil court proceedings.

Utility System Assessment

Led a management and performance review of the Public Utility Commission. Conducted performance reviews and valuation studies of municipal utility systems. Assessed ability to compete in the marketplace, and recommended specific actions to improve the competitive position of the utilities. Provided comprehensive support in the potential sale of a municipal gas system, including preparation of a valuation study and all activities leading to negotiation of contract for sale and franchise agreements.

Energy Supply Analysis

Reviewed system requirements and prepared requests for proposals (RFPs) to obtain natural gas and power supplies for both utility and non-utility clients. Evaluated submittals under alternative demand and market conditions, and recommended cost-effective supply proposals. Assessed supply strategies to determine optimum mix of available resources.

Econometric Forecasting

Prepared econometric forecasts of peak demand and energy for municipal and electric cooperative utilities in support of system planning activities. Developed forecasts at the rate class and substation levels. Projected price of natural gas by individual supplier for Texas electric and natural gas utilities to support review of utility resource plans.

Reservoir Engineering

Managed certain reserves for a petroleum exploration and production company in Texas. Responsible for field surveillance of producing oil and natural gas properties, including reserve estimation, production forecasting, regulatory reporting, and performance optimization. Performed evaluations of oil and natural gas exploration prospects in Texas and Louisiana.

PROFESSIONAL MEMBERSHIPS

Society of Petroleum Engineers
International Association for Energy Economics
United States Association for Energy Economics

SELECT PUBLICATIONS, PRESENTATIONS, AND TESTIMONY

“Summary of the USAEE Central Texas Chapter’s Workshop entitled ‘EPA’s Proposed Clean Power Plan Rules: Economic Modeling and Effects on the Electric Reliability of Texas Region,’” with Dr. Jay Zarnikau and Mr. Neil McAndrews, USAEE Dialogue, May 2015

“Public Utility Ratemaking,” EBF 401: Strategic Corporate Finance, The Pennsylvania State University, September 2013

“What You Should Know About Public Utilities,” EBF 401: Strategic Corporate Finance, The Pennsylvania State University, October 2011

“Natural Gas Markets and the Impact on Electricity Prices in ERCOT,” Texas Coalition of Cities for Fair Utility Issues, Dallas, October 2008

“Natural Gas Regulatory Policy in Texas,” Hungarian Oil and Gas Policy Business Colloquium, U.S. Trade and Development Agency, Houston, May 2003

“Railroad Commission Update,” Texas Society of Certified Public Accountants, Austin, April 2003

“Gas Utility Update,” Railroad Commission Regulatory Expo and Open House, October 2002

“Deregulation: A Work in Progress,” Interview by Karen Stidger, *Gas Utility Manager*, October 2002

“Regulatory Overview: An Industry Perspective,” Southern Gas Association’s Ratemaking Process Seminar, Houston, February 2001

“Natural Gas Prices Could Get Squeezed,” with Commissioner Charles R. Matthews, *Natural Gas*, December 2000

“Railroad Commission Update,” Texas Society of Certified Public Accountants, Austin, April 2000

“A New Approach to Electronic Tariff Access,” Association of Texas Intrastate Natural Gas Pipeline Annual Meeting, Houston, January 1999

“A Texas Natural Gas Model,” United States Association for Energy Economics North American Conference, Albuquerque, 1998

“Texas Railroad Commission Aiding Gas Industry by Updated Systems, Regulations,” *Natural Gas*, July 1998

“Current Trends in Texas Natural Gas Regulation,” Natural Gas Producers Association, Midland, 1998

“An Overview of the American Petroleum Industry,” Institute of International Education Training Program, Austin, 1993

Direct testimony in PUC Docket No. 10400 summarized in *Environmental Externality*, Energy Research Group for the Edison Electric Institute, 1992

“God’s Fuel - Natural Gas Exploration, Production, Transportation and Regulation,” with Danny Bivens, Public Utility Commission of Texas Staff Seminar, 1992

“A Summary of Utilities’ Positions Regarding the Clean Air Act Amendments of 1990,” Industrial Energy Technology Conference, Houston, 1992

“The Clean Air Act Amendments of 1990,” Public Utility Commission of Texas Staff Seminar, 1992

**KARL J. NALEPA
TESTIMONY FILED**

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
<u>Before the Public Utility Commission of Texas</u>					
56887	Aug 24	Cities	Texas-New Mexico Power	DCRF	DCRF Methodology
56595	Jun 24	Xcel Municipalities	Southwestern Public Service	DCRF	DCRF Methodology
56572	Aug 24	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
56548	Jun 24	Cities	CenterPoint Houston	System Resiliency Plan	Public Interest Review
56545	Jul 24	Office of Public Counsel	Oncor Electric Delivery	System Resiliency Plan	Public Interest Review
56428	Apr 24	Cities	Texas-New Mexico Power	DCRF	DCRF Methodology
56425	Apr 24	City of El Paso	El Paso Electric	DCRF	DCRF Methodology
56306	Mar 24	Cities	Oncor Electric Delivery	DCRF	DCRF Methodology
56225	Aug 24	City of El Paso	El Paso Electric	GCRR	GCRR Methodology
56165	May 24	Cities	AEP Texas	Cost of Service	Cost of Service
55993	Jan 24	Cities	CenterPoint Energy Houston	DCRF	DCRF Methodology
55973	Jul 24	Xcel Municipalities	Southwestern Public Service	Fuel Reconciliation	Fuel Cost Recovery
55629	Nov 23	CARD	SWEP CO	DCRF	DCRF Methodology
55525	Oct 23	Cities	Oncor Electric Delivery	DCRF	DCRF Methodology
55176	Mar 24	Office of Public Counsel	El Paso Electric	Business Solar Program	Public Interest Review
55155	Apr 24	Office of Public Counsel	SWEP CO	Remand	Refund Methodology
54950	Aug 23	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
54929	Oct 23	Office of Public Counsel	El Paso Electric	CCN	Public Interest Review

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
54830	Sep 23	Cities	CenterPoint Energy Houston	TEEEF	TEEEF Cost of Service
54825	Jun 23	Cities	CenterPoint Energy Houston	DCRF	DCRF Methodology
54659	Jun 23	City of El Paso	El Paso Electric	GCRR	GCRR Methodology
54657	Dec 23	Office of Public Counsel	Lubbock Power & Light	TCOS	Wholesale Transmission Rate
54634	Aug 23	Xcel Municipalities	Southwestern Public Service	Cost of Service	Cost of Service
54282	Jan 23	Xcel Municipalities	Southwestern Public Service	Fuel Surcharge	Appropriate Recovery Period
54234	Jan 23	CARD	SWEPCO	Fuel Surcharge	Appropriate Recovery Period
54057	Mar 23	Cities	Entergy Texas Inc.	Fuel Reconciliation	Fuel Cost Recovery
54040	Jan 23	CARD	SWEPCO	TCRF	TCRF Methodology
54039	Nov 22	CARD	SWEPCO	DCRF	DCRF Methodology
53931	Mar 23	Office of Public Counsel	SWEPCO	Fuel Reconciliation	Fuel Cost Recovery
53766	Nov 22	Xcel Municipalities	Southwestern Public Service	Rate Surcharge	Appropriate Interest Rate
53719	Oct 22	Cities	Entergy Texas Inc.	Cost of Service	Cost of Service
53625	Nov 22	Office of Public Counsel	SWEPCO	CCN	Public Interest Review
53601	Aug 22	Cities	Oncor Electric Delivery	Cost of Service	Revenues / Tariffs / Cost Allocation
53551	Aug 22	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
53436	May 22	TNMP Cities	Texas-New Mexico Power	DCRF	DCRF Methodology
53034	Jul 22	Xcel Municipalities	Southwestern Public Service	Fuel Reconciliation	Fuel Cost Recovery
52728	May 22	Office of Public Counsel	City of College Station	TCOS	Wholesale Transmission Rate
52487	Mar 22	Office of Public Counsel	Entergy Texas Inc.	CCN	Public Interest Review
52485	Mar 22	Office of Public Counsel	Southwestern Public Service	CCN	Public Interest Review

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
52195	Oct 21	City of El Paso	El Paso Electric	Cost of Service	Cost of Service Model
52194	July 21	Cities	CenterPoint Energy Houston	EECRF	EECRF Methodology
52178	July 21	Cities	Oncor Electric Delivery	EECRF	EECRF Methodology
52081	July 21	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
52067	July 21	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology
51997	Aug 21	Office of Public Counsel	Entergy Texas, Inc.	System Restoration Costs	Cost Review
51802	Aug 21	Xcel Municipalities	Southwestern Public Service	Cost of Service	Cost Allocation
51415	Mar 21	CARD	SWEPSCO	Cost of Service	Cost Allocation
51381	Dec 20	Entergy Cities	Entergy Texas Inc.	GCRR	GCRR Methodology
51345	Oct 20	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
51215	Mar 21	Office of Public Counsel	Entergy Texas Inc.	CCN	Public Interest Review
51100	Nov 20	Office of Public Counsel	Lubbock Power & Light	TCOS	Wholesale Transmission Rate
50997	Jan 21	CARD	SWEPSCO	Fuel Reconciliation	Fuel Cost Recovery
50790	Jul 20	Office of Public Counsel	Entergy Texas, Inc.	Sale, Transfer, Merger	Public Interest Review
50714	May 20	Cities	Entergy Texas Inc.	DCRF	DCRF Methodology
50110	Dec 19	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
49831	Feb 20	Xcel Municipalities	Southwestern Public Service	Cost of Service	Cost Allocation
49737	Jan 20	Office of Public Counsel	SWEPSCO	CCN	Public Interest Review
49594	Jul 19	Oncor Cities	Oncor Electric Delivery	EECRF	EECRF Methodology
49592	Jul 19	AEP Cities	AEP Texas Inc.	EECRF	EECRF Methodology
49586	Jul 19	TNMP Cities	Texas-New Mexico Power	EECRF	EECRF Methodology

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
49583	Aug 19	Gulf Coast Coalition	CenterPoint Energy Houston	EECRF	EECRF Methodology
49496	Jun 19	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
49494	Jul 19	AEP Cities	AEP Texas Inc.	Cost of Service	Plant Additions
49421	Jun 19	Office of Public Counsel	CenterPoint Energy Houston	Cost of Service	Cost of Service
49395	May 19	City of El Paso	El Paso Electric	DCRF	DCRF Methodology
49148	Apr 19	City of El Paso	El Paso Electric	TCRF	TCRF Methodology
49042	Mar 19	SWEPSCO Cities	SWEPSCO	TCRF	TCRF Methodology
49041	Feb 19	SWEPSCO Cities	SWEPSCO	DCRF	DCRF Methodology
48973	May 19	Xcel Municipalities	Southwestern Public Service	Fuel Reconciliation	Fuel / Purch Power Costs
48963	Dec 18	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
48420	Aug 18	Gulf Coast Coalition	CenterPoint Energy Houston	EECRF	EECRF Methodology
48404	Jul 18	Cities	Texas-New Mexico Power	EECRF	EECRF Methodology
48371	Aug 18	Cities	Entergy Texas Inc.	Cost of Service	Cost of Service
48231	May 18	Cities	Oncor Electric Delivery	DCRF	DCRF Methodology
48226	May 18	Gulf Coast Coalition	CenterPoint Energy Houston	DCRF	DCRF Methodology
48222	Apr 18	Cities	AEP Texas Inc.	DCRF	DCRF Methodology
47900	Dec 17	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
47527	Apr 18	Xcel Municipalities	Southwestern Public Service	Cost of Service	Cost of Service
47461	Dec 17	Office of Public Counsel	SWEPSCO	CCN	Public Interest Review
47236	Jul 17	Cities	AEP Texas	EECRF	EECRF Methodology
47235	Jul 17	Cities	Oncor Electric Delivery	EECRF	EECRF Methodology

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
47217	Jul 17	Cities	Texas-New Mexico Power	EECRF	EECRF Methodology
47032	May 17	Gulf Coast Coalition	CenterPoint Energy Houston	DCRF	DCRF Methodology
46936	Oct 17	Xcel Municipalities	Southwestern Public Service	CCN	Public Interest Review
46449	Apr 17	Cities	SWEPSCO	Cost of Service	Cost of Service
46348	Sep 16	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
46238	Jan 17	Office of Public Counsel	Oncor Electric Delivery	STM	Public Interest Review
46076	Dec 16	Cities	Entergy Texas Inc.	Fuel Reconciliation	Fuel Cost Recovery
46050	Aug 16	Cities	AEP Texas	STM	Public Interest Review
46014	Jul 16	Gulf Coast Coalition	CenterPoint Energy Houston	EECRF	EECRF Methodology
45788	May 16	Cities	AEP-TNC	DCRF	DCRF Methodology
45787	May 16	Cities	AEP-TCC	DCRF	DCRF Methodology
45747	May 16	Gulf Coast Coalition	CenterPoint Energy Houston	DCRF	DCRF Methodology
45712	Apr 16	Cities	SWEPSCO	DCRF	DCRF Methodology
45691	Jun 16	Cities	SWEPSCO	TCRF	TCRF Methodology
45414	Feb 17	Office of Public Counsel	Sharyland	Cost of Service	Cost of Service
45248	May 16	City of Fritch	City of Fritch	Cost of Service (water)	Cost of Service
45084	Nov 15	Cities	Entergy Texas Inc.	TCRF	TCRF Methodology
45083	Oct 15	Cities	Entergy Texas Inc.	DCRF	DCRF Methodology
45071	Aug 15	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
44941	Dec 15	City of El Paso	El Paso Electric	Cost of Service	CEP Adjustments
44677	Jul 15	City of El Paso	El Paso Electric	EECRF	EECRF Methodology

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
44572	May 15	Gulf Coast Coalition	CenterPoint Energy Houston	DCRF	DCRF Methodology
44060	May 15	City of Frisco	Brazos Electric Coop	CCN	Transmission Cost Recovery
43695	May 15	Pioneer Natural Resources	Southwestern Public Service	Cost of Service	Cost Allocation
43111	Oct 14	Cities	Entergy Texas Inc.	DCRF	DCRF Methodology
42770	Aug 14	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
42485	Jul 14	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology
42449	Jul 14	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
42448	Jul 14	Cities	SWEPSCO	TCRF	Transmission Cost Recovery Factor
42370	Dec 14	Cities	SWEPSCO	Rate Case Expenses	Rate Case Expenses
41791	Jan 14	Cities	Entergy Texas Inc.	Cost of Service	Cost of Service/Fuel
41539	Jul 13	Cities	AEP Texas North	EECRF	EECRF Methodology
41538	Jul 13	Cities	AEP Texas Central	EECRF	EECRF Methodology
41444	Jul 13	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology
41223	Apr 13	Cities	Entergy Texas Inc.	ITC Transfer	Public Interest Review
40627	Nov 12	Austin Energy	Austin Energy	Cost of Service	General Fund Transfers
40443	Dec 12	Office of Public Counsel	SWEPSCO	Cost of Service	Cost of Service/Fuel
40346	Jul 12	Cities	Entergy Texas Inc.	Join MISO	Public Interest Review
39896	Mar 12	Cities	Entergy Texas Inc.	Cost of Service/ Fuel Reconciliation	Cost of Service/ Nat Gas/ Purch Power
39366	Jul 11	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology
38951	Feb 12	Cities	Entergy Texas Inc.	CGS Tariff	CGS Costs
38815	Sep 10	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
38480	Nov 10	Cities	Texas-New Mexico Power	Cost of Service	Cost of Service/Rate Design
37744	Jun 10	Cities	Entergy Texas Inc.	Cost of Service/ Fuel Reconciliation	Cost of Service/ Nat Gas/ Purch Power/ Gen
37580	Dec 09	Cities	Entergy Texas Inc.	Fuel Refund	Fuel Refund Methodology
37482	Jan 10	Cities	Entergy Texas Inc.	PCRf	PCRf Methodology
37404	Aug 09	Texas Municipal Power	Texas Municipal Power	Interim TCOS	Corrected TCOS Rate
36956	Jul 09	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology
36392	Nov 08	Texas Municipal Power	Texas Municipal Power	Interim TCOS	Wholesale Transmission Rate
35717	Nov 08	Cities Steering Committee	Oncor Electric Delivery	Cost of Service	Cost of Service/Rate Design
34800	Apr 08	Cities	Entergy Gulf States	Fuel Reconciliation	Natural Gas/Coal/Nuclear
16705	May 97	North Star Steel	Entergy Gulf States	Fuel Reconciliation	Natural Gas/Fuel Oil
10694	Jan 92	PUC Staff	Midwest Electric Coop	Revenue Requirements	Depreciation/ Quality of Service
10473	Sep 91	PUC Staff	HL&P	Notice of Intent	Environmental Costs
10400	Aug 91	PUC Staff	TU Electric	Notice of Intent	Environmental Costs
10092	Mar 91	PUC Staff	HL&P	Fuel Reconciliation	Natural Gas/Fuel Oil
10035	Jun 91	PUC Staff	West Texas Utilities	Fuel Reconciliation Fuel Factor	Natural Gas Natural Gas/Fuel Oil/Coal
9850	Feb 91	PUC Staff	HL&P	Revenue Req. Fuel Factor	Natural Gas/Fuel Oil/ETSI Natural Gas/Coal/Lignite
9561	Aug 90	PUC Staff	Central Power & Light	Fuel Reconciliation Revenue Requirements Fuel Factor	Natural Gas Natural Gas/Fuel Oil Natural Gas
9427	Jul 90	PUC Staff	LCRA	Fuel Factor	Natural Gas

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
9165	Feb 90	PUC Staff	El Paso Electric	Revenue Requirements Fuel Factor	Natural Gas/Fuel Oil Natural Gas
8900	Jan 90	PUC Staff	SWEPCO	Fuel Reconciliation Fuel Factor	Natural Gas Natural Gas
8702	Sep 89 Jul 89	PUC Staff	Gulf States Utilities	Fuel Reconciliation Revenue Requirements Fuel Factor	Natural Gas/Fuel Oil Natural Gas/Fuel Oil Natural Gas/Fuel Oil
8646	May 89 Jun 89	PUC Staff	Central Power & Light	Fuel Reconciliation Revenue Requirements Fuel Factor	Natural Gas Natural Gas/Fuel Oil Natural Gas
8588	Aug 89	PUC Staff	El Paso Electric	Fuel Reconciliation	Natural Gas

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
<u>Before the Railroad Commission of Texas</u>					
17471	Aug 24	TGS Cities	Texas Gas Service	Cost of Service	Cost Allocation/Rate Design
15513	Mar 24	Cities Served by CenterPoint	CenterPoint Energy Entex	Cost of Service	Consolidation / Cost of Service
13758	Sep 23	Cities Steering Committee	Atmos Pipeline Texas	Cost of Service	Cost of Service/Cost Allocation
09896	Sep 22	City of El Paso	Texas Gas Service	Cost of Service	Consolidation / Cost of Service
07061	Sep 21	Texas Cities Alliance	Multiple	Gas Cost Securitization	Prudence Determination
05509	Dec 20	LDC, LLC	LDC, LLC	Cost of Service	Cost of Service/Rate Design
10928	Mar 20	TGS Cities	Texas Gas Service	Cost of Service	Cost of Service/Rate Design
10920	Feb 20	East Texas Cities Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
10900	Nov 19	Cities Steering Committee	Atmos Energy Triangle	Cost of Service	Cost of Service
10899	Sep 19	NatGas, Inc.	NatGas, Inc.	Cost of Service	Cost of Service/Rate Design
10737	Jun 18	T&L Gas Co.	T&L Gas Co.	Cost of Service	Cost of Service/Rate Design
10622	Apr 17	LDC, LLC	LDC, LLC	Cost of Service	Cost of Service/Rate Design
10617	Mar 17	Onalaska Water & Gas	Onalaska Water & Gas	Cost of Service	Cost of Service/Rate Design
10580	Mar 17	Cities Steering Committee	Atmos Pipeline Texas	Cost of Service	Cost of Service/Rate Design
10567	Feb 17	Gulf Coast Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
10506	Jun 16	City of El Paso	Texas Gas Service	Cost of Service	Cost of Service/Energy Efficiency
10498	Feb 16	NatGas, Inc.	NatGas, Inc.	Cost of Service	Cost of Service/Rate Design
10359	Jul 14	Cities Steering Committee	Atmos Energy Mid Tex	Cost of Service	Cost of Service/Rate Design
10295	Oct 13	Cities Steering Committee	Atmos Pipeline Texas	Revenue Rider	Rider Renewal
10242	Jan 13	Onalaska Water & Gas	Onalaska Water & Gas	Cost of Service	Cost of Service/Rate Design

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
10196	Jul 12	Bluebonnet Natural Gas	Bluebonnet Natural Gas	Cost of Service	Cost of Service/Rate Design
10190	Jan 13	City of Magnolia, Texas	Hughes Natural Gas	Cost of Service	Cost of Service/Rate Design
10174	Aug 12	Cities Steering Committee	Atmos Energy West Texas	Cost of Service	Cost of Service/Rate Design
10170	Aug 12	Cities Steering Committee	Atmos Energy Mid Tex	Cost of Service	Cost of Service/Rate Design
10106	Oct 11	Gulf Coast Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
10083	Aug 11	City of Magnolia, Texas	Hughes Natural Gas	Cost of Service	Cost of Service/Rate Design
10038	Feb 11	Gulf Coast Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
10021	Oct 10	AgriTex Gas, Inc.	AgriTex Gas, Inc.	Cost of Service	Cost of Service/Rate Design
10000	Dec 10	Cities Steering Committee	Atmos Pipeline Texas	Cost of Service	Cost of Service/Rate Design
9902	Oct 09	Gulf Coast Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
9810	Jul 08	Bluebonnet Natural Gas	Bluebonnet Natural Gas	Cost of Service	Cost of Service/Rate Design
9797	Apr 08	Universal Natural Gas	Universal Natural Gas	Cost of Service	Cost of Service/Rate Design
9732	Jul 08	Cities Steering Committee	Atmos Energy Corp.	Gas Cost Review	Natural Gas Costs
9670	Oct 06	Cities Steering Committee	Atmos Energy Corp.	Cost of Service	Affiliate Transactions/ O&M Expenses/GRIP
9667	Nov 06	Oneok Westex Transmission	Oneok Westex Transmission	Abandonment	Abandonment
9598	Sep 05	Cities Steering Committee	Atmos Energy Corp.	GRIP Appeal	GRIP Calculation
9530	Apr 05	Cities Steering Committee	Atmos Energy Corp.	Gas Cost Review	Natural Gas Costs
9400	Dec 03	Cities Steering Committee	TXU Gas Company	Cost of Service O&M Expenses/Capital Costs	Affiliate Transactions/

DKT NO.	DATE	REPRESENTING	UTILITY	PHASE	ISSUES
<u>Before the Louisiana Public Service Commission</u>					
U-36254	Jul 22	PSC Staff	Dixie Electric Membership Corporation	Formula Rate Plan	Emergency Rate Relief
U-35359	Feb 20 Nov 20	PSC Staff	Dixie Electric Membership Corporation	Cost of Service	Cost of Service / FRP Renewal / AMS Certification Stipulation
U-34344/ U-34717	Apr 18	PSC Staff	Dixie Electric Member Corporation	Formula Rate Plan	Stipulation
U-34344	Jan 18	PSC Staff	Dixie Electric Member Corporation	Formula Rate Plan	Adjusted Revenues
U-33633	Nov 15	PSC Staff Entergy Gulf States Louisiana	Entergy Louisiana, LLC/	Resource Certification	Prudence
U-33033	Jul 14	PSC Staff Entergy Gulf States Louisiana	Entergy Louisiana, LLC/	Resource Certification	Revenue Requirement
U-31971	Nov 11	PSC Staff Entergy Gulf States Louisiana	Entergy Louisiana, LLC/	Resource Certification	Certification/Cost Recovery
<u>Before the Colorado Public Utilities Commission</u>					
18A-0791E	Mar 19	Pueblo County	Black Hills Colorado Electric	Economic Development Rate	Tariff Issues
<u>Before the Arkansas Public Service Commission</u>					
O7-105-U	Mar 08	Arkansas Customers & pipelines serving CenterPoint	CenterPoint Energy, Inc.	Gas Cost Complaint	Prudence / Cost Recovery

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OCSC RFI Set No. 1
Question No. 1-01
Page 1 of 2

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.

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 OCSC RFI Set No. 1
 Question No. 1-01
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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

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Question No. 1-02
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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.

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 OCSC RFI Set No. 1
 Question No. 1-02
 Page 2 of 2

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	21063	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

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OCSC RFI Set No. 1
Question No. 1-03
Page 1 of 2

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.

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 OCSC RFI Set No. 1
 Question No. 1-03
 Page 2 of 2

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

ReSolved Energy Consulting, LLC

PO BOX 90908

Austin, TX 78709

Invoice

DATE	INVOICE NUMBER
9/9/2024	5594

BILL TO

Thomas Brocato
Lloyd Gosselink Law Firm
816 Congress Ave, # 1900
Austin, Tx 78701

PROJECT

LG ONCOR DCRF 56963

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	5.6	280.00	1,568.00
Work Completed thru - August 31, 2024		TOTAL DUE	\$1,568.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
August 20, 2024	Review filing.	1.80
August 21, 2024	Review filing and work on analysis.	1.30
August 22, 2024	Review filing and work on discovery.	1.00
August 23, 2024	Complete discovery and send to S. Miller for review.	1.50

5.60

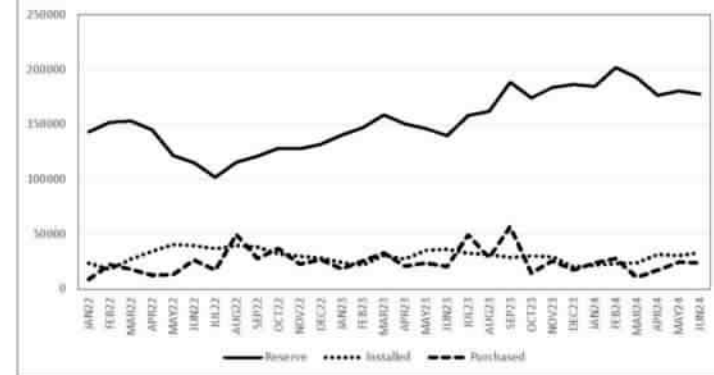
Table 1

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

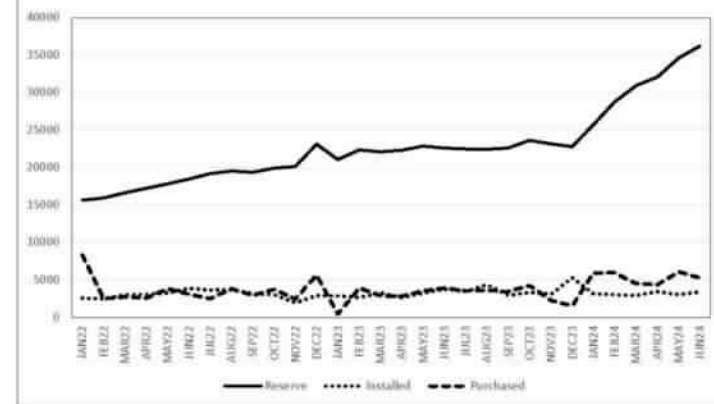
Table 1

Month/Year	Transformers in Reserve	Transformers Installed	Transformers Purchased
JAN22	15638	2581	8347
FEB22	15951	2495	2484
MAR22	16621	3019	2757
APR22	17248	3081	2552
MAY22	17832	3278	3852
JUN22	18496	3872	3100
JUL22	19187	3663	2509
AUG22	19558	3700	3832
SEP22	19373	3181	2951
OCT22	19925	3030	3752
NOV22	20160	1967	2466
DEC22	23127	2940	5645
JAN23	21083	2892	475
FEB23	22330	2665	3917
MAR23	22119	3309	2901
APR23	22311	2661	2829
MAY23	22849	3260	3543
JUN23	22599	3795	3925

Oncor - Meters



Oncor - Transformers



JUL23	22488	3476	3546
AUG23	22452	4377	3619
SEP23	22614	2959	3467
OCT23	23643	3348	4268
NOV23	23141	3112	2277
DEC23	22804	5299	1534
JAN24	25727	3174	5935
FEB24	28739	3037	5942
MAR24	30907	2943	4517
APR24	32073	3454	4359
MAY24	34603	3049	6081
JUN24	36228	3442	5294

Table 1

Month/Year	Capacitors in Reserve	Capacitors Installed	Capacitors Purchased
JAN22	929	14	462
FEB22	1146	430	704
MAR22	908	385	144
APR22	790	233	151
MAY22	702	211	105
JUN22	820	278	399
JUL22	802	352	385
AUG22	641	191	30
SEP22	679	103	138
OCT22	719	230	279
NOV22	780	58	248
DEC22	692	210	106
JAN23	1123	146	597
FEB23	1200	156	240
MAR23	1809	239	916
APR23	1860	266	350
MAY23	1818	211	115
JUN23	1646	189	51
JUL23	1354	361	90
AUG23	1304	399	265
SEP23	1214	83	24
OCT23	1136	143	0
NOV23	1069	40	0
DEC23	931	107	0
JAN24	2268	201	1532
FEB24	2068	137	0
MAR24	2003	140	80
APR24	1972	150	99
MAY24	1911	81	0
JUN24	2078	55	237

Request

