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Public Utility Commission of Texas

TO: Shelah Cisneros
Commission Counsel

All Parties of Record

FROM: Isaac Ta *I. T.*
Administrative Law Judge

RE: **Docket No. 56963** – *Application of Oncor Electric Delivery Company LLC to Amend its Distribution Cost Recovery Factor*

DATE: October 9, 2024

Enclosed is the Proposal for Decision (PFD) in the above-referenced case. By copy of this memorandum, the parties to this proceeding are being served with the PFD.

Please place this docket on an open meeting agenda for the Commissioners' consideration. Please notify me and the parties of the open meeting date, as well as the deadline for filing exceptions to the PFD, replies to the exceptions, and requests for oral argument.

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DOCKET NO. 56963

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

PROPOSAL FOR DECISION

In this proceeding, Oncor Electric Delivery Company LLC seeks to update its current distribution cost recovery factor (DCRF) to include distribution invested capital placed in service during the period from January 1, 2022, through June 30, 2024. Oncor seeks to amend its DCRF and tariffs under PURA¹ § 36.210 and 16 Texas Administrative Code (TAC) § 25.243. In this Proposal for Decision (PFD), the administrative law judge (ALJ) recommends that the Commission approve Oncor's requested tariff schedules attached to its August 16, 2024 application as attachments A and B, effective on and after Oncor's provision of 45 days' notice of the approved rates to retail electric providers (REPs).

I. Procedural History

Oncor filed its application on August 16, 2024. The application seeks to update Oncor's DCRF to include additional distribution invested capital placed in service during the period from January 1, 2022, through June 30, 2024.

In Order No. 4 filed on September 9, 2024, the ALJ found the application administratively complete and notice by Oncor sufficient.

Four intervenors were admitted as parties in this proceeding: Steering Committee of Cities Served by Oncor, Texas Industrial Energy Consumers (TIEC), Alliance for Retail Markets (ARM), and Alliance of Oncor Cities (AOC).

In Order No. 6 filed on October 1, 2024, the ALJ extended the 60-day deadline to enter a final order on the application for an additional 15 days, as authorized by PURA § 36.210(i).

The parties do not agree on all issues in the case. Steering Committee identified a substantive issue on which it disagrees with Oncor.

¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001–66.016.

II. Discussion and Analysis

In the application, Oncor seeks to update its current Rider Distribution Cost Recovery Factor (DCRF) and Rider WDCRF – Wholesale Distribution Cost Recovery Factor to include additional distribution invested capital placed in service during the period from January 1, 2022, through June 30, 2024. Oncor seeks an increase of \$3,176,811,471 to total distribution rate base and an increase of \$408,745,142 to its total distribution revenue requirement to the baseline amounts approved in Docket No. 53601, which is the company's most recent comprehensive base-rate proceeding. The components that make up the requested increase of \$408,745,142 are:

- \$116,149,459 in annual depreciation;
- \$46,503,379 in taxes other than income taxes (consisting of an increase of \$44,089,223 in annual ad valorem tax expense and \$2,414,156 in annual Texas margin tax expense);
- \$103,518,198 in annual federal income taxes; and
- \$211,257,963 in return on rate base (derived by multiplying \$3,176,811,471 in distribution rate base by the 6.65% rate of return approved by the Commission in Docket No. 53601).

Oncor also includes in the application an adjustment for distribution growth revenue of \$31,087,719, such that the net increase it seeks to its distribution revenue requirement is \$377,657,423.

Steering Committee identified a single substantive issue on which it disagrees with Oncor. Steering Committee agrees that it is appropriate for Oncor to maintain a reserve of meters, transformers, and capacitors, but argues that Oncor's meter, transformer, and capacitor reserves exceed the amounts necessary to provide reliable service. However, Steering Committee asserts that Oncor has increased its meter, transformer, and capacitor reserves at rates that exceed Oncor's average customer growth rates.² Accordingly, Steering Committee recommends alternative meter, transformer, and capacitor reserves with corresponding reductions to Oncor's distribution invested capital based on Steering Committee's calculations of Oncor's cost per meter, transformer, and

² Direct Testimony of Karl J. Nalepa at 7–8, 13, and 17.

capacitor. Specifically, Steering Committee recommends that Oncor's distribution invested capital be reduced by \$4,830,240 related to meters, \$80,521,065 related to transformers, and \$4,192,360 related to capacitors.³

Oncor disputes the contention that its reserves of meters, transformers, and capacitors are excessive. Oncor asserts that its investment in reserve meters, transformers, and capacitors have been properly categorized or functionalized by Oncor as distribution plant, distribution-related intangible plant, or distribution-related communication equipment and networks properly recorded in Federal Energy Regulatory Commission (FERC) accounts 368 and 370 and are eligible for inclusion in its DCRF.⁴ Oncor further argues that the Commission's DCRF rule does not require Oncor to demonstrate, in this proceeding, that its reserves of meters, transformers, and capacitors are prudent, reasonable, and necessary.⁵ Oncor also explained that while its customer growth rate is a factor in determining its meter, transformer, and capacitor reserves, Oncor additionally considers factors such as replacement needs, manufacturing lead times, customer-service dates, manufacturer plant closures during the holidays, and the required number of unique styles of transformers on Oncor's distribution system.⁶

The ALJ agrees with Oncor that Oncor's investments in reserve meters, transformers, and capacitors have been properly categorized or functionalized by Oncor as distribution plant, distribution-related intangible plant, or distribution-related communication equipment and networks properly recorded in FERC accounts 368 and 370. As such, it is eligible for inclusion under the Commission's DCRF rule. The ALJ additionally agrees that the Commission's DCRF rule does not require Oncor to demonstrate, at this time, the prudence, reasonableness, and necessity of its reserve levels. As the Commission has previously stated, the Commission does not determine in proceedings such as this one "whether investments recovered through the DCRF comply with PURA or are prudent, reasonable, and necessary. The Commission will make those determinations in Oncor's DCRF reconciliation under 16 TAC § 25.243(f)."⁷

³ *Id.* at 4.

⁴ Rebuttal Testimony of W. Alan Ledbetter at 7.

⁵ *Id.* at 4, 8.

⁶ Rebuttal Testimony of Coler D. Snelleman at 3.

⁷ *Application of Oncor Electric Delivery Company LLC to Amend its Distribution Cost Recovery Factor and Update Mobile Generation Riders*, Docket No. 56306, Interim Order at Ordering Paragraph 9 (May 16, 2024).

Therefore, the ALJ recommends that the Commission approve Oncor's request to amend its DCRF as requested, subject to reconciliation in Oncor's next base-rate proceeding.

III. Findings of Fact

The ALJ makes the following findings of fact.

Applicant

1. Oncor is a Delaware limited liability company registered with the Texas secretary of state under filing number 800880712.
2. Oncor owns and operates for compensation facilities and equipment in Texas to transmit and distribute electricity in the Electric Reliability Council of Texas region.
3. Oncor holds certificate of convenience and necessity number 30043 to provide service to the public.

Application

4. On August 16, 2024, Oncor filed an application for approval to amend its DCRF and tariffs with the Commission and each of its municipal regulatory authorities that have not ceded their jurisdiction over Oncor's distribution service area to the Commission.
5. This is Oncor's second DCRF application for the 2024 calendar year and its fourth DCRF proceeding since its last base-rate proceeding, Docket No. 53601.⁸
6. In Docket No. 55190,⁹ the Commission approved Oncor's initial DCRF after Docket No. 53601 based on the period of January 1 through December 31, 2022, with the approved rates to become effective for bills rendered on and after the first day of the month following Oncor's provision of 45 days' notice of the approved rates to REPs.

⁸ *Application of Oncor Electric Delivery Company LLC for Authority to Change Rates*, Docket No. 53601, Order on Rehearing (June 30, 2023).

⁹ *Application of Oncor Electric Delivery Company LLC to Amend its Distribution Cost Recovery Factor and Update Mobile Generation Riders*, Docket No. 55190, Order (Nov. 3, 2023).

7. In Docket No. 55525,¹⁰ the Commission approved Oncor's second DCRF after Docket No. 53601 based on the period of January 1, 2022, through June 30, 2023, effective for bills rendered on and after December 28, 2023.
8. In Docket No. 56306,¹¹ the Commission approved Oncor's third DCRF after Docket No. 53601 based on the period of January 1, 2022, through December 31, 2023, with the approved rates to become effective on and after Oncor's provision of 45 days' notice of the approved rates to REPs.
9. In its application in this docket, Oncor requested approval of a DCRF based on an annual revenue requirement of \$377,657,423, after adjusting for load growth, which is cumulative of and includes the annual revenue requirement approved in Docket No. 56306.
10. Oncor calculated its annual revenue requirement in this docket using the period January 1, 2022, through June 30, 2024.
11. The request represented an incremental increase of \$90,288,143 to Oncor's DCRF revenue requirement of \$287,369,280 approved in Docket No. 56306, which excluded any amounts for mobile generation facilities in issue in Docket No. 56306.
12. In its application, Oncor states that, from January 1, 2022, through June 30, 2024, it had invested \$3,176,811,471 in net distribution-system invested capital booked in FERC accounts 303, 352, 353, 360 through 374, 391, and 397.
13. In its application, Oncor requested the following DCRF rates, which are compared here to the DCRF rates approved by the Commission in Oncor's most recent DCRF proceeding, Docket No. 56306:

¹⁰ *Application of Oncor Electric Delivery Company LLC to Amend its Distribution Cost Recovery Factor*, Docket No. 55525, Order (Dec. 14, 2023).

¹¹ *Application of Oncor Electric Delivery Company LLC to Amend its Distribution Cost Recovery Factor and Update Mobile Generation Riders*, Docket No. 56306, Interim Order (May 16, 2024).

Rate Class	DCRF Charge Proposed in Application	DCRF Charge Approved in Docket No. 56306	Billing Units
Residential Service	\$0.004553	\$0.003472	\$/kWh
Secondary Service Less Than or Equal to 10 kW	\$0.004811	\$0.003573	\$/kWh
Secondary Service Greater Than 10 kW	\$0.819305	\$0.614487	\$/Billing kW
Primary Service Less Than or Equal to 10kW	\$0.004010	\$0.002890	\$/kWh
Primary Service Greater Than 10 kW — Distribution Line	\$0.452807	\$0.352451	\$/Billing kW
Primary Service Greater Than 10 kW — Substation	\$0.107665	\$0.090527	\$/Billing kW
Transmission Service	\$0.007132	\$0.005877	\$/Billing kW
Lighting Service	\$0.005404	\$0.004014	per kWh
Wholesale Service-Substation	\$0.134434	\$0.116828	\$/kW, billed at Annual Demand (kW)
Wholesale Service - Distribution Line	\$0.560106	\$0.450904	\$/Billing kW

14. Oncor's application affects all REPs that take electric delivery service from Oncor and will affect the retail electric customers of those providers to the extent that the REPs pass along charges to their customers under Oncor's approved DCRF tariffs. The application also affects Oncor's wholesale customers receiving service at distribution voltage.
15. In its earnings monitoring report included in its application, Oncor demonstrated that it is not earning more than its authorized rate of return using weather-normalized data.
16. Oncor does not have a comprehensive base-rate proceeding pending before the Commission.
17. The Commission set Oncor's DCRF baseline values in Docket No. 54817.¹²
18. In its application, Oncor used the DCRF baseline values approved in Docket No. 54817.

¹² *Compliance Filing for Final Order in Docket No. 53601 (Application of Oncor Electric Delivery Company LLC for Authority to Change Rates)*, Docket No. 54817, Order No. 6, Approving Tariffs, Riders, and Baselines; and Denying Pending Motions by Rayburn Country and ETEC (Aug. 8, 2023).

19. In its application, Oncor applied the 6.65% rate of return approved by the Commission in Docket No. 53601.
20. In its application, Oncor proposed two DCRF riders: one for wholesale customers of Oncor receiving service at distribution voltage, and one for REPs that take delivery service from Oncor. The Commission approved the use of two riders for these customers in Docket No. 48231.¹³
21. In its application, Oncor included the direct testimonies of W. Alan Ledbetter, vice president and controller for Oncor; Bonnie L. Clutter, assistant controller for Oncor; Janice I. Fennell, senior manager – rates for Oncor; and Coler D. Snelleman, senior director of transmission and distribution supply chain management for Oncor. Oncor subsequently filed the rebuttal testimonies of Mr. Ledbetter and Mr. Snelleman. These testimonies collectively demonstrate Oncor's compliance with the DCRF recovery standards.
22. No party filed a motion to find the application materially deficient and the ALJ did not issue an order concluding that material deficiencies exist in the application.
23. In Order No. 4 filed on September 9, 2024, the ALJ found the application administratively complete.

Notice

24. On August 30, 2024, Oncor filed an affidavit of Joni Price, senior manager of regulatory support and compliance for Oncor, attesting to the following:
 - a. that Oncor filed the application with the municipalities having original jurisdiction over Oncor's rates on August 16, 2024;
 - b. that Oncor provided notice of the application to all other municipalities in its service area on August 16, 2024;
 - c. that Oncor provided notice by mail via Federal Express and by emailing a link to the electronic native files to all parties of record to its last comprehensive base-rate proceeding, Docket No. 53601, on August 16, 2024; and

¹³ *Application of Oncor Electric Delivery Company LLC for a Distribution Cost Recovery Factor*, Docket No. 48231, Order (Aug. 30, 2018).

- d. that Oncor provided notice of the application by mail via Federal Express and by emailing a link to the electronic native files to all authorized representatives for parties participating in Oncor's last DCRF proceeding, Docket No. 56306.
25. Oncor's provision of notice by mail via Federal Express and by emailing a link to the electronic native files was reasonable.
26. In Order No. 4 filed on September 9, 2024, the ALJ found the notice sufficient.

Interventions

27. In Order No. 2 filed on August 27, 2024, the ALJ granted the motion to intervene filed by Steering Committee.
28. In Order No. 3 filed on September 5, 2024, the ALJ granted the motions to intervene filed by TIEC and ARM.
29. In Order No. 5 filed on September 12, 2024, the ALJ granted the motion to intervene filed by AOC.

Testimony and Recommendations

30. On August 16, 2024, Oncor filed the direct testimonies and exhibits of W. Alan Ledbetter, Bonnie L. Clutter, Janice I. Fennell, and Coler D. Snelleman.
31. On September 12, 2024, Steering Committee filed the direct testimony, attachments, and workpapers of Karl J. Nalepa.
32. On September 12, 2024, ARM filed its recommendation regarding Oncor's application.
33. On September 16, 2024, Commission Staff filed its recommendation on final disposition that included memoranda from Commission Staff experts Joseph Cooper, Mark Filarowicz, and Dylan Love. Commission Staff recommended Oncor's application be approved.
34. On September 17, 2024, Steering Committee filed the affidavit of Thomas Brocato, attorney for Steering Committee, related to the rate-case expenses Steering Committee incurred in this proceeding.
35. On September 19, 2024, Oncor filed the rebuttal testimonies and exhibits of W. Alan Ledbetter and Coler D. Snelleman.

36. On October 4, 2024, AOC filed the affidavit of Alfred Herrera, attorney for AOC, related to the rate-case expenses AOC incurred in this proceeding.
37. On October 7, 2024, Steering Committee filed the supplemental affidavit of Thomas Brocato related to the rate-case expenses Steering Committee incurred in this proceeding.

Evidentiary Record

38. In Order No. 6 filed on October 1, 2024, the ALJ admitted as evidence in the record of this proceeding the affidavit of Thomas Brocato related to rate-case expenses filed on September 17, 2024.
39. In Order No. 8 filed on October 9, 2024, the ALJ admitted the following additional evidence into the record of this proceeding:
 - a. Oncor's application and all attachments filed on August 16, 2024;
 - b. the direct testimony and exhibits of Oncor witnesses W. Alan Ledbetter, Bonnie L. Clutter, Janice I. Fennell, and Coler D. Snelleman filed on August 16, 2024;
 - c. Oncor's proof of notice filed on August 30, 2024;
 - d. Commission Staff recommendation on the administrative completeness and notice filed on September 6, 2024;
 - e. Commission Staff's recommendation on final disposition, including the attached memoranda of Joseph Cooper, Mark Filarowicz, and Dylan Love filed on September 16, 2024;
 - f. The rebuttal testimonies and exhibits of Oncor witness W. Alan Ledbetter and Coler D. Snelleman filed on September 19, 2024;
 - g. the affidavit of Alfred R. Herrera related to rate-case expenses, including attorneys' fees incurred by AOC filed on October 4, 2024; and
 - h. the supplemental affidavit of Thomas Brocato related to rate-case expenses filed on October 7, 2024.

Jurisdictional Deadline

40. In Order No. 6 filed on October 1, 2024, the ALJ extended the deadline to enter a final order by 15 days.

Meter, Transformer, and Capacitor Reserves

41. Oncor's investment in reserve meters, transformers, and capacitors has been properly categorized or functionalized by Oncor as distribution plant, distribution-related intangible plant, or distribution-related communication equipment and networks properly recorded in FERC accounts 368 and 370 and is eligible for inclusion under 16 TAC § 25.243(b)(3). None of Oncor's reserve meters, transformers, or capacitors included in the application are ineligible for inclusion in the DCRF under 16 TAC § 25.243(b)(3), and none should be excluded.

Final Rates

42. It is appropriate for the Commission to approve the rates proposed in Oncor's application.
43. The DCRF is consistent with the allocation to each rate class of invested-capital costs in Docket No. 53601.
44. The rate-class billing determinants used in calculating the DCRF approved by this Order are weather-normalized and reflect Oncor's number of customers as of June 30, 2024.
45. The DCRF does not include any indirect corporate costs or capitalized operations and maintenance costs.

Rate-Case Expenses

46. On September 17, 2024, Steering Committee filed the affidavit of Thomas Brocato, attesting that the rate-case expenses from August 1 through 31, 2024, in the amount of \$5,229 for this proceeding are reasonable given the nature of the Steering Committee's participation in this docket, the number of issues involved, and the complexity, importance, and scope of this docket.
47. On October 4, 2024, AOC filed the affidavit of Alfred Herrera, attesting that the rate-case expenses from August 1 through September 30, 2024, in the amount of \$3,991.50 for this proceeding are reasonable given the nature of AOC's participation in this docket, the number of issues involved, and the complexity, importance, and scope of this docket.
48. On October 7, 2024, Steering Committee filed the supplemental affidavit of Thomas Brocato attesting that the rate-case expenses from September 1 through 30, 2024, in the amount of \$10,149.50 for this proceeding are reasonable given the nature of the Steering

Committee's participation in this docket, the number of issues involved, and the complexity, importance, and scope of this docket.

49. It is appropriate for Oncor to reimburse the participating municipalities for their rate-case expenses within 30 days of the date of a signed final order in this docket.
50. It is appropriate for Oncor to establish a regulatory asset for its rate-case expenses incurred in this proceeding, including the reimbursement of participating municipalities for their rate-case expenses, and for Oncor to be allowed to request recovery of that asset in a future proceeding or a proceeding to collect those expenses through a separate surcharge. Rate-case expenses in connection with this proceeding are subject to a final determination by the Commission as to the reasonableness and necessity of those expenses.

Good Cause Exception

51. It is appropriate to consider this PFD at the earliest open meeting available; therefore, good cause exists to waive the requirement in 16 TAC § 22.35(b)(2) that a proposed order be served on the parties at least 20 days before the Commission is scheduled to consider the proposed order in an open meeting.

IV. Conclusions of Law

The Commission makes the following conclusions of law.

1. Oncor is a public utility as defined in PURA § 11.004(1) and an electric utility as defined in PURA § 31.002(6).
2. The Commission has authority over this matter under PURA §§ 14.001, 32.001, 33.002, and 36.210.
3. The Commission processed this docket in accordance with the requirements of PURA, the Administrative Procedure Act,¹⁴ and Commission rules.
4. Oncor is eligible to file this application for a DCRF under PURA § 36.210(d).
5. Oncor provided notice of the application using a reasonable method in compliance with 16 TAC § 25.243(e)(2).

¹⁴ Tex. Gov't Code §§ 2001.001–.903.

6. The application was deemed sufficient under 16 TAC § 25.243(e)(6)(A).
7. The basis for Oncor's DCRF application is changes in invested capital under PURA § 36.053 that are categorized or functionalized as distribution plant, distribution-related intangible plant, and distribution-related communication equipment and networks under PURA § 36.210(a) and 16 TAC § 25.243(b)(3).
8. Oncor's classification of distribution investments, distribution revenue requirement, cost allocation, and rate design, as reflected in Oncor's application, results in rates that are just and reasonable, that comply with the relevant ratemaking provisions in PURA and Commission rules, and that are not unreasonably discriminatory, preferential, or prejudicial.
9. The rates recommended for approval by this PFD are just and reasonable under PURA § 36.003(a).
10. In accordance with PURA § 36.003(b), the rates recommended for approval by this PFD are not unreasonably preferential, prejudicial, or discriminatory and are sufficient, equitable, and consistent in application to each class of consumer.
11. The rates recommended by this PFD establish Oncor's overall revenue at a level that will provide the utility a reasonable opportunity to earn a reasonable return as required by PURA § 36.051.
12. The rates recommended for approval by this PFD were calculated in compliance with 16 TAC § 25.243(d).
13. The rate of return used to calculate the DCRF recommended for approval by this PFD complies with 16 TAC § 25.243(d)(2).
14. Oncor's DCRF recommended for approval by this PFD complies with PURA § 36.210 and 16 TAC § 25.243.
15. Oncor's DCRF recommended for approval by this PFD takes into account changes in the number of Oncor's customers and the effects, on a weather-normalized basis, that energy consumption and energy demand have on the amount of revenue recovered through Oncor's base rates in accordance with PURA § 36.210(a)(2) and 16 TAC § 25.243(d)(1).

16. Oncor is required to provide notice of the approved rates in accordance with PURA § 36.210(b)(2) and 16 TAC § 25.243(e)(6)(E).
17. Steering Committee and AOC met the requirements of 16 TAC § 25.245 with respect to their rate-case expenses incurred and recommended for approval by this PFD.
18. Under PURA § 33.023(b), Oncor is required to reimburse the municipal regulatory authorities that participated in this docket for their reasonable and necessary rate-case expenses to the extent the Commission determines is reasonable.
19. Under PURA § 36.210, a DCRF proceeding is a periodic rate adjustment, not a rate change. The opportunity for a hearing will occur in the applicant's next base-rate proceeding, not in an applicant's DCRF proceeding.
20. Under 16 TAC § 25.243(f), the Commission will reconcile the investments Oncor recovers through its DCRF during its next comprehensive base-rate proceeding.
21. There is good cause under 16 TAC § 22.5(b) to grant an exception to the 20-day notice requirement in 16 TAC § 22.35(b)(2).

V. Ordering Paragraphs


In accordance with these findings of fact and conclusions of law, the ALJ proposes the following ordering paragraphs.

1. The Commission amends Oncor's DCRF to the extent provided in this Order.
2. The Commission approves the DCRF tariff schedules attached to Oncor's August 16, 2024 application at attachments A and B, effective on and after Oncor's provision of 45 days' notice of the approved rates to REPs.
3. Oncor must provide notice to REPs of the approved DCRF rates and the effective date within one working day of the date of this Order and at least 45 days before the approved rates are implemented.
4. Oncor must reimburse the participating municipalities for their rate-case expenses incurred in this proceeding within 30 days of the date of this Order.
5. Oncor is authorized to defer as a regulatory asset and to request recovery of its own and any participating municipality's rate-case expenses incurred in this proceeding either in a

- future rate-case proceeding or through a separate surcharge, subject to final determination by the Commission as to the reasonableness and necessity of those rate-case expenses.
6. The Commission makes no determinations in this proceeding regarding the reasonableness of participating municipalities' or Oncor's rate-case expenses incurred in this proceeding. The Commission will make determinations regarding the reasonableness of those expenses in a future docket.
 7. The Commission grants a good-cause exception under 16 TAC § 22.5(b) to the requirement in 16 TAC § 22.35(b)(2) that a proposed order be served on all parties no less than 20 days before the Commission is scheduled to consider the application in open meeting.
 8. Within ten days of the date of this Order, Oncor must provide the Commission with a clean copy of its DCRF tariff schedules approved by this Order, *Schedule 6.1.1.6.4 Rider Distribution Cost Recovery Factor (DCRF)* and *Schedule 3.6 Rider WDCRF - Rider Wholesale Distribution Cost Recovery Factor*, to be stamped *Approved* by Central Records and filed in the Commission's tariff books.
 9. The Commission is not determining in this Order whether investments recovered through the DCRF comply with PURA or are prudent, reasonable, and necessary. The Commission will make those determinations in Oncor's DCRF reconciliation under 16 TAC § 25.243(f).
 10. The Commission denies all other motions and any other requests for general or specific relief that are not expressly granted in this Order.

Signed at Austin, Texas on the 9th day of October 2024.

PUBLIC UTILITY COMMISSION OF TEXAS



**ISAAC TA
ADMINISTRATIVE LAW JUDGE**