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PUC DOCKET NO. 56963

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

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

The Steering Committee of Cities Served by Oncor (OCSC) files its First Request for Information (RFI) to the Oncor Electric Delivery Company LLC (Oncor) in the above-styled docket. Oncor is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Lloyd Gosselink Rochelle & Townsend, P.C., 816 Congress Avenue, Suite 1900, Austin, Texas 78701 within ten (10) working days. These requests shall be deemed continuing so as to require further and supplemental responses if Oncor receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Also, where data is requested, provide it in hard copy and Excel format with all formulas intact.

DEFINITIONS AND INSTRUCTIONS

A. "Oncor" refers to the Oncor Electric Delivery Company LLC.

B. The term "document" shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and

any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper document is a separate document within the meaning of this term.

C. Pursuant to Tex. R. Civ. P. 196.4, OCSC specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced on CD-ROM in a format that is compatible with Microsoft Office and/or Word Perfect and be produced with your response to these requests. OCSC further requests that Oncor produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

D. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

E. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

F. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

G. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

H. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

I. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

J. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

K. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

L. Pursuant to 16 Tex. Admin Code § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

M. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800 Tel.
(512) 472-0532 Fax



THOMAS L. BROCATO
State Bar No. 03039030
tbrocato@lglawfirm.com

SAMANTHA N. MILLER
State Bar No. 24131515
smiller@lglawfirm.com

**ATTORNEYS FOR STEERING COMMITTEE
OF CITIES SERVED BY ONCOR**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 23, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.



SAMANTHA N. MILLER

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OCSC'S FIRST REF TO ONCOR

- OCSC 1-1** 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.
- OCSC 1-2** 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.
- OCSC 1-3** 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.
- OCSC 1-4** Refer to WP B-1_1_2022. Please explain the purpose of Project 3472685E, 2018 CAPEX CARRYOVER: DENDR000, costing \$1,382,963.

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- OCSC 1-5** Refer to WP B-1_1_2022. Please explain if Project IT160009, Work and Asset Management, costing \$84,315,918, is assigned 100% to Distribution or is any of the project allocated to Transmission.
- OCSC 1-6** Refer to WPs Schedule B-1_1_2 Substation over \$100k by Property Unit 2022, 6 ME 6-30-23, 6 ME 12.31.23, and 6 ME 6-30-24. Please confirm that for all substation land purchases included in Oncor's requested DCRF, construction has either already commenced or will commence within 24 months from the land purchase date. If Oncor cannot confirm, please provide an explanation why not.
- OCSC 1-7** Refer to WP Schedule B-1_1_3 Distribution over \$100k by Property Unit 2022. Please provide an explanation why this workpaper includes projects that have in-service dates in 2020 and 2021 and confirm whether these projects are not already included in rates.
- OCSC 1-8** Refer to WP Schedule B-1_1_3 Distribution over \$100k by Property Unit 6 ME 6-30-23. Please provide an explanation why this workpaper includes projects that have in-service dates in 2021 and 2022 and confirm whether these projects are not already included in rates.
- OCSC 1-9** Refer to WP Schedule B-1_1_3 Distribution over \$100k by Property Unit 6 ME 12-31-23. Please provide an explanation why this workpaper includes projects that have in-service dates in 2022 and confirm whether these projects are not already included in rates.
- OCSC 1-10** Refer to WP Schedule B-1_1_3 Distribution over \$100k by Property Unit 6 ME 6-30-24. Please provide an explanation why this workpaper includes projects that have in-service dates in 2022 and 2023 and confirm whether these projects are not already included in rates.