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**SOAH DOCKET NO. 473-25-10411
PUC DOCKET NO. 57467**

**APPLICATION OF CROSS TEXAS § BEFORE THE STATE OFFICE
TRANSMISSION, LLC FOR AUTHORITY § OF
TO CHANGE RATES AND TARIFFS § ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S RESPONSE TO
CROSS TEXAS TRANSMISSION, LLC'S
FIRST REQUEST FOR INFORMATION**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) responds to Cross Texas Transmission, LLC's (Cross Texas) First Request for Information (RFI) to Staff and stipulates that the following RFI responses may be treated by all parties as if the answers were filed under oath.

Dated: April 22, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

Ian Groetsch
Managing Attorney

/s/ Scott Miles
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CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on April 22, 2025, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Scott Miles
Scott Miles

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**COMMISSION STAFF'S RESPONSE TO
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FIRST REQUEST FOR INFORMATION**

- CTT-STAFF 1-1** Please provide the following information for each witness that will provide testimony for Staff in this case:
- a. the subject matter on which the witness will testify;
 - b. the facts known by the witness that relate to or form the basis of the witness's mental impressions and opinions formed or made in connection with the testimony;
 - c. the methods by which the mental impressions and opinions were formed;
 - d. all documents, tangible things, reports, models, or data compilations that have been provided to the witness in anticipation of his or her testimony. For the rate filing package filed by Cross Texas in this proceeding, do not provide the documents but instead list the portions of the rate filing package (including any updates) provided to the witness, including the specific pages provided (provide Bates Stamp numbers). For discovery responses that have been provided by Cross Texas in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided to the witness (provide Bates Stamp numbers);
 - e. all documents, tangible things, reports, models or data compilations that have been reviewed by the witness in anticipation of his or her testimony. For the rate filing package filed by Cross Texas in this proceeding, do not provide the documents but instead list the portions of the rate filing package (including any updates) reviewed by the witness, including the specific pages reviewed (provide Bates Stamp numbers). For discovery responses that have been provided by Cross Texas in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided or reviewed (provide Bates Stamp numbers);
 - f. the facts contained in the documents, tangible things, reports, models, or data compilations that have been reviewed by the witness that relate to or form the basis of the witness's mental impressions and opinions formed or made in connection with the pending case. For facts taken from discovery responses that have been provided by Cross Texas in this proceeding, do not provide the documents but instead list the discovery response, including the specific pages provided or reviewed (provide Bates Stamp numbers), and the

- specific facts contained on each page that relate to or form the basis of the witness's mental impressions and opinions;
- g. the witness's current resume and bibliography, including, for the period since January 1, 2015, a complete listing of cases in which the witness has submitted testimony. Further, provide the docket number, jurisdiction, the party for whom testimony was submitted, and the topics addressed in the testimony;
- h. copies of all articles, speeches, published materials, and peer-reviewed material written by the witness (or, for documents that are publicly available online, a link to access the online document may be provided instead of a copy);
- i. the witness's billing rate, if not an employee of the Commission; and
- j. the number of hours spent by the witness on this case by week.

RESPONSES:

Staff respectfully provides the following responses for Staff witnesses David Gage Holt, Emily Sears, and Emily Cantu.

David Gage Holt

- a. Please see the Direct Testimony and Attachment DGH-2 of David Gage Holt.
- b. See response to part (a).
- c. See response to part (a).
- d. See response to part (a).
- e. See response to part (a).
- f. See response to part (a).
- g. Please refer to page 3 of 7 (bates page 3) and Attachment DGH-1 to Mr. Holt's testimony for his educational background and professional experience. Please refer to Attachment DGH-1 to Mr. Holt's testimony for a complete list of cases in which he has provided memoranda in lieu of testimony.
- h. N/A.
- i. N/A
- j. Unknown.

Emily Sears

- a. Please see the Direct Testimony Emily Sears.
- b. See response to part (a).
- c. See response to part (a).
- d. See response to part (a).
- e. See response to part (a).
- f. See response to part (a).
- g. Please refer to Attachments ES-1 and ES-2 in Ms. Sears' testimony.
- h. N/A.
- i. N/A
- j. Unknown.

Emily Cantu

- a. Please see the Direct Testimony of Emily Cantu.
- b. Please refer to page 6 of 25 (bates page 9) and page 12 of 25 (bates page 15) of Ms. Cantu's testimony for discussion about the facts known that relate to or form the basis of Ms. Cantu's mental impressions and opinions formed in connection with her recommendations about Cross Texas's cost of service and rate-case expenses, respectively.
- c. Please refer to pages 3-4 of 25 (bates pages 6-7), page 5 of 25 (bates page 8), and page 13 of 25 (bates page 16) of Ms. Cantu's testimony for discussion about the methods and standards by which the mental impressions and opinions were formed with respect to Cross Texas's cost of service and rate-case expenses, respectively.
- d. Direct Testimonies (all)—and, as applicable, Exhibits, Attachments, and Workpapers—of Eric Schroeder, Anna Cavaco, Matthew Popp, Todd Jirovec, Suzanne Robbins, Rebecca Beckham, Patrick Pearsall, and Karl Nalepa. Responses of Cross Texas to Staff's Second RFI, Staff's Fourth RFI, and Staff's Eighth RFI, other documents, reports, and data compilations that are either attached to or cited in Ms. Cantu's testimony, or included in the public and confidential attachments to Ms. Cantu's testimony.
- e. See response to part (d).
- f. See response to part (d).
- g. Please refer to page 1 of 25 (bates page 4) of Ms. Cantu's testimony for her educational background and professional experience. Please refer to Attachment EC-1 to Ms. Cantu's testimony for a complete list of cases in which she has submitted testimony.
- h. N/A.
- i. N/A
- j. Unknown.

Prepared by:
Sponsors:

Counsel
David Gage Holt, Emily Sears, and Emily Cantu

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CTT-STAFF 1-2 For each witness that will provide testimony for Staff, please provide, for the period since January 1, 2015, a complete copy of all prior testimonies submitted or testified to at hearing by the witness relating to the topic(s) the witness will address in this docket. For testimony that is readily available from the PUC website, simply list the docket number, and for documents that are otherwise publicly available online, a link to access the online document may be provided instead of a copy of the document.

RESPONSES: Staff respectfully provides the following responses for Staff witnesses David Gage Holt, Emily Sears, and Emily Cantu.

David Gage Holt

Please refer to Attachment DGH-1 to Mr. Holt's testimony.

Emily Sears

Please refer to Attachment ES-2 in Ms. Sears' testimony. Further, although not applicable to the period since January 1, 2015, please refer to the following link to find Ms. Sears' testimony provided before the Pennsylvania Public Utility Commission.

<https://www.puc.pa.gov/search/document-search/>

Emily Cantu

Please refer to Attachment EC-1 in Ms. Cantu's testimony.

Prepared by:

Counsel

Sponsors:

David Gage Holt, Emily Sears, and Emily Cantu

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CTT-STAFF 1-3 Provide all materials regarding David Gage Holt's qualifications listed in his Direct Testimony Attachment DGH-1 that support his expertise in utilities' export revenues and Wholesale Transmission Rates in the State of Texas.

RESPONSE: Please refer to Mr. Holt's responses to CTT-STAFF 1-1(g) and 1-2.

Prepared by: Counsel
Sponsor: David Gage Holt

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**COMMISSION STAFF'S RESPONSE TO
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FIRST REQUEST FOR INFORMATION**

CTT-STAFF 1-4 Provide all materials regarding Emily Sears' qualifications listed in her Direct Testimony Attachment ES-1 that support her expertise in utilities' rates of return, cost of capital, cost of debt, capital structure, and cost of service in the State of Texas.

RESPONSE: Please refer to Ms. Sears' responses to CTT-STAFF 1-1(g) and 1-2.

Prepared by: Counsel
Sponsor: Emily Sears

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**COMMISSION STAFF'S RESPONSE TO
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FIRST REQUEST FOR INFORMATION**

CTT-STAFF 1-5 Provide all materials regarding or reflecting Emily Cantu's qualifications that support her expertise in utilities' cost of service, Texas margin taxes, federal income taxes, Texas ad valorem taxes, consultants' hourly rates, and attorneys' hourly rates.

RESPONSE: Please refer to Ms. Cantu's responses to CTT-STAFF 1-1(g) and 1-2. Additionally, Ms. Cantu attended the Basics of Utility Accounting and Ratemaking 2024 conference hosted by the National Association of Regulatory Utility Commissioners.

In addition to her filed testimonies, Ms. Cantu has provided memoranda in lieu of testimony before the Commission in the following dockets, which are available on the PUC's website.

57080
57091
57096
57111
57304
57309

Prepared by: Counsel
Sponsors: Emily Cantu