



## **Filing Receipt**

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**Item Number - 55**

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

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

**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO  
CROSS TEXAS TRANSMISSION, LLC  
QUESTION NOS. STAFF 4-1 THROUGH STAFF NO. 4-12**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Cross Texas Transmission, LLC and by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: March 4, 2025

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Marisa Lopez Wagley  
Division Director

Ian Groetsch  
Managing Attorney

/s/ Scott Miles  
Scott Miles  
State Bar No. 24098103  
Glen Imes  
Senior Litigation Counsel  
State Bar No. 24084316  
1701 N. Congress Avenue  
P.O Box 13326  
Austin, Texas 78711-3326  
(512) 936-7228  
(512) 936-7268 (facsimile)  
Scott.Miles@puc.texas.gov

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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 March 4, 2025, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Scott Miles  
Scott Miles

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**DEFINITIONS**

- 1) "Cross Texas" or "You" refers to Cross Texas Transmission, LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
  
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information, or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) 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.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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Please provide the following information:

- STAFF 4-1** Please refer to Schedule II-D-2.9. Please provide the agreement associated with the lease(s) on lines 9 and 10.
- STAFF 4-2** Please provide copies of affiliate billings from LS Power regarding payroll and benefit expense for the test year.
- STAFF 4-3** Please refer to the direct testimony of Matthew Popp, bates page 125, lines 11 through 13. Please clarify the "specified fee" charged in addition to, or in lieu of, labor and non-labor charges. Please explain how the specified fee is calculated, how it is determined, and what it pertains to or covers.
- STAFF 4-4** Please refer to the direct testimony of Matthew Popp, bates page 125, lines 22 through 24. Please explain the "negotiated management fee" that is charged in lieu of an hourly allocation of costs from executive management. Please explain the types of charges that this fee covers, how it is calculated, the frequency of changes in the negotiated fee, and who negotiates the fee along with the negotiation process.
- STAFF 4-5** Please refer to the direct testimony of Matthew Popp, bates page 128, lines 12 through 13. Has Cross Texas requested an internal audit of affiliate charges within the past five years? If so, please provide a copy of the findings or results from the internal audit. If an internal audit of affiliate charges has not been requested within the past five years, how does Cross Texas determine that the affiliate charges are reasonable and necessary?
- STAFF 4-6** Please refer to the direct testimony of Matthew Popp, bates page 128, lines 6 through 8. Has Cross Texas ever contested its billed affiliate charges? If so, please explain the nature of the charge, the reason for contesting the charge, and the outcome of contesting the charge.
- STAFF 4-7** Please refer to the direct testimony of Todd Jirovec, bates page 187, lines 9 through 11. Please explain how the "management fee" is calculated if it is not directly calculated based on the quantity of services provided. Please explain what the management fee represents, and the parameters Cross Texas relies upon for determining its reasonableness and necessity.
- STAFF 4-8** Please refer to the direct testimony of Rebecca Beckham, bates page 511, lines 11 through 14. Please provide a copy of monthly and quarterly reviews of charges and services from LSP Western.

- STAFF 4-9** Please refer to the direct testimony of Rebecca Beckham, bates page 514, lines 12 through 15. Cross Texas is requesting that approved rate-case expenses be recorded as a regulatory asset and be included in rates as a charge to operating expense while also requesting a rate-case expense rider. Please clarify whether Cross Texas has removed rate-case expenses from its O&M expenses and provide the location of the adjustment in the rate-filing package.
- STAFF 4-10** Please refer to the direct testimony of Rebecca Beckham, bates page 518, lines 8 through 11. Please define the “hourly rate loader.” Please explain what is included in the hourly rate loader and how it is determined.
- STAFF 4-11** Please provide a general ledger in Microsoft Excel format for the administrative and general expenses separated by FERC account.
- STAFF 4-12** Please provide a list of third-party vendors and contractors who perform work to supplement administrative and general expense activities for LS Power Development, LLC for the current proceeding.