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

APPLICATION OF CROSS TEXAS TRANSMISSION, LLC FOR AUTHORITY TO CHANGE RATES AND TARIFFS	§ § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**RESPONSE OF CROSS TEXAS TRANSMISSION, LLC TO OFFICE OF PUBLIC
UTILITY COUNSEL'S FIRST REQUEST FOR INFORMATION**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW Cross Texas Transmission, LLC ("CTT" or "Company") and files this Response to the aforementioned Requests for Information ("RFIs"):

**I.
WRITTEN RESPONSES**

Attached hereto and incorporated herein by reference are CTT's written responses to the aforementioned RFIs. Each such response is set forth on or attached to a separate page upon which the request has been restated. Such responses are also made without waiver of CTT's right to contest the admissibility of any such matters upon hearing. CTT hereby stipulates that its responses may be treated by all parties exactly as if they were filed under oath.

**II.
INSPECTIONS**

In those instances where materials are to be made available for inspection by request or in lieu of a written response, the attached response will so state. For those materials that a response indicates are voluminous, materials will be provided in electronic format through a file sharing site upon request. Requests for voluminous materials should be directed to Dana Drake at ddrake@Hunton.com or (713) 220-3821. For those materials that a response indicates are highly sensitive confidential or confidential, please contact Dana Drake once you have signed a certification to be bound by the draft protective order contained in the rate filing package or a protective order issued in this docket.

Respectfully submitted,

CROSS TEXAS TRANSMISSION, LLC

/s/ Myles F. Reynolds

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**ATTORNEYS FOR
CROSS TEXAS TRANSMISSION, LLC**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties of record on this 20th day of March, 2025, via email in accordance with 16 TAC § 22.74, the Commission's Second Order Suspending Rules in Project No. 50664, *See Issues Related to the State of Disaster for the Coronavirus Disease 2019*, and SOAH Order No. 1 issued in this proceeding.

/s/ Myles F. Reynolds

REQUEST

Please provide a detailed description of the ownership structure of CTT and identify the percentage ownership of CTT between the various owners.

RESPONSE

The following response was prepared by or under the direct supervision of B. Cameron Fredkin and Matthew Popp, the sponsoring witnesses for this response.

Please see the direct testimony of Mr. Fredkin at pages 9-10 (Bates Nos. 025-026) for a description of Cross Texas' ownership structure. Please also see Schedule V-K-3 (Bates Nos. 743-744) and the highly sensitive confidential workpapers supporting Schedule V-K-3 for additional ownership information.

REQUEST

Please provide a detailed description of each entity, including LS Power Associates, LP, that is an owner of CTT. Additionally, describe any significant partnerships, investments, or operations that LS Power Associates, LP may have in relation to CTT.

RESPONSE

The following response was prepared by or under the direct supervision of B. Cameron Fredkin and Matthew Popp, the sponsoring witnesses for this response.

Please see Cross Texas' response to OPUC RFI Set 1, Question No. 1-1.

REQUEST

Please provide a detailed description of each equity infusion that CTT has received from its owners since December 31, 2018, including the dates, amounts, and source(s) of each equity infusion.

RESPONSE

The following response was prepared by or under the direct supervision of Rebecca L. Beckham, the sponsoring witness for this response.

Please see the table below for information responsive to this request.

Date	Amount	Source
September 11, 2024	\$17,500,000	TNT
September 11, 2024	\$8,014	InfraRed
September 11, 2024	\$9,503	TNT Holdings

REQUEST

Please refer to the Petition and Statement of Intent to Change Rates and Tariffs of CTT ("Petition") at 4. Please identify the "affiliated services provider" and identify its ownership and provide a detailed description of its affiliated relationship to CTT.

RESPONSE

The following response was prepared by or under the direct supervision of Matthew Popp, the sponsoring witness for this response.

Please see Cross Texas' response to OPUC RFI Set 1, Question No. 1-1.

REQUEST

Please refer to the Petition at 4. Please identify each “third-party unaffiliated service providers and contractors”, their charges, and the date of these charges to CTT that were included in CTT’s test-year revenue requirement.

RESPONSE

The following response was prepared by or under the direct supervision of Rebecca L. Beckham, the sponsoring witness for this response.

Please see Schedule II-D-2.7 (Bates No. 673) and Cross Texas’ response to Commission Staff RFI Set 1, Question Nos. 1-6 and 1-7 for information responsive to this request.

REQUEST

Please refer to the Petition at 4. Please provide a detailed explanation and all associated workpapers that CTT used to determine when it was cost effective to use the “affiliated services provider,” a third-party unaffiliated service provider, and/or contractors during the test-year.

RESPONSE

The following response was prepared by or under the direct supervision of Matthew Popp, Eric B. Schroeder, Todd J. Jirovec, and B. Cameron Fredkin, the sponsoring witnesses for this response.

Please refer to the direct testimony of Mr. Popp at pages 4-16 (Bates Nos. 116-128), Mr. Schroeder at pages 7-19 (Bates Nos. 078-090), Mr. Jirovec at pages 8-39 (Bates Nos. 158-189), and Mr. Fredkin at pages 19-22 (Bates Nos. 035-038) for information responsive to this request. There are no workpapers responsive to this request.

REQUEST

Please provide copies of CTT's annual filings for calendar years 2021 - 2023 in Docket No. 36867 - Electric Utilities' Annual Report of Affiliate Activities Pursuant to PUC Subst. R. §25.84 that CTT filed as confidential. In addition, please provide the information required for calendar year 2024, once this information is available.

RESPONSE

The following response was prepared by or under the direct supervision of Matthew Popp, the sponsoring witness for this response.

The documents responsive to this request are highly sensitive confidential and will be made available only after execution of a certification to be bound by the protective order issued in this docket. An index of the non-voluminous highly sensitive confidential information is included in Attachment 1 to this request.

ATTACHMENT

Attachment 1 – Highly Sensitive Confidential Non-Voluminous Index, 1 page

HIGHLY SENSITIVE CONFIDENTIAL NON-VOUMINOUS INDEX

1. CTT 2021 Annual Report for Affiliate Activities, 19 pages
2. CTT 2022 Annual Report for Affiliate Activities, 19 pages
3. CTT 2023 Annual Report for Affiliate Activities, 19 pages

REQUEST

Please refer to the Direct Testimony of Genevieve D. Giamarino at 3:26–4:4. Please provide CTT’s actual capital structure percentage debt and percentage equity at the end of each calendar quarter for the period of July 1, 2021 through June 30, 2024.

RESPONSE

The following response was prepared by or under the direct supervision of Rebecca L. Beckham, the sponsoring witness for this response.

Please see Attachment 1 to this response for information responsive to this request.

ATTACHMENT

Attachment 1 – CTT Response to OPUC 1-8.xlsx

The following files are not convertible:

11. Att 1- OPUC 1-8.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.

REQUEST

Please refer to the Direct testimony of B. Cameron Fredkin at 14:29–15:13. For the additional capital investments CTT anticipates will be required “to maintain and replace existing utility infrastructure and to fund investment in new facilities to help fulfill Texas’ policy goals of hardening infrastructure, improving reliability, and interconnecting new generation,” please explain whether CTT expects to receive any equity infusions from its owners. If so, please identify the planned equity infusions and the expected amounts by owners.

RESPONSE

The following response was prepared by or under the direct supervision of Genevieve D. Giamarino, the sponsoring witness for this response.

Please see Cross Texas’ response to TIEC RFI Set No. 1, Question No. 1-31.

REQUEST

Please refer to the Direct Testimony of Adrien M. McKenzie (“McKenzie Direct”), Exhibit AMM-1, at pages 1 – 2. Please identify each investor-owned electric utility for which Mr. McKenzie filed direct or rebuttal testimony concerning return on equity (“ROE”) from January 1, 2022 through present and identify if the utility was a fully integrated electric utility, a transmission and distribution utility, a transmission only utility, or another form of electric utility.

RESPONSE

The following response was prepared by or under the direct supervision of Adrien M. McKenzie, the sponsoring witness for this response.

Please see Attachment 1 to this response for a table identifying each investor-owned electric utility for which Mr. McKenzie filed direct or rebuttal testimony concerning ROE from January 1, 2022 through present.

ATTACHMENT

Attachment 1 – CTT Response to OPUC 1-10, 3 pages

No.	Utility Case	Agency	Docket	Date	Utility Operations
1.	Kentucky Utilities Company d/b/a Old Dominion Power Co.	Virginia SCC	PUR-2021-00171	Aug-21 Mar-22	Vertically Integrated
2.	Avista Corp.	Washington UTC	UE-220053 UG-220054	Jan-22 Aug-22	Vertically Integrated
3.	Rockland Electric Co.	FERC	ER22-910	Jan-22	Transmission Only
4.	Niagara Mohawk Power Co.	FERC	ER22-1201	Mar-22	Transmission Only
5.	Delmarva Power Co.	Maryland PSC	9681	May-22 Sep-22	Transmission & Distribution
6.	Cheyenne Light, Fuel and Power Co.	Wyoming PSC	17072	Jun-22	Vertically Integrated
7.	Black Hills Colorado Electric, LLC	FERC	ER22-2185	Jun-22	Transmission Only
8.	Alaska Electric Light and Power Co.	RC of Alaska	U-22-078	Jul-22 May-23	Vertically Integrated
9.	NorthWestern Energy	Montana PSC	D2022.07.078	Aug-22 Mar-23	Vertically Integrated
10.	Upper Peninsula Power Company	Michigan PSC	U-21286	Oct-22 Feb-23	Vertically Integrated
11.	Public Service Co. of Oklahoma	Oklahoma CC	PUD 2022-000093	Nov-22 Apr-23	Vertically Integrated
12.	Public Service Co. of New Mexico	New Mexico PRC	22-00270-UT	Dec-22 Jul-23	Vertically Integrated
13.	Ohio Power Co.	Ohio PUC	23-23-EL-SSO	Jan-23	Transmission & Distribution
14.	Avista Corp.	Idaho PUC	AVU-E-23-01; AVU-G-23-01	Jan-23	Vertically Integrated
15.	Electric Transmission Texas, LLC	Texas PUC	54608	Feb-23	Transmission Only
16.	Baltimore Gas & Electric Co.	Maryland PSC	9692	Feb-23 Jul-23	Transmission & Distribution
17.	Appalachian Power Co.	Virginia SCC	PUR-2023-00001	Mar-23 Aug-23	Vertically Integrated
18.	Potomac Electric Co.	DC PSC	1176	Apr-23 Oct-23 Feb-24	Transmission & Distribution

No.	Utility Case	Agency	Docket	Date	Utility Operations
19.	nNew York State Electric & Gas Corp.	FERC	ER23-1816	May-23	Transmission Only
20.	Rochester Gas and Electric Corp.	FERC	ER23-1817	May-23	Transmission Only
21.	Potomac Electric Co.	Maryland PSC	9702	May-23 Jan-24	Transmission & Distribution
22.	Idaho Power Co.	Idaho PUC	IPC-E-23-11	Jun-23	Vertically Integrated
23.	Consolidated Edison Co. of New York	FERC	ER23-2212	Jun-23	Transmission Only
24.	NorthWestern Energy	South Dakota PUC	EL23-016	Jun-23	Vertically Integrated
25.	Kentucky Power Co.	Kentucky PSC	2023-00159	Jun-23 Nov-23	Vertically Integrated
26.	Indianapolis Power & Light Co.	Indiana URC	45911	Jun-23 Nov-23	Vertically Integrated
27.	Central Hudson Gas & Electric Co.	FERC	ER23-2507	Jul-23	Transmission Only
28.	Entergy Louisiana, LLC	Louisiana PSC	U-36959	Aug-23	Vertically Integrated
29.	Pacific Gas & Electric Co.	FERC	ER24-96	Oct-23	Transmission Only
30.	New York Transco, LLC	FERC	ER24-232	Oct-23	Transmission Only
31.	Florida Power & Light Co.	FERC	ER24-268	Oct-23	Transmission Only
32.	Viridon Mid-Atlantic LLC	FERC	ER24-506	Nov-23	Transmission Only
33.	Viridon New York, Inc.	FERC	ER24-726	Dec-23	Transmission Only
34.	Viridon Southwest LLC	FERC	ER24-727	Dec-23	Transmission Only
35.	Viridon California LLC	FERC	ER24-766	Dec-23	Transmission Only
36.	Avista Corp.	Washington UTC	UE-240006 UG-240007	Jan-24 Aug-24	Vertically Integrated
37.	Public Service Co. of Oklahoma	Oklahoma CC	PUD 2023-000086	Jan-24 Aug-24	Vertically Integrated
38.	Appalachian Power Co.	Virginia SCC	PUR-2024-00024	Mar-24 Aug-24	Vertically Integrated
39.	Duke Energy Florida, LLC	Florida PSC	20240025-EI	Apr-24 Jul-24	Vertically Integrated

No.	Utility Case	Agency	Docket	Date	Utility Operations
40.	Duke Energy Indiana, LLC	Indiana URC	46038	Apr-24 Aug-24	Vertically Integrated
41.	Kentucky Utilities Company d/b/a Old Dominion Power Co.	Virginia SCC	PUR-2024-00052	Apr-24	Vertically Integrated
42.	Black Hills Colorado Electric, LLC	Colorado PUC	24AL-0275E	Jun-24 Nov-24	Vertically Integrated
43.	Public Service Co. of New Mexico	New Mexico PRC	24-00089-UT	Jun-24 Jan-25	Vertically Integrated
44.	NorthWestern Energy	South Dakota PUC	NG24-05	Jun-24	Vertically Integrated
45.	NextEra Energy Transmission MidAtlantic, Inc.	FERC	ER24-2255	Jun-24	Transmission Only
46.	NorthWestern Energy	Montana PSC	D2024.05.053	Jul-24	Vertically Integrated
47.	Pacific Gas & Electric Co.	FERC	ER25-209	Oct-24	Transmission Only
48.	Dayton Power & Light Co.	Ohio PUC	24-1009-EL-AIR	Dec-24	Transmission & Distribution
49.	New York Transco, LLC	FERC	ER25-885	Jan-25	Transmission Only
50.	Cross Texas Transmission LLC	Texas PUC	57467	Jan-25	Transmission Only
51.	DATC Path 15, LLC	FERC	ER25-1310	Feb-25	Transmission Only

REQUEST

Please refer to McKenzie Direct, Exhibit AMM-1, at pages 1 – 2. For each case or docket for which Mr. McKenzie has filed direct or rebuttal testimony concerning ROE for an investor-owned electric utility from January 1, 2022 through present, please identify Mr. McKenzie's recommended ROE and, if a final order has been issued in that case, identify the ROE approved in that proceeding.

RESPONSE

The following response was prepared by or under the direct supervision of Adrien M. McKenzie, the sponsoring witness for this response.

Mr. McKenzie does not maintain a comprehensive database of his ROE recommendations or Commission orders in the proceedings in which he has submitted testimony. This information is publicly available from the respective regulatory agencies, with the information necessary to identify the relevant documents being provided in Cross Texas' response to OPUC RFI Set 1, Question No. 1-10.

REQUEST

Please refer to McKenzie Direct, Exhibit AMM-1, at pages 1 – 2. Please identify any case filed since December 31, 2021 in which Mr. McKenzie filed testimony that Mr. McKenzie is aware included a final approved ROE of 10% or higher.

RESPONSE

The following response was prepared by or under the direct supervision of Adrien M. McKenzie, the sponsoring witness for this response.

The information provided in the table below identifies the cases filed since December 31, 2021 in which Mr. McKenzie filed testimony that Mr. McKenzie is aware included a final approved ROE of 10% or higher.

Commission	Docket
Regulatory Commission of Alaska	U-22-078
Florida Public Service Commission	20240025-E1
Federal Energy Regulatory Commission	ER23-1816
Federal Energy Regulatory Commission	ER23-1817
Federal Energy Regulatory Commission	ER23-2212
Federal Energy Regulatory Commission	ER23-2507
Federal Energy Regulatory Commission	ER24-232
Federal Energy Regulatory Commission	ER24-1614