

PUC DOCKET NO. 50734

**APPLICATION OF ONCOR ELECTRIC
DELIVERY COMPANY LLC TO AMEND
ITS DISTRIBUTION COST RECOVERY
FACTOR**

§
§
§
§
§

PUBLIC UTILITY COMMISSION

OF TEXAS



**ALLIANCE OF ONCOR CITIES' SECOND SET OF REQUESTS FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY**

Alliance of Oncor Cities' ("AOC") Second Set of Requests for Information ("RFIs") to Oncor Electric Delivery Company ("Oncor" or "Company") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4400 Medical Parkway, Austin, Texas 78756, within ten (10) working days of service hereof or no later than **June 8, 2020** or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "Oncor Electric Delivery Company," "Oncor," the "Company," and "Applicant" refer to Oncor Electric Delivery Company and its affiliates.
2. "You," "yours," and "your" refer to Oncor Electric Delivery Company (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all

28

memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of Oncor Electric Delivery Company.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of Oncor Electric Delivery Company or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If Oncor Electric Delivery Company considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve

the problem. Likewise, if Oncor Electric Delivery Company objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if Oncor Electric Delivery Company receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

PO Box 302799

Austin, Texas 78703

4400 Medical Parkway

Austin, Texas 78756

(512) 474-1492 (voice)

(512) 474-2507 (fax)

By: /s/Brennan Foley

Alfred R. Herrera

State Bar No. 09529600

aherrera@herreralawpllc.com

Brennan J. Foley

State Bar No. 24055490

bfoley@herreralawpllc.com

Sergio E. Herrera

State Bar No. 24109999

sherrera@herreralawpllc.com

service@herreralawpllc.com

**ATTORNEYS FOR ALLIANCE OF ONCOR
CITIES**

CERTIFICATE OF SERVICE

I certify that I have served a copy of *AOC's Second Set of Requests for Information to Oncor Electric Delivery Company* upon all known parties of record by electronic mail, fax and/or Second class mail postage paid, on this the 22nd day of May 2020.

/s/Leslie Lindsey

Leslie Lindsey

PUC DOCKET NO. 50734

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

**ALLIANCE OF ONCOR CITIES' SECOND SET OF REQUESTS FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY**

- 2-1. [Reference Ledbetter Direct Testimony, pages 7-8] Please confirm or deny that the Company has not capitalized any costs from its corporate centralized services cost centers into the distribution plant included in this proceeding. If deny, provide the manner in which any corporate costs are computed for capitalization, the related cost centers, and the amount that has been included by project requested in this proceeding.
- 2-2. [Reference Ledbetter Direct Testimony, pages 7-8] Please provide a copy of the 2019 Cost Allocation Manual for the allocation of centralized services costs to Oncor operations.
- 2-3. [Reference Ledbetter Direct Testimony, pages 7-8] Please provide a copy of the Cost Allocation Manual in effect in Oncor's last general rate proceeding.
- 2-4. [Reference Ledbetter Direct Testimony, pages 7-8] Please confirm or deny that Oncor has an administrative and general overhead amount that is capitalized into its distribution projects. If confirm, provide a detailed listing of the cost categories that are capitalized.