



Control Number: 50295



Item Number: 28

Addendum StartPage: 0

**DOCKET NO. 50295**

**APPLICATION OF EAST TEXAS  
ELECTRIC COOPERATIVE, INC. TO  
CHANGE WHOLESALE  
TRANSMISSION SERVICE RATES**

§  
§  
§  
§

**PUBLIC UTILITY COMMISSION  
OF TEXAS**



**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION  
TO EAST TEXAS ELECTRIC COOPERATIVE, INC.  
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-2**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that East Texas Electric Cooperative, Inc. (ETEC), by and through its attorneys 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 answers to these questions by filing with the Commission, solely via the Interchange on the Commission's website. Additionally, provide notice to all other parties via email, stating that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer, pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: May 20, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Rachelle Nicolette Robles  
Division Director

/s/ Richard Nemer

---

Richard Nemer  
State Bar No. 24042829  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7348  
(512) 936-7268 (facsimile)  
richard.nemer@puc.texas.gov

**DOCKET NO. 50295**

**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 May 20, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Richard Nemer

---

Richard Nemer

**DOCKET NO. 50295**

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION  
TO EAST TEXAS ELECTRIC COOPERATIVE, INC.  
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-2**

**DEFINITIONS**

- 1) "ETEC," "Company," or "you" refers to East Texas Electric Cooperative, Inc., and any person acting or purporting to act on its 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 the Company's 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.

**DOCKET NO. 50295**

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION  
TO EAST TEXAS ELECTRIC COOPERATIVE, INC.  
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-2**

**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.

**DOCKET NO. 50295**

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION  
TO EAST TEXAS ELECTRIC COOPERATIVE, INC.  
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-2**

- Staff 5-1      Reference ETEC's response to Staff 1-5. Please provide the amount of expenses associated with the outside services of Kelly, Hart & Hallman as identified in the RFI response.
- Staff 5-2      Please update ETEC's response to Staff 1-8 to include the months of December 2019 through April 2020 and continue to update that response on a monthly basis. In the event the response results in the production of voluminous information, please provide by USB drive.