



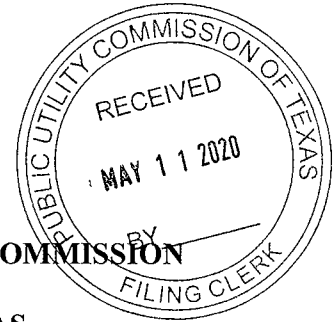
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PUC DOCKET NO. 50295



APPLICATION OF EAST TEXAS § PUBLIC UTILITY COMMISSION
ELECTRIC COOPERATIVE INC. TO §
CHANGE WHOLESALE § OF TEXAS
TRANSMISSION SERVICE RATES §

**EAST TEXAS ELECTRIC COOPERATIVE INC.'S
RESPONSE TO COMMISSION STAFF'S
FOURTH SET OF REQUESTS FOR INFORMATION**

NOW COMES East Texas Electric Cooperative, Inc. ("ETEC") and files this Response to Commission Staff's Fourth Set of Requests for Information. The response to such request is attached and is numbered as in the request.

ETEC believes the foregoing response is correct and complete as of the time of the response, but ETEC will supplement, correct or complete the response if it becomes aware that the response is no longer true and complete, and the circumstance is such that failure to amend the answer is in substance misleading. The parties may treat this response as if it were filed under oath.

Respectfully Submitted,

/s/ Jacob Lawler

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ATTORNEYS FOR EAST TEXAS ELECTRIC COOPERATIVE, INC.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent on May 11, 2020 by electronic mail to all parties of record.

/s/ Jacob Lawler

Jacob J. Lawler

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Question No. Staff 4-1

Reference ETEC's response to Staff 1-1 . Please explain the decrease in the January through December 2018 salary expense of \$954,340 to the January through December 2019 salary expense of \$904,925.

Response:

ETEC's salary expense was lower during CY 2019 than it was in CY 2018 due to an open (i.e., vacant) full-time employee position that remained unfilled during part of CY 2019.

Witness: Alfred Busbee

Prepared By: Carrie Hawkins

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Question No. Staff 4-2

Reference ETEC's response to Staff 1-1 . With respect to the January through December 2019 severance pay of \$44,288, please provide a copy of ETEC's policies and procedures outlining severance payments.

Response:

ETEC does not have written policies and procedures outlining severance payments.

Witness: Alfred Busbee

Prepared By: Carrie Hawkins

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Question No. Staff 4-3

Please provide the amount of severance payments incurred during calendar years 2016-2018 and the number of employees receiving the payments.

Response:

There were no severance payments in 2016, 2017 or 2018.

Witness: Alfred Busbee

Prepared By: Carrie Hawkins

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**EAST TEXAS ELECTRIC COOPERATIVE INC.'S
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Question No. Staff 4-4

Please provide the amount of severance payments incurred thus far in 2020.

Response:

ETEC has incurred [REDACTED] in severance payments through April 30, 2020.

Witness: Alfred Busbee

Prepared By: Carrie Hawkins

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**EAST TEXAS ELECTRIC COOPERATIVE INC.'S
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Question No. Staff 4-5

Reference ETEC's response to Staff 1-5. Please provide the amount of expenses associated with the outside services of McCarter and English as identified in the RFI response.

Response:

The amount of expenses associated with outside services of McCarter & English as identified in the RFI response were \$169,641.05.

Witness: Alfred Busbee

Prepared By: Carrie Hawkins

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Question No. Staff 4-6

Reference ETEC's response to Staff 1-5. Please provide the amount of expenses associated with the outside services of Baker, Tilly, Virchow & Krause as identified in the RFI response.

Response:

The amount of expenses associated with outside services of Baker, Tilly, Virchow & Krause as identified in the RFI response were \$40,829.12.

Witness: Alfred Busbee

Prepared By: Carrie Hawkins

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Question No. Staff 4-7

Reference ETEC's response to Staff 1-8 and the Holland & Knight invoices submitted. Please provide the dates that each individual's services occurred during the month of October 2019.

Response:

Please see attached Exhibit Staff RFI 4-7 and 4-8.

Witness: Alfred Busbee

Prepared By: Counsel

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Question No. Staff 4-8

Reference ETEC's response to Staff 1-8 and the Holland & Knight invoices submitted. Please provide the dates that each individual's services occurred during the month of November 2019.

Response:

Please see attached Exhibit Staff RFI 4-7 and 4-8.

Witness: Alfred Busbee

Prepared By: Counsel

Date	Timekeeper	Task
10-18-19	JJL	Review two draft ETEC Wholesale Transmission Service Tariffs from GDS's Jim Daniel; revise and comment on same.
10-18-19	MCD	Review emails regarding TCOS filings and deadlines; calls regarding same; respond to same.
10-20-19	JJL	Finalize edits to draft ETEC Wholesale Transmission Service Tariffs; send same to Jim and Mark for feedback.
10-22-19 thru 10-25-19	SDP	Review and forward incoming letter regarding Oncor tariff at FERC; monitor and forward multiple PUC dockets with possible impact on ERCOT operations and TCOS.
10-28-19	JJL	Correspondence with GDS's Claude about draft Wholesale Transmission Service tariffs; send copy of same to Claude.
11-11-19	JJL	Multiple correspondences and telephone conference with A. Busbee on draft TCOS filing; review same; review PUCT RFP documents; internal conference with A. Waddell on same.
11-15-19	JJL	Review and assist preparation of GDS's Alfred's TCOS testimony; correspondence with A. Busbee on same.
11-18-19	JJL	Further review and prepare TCOS materials, including review of 2018 TCOS matrix and referenced prior TCOS dockets of coops; summarizer and send same to Mark; correspondence with Jim and Alfred.
11-21-19	JJL	Telephone conference with GDS's Jim Daniel on TCOS application, status, next steps; prepare cover pleading; correspondence with Jim on wholesale distribution service portion of WTS tariff; send same to A. Waddell for review.
11-22-19	JJL	Review revised WTS tariff from Jim; multiple correspondences with Jim on same; begin review of revised application materials, including testimonies and schedules.
11-23-19	JJL	Further prepare TCOS application, including proposed notice and protective order.
11-24-19	JJL	Further prepare TCOS application, including cover pleading, table of contents, and testimonies including incorporating comments from A. Waddell.
11-24-19	AMW	Review and revise TCOS testimony.
11-25-19	JJL	Further prepare draft TCOS filing package, including cover pleading and attachments; further prepare draft testimonies based on comments from GDS/ETEC and discussion with Alfred and Jim; telephone conference with GDS/HK team on final steps to complete application; multiple correspondences among same; review final drafts of WTS tariff and TCOS schedules.
11-25-19	AMW	Review and revise TCOS filing package.
11-25-19	WHB	Review TCOS filing.

11-26-19	JJL	Finalize TCOS application; multiple correspondences with GDS/HK team on same; coordinate assembly and filing of same.
11-26-19	AMW	Finalize TCOS application for filing.
11-26-19	SDP	Assist in filing TCOS application and service of same.
11-26-19	NLM	Assist in filing TCOS application and service of same.
11-27-19	SDP	Assist in sending notice of TCOS application.
11-27-19	NLM	Assist in sending notice of TCOS application.