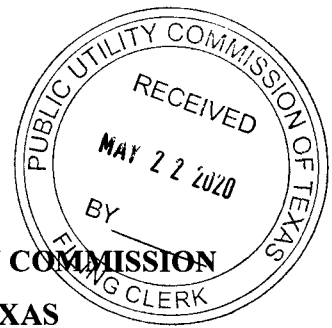


DOCKET NO. 50302



**APPLICATION OF RIO GRANDE
ELECTRIC COOPERATIVE TO
CHANGE WHOLESALE
TRANSMISSION SERVICE RATES**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION
TO RIO GRANDE ELECTRIC COOPERATIVE
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-9**

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 Rio Grande Electric Cooperative by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) 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 question(s) 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 an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

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Dated: May 22, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Thomas S. Hunter
Division Director

Heath D. Armstrong
Managing Attorney

/s/Courtney Dean
Courtney N. Dean
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(512) 936-7268 (facsimile)
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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 22, 2020, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/Courtney Dean
Courtney N. Dean

DOCKET NO. 50302

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION
TO RIO GRANDE ELECTRIC COOPERATIVE
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-9**

DEFINITIONS

- 1) "Rio Grande," "RGEC," "the Company" or "you" refers to Rio Grande Electric Cooperative 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 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. 50302

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION
TO RIO GRANDE ELECTRIC COOPERATIVE
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-9**

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. 50302

**COMMISSION STAFF'S FIFTH REQUEST FOR INFORMATION
TO RIO GRANDE ELECTRIC COOPERATIVE
QUESTION NOS. STAFF 5-1 THROUGH STAFF 5-9**

- Staff 5-1** Please provide complete payroll data for fiscal years 2017, 2018, and 2019 divided between the categories of regular pay, bonuses, benefits, other payroll, etc. Please include the average number of employees per year for each year's data.
- Staff 5-2** Please provide the amounts, if any, that Rio Grande included in its requested revenue requirement relating to incentive compensation. Please provide a copy of Rio Grande's policy related to the payment of incentive compensation.
- Staff 5-3** Please provide the operations and maintenance balance for Federal Energy Regulatory Commission (FERC) expense accounts 560 through 573 (and any other accounts that have operations and maintenance expenses ultimately allocated to the transmission function) for fiscal years 2017, 2018, and 2019.
- Staff 5-4** Please provide the administrative and general balance for FERC expense accounts 920 through 935 (and any other accounts that have administrative and general expenses ultimately allocated to the transmission function) for fiscal years 2017, 2018, and 2019.
- Staff 5-5** Reference Errata-3, Workpaper WP/D-2. Please provide the composition of the amount of Dues Paid to Associated Organizations by organization and provide the regulated business purpose of the payment. Indicate whether the payment is recurring.
- Staff 5-6** Reference Rio Grande's Errata-3, Workpaper WP/ProForma-1 and the Total Pro Forma Adjusted Amount of \$5,004. Please provide the composition of the adjusted amount by FERC Account.
- Staff 5-7** Please provide Rio Grande's calculation of its requested property tax expense including the rationale for any underlying assumptions used in the calculation. Further, please provide the effective rate referenced in Errata-3, Workpaper WP/ProForma-3.
- Staff 5-8** Reference Rio Grande's Errata-3, Schedule E-2 and Errata-3, Workpaper WP/ProForma-3. Please indicate whether Rio Grande requests inclusion of property tax expense in its requested transmission revenue requirement. If yes, please explain why the requested property tax expense does not appear within Schedule E-2 and identify by FERC account and amount the location of its property tax expense requested in the rate filing package.

Staff 5-9 Reference Rio Grande's Errata-3, Schedule E-2. Please indicate whether Rio Grande requests inclusion of payroll tax expense in its requested transmission revenue requirement. If yes, please explain why the requested payroll tax expense does not appear within Schedule E-2 and identify by FERC account and amount the location of each type of payroll tax expense requested in the rate filing package.