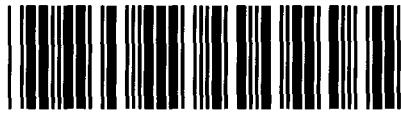


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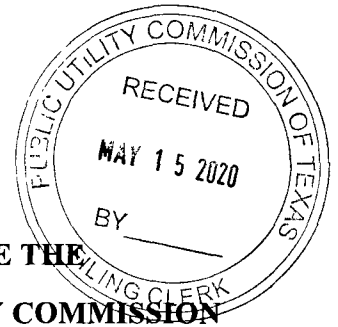
Addendum StartPage: 0

PUC DOCKET NO. 50734

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

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§
§
§
§

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**



**ALLIANCE FOR RETAIL MARKETS' SECOND REQUEST FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY LLC**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Alliance for Retail Markets (ARM) requests that Oncor Electric Delivery Company LLC (Oncor), as defined in this Second Request for Information (RFI), provide all information in response to the questions and sub-questions in this RFI and to provide such responses under oath. Please answer the questions in the order in which they are submitted and include sufficient detail to provide a complete and accurate response and to fully present all of the relevant facts. 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 proceeding who will sponsor the answer to the question and can vouch for the truth of the answer.

Date: May 15, 2020

Respectfully submitted,



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ATTORNEYS FOR ALLIANCE FOR RETAIL MARKETS

PUC DOCKET NO. 50734

I certify that a copy of this document will be served on all parties of record on May 15, 2020 via email in accordance with the Commission's Order Suspending Rules issued in Project No. 50664 on March 16, 2020.



Matthew A. Arth

PUC DOCKET NO. 50734

**ALLIANCE FOR RETAIL MARKETS' SECOND REQUEST FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY LLC**

DEFINITIONS

As used in this RFI:

- A. "Oncor," "the Company," "Applicant", "you", "yours", and "your" refers to Oncor Electric Delivery Company LLC and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.

- B. "Document", "documents", and "documentation" 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.

PUC DOCKET NO. 50734

**ALLIANCE FOR RETAIL MARKETS' SECOND REQUEST FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY LLC**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), ARM requests that answers to the requests for information be made under oath.
- 2) In answering these questions, furnish all information available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may feely obtain it, and your attorneys and their investigators.
- 3) Please copy the question immediately above the answer to each question. State the name and job position of the witness in this proceeding who will sponsor the answer to the question and can vouch for the truth of the answer.
- 4) 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.
- 5) 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.
- 6) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 7) 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.
- 8) 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.
- 9) ARM requests that each item of information be made available as it is completed, rather than upon completion of all information requested.
- 10) Data should be provided in native electronic format including active Excel workbooks and all linked workbooks, with all formulas, cell references, links, etc. intact, functioning, and complete for all tables, figures, and attachments in the testimony.

PUC DOCKET NO. 50734

**ALLIANCE FOR RETAIL MARKETS' SECOND REQUEST FOR INFORMATION
TO ONCOR ELECTRIC DELIVERY COMPANY LLC**

- ARM 2-1 Please refer to Oncor's response to ARM RFI 1-1(e), which states that \$49 of additional investment is being booked to FERC Account 363 for a "trailing transportation charge." Explain what that trailing transportation charge is, how it relates to the installation of batteries, and why Oncor did not attribute that amount to FERC Account 363 until now.
- ARM 2-2 Please confirm that Oncor is not requesting that the Commission make a prudence determination for any invested capital included in FERC Account 363.
- ARM 2-3 Please refer to page 13, lines 17 through 19 of the Direct Testimony of Matthew A. Troxle in which he attests that Oncor requests an effective date of September 1, 2020 consistent with 16 TAC § 25.243(e)(6)(C). Following the granting of Oncor's request to stay this proceeding, does Oncor continue to request a September 1, 2020 effective date? If not, what effective date does Oncor propose?