

DOCKET NO. 50277

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**APPLICATION OF EL PASO
ELECTRIC COMPANY TO AMEND
ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR AN ADDITIONAL
GENERATING UNIT AT THE
NEWMAN GENERATING STATION**

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BEFORE THE PUBLIC UTILITY COMMISSION
FILING CLERK

**PUBLIC UTILITY COMMISSION
OF TEXAS**

**CITY OF EL PASO'S FIRST REQUESTS FOR INFORMATION TO EL PASO
ELECTRIC COMPANY NOS CEP-1 THROUGH CEP 1-26**

TO: EL PASO ELECTRIC COMPANY.

The City of El Paso (the "City") requests that El Paso Electric Company ("EPE"), 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 20 calendar days. Please copy the question immediately above the answer to each question. The question(s) are continuing in nature, and if there is a relevant change in circumstances, such as that new or additional information or review reveals that an answer previously made is no longer complete or is inaccurate, that EPE submit an amended answer, under oath, as a supplement to your original answer within five days of the discovery of new or additional information. 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.

The City requests that EPE serve its respective responses to this Request on the following person via electronic mail and/or delivery of hard copies:

Norman J. Gordon
PO Box 8
El Paso, Texas, 79940
221 N. Kansas, Suite 700
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ngordon@ngordonlaw.com

Dated February 7, 2020

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Respectfully submitted.

Norman J. Gordon (ngordon@ngordonlaw.com)
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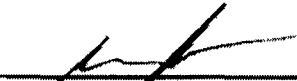
Attorneys for the City of El Paso

By: 

Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on February 7, 2020.



Norman J. Gordon

**CITY OF EL PASO'S FIRST REQUESTS FOR INFORMATION TO EL PASO
ELECTRIC COMPANY NOS CEP-1 THROUGH CEP 1-26**

- CEP 1-1. Provide EPE's most recent 3 integrated resource plan reports.
- CEP 1-2. Provide EPE's last five annual Loads and Resources analyses reports.
- CEP 1-3. Describe the status of EPE's efforts to obtain regulatory approval of Newman 6 in each jurisdiction, including the Docket No. and schedule for any regulatory proceedings.
- CEP 1-4. Provide EPE's energy (MWh) sales by rate class for each of the last five calendar years.
- CEP 1-5. Provide EPE's annual peak demand (MW) and the date and time of the EPE peak demand occurrence for each of the last five calendar years.
- CEP 1-6. Provide the 100 highest hours of demand (MW) on EPE's system along with the date and time of each such peak hour for each of the last five calendar years.
- CEP 1-7. Describe all actions taken by EPE to reduce peak demands on the EPE system.
- CEP 1-8. Describe demand-side management programs and provide the annual costs and estimated peak reduction achieved from each program in each of the last five calendar years.
- CEP 1-9. Provide copies of any rates offered by EPE that are designed to encourage peak demand reduction by customers.
- CEP 1-10. Identify and describe each model used for EPE's IRP analyses or other production cost analyses supporting the need for a new gas-fired combustion turbine generating unit on EPE's system that will be supplied by Newman 6.
- CEP 1-11. Provide benchmarking analyses used to demonstrate that models used for the production cost analyses supporting the need and economic benefits of the proposed Newman 6 CT unit are reasonably simulating operations and costs of EPE's generating resources.
- CEP 1-12. Provide documentation for the bid analysis and selection process leading to the selection of Newman 6.
- CEP 1-13. Provide the bid rankings for each qualified bid considered in the selection process leading to the selection of Newman 6.

CEP 1-14. Identify each bid that was rejected and the primary basis for rejection of the bid in the selection process leading to the selection of Newman 6.

CEP 1-15. Provide the following information for each EPE generating unit:

- a. Net dependable capacity
- b. Primary fuel type
- c. Commercial Operation Date
- d. Planned Retirement Date
- e. Original cost
- f. Net book value

CEP 1-16. Provide the following information for each EPE generating unit:

- a. Net generation for each of the last five years
- b. Average capacity factor for each of the last five years
- c. Average net heat rate for each of the last five years
- d. Average annual equivalent availability factor for each of the last five years
- e. Average equivalent availability during summer peak daily hours for each of the last five years
- f. Average variable production cost (\$/MWh) for each of the last five years
- g. Total fuel cost for each of the last five years
- h. Total O&M cost for each of the last five years
- i. Total capital additions for each of the last five years
- j. Average cost of fuel burned (\$/MMBtu) for each of the last five years
- k. Total starts for each of the last five years
- l. Equivalent forced outage hours for each of the last five years
- m. Planned outage hours for each of the last five years

CEP 1-17. Provide the most recent economic analysis supporting the current planned retirement date for each EPE generating unit.

CEP 1-18. Provide EPE's average delivered cost of natural gas for each generating station for each of the last five calendar years.

CEP 1-19. Reference page 5 of the Direct Testimony of Omar Gallegos, provide calculations and underlying assumptions supporting the Rate/Cost of each listed Project.

CEP 1-20. Reference page 5 of the Direct Testimony of Omar Gallegos, provide results, calculations and underlying assumptions for any analyses conducted by EPE that compare each listed Project on a levelized cost of energy or other comparable basis.

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CEP 1-20. Reference page 5 of the Direct Testimony of Omar Gallegos, provide results, calculations and underlying assumptions for any analyses conducted by EPE that compare each listed Project on a levelized cost of energy or other comparable basis.

CEP 1-21. Reference page 5 of the Direct Testimony of Omar Gallegos, provide the estimated firm capacity for system reserve purposes for each listed Project and explain how this value is determined for each project.

CEP 1-22. Reference page 5 of the Direct Testimony of Omar Gallegos, provide the estimated capacity factor for each listed Project and explain how this value is determined for each project.

CEP 1-23. Reference page 5 of the Direct Testimony of Omar Gallegos, provide the estimated average value of renewable energy credits for each listed solar Project and explain how this value was determined and reflected in the listed project costs.

CEP 1-24. Reference page 7 of the Direct Testimony of Omar Gallegos, provide EPE's forecasted system energy mix based on MWh generation for the categories listed for next ten calendar years with and without Newman 6 and the proposed solar projects.

CEP 1-25. Please provide copies of all pleadings, Orders testimony and discovery responses filed after November 18, 2019 in New Mexico Public Regulation Commission Docket No. 19-00348-UT *In the Matter of El Paso Electric Company's Application For Approval of Three Long-Term Purchased Power Agreements with Hecate Energy Santa Teresa, LLC, Buena Vista Energy LLC, and Canutillo Energy Center LLC.*

CEP 1-26. Please provide copies of all pleadings, Orders testimony and discovery responses filed after November 18, 2019 at the New Mexico Public Regulation Commission in the matter styled, *In the Matter of El Paso Electric Company's Application for a Certificate of Public Convenience and Necessity to Construct, Own, and Operate Generating Unit 6 at the Newman Generating Station.*