

Control Number: 38306



Item Number: 212

Addendum StartPage: 0

**SOAH DOCKET NO. 473-10-4451
DOCKET NO. 38306**

TEXAS-NEW MEXICO POWER	§	BEFORE THE STATE OFFICE
COMPANY'S REQUEST FOR	§	
APPROVAL OF ADVANCE	§	OF
METERING SYSTEM (AMS)	§	
DEPLOYMENT AND AMS SURCHARGE	§	ADMINISTRATIVE HEARINGS

**ALLIANCE OF TEXAS-NEW MEXICO POWER MUNICIPALITIES
EIGHTH SET OF REQUESTS FOR INFORMATION TO
TEXAS-NEW MEXICO POWER COMPANY**

Alliance of Texas-New Mexico Power Municipalities' ("ATM") Eighth Set of Requests for Information ("RFIs") to Texas-New Mexico Power Company ("TNMP") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Jim Boyle, Herrera & Boyle, PLLC at 816 Congress Avenue, Suite 1250, Austin, Texas 78701, within ten (10) days of service hereof or no later than May 16, 2011 in conformance with the requirements of SOAH Order No. 2. Exhibit A is attached hereto and incorporated herein for all purposes.

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Definitions

1. "TNMP," the "Company," and "Applicant" refer to Texas-New Mexico Power Company and its affiliates.
2. "You," "yours," and "your" refer to TNMP (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not

reflected in the memoranda and documents provided and to the extent it is within the knowledge of TNMP.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SPS or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.

Instructions

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If TNMP considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SPS objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

7. These requests shall be deemed continuing so as to require further and supplemental responses if TNMP receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

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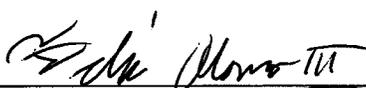
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**ATTORNEYS FOR
ALLIANCE OF TEXAS-NEW MEXICO
MUNICIPALITIES**

CERTIFICATE OF SERVICE

I certify that I have served a copy of ATM's Eighth Set of Requests for Information to TNMP upon all known parties of record by fax and/or first class mail on this the 4th day of May 2011.



Felipe Alonso III

EXHIBIT A

**SOAH DOCKET NO. 473-10-4451
PUC DOCKET NO. 38306**

**ALLIANCE OF TEXAS-NEW MEXICO POWER MUNICIPALITIES
EIGHTH SET OF REQUESTS FOR INFORMATION TO
TEXAS-NEW MEXICO POWER COMPANY**

**Re TNMP Advanced Meters Docket 38306
TNMP Supplemental Testimony Filed May 4, 2011**

Please see the Rebuttal Testimony of Mr. Burke

- ATM 8-1 . Page 4:19-23. Please identify the specific section of Mr. Hornby's testimony to which Mr. Burke is referring.
- ATM 8-2 Page 9: 21-23. Please provide TNMP's most recent quantitative estimate of the incremental benefit to REPs.
- ATM 8-3 Page 9:26-28. Please provide TNMP's most recent quantitative estimate of the increase in reliability it will achieve through its proposed OMS and reconcile that estimate with the data responses cited on page 21:12-16 of Mr. Hornby's Direct Testimony.
- ATM 8-4 Page 13:2-5 and 19-21. Please provide TNMP's most recent quantitative estimate of the reduction in total time required to restore power it will achieve through its proposed OMS and reconcile that estimate with the data responses cited on page 21:12-16 of Mr. Hornby's Direct Testimony.

Please see the Rebuttal Testimony of Mr. Kessler

- ATM 8-5 Page 8:19-20. Does TNMP's estimate of reductions in labor costs from its AMI include reductions in labor costs from implementing its proposed OMS? If so, please identify the annual amount of those reductions and where they are reported in the Company's filing. If not, why not.
- ATM 8-6 Page 8:22-25. Please provide TNMP's most recent quantitative estimate of the increase in reliability it will achieve through its proposed OMS and reconcile that estimate with the data responses cited on page 21:12-16 of Mr. Hornby's Direct Testimony.

- ATM 8-7 Page 9:13-18. Please describe the services and/or functions that SAIC and InfoSys will provide to TNMP in the design, implementation and operation of its AMI.
- ATM 8-8 Page 9:13-28. Please provide all enquiries and analyses prepared by TNMP of acquiring AMI related services and functions from SAIC, InfoSys, Capgemini, Accenture or other similar service providers.

Please see the Rebuttal Testimony of Mr. Whitehurst

- ATM 8-9 Page 4:23-27. Please identify the specific section(s) of Exhibit SRW-R-2 that consider the relative density and geographic diversity of TNMP's customer base
- ATM 8-10 Page 8:18. Mr. Whitehurst states "...AMS offers no financial benefit to TNMP.'
- ATM 8- 11 Please confirm that TNMP expects to earn an annual return on its investment in AMI. If not, please explain why not.
- ATM 8-12 Please confirm that if TNMP reduces the frequency and or duration of outages it will reduce the revenues it loses due to outages which should improve its annual earnings. If not, please explain why not.
- ATM 8- 13 Page 12:10-12. Please identify the specific section of Mr. Hornby's testimony to which Mr. Whitehurst is referring.
- ATM 8- 14 Page 28:1-3. Is it Mr. Whitehurst's position that Mr. Hornby is opposed to TNMP's deployment of AMS? If so, please identify the specific section(s) of Mr. Hornby's testimony upon which Mr. Whitehurst bases that position.
- ATM 8- 15 Page 28:1-3. In its extensive discovery did TNMP ask Mr. Hornby whether he would have opposed the deployment of AMS by AEP TNC based upon this comparison of capital costs?

Please see the Rebuttal Testimony of Mr. Van Den Berg

- ATM 8-16 Page 1:25-2:13. Has Mr. Van Den Berg used cost comparisons and benchmarking in his engagements to improve cost performance in the areas of utility customer care and operations strategy? If not, why not?

- ATM 8-17 Page 1:10-2:13. Please list the engagements since January 1, 2008 in which Mr. Van Den Berg has been retained to analyze the costs, benefits and/or rates associated with AMS or similar smart grid projects being developed or proposed by electric utilities.
- ATM 8-18 Page 1:10-2:13. Please list the proceedings since January 1, 2008 in which Mr. Van Den Berg has presented testimony regarding the costs, benefits and/or rates associated with AMS or similar smart grid projects being developed or proposed by electric utilities and provide copies of his testimony in those proceedings.
- ATM 8-19 Page 6:30-7:2. Please provide the residential surcharges for all electric utility AMS projects collected by or for Mr. Van Den Berg, and the citations underlying those values.
- ATM 8-20 Page 7:2-3. Please list all electric utility AMS projects upon which Mr. Van Den Berg bases his statement that "...TNMP is one of the smallest utilities to attempt to implement a full scale AMS."
- ATM 8-21 Page 7:2-3. Please identify each AMS component or AMS cost category for which Mr. Van Den Berg maintains TNMP does not have "the scale benefits of the other TDUs in Texas" and the basis for that position.
- ATM 8-22 Page 7:9. Does Mr. Van Den Berg agree with the last sentence on page 9 of Mr. Hornby's, which begins on line 16? If not please explain why not.
- ATM 8-23 Page 8:1-15. Does Mr. Van Den Berg agree that the number of years Mr. Hornby used in his comparisons corresponds to the number of years over which the PUCT approved each utility's surcharge? If not please explain why not.
- ATM 8-24 Page 8:2-4. Does Mr. Van Den Berg maintain that the Centerpoint costs presented in Mr. Hornby's testimony reflect grant money from the ARRA? If so please provide the basis for that position.
- ATM 8-25 Page 8:4-6. Does Mr. Van Den Berg maintain that the AEP costs presented in Mr. Hornby's testimony reflect a mandated refund? If so please provide the basis for that position.

- ATM 8-26 Page 9:13-18. Please provide all analyses prepared by or for Mr. Van Den Berg of the incremental meter installation costs that rural and suburban utilities incur due to its lower meter density and less contiguous service territory
- ATM 8-27 Page 9:13-18. Please provide all analyses prepared by or for Mr. Van Den Berg of the estimated incremental meter installation costs that TNMP will incur due to its lower meter density and less contiguous service territory.
- ATM 8-28 Page 11:15-20. Please indicate when, and through what ratemaking process, Mr. Van Den Berg expects TNMP will adjust its base metering charge to reflect AMS reductions?
- ATM 8-29 Page 14:10-14. Please provide all quantitative estimates of the reduction in TNMP outage times as a result of implementing an OMS that Mr. Van Den Berg has reviewed and reconcile those estimates with the data responses cited on page 21:12-16 of Mr. Hornby's Direct Testimony.
- ATM 8-30 Page 14:23-27. Please provide all analyses prepared by or for Mr. Van Den Berg of the reductions in unit meter costs that utilities can achieve through larger volume purchases.
- ATM 8-31 Page 14:19-16:18. Please provide all analyses prepared by or for Mr. Van Den Berg of the extent to which each of the four factors helps explain the variation in installed capital costs between the utilities in Exhibit 9.
- ATM 8-32 Rebuttal Testimony of Mr. Van Den Berg. Please provide the workbooks used to create Exhibits 1, 3, 9 and 11 in hard copy and their native operational electronic format.