



Control Number: 44677



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SOAH DOCKET NO. 473-15-3684
PUC DOCKET NO. 44677

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2015 MAY 19 PM 1:55

APPLICATION OF EL PASO §
ELECTRIC COMPANY FOR §
APPROVAL TO REVISE ITS ENERGY §
EFFICIENCY COST RECOVERY §
FACTOR AND REQUEST TO §
ESTABLISH REVISED COST CAP §

PUBLIC UTILITY COMMISSION
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF EL PASO
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that the City of El Paso (the "City") by and through its 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 10 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.

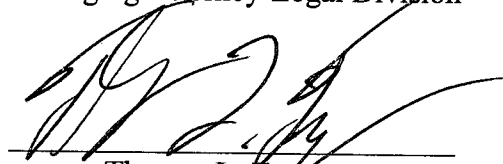
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: May 19, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Karen S. Hubbard
Managing Attorney-Legal Division

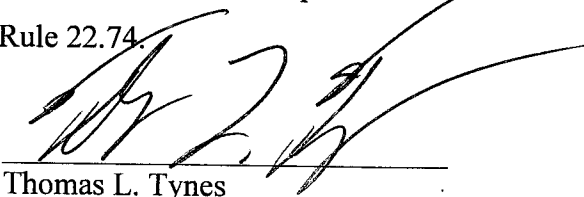


Thomas L. Tynes
Attorney-Legal Division
State Bar No. 24085629
(512) 936-7297
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

PUC DOCKET NO. 44677
SOAH DOCKET NO. 473-15-3683

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 19, 2015, in accordance with P.U.C. Procedural Rule 22.74.



Thomas L. Tynes

**SOAH DOCKET NO. 473-15-3684
PUC DOCKET NO. 44677**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF EL PASO (the CITY)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

DEFINITIONS

- A. "The City", "Company" or "you" refers to the City of El Paso 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" 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 not exist and these documents will be provided.

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PUC DOCKET NO. 44677**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF EL PASO
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

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(g)(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.
- 9) Pursuant to 16 TAC § 26.417-.418, responses to requests for information shall be provided to the commission staff and the Office of Public Utility Counsel within ten days after receipt of the request by the applicant.

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO THE CITY OF EL PASO
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4**

- Staff 1-1 Is the City of El Paso requesting recovery of rate-case expenses in the current El Paso Electric Company EECRF filing for its participation in the 2014 EECRF proceeding? If yes, please provide the requested rate-case expense amount.
- Staff 1-2 If the answer to Staff 1-1 above is yes, please provide for the amount of rate-case expenses requested all supporting documentation. Include engagement agreements, summary schedules of expenses requested, and copies of third party invoices to support each requested expense.
- Staff 1-3 If the answer to Staff 1-1 above is yes, please provide appropriate affidavits and testimony which meet the requirements of 16 TAC § 25.245.
- Staff 1-4 If the Company is not requesting recovery of rate-case expenses in the current EECRF filing, please describe the process anticipated by the City of El Paso for recovery of rate-case expenses for its participation in the 2014 EECRF proceeding.