



Control Number: 44677



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APPLICATION OF EL PASO	§	BEFORE THE	PUBLIC UTILITY COMMISSION
ELECTRIC COMPANY FOR	§		FILING CLERK
APPROVAL TO REVISE ITS ENERGY	§	PUBLIC UTILITY COMMISSION	
EFFICIENCY COST RECOVERY	§		
FACTOR AND REQUEST TO	§		
ESTABLISH REVISED COST CAP	§	OF TEXAS	

CITY OF EL PASO'S 1ST REQUESTS FOR INFORMATION TO
EL PASO ELECTRIC COMPANY
QUESTIONS NO. CEP 1-1 to CEP 1-4

TO: EL PASO ELECTRIC COMPANY, regarding its Application for Approval to Revise its Energy Efficiency Cost Recovery Factor and Request to Establish Revised Cost Cap.

The City of El Paso (the "City") requests that the El Paso Electric Company ("EPEC") 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 ten (10) 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 EPEC serve its respective responses to this Request on the following person via electronic mail and delivery of hard copies:

Norman J. Gordon
Mounce, Green, Myers, Safi, Paxson & Galatzan
100 N. Stanton, Suite 1000
El Paso, Texas 79901
gordon@mgmsg.com

DEFINITIONS AND INSTRUCTIONS

1. This Request is directed to El Paso Electric Company ("EPEC" or "EPE"). Reference to EPEC, **"you" or "your"** means all divisions, departments, bureaus, agencies, and all witnesses whose testimony EPEC intends to present, and all persons acting or purporting to act for or on behalf of EPEC, including its directors, officers, employees, and agents.

2. The terms **"document" and "documents"** are used in their broadest sense and shall mean and include all written, printed, electronic, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" or "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of personal conversations, minutes or summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultant reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

3. **"Person"** means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver syndicate, municipal corporation, government agency, any other form of legal entity, and other group or combination acting as a unit.

4. **"Relating to"** a subject means making a statement about, mentioning, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting or in any way pertaining, in whole or in part, to the subject.

5. **"Identify"** means:

- a. as to a "person," stating his, her or its:
 - (i) legal, full, and customarily used names;
 - (ii) present residential or business address;
 - (iii) job title; and
 - (iv) name of employer.
- b. as to a document, act, event, transaction or occurrence, stating:
 - (i) its date, authors or participants;
 - (ii) the place where it took place, was created or occurred;
 - (iii) its purpose and subject matter; and
 - (iv) a concise description of what transpired.

6. For each response, please state the Request for Information and identify the individual(s) responsible for preparing and sponsoring the response by name and title.

7. Pursuant to Rule 196.4, Texas Rules of Civil Procedure, any electronic or magnetic data included in the definition of document should be produced on a CD-ROM or similar media that is compatible with Microsoft Office software.

8. For each document produced that is generated by computer, please identify:
 - a. the nature and source of the data constituting the input;
 - b. the form of the input (e.g., tapes, punch cards);
 - c. the recording system employed (e.g., program, flow charts); and
 - d. the person(s) responsible for processing the input and/or performing the programming.
9. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each".
10. "Any" shall be construed to include "all" and "all" shall be construed to include "any."
11. The terms "and" and "or" shall be construed as either disjunctive or conjunctive as necessary to make this request inclusive rather than exclusive.
12. The term "concerning" includes the following meanings: relating to; pertaining to; regarding; discussion; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected to the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.
13. The term "including" means and refers to "including but not limited to."
14. 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.
15. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

Respectfully submitted,

Norman J. Gordon
State Bar No. 08203700
Merwan N. Bhatti
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and
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915 541-4550
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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 facsimile on all parties of record in this proceeding on May 21, 2015.

By: 
Norman J. Gordon

EL PASO ELECTRIC COMPANY

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TIEC

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PUC Docket No. 44677
El Paso Electric Company EFFCRF
City of El Paso's 1st Requests for Information

- CEP 1-1 Please provide all workpapers and documents utilized in the load forecast for 2016 kWh, for Rate Class 08, including the detail for Rate Code TXRT08 and TXRT08A in Tab WP 2016 Forecast, Exhibit RFG-1 2016 EECRF Calculation. Workpaper RFG-1, page 8 of 12.
- CEP 1-2 Please provide an explanation why the kWh for Rate 08 is projected to decline from 37,290,404 in 2014(WP RFG-1, pages 5 of 12 and 6 of 12 to WP RFG-1, page 7 of 12 and 8 of 12). Provide all calculations supporting your response.
- CEP 1-3 Please identify the 2014 program from which the incentives were paid to customers in Rate Class 08 Governmental Street Lighting.
- CEP 1-4 Please provide all calculations and workpapers for the reduction in demand claimed saved due to the incentives paid to governmental street lighting customers in 2014.