



Control Number: 44677



Item Number: 21

Addendum StartPage: 0

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

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

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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE EL PASO ELECTRIC COMPANY (EPE)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-6**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that El Paso Electric Company (EPE) 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.

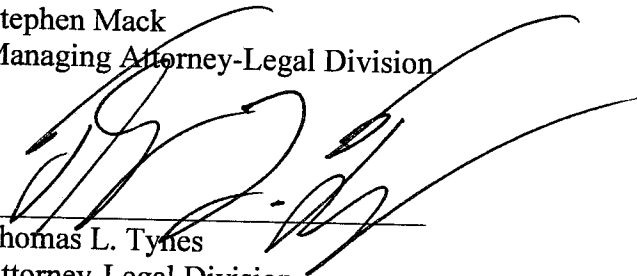
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Dated: May 28, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

Stephen Mack
Managing Attorney-Legal Division

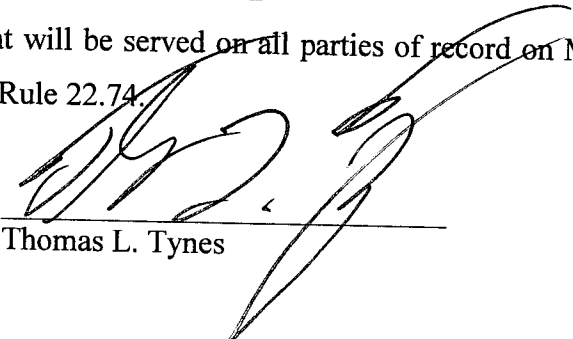


Thomas L. Tynes
Attorney-Legal Division
State Bar No. 24085629
(512) 936-7297
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

PUC DOCKET NO. 44612
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 28, 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 SECOND REQUEST FOR INFORMATION
TO THE EL PASO ELECTRIC COMPANY (EPE)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-6**

DEFINITIONS

- A. "El Paso Electric Company," "Company" or "you" refers to the El Paso Electric Company 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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COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO THE EL PASO ELECTRIC COMPANY (EPE)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-6

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 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 SECOND REQUEST FOR INFORMATION
TO THE EL PASO ELECTRIC COMPANY (EPE)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-6**

- STAFF 2-1** In El Paso Electric Company's (EPE) Application, Direct Testimony of Susanne E. Stone, p. 6 of 35, Exhibit SES-1, Table 1, EPE indicates that the line loss used to calculate the demand goal at the meter is based on EPE's *2010 Analysis of System Losses*. Please provide a copy of this study along with a reference to the docket that the Commission approved the line loss factors.
- STAFF 2-2** Please indicate if EPE claimed savings in its LivingWise® Market Transformation Program for measures that were not verified using an industry-accepted evaluation and/or measurement and verification (M&V) protocol pursuant to 16 Tex. Admin. Code (TAC) § 25.181(p) or not derived from Commission-approved deemed savings values pursuant to 16 TAC § 25.181(p)(2) and contained in the statewide technical reference manual.
- STAFF 2-3** If the answer to question STAFF 2-2 is affirmative, list the measures and savings claimed that were not verified using an industry accepted M&V protocol or not derived from Commission-approved deemed savings.
- STAFF 2-4** If the answer to question STAFF 2-2 is affirmative, please provide revisions to all relevant testimony and documents in EPE's Energy Efficiency Cost Recovery Factor (EECRF) and Energy Efficiency Plan & Report in order to remove the savings listed in STAFF 2-3.
- STAFF 2-5** Provide a comparison of the expected conditions for the 2016 program year that has prompted EPE to ask for a good cause exception to its commercial cost cap with conditions in the 2014 and 2015 program year that would have required EPE to significantly restructure its energy efficiency programs had the Commission not approved a good cause exception to EPE's commercial cost cap.
- STAFF 2-6** Please describe any barriers to participation in energy efficiency programs by the residential sector that has prompted EPE to rely more heavily on commercial customers to reach its goal.