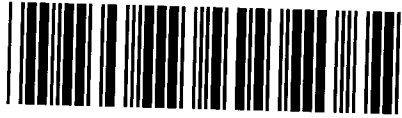


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SOAH DOCKET NO. 473-16-4000
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2016 MAY 19 PM 1:16

BEFORE THE STATE OFFICE
PUBLIC UTILITY COMMISSION
FILING CLERK
OF

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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ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO EL PASO ELECTRIC COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

Pursuant to 16 Tex. Admin. Code § 22.144 (TAC) of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that the El Paso Electric Company 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 20 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.

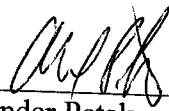
Dated: May 19, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney

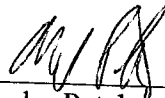


Alexander Petak
State Bar No. 24088216
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7377
(512) 936-7268 (facsimile)

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on May 19, 2016, in accordance with 16 TAC § 22.74.



Alexander Petak

**SOAH DOCKET NO. 473-16-4000
PUC DOCKET NO. 45885**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO EL PASO ELECTRIC COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

DEFINITIONS

- 1) "EPEC" 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.

- 2) "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.

**SOAH DOCKET NO. 473-16-4000
PUC DOCKET NO. 45885**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO EL PASO ELECTRIC COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

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.

**SOAH DOCKET NO. 473-16-4000
PUC DOCKET NO. 45885**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO EL PASO ELECTRIC COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

- Staff 1-1** Please identify all incentive compensation costs included in the EECRF by plan type for the year 2015 as well as the estimated amounts included in the Company's request related to 2017. Your response should include information for expenses directly incurred by EPEC and for expenses allocated to EPEC by affiliates, if any.
- Staff 1-2** For each type of incentive compensation identified in the response to Staff 1-1, please provide a detailed explanation and support for why the Company has classified the plan's payments as based on operational and not financial measures.
- Staff 1-3** Please refer to the testimony of Rene Gonzalez at page 5, line 11 which indicates that the Company is seeking \$83,290 for its prior year (2015) EECRF proceeding expenses. Please also refer to the affidavit of Bret Slocum at page 2, the last sentence of the first paragraph which supports a request of \$56,387 in expenses for the 2015 EECRF proceeding and reconcile the two amounts.