



Control Number: 46002



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SOAH DOCKET NO. 473-16-4452
PUC DOCKET NO. 46002

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APPLICATION OF TEXAS-NEW § BEFORE THE STATE OFFICE
MEXICO POWER COMPANY FOR §
APPROVAL TO ADJUST THE § OF
ENERGY EFFICIENCY COST §
RECOVERY FACTOR (EECRF) § ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO CITIES SERVED BY
TEXAS-NEW MEXICO POWER COMPANY (CITIES)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-4

Pursuant to 16 Tex. Admin. Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that the Cities Served by Texas-New Mexico Power Company (Cities) 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: June 15, 2016

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney

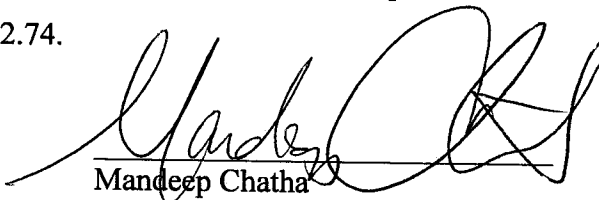


Mandeep Chatha
State Bar No. 24082803
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Vera Dygert
State Bar No. 24094634
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7268 (facsimile)

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 15, 2016, in accordance with 16 TAC § 22.74.



Mandeep Chatha

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DEFINITIONS

- 1) "Cities", "the Company" or "you" refers to Cities Served by Texas-New Mexico Power 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.

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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.

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- Staff 1-1 Are the Cities Served by TNMP requesting recovery of rate-case expenses in the current Texas-New Mexico Power Company EECRF proceeding for participation in the 2015 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 all supporting documentation for the amount of rate-case expenses requested. 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/or testimony which meet the requirements of 16 TAC § 25.245.
- Staff 1-4 If the Cities Served by TNMP are not requesting recovery of rate-case expenses in the current EECRF proceeding, please describe the process anticipated by the Cities for recovery of rate-case expenses incurred for participation in the 2015 EECRF proceeding.