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**SOAH DOCKET NO. 473-17-2686
DOCKET NO. 46831**

**APPLICATION OF EL PASO
ELECTRIC COMPANY TO CHANGE
RATES**

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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

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**SOLAR ENERGY INDUSTRIES ASSOCIATION'S
FOURTH SET OF REQUESTS FOR INFORMATION
TO EL PASO ELECTRIC COMPANY**

Pursuant to § 22.144 of the Commission's Procedural Rules, the Solar Energy Industries Association ("SEIA") requests that El Paso Electric Company ("EPE") provide the information requested in Exhibit "A" within the period specified in the procedural schedule in this case.

Pursuant to P.U.C. Proc. R. 22.144(c)(2), SEIA further requests that answers to the requests for information be made under oath. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. In producing documents pursuant to this request for information, please indicate the specific request(s) to which the document is being produced. These requests are continuing in nature, and should there be, for any reason, a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as a supplement to your original answer pursuant to P.U.C. Proc. R. 22.144(i). Please answer each request and sub-request in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the request. SEIA further requests that each item of information be made available as it is completed, rather than upon compilation of all information requested. If any RFI appears confusing, please request clarification from the undersigned counsel.

All information responsive to the requests on the attached Exhibit "A" should be sent to the following person on a piecemeal basis as individual items become available:

Mr. Michael J. Jewell
Jewell & Associates, PLLC
506 West 7th Street, Suite 1
Austin, TX 78701
(512) 423-4065
(512) 236-5170 (FAX)
michael@jewellandassociates.com

DEFINITIONS AND INSTRUCTIONS

A. "El Paso Electric", "El Paso Electric Company", "EPE," "the Company", "you", "yours", and "your" refer to El Paso Electric Company, and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, directors, officers, attorneys, agents, advisors, investigators, representatives, consultants, employees or other persons.

B. "Applicant" refers to El Paso Electric Company, and its affiliates, subsidiaries, and any person acting or purporting to act on its behalf, as it relates to this and related appeals, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

C. The terms "document" or "documents" are used in their broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description whether printed, produced, reproduced or stored by any process whether visually, magnetically, mechanically, electronically or by hand, whether final or draft, original or reproduction, whether or not claimed to be privileged or otherwise excludable from discovery, and whether or not in your actual or constructive possession, custody, or control. The terms include writings, correspondence, telegrams, memoranda, studies, reports, surveys, statistical compilations, notes, calendars, tapes, computer disks, data on computer drives, e-mails, cards, recordings, contracts, agreements, invoices, licenses, diaries, journals, accounts, pamphlets, books, ledgers, publications, microfilm, microfiche and any other data compilations from which information can be obtained and translated, by you if necessary, into reasonably usable form. The definition includes electronic information that has been deleted. "Document" or "documents" shall also include every copy of a document where the copy contains any commentary or notation of any kind that does not appear on the original or any other copy.

D. Pursuant to Rule 196.4 of the Texas Rules of Civil Procedure, SEIA specifically requests that any electronic or magnetic information (which is included in the definition of "document") that is responsive to a request herein be produced on CD-Rom in a format that is compatible with Adobe Acrobat, Microsoft, Macintosh and/or Word Perfect and be produced with your response to these requests. If emails are responsive to these requests, please provide a searchable .pdf copy of the entire email string. Attachments to emails should be provided with the email in searchable .pdf form, unless it is stored in a different format, in which the attachment should be produced in its native format and provided on CD-Rom.

E. The terms "and" and "or" shall be construed both disjunctively and conjunctively is necessary to make the request inclusive rather than exclusive.

F. "Each" shall be construed to include the word "every" and "every" shall be construed to include the word "each."

G. "Any" shall be construed to include "all" and "all" shall be construed to include "any".

H. The term "concerning," or one of its inflections, includes the following meanings:

relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

I. The term "including," or one of its inflections, means and refers to "including but not limited to."

J. 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.

K. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

L. 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 of copies, subject matter of the document, and the basis upon which such privilege is claimed.

M. Pursuant to P.U.C. Proc. R. 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

N. If the information requested is included in previously furnished exhibits, workpapers, and responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

O. The term "emails" includes the entire email string and all attachments found anywhere within the email string. Please refer to paragraph "D." regarding specific instructions for producing such items.

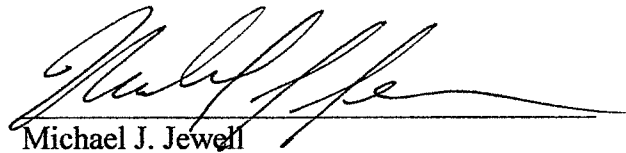
P. "Communications" refers to correspondence of any kind, including emails.

Q. "Identify" and "describe" shall have the meaning set forth below according to the context in which the term is used:

- i. When used in reference to an individual, shall mean to state his or her full name, present or last known residence address, business affiliation and business address, and residence and business telephone number;
- ii. When used in reference to a corporation, shall mean to state its full name, its state of incorporation, its address and its principal place of business;
- iii. When used in reference to any entity other than an individual or corporation, shall mean to state its official name, its organizational form and its address;

- iv. When used in reference to a document, shall mean to state the type of document, date, author, addressee, title, its present location, the name and address of its custodian, and the substance of the contents thereof. In lieu of identifying any document, copies thereof may be furnished; and
- v. When used in reference to a communication, shall mean to state the form of the communication (e.g., telephone conversation, letter, telegram, teletype, telecopy, written memorandum, face to face conversation, or any other form), the date of the communication or the dates on which the communication was sent and/or received if not the same, the parties to the communication, the party who initiated it, the substance of the communication, and the present location and the name and address of the custodian if the communication was non-verbal and/or of any written memorialization of the communication.

Respectfully submitted,

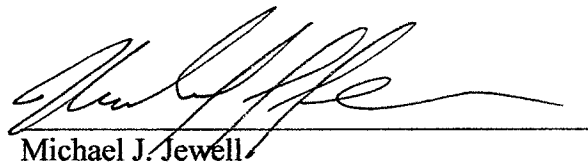


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ATTORNEY FOR THE SOLAR ENERGY
INDUSTRIES ASSOCIATION

CERTIFICATE OF SERVICE

I, Michael J. Jewell, Attorney and Representative for the Solar Energy Industries Association, certify that a copy of this document was served on all parties of record in this proceeding on the 5th day May 2017 hand-delivery, facsimile transmission, First Class U.S. Mail, postage prepaid, and/or by e-mail through prior agreement, to all parties of record.



Michael J. Jewell

Exhibit A

SOLAR ENERGY INDUSTRIES ASSOCIATION'S FOURTH SET OF REQUESTS FOR INFORMATION TO EL PASO ELECTRIC COMPANY

- SEIA 4-1. In the current proceeding, EPE lists the number of Residential DG customers as 1,807 and the number of Residential customers (exclusive of Residential DG customers) as 276,097.
- a. Please confirm that the percentage of Residential DG customers as a total of all residential customers in this proceeding is 0.65%.
- SEIA 4-2 EPE, in response to EFCA RFI 3-15, provided a listing of feeders along with the counts of customers and the counts of DG customers on each feeder.
- a. Is it correct to assume that a feeder that is included in the EFCA 03-15 Attachment 1 (the full listing of feeders) that does not appear in EFCA 03-15 Attachment 3 (the listing of DG customers per feeder) means that feeder has 0 DG customers?
- b. If the assumption in part a. above is correct, an analysis of EFCA 3-15 shows that 26.74% of feeders have 0 DG customers, 66.67% of feeders have fewer than 0.5% of customers with DG systems, and 93.02% of feeders have fewer than 1.5% of customers with DG systems. Please confirm if these figures are reflective of the feeders listed in EFCA 03-15.
- c. Would EPE generally characterize Residential DG customers on their system as being geographically dispersed (that is, a small percentage of each feeder's customers is a Residential DG customer) or geographically concentrated (that is, a high percentage of each feeder's customers is a Residential DG customer)?
- SEIA 4-3. For Residential DG customers in EPE's service territory:
- a. What percentage of Residential DG customers added solar to an existing house vs. constructed a new house with DG installed at or near the time of utility hookup? If an exact figure is not known, please estimate the approximate percentages.
- b. For a Residential DG customer that added DG to an existing house, what additional distribution hardware beyond metering did EPE add to its distribution grid to accommodate the DG? If none, please confirm.
- c. For a Residential DG customer that added DG to an existing house, what distribution hardware did EPE remove from its distribution grid to accommodate the lower levels of sales to the Residential DG customer? If none, please confirm.
- d. If all Residential DG customers removed their DG systems from EPE distribution grid, what would be the impact on the distribution system? What hardware would EPE need to add or remove to accommodate this change?

- SEIA 4-4. Exhibit GN-2 contains the load forecast for EPE's system, and includes a reduction in Total System Net Energy and Total System Demand for energy and capacity resulting from DG and EE resources.
- a. If all Residential DG customers removed their DG systems from EPE distribution grid, what would be the impact on EPE's bulk power system (i.e. production and transmission assets)? What hardware would EPE need to add or remove to accommodate this change?
 - b. If the DG and EE resources that were forecast in GN-2 were not constructed, what would the impact to the forecast be? All else equal, would this increase or decrease the cost to serve EPE customers?
 - c. Assuming that Residential DG customers were part of the Residential class, if all Residential DG customers removed their DG systems from the EPE distribution grid, what would be the expected impact be on the Residential class MCD and the Residential class 4CP be?
 - d. If the answer to part c. above is that the expected result would be that the MCD and 4CP demand of the Residential class would increase, all else equal, would that tend to increase or decrease the costs to serve Residential customers?