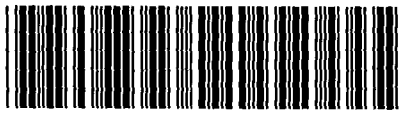

Control Number: 46831

Item Number: 467

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SOAH DOCKET NO. 477-17-2686
PUC DOCKET NO. 46831

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO	§	OF
CHANGE RATES	§	ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO SOLAR ENERGY INDUSTRIES ASSOCIATION'S TENTH SET OF REQUESTS FOR INFORMATION QUESTION NOS. SEIA 10-1 THROUGH SEIA 10-6

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APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
SOLAR ENERGY INDUSTRIES ASSOCIATION'S
TENTH SET OF REQUESTS FOR INFORMATION
QUESTION NOS. SEIA 10-1 THROUGH SEIA 10-6

SEIA 10-1:

Please refer to EPE's response to SEIA 3-17 Attachment 1 and SEIA 3-8.

a. Please describe the specific steps by which the values in the Load Studies from SEIA 3-8 are incorporated and integrated into the cost allocation process contained in SEIA 3-17.

b. The values found in row 12 of the 'Load Factors' tab of SEIA 3-17 Attachment 1 (TXRT03 Residential Partial Requirements) match the values found in row 40 of the 'TX Interconnection and Parallel Operation Delivered Load Study' tab of SEIA 3-8 Attachment 1. That is, the load factor based on the Maximum Diversified Demand from SEIA 3-8 matches the monthly values found in the Load Factor tab of SEIA 3-17.

However, the values found in row 10 of the 'Load Factors' tab of SEIA 3-17 Attachment 1 (TXRT01 Residential Service) do not match the values found in row 40 of the 'Residential Class' tab of SEIA 3-8 Attachment 1.

Please explain the origin of the Load Factor values in SEIA 3-17 and why they match the values in SEIA 3-8 for the Residential DG class but do not match for the Residential class. If the origin for these values in SEIA 3-17 is something other than the Load Study reports contained in SEIA 3-8, please provide all analyses and documentation for their origin in its native format with formulas intact. Further, if any adjustments were made to the Residential load factor values, please explain why and how this was done.

c. The values found in row 12 of the 'Coincidence Factors' tab of SEA 3-17 Attachment 1 (TXRT03 Residential Partial Requirements) match the values found in row 44 of the 'TX DG Delivered Load Study' tab of SEIA 3-8 Attachment 1. That is, the coincidence factor based on the Maximum Diversified Demand from SEIA 3-8 matches the monthly values found in the Coincidence Factor tab of SEIA 3-17.

However, the values found in row 12 of the 'Coincidence Factors' tab of SEA 3-17 Attachment 1 (TXRT01 Residential Service) do not match the values found in row 44 of the 'Residential Class' tab of SEIA 3-8 Attachment 1.

Please explain the origin of the Coincident Factor values in SEIA 3-17 and why they match the values in SEIA 3-8 for the Residential DG class but do not match for the Residential class. If the origin for these values in SEIA 3-17 is something other than the Load Study reports contained in SEIA 3-8, please provide all analyses and documentation for their origin in its native format with formulas intact. Further, if any adjustments were made to the Residential coincident factor values, please explain why and how this was done.

RESPONSE:

a. Only the load and coincidence factors from the total Residential Class and the TX DG Delivered load studies are relevant in cost allocation. EPE estimates the monthly maximum diversified demand (MDD) and coincident peak demand (CPD), found in Schedules O-1.3 and O-1.4, by using the estimated load and coincidence factors from the load studies to the billed energy by applying the following formulas:

$$MDD = \frac{Energy}{Load\ Factor \times Hours}$$

$$CPD = MDD \times Coincidence\ Factor$$

For the unadjusted model provided in Schedule O-1.3, EPE adjusted the load and coincidence factors, without compromising the load shape from the original load study, in order to reconcile coincident demand by rate class to the native system peak. These adjustments are made to rate classes that have a sampled study only. Since these adjustments are made manually, no work papers are available. The adjusted load and coincidence factors used in the unadjusted model are applied to the adjusted energy to calculate adjusted MDD and CPD values. Please see EPE's response to SEIA 3-17, Attachment 1, for the calculations of the allocation factors provided in WP/P-7 Errata using the adjusted MDD and CPD values per class.

b-c. As mentioned in the response to subpart a, the load and coincidence factors are adjusted for the residential class are adjusted in order to reconcile coincident demand to the native system peak. Since the Residential DG class is not part of the unadjusted model, there are no adjustments made to its load and coincidence factors. Adjustments are made to the Residential class coincidence factor, without compromising the load shape from the original load study, to account for the Residential DG Customers moving to their own proposed rate. Please see EPE's response to SEIA 3-5 for a detailed explanation of the adjustments made to the Residential class as a result of proposed Residential DG rate.

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APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
SOLAR ENERGY INDUSTRIES ASSOCIATION'S
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SEIA 10-2:

Please refer to EPE's response to SEIA 3-8. Please reproduce the TX DG Delivered Load Study tab, but using the date and hour of the non-DG Residential class Maximum Diversified Demand for each month.

RESPONSE:

Please see SEIA 10-2 Attachment 1.

Preparer: Donna Enriquez Title: Economist-Staff

Sponsor: George Novela Title: Manager-Economic Research

EL PASO ELECTRIC COMPANY
CONSUMPTION, DEMAND AND USAGE INFORMATION
TEXAS RESIDENTIAL DG
TOTAL CLASS
MONTHLY DELIVERED LOAD DATA BASED ON 60-MINUTE
INTEGRATED DEMAND AT THE METER
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016

SOAH Docket No. 473-17-2686
PUC Docket no. 46831
SEIA's 10th, Q. No. SEIA 10-02
Attachment 1

Line No.	(a) Description	(b) October 2015	(c) November 2015	(d) December 2015	(e) January 2016	(f) February 2016	(g) March 2016	(h) April 2016
1	Number of Customers	48	54	54	54	54	55	57
2	Average Energy Used - kWh	533	415	516	489	396	368	388
3	On-Peak Energy Used	0	0	0	0	0	0	0
4	Off-Peak Energy Used	533	415	516	489	396	368	388
5	Percent On-Peak Energy Used	0	0	0	0	0	0	0
6	Total Demand - kW							
7	At Time of Native System Peak (1)	1.94	1.36	1.38	1.49	1.25	1.06	0.35
8	Day, Date	Thu 01	Mon 30	Tue 15	Mon 04	Tue 02	Wed 02	Fri 22
9	Hour Ended, MST	4:00 PM	8:00 PM	8:00 PM	8:00 PM	8:00 PM	8:00 PM	3:00 PM
10	Maximum Diversified Demand	1.94	1.36	1.38	1.49	1.25	1.06	0.35
11	Day, Date	Thu 01	Mon 30	Mon 28	Tue 05	Wed 03	Tue 22	Sat 23
12	Hour Ended, MST	4:00 PM	8:00 PM	7:00 PM	9:00 PM	9:00 PM	8:00 PM	5:00 PM
13	On-Peak Maximum Class Demand	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14	Off-Peak Maximum Class Demand	2.59	1.50	1.63	1.52	1.43	1.45	1.84
15	Non-Coincident Demand	4.61	3.47	3.73	3.65	3.36	3.69	4.23
16	Diversity Factor	1.78	2.32	2.29	2.41	2.35	2.54	2.30
17	Load Factor, Percent, Based on							
18	Time of Native System Peak	36.84	42.52	50.21	44.01	45.50	46.80	154.52
19	Maximum Diversified Demand	36.84	42.52	49.37	49.25	41.05	49.19	52.34
20	Class Non-Coincident Peak	15.52	16.60	18.61	17.99	16.93	13.41	12.74
21	Coincidence Factor, Percent, Based on							
22	Maximum Diversified Demand	99.99	99.99	98.32	111.90	90.22	105.11	33.87
23	Class Non-Coincident Peak	42.14	39.04	37.06	40.87	37.20	28.66	8.24

*Note: The Maximum Diversified Demand above is based on the time and date of the non-DG Residential class Maximum Diversified Demand.

EL PASO ELECTRIC COMPANY
CONSUMPTION, DEMAND AND USAGE INFORMATION
TEXAS RESIDENTIAL DG
TOTAL CLASS
MONTHLY DELIVERED LOAD DATA BASED ON 60-MINUTE
INTEGRATED DEMAND AT THE METER
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016

Line No.	(a) Description	(b) May 2016	(c) June 2016	(d) (1) July 2016	(e) August 2016	(f) September 2016	(g) Annual Summary	(h) Annual Average
1	Number of Customers	57	57	57	57	57		55
2	Average Energy Used - kWh	580	956	1,216	905	751	7,512	626
3	On-Peak Energy Used	0	170	215	160	124	668	167
4	Off-Peak Energy Used	580	787	1,001	745	627	6,845	570
5	Percent On-Peak Energy Used	0	18	18	18	17	9	27
6	Total Demand - kW							
7	At Time of Native System Peak (1)	1.49	2.16	2.49	2.38	2.16	2.49	1.63
8	Day, Date	Fri 13	Thu 23	Thu 14	Mon 08	Wed 21	Thu 14	
9	Hour Ended, MST	4:00 PM	4:00 PM	4:00 PM	4:00 PM	4:00 PM	4:00 PM	
10	Maximum Diversified Demand	1.49	2.16	2.49	2.38	2.16	2.49	1.63
11	Day, Date	Sun 29	Wed 22	Sun 24	Mon 08	Sun 04	Sun 24	
12	Hour Ended, MST	2:00 PM	6:00 PM	5:00 PM	4:00 PM	5:00 PM	5:00 PM	
13	On-Peak Maximum Class Demand	0.00	3.04	3.32	3.40	2.55	3.40	3.08
14	Off-Peak Maximum Class Demand	2.50	3.67	4.52	3.27	3.11	4.52	2.42
15	Non-Coincident Demand	5.35	6.67	7.03	6.02	5.84	7.03	4.80
16	Diversity Factor	2.14	1.82	1.55	1.77	1.88	1.55	2.10
17	Load Factor, Percent, Based on							
18	Time of Native System Peak	52.40	61.38	65.71	51.11	48.36	34.39	58.28
19	Maximum Diversified Demand	128.37	36.34	47.50	51.11	53.18	23.40	53.09
20	Class Non-Coincident Peak	14.57	19.92	23.26	20.18	17.85	12.17	17.30
21	Coincidence Factor, Percent, Based on							
22	Maximum Diversified Demand	244.96	59.21	72.29	99.99	109.97	68.05	102.15
23	Class Non-Coincident Peak	27.81	32.46	35.40	39.49	36.90	35.40	33.77

*Note: The Maximum Diversified Demand abov

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APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
SOLAR ENERGY INDUSTRIES ASSOCIATION'S
TENTH SET OF REQUESTS FOR INFORMATION
QUESTION NOS. SEIA 10-1 THROUGH SEIA 10-6

SEIA 10-3:

Please refer to EPE's response to SEIA 2-1 and Schedule Q-5.2. The five strata are identified as follows:

Strata	Residential DG Customers SEIA 2-1, Attachment 4	Residential Customers Schedule Q-5.2
1	0 – 500	0 – 300
2	501 – 900	301 – 500
3	901 – 1,300	501 – 800
4	1,301 – 2,100	801 – 1,400
5	2,101 – 18,500	1,400 – 19,000

Please explain why a different strata definition was used for Residential DG customers than was used for non-DG Residential customers.

RESPONSE:

Stratum boundaries for stratified random samples are determined with the Dalenius-Hodges process. This procedure uses average energy from the population that is to be sampled to generate the boundaries for each stratum. In the case of the Residential DG sample, the average total household energy for residential customers with DG was used. In the case of non-DG residential customers, the average energy for the population of customers without DG was utilized. As a result, the two samples have different strata boundaries.

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APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO SOLAR ENERGY INDUSTRIES ASSOCIATION'S TENTH SET OF REQUESTS FOR INFORMATION QUESTION NOS. SEIA 10-1 THROUGH SEIA 10-6

SEIA 10-4:

Please refer to EPE's response to ECO 4-6.

a. Please explain why EPE used the total household load rather than the delivered household load when stratifying the DG customers.

b. Please confirm that using the total household load when stratifying DG customers results in strata definitions that are bounded by higher levels of energy use than would have been set had the delivered household load been used.

c. Please confirm that EPE is required to serve and standby to serve the instantaneous demand of a residential customer, and that the instantaneous demand is equal to the difference between the total household load at that instant and the distributed generation production at that instant.

d. If EPE disagrees with c. above, please describe in detail how it characterizes the relationship between the instantaneous total household load and the instantaneous level of customer generation production, including whether it agrees that the instantaneous production from customer-sited DG systems reduces the instantaneous load that is supplied by EPE's system.

RESPONSE:

a. The total household energy better represents the residential DG customers' energy consumption and load requirements. Total household characterizes the energy consumed by the customer regardless of the source of the energy. Delivered load only characterizes one aspect of the customers load requirement. In order to get a clear representation of a DG customer's load profile, total household energy should be used.

b. EPE cannot confirm that the stratum boundaries would have been lower had delivered household load been used. EPE only conducted the Dalenius-Hodges methodology using total household load.

c. EPE plans its system to serve the instantaneous demand of all of its customers. EPE agrees that that instantaneous load for residential DG customers is the difference between the customer's energy consumption and that of their systems production. EPE delivers energy to DG customers when their energy consumption is greater than that of their system's energy production. On the other hand, EPE receives energy from residential DG customers when their system production is greater than that of their consumption. EPE total household energy is the sum of the energy production of the customers DG system and the energy delivered by EPE, less the energy received by EPE. However, please note that since billing is conducted on a monthly volumetric basis, costs of instantaneous service are not reflected on the customer's bill.

d. Please see response in subpart c.

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APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
SOLAR ENERGY INDUSTRIES ASSOCIATION'S
TENTH SET OF REQUESTS FOR INFORMATION
QUESTION NOS. SEIA 10-1 THROUGH SEIA 10-6

SEIA 10-5:

Please refer to EPE's response to ECO 4-6.

a. EPE states in its response that "EPE uses a list of all Texas residential DG customers that has account, customer name, and address information." The file ECO 4-6 Attachment 1 contains 290 accounts in total. Please confirm when the sample that was used in the sample study was selected, whether the 290 customers represented the entire Residential DG population at the time, and whether EPE updated the sample study specifically for this proceeding.

b. In the In ECO 4-6 Attachment 1, the number of customers identified as "sample" customers through cell shading does not match the total number of customers that were included in the sample study. Please explain this discrepancy, and identify each specific customer contained in the file that was actually included in the sample study for each strata.

RESPONSE:

a. The 290 customers presented in EPE's response to ECO 4-6, Attachment 1, does not represent the entire Residential DG population. ECO 4-6, Attachment 1, was created as a workpaper to present a final list of random samples with backups for installation. EPE did not update the sample study specifically for this proceeding.

b. EPE already had meters in place from the previous residential DG sample design and some of those meters were kept. The number of customers identified as "sample" in ECO 4-6, Attachment 1, represents the additional number of sample points which were needed to satisfy the requirements of the current sample design. Please note that "Stratum 1" tab should have had 2 sample points highlighted as "sample" and the "Stratum 2' tab should have had 6 sample points highlighted as "sample". Please see

SEIA 10-5 Attachment 1, for an updated version of EPE's response to ECO 4-6, Attachment1, showing the customers that were ultimately selected to be in the sample study. SEIA 10-5 Attachment 1, also updates the highlighted cells to reflect the correct number of "sample" customers.

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EL PASO ELECTRIC COMPANY
RANDOM LIST OF CANDIDATES

SOAH Docket No 473-17-2686
PUC Docket no 46831
SEIA's 10th, Q No SEIA 10-05
Attachment 1

Stratum 1 0-500 kWh

Account No.	Total	Name	Address	Random No.	Customer Selected
DG Account 1	156.60	DG Customer Name 1	DG Address 1	0.00285694	
DG Account 2	329.92	DG Customer Name 2	DG Address 2	0.02444878	
[redacted]					
DG Account 16	155.67	DG Customer Name 16	DG Address 16	0.36682226	
DG Account 17	372.92	DG Customer Name 17	DG Address 17	0.373212075	
DG Account 18	444.83	DG Customer Name 18	DG Address 18	0.381902105	
DG Account 19	388.92	DG Customer Name 19	DG Address 19	0.397117793	
DG Account 20	372.75	DG Customer Name 20	DG Address 20	0.419264194	
DG Account 21	448.50	DG Customer Name 21	DG Address 21	0.425856095	
DG Account 22	305.00	DG Customer Name 22	DG Address 22	0.434324287	
DG Account 23	342.08	DG Customer Name 23	DG Address 23	0.455378177	
DG Account 24	375.00	DG Customer Name 24	DG Address 24	0.505673297	
DG Account 25	45.50	DG Customer Name 25	DG Address 25	0.527308591	
DG Account 26	258.00	DG Customer Name 26	DG Address 26	0.541641619	
DG Account 27	293.30	DG Customer Name 27	DG Address 27	0.552790812	
DG Account 28	474.25	DG Customer Name 28	DG Address 28	0.614184666	
DG Account 29	0.00	DG Customer Name 29	DG Address 29	0.627790825	
DG Account 30	304.33	DG Customer Name 30	DG Address 30	0.632209137	
DG Account 31	190.33	DG Customer Name 31	DG Address 31	0.638924506	
DG Account 32	294.00	DG Customer Name 32	DG Address 32	0.683678321	
DG Account 33	457.33	DG Customer Name 33	DG Address 33	0.706113633	
DG Account 34	131.60	DG Customer Name 34	DG Address 34	0.716347544	
DG Account 35	483.67	DG Customer Name 35	DG Address 35	0.728141368	
DG Account 36	0.00	DG Customer Name 36	DG Address 36	0.764497751	
DG Account 37	225.92	DG Customer Name 37	DG Address 37	0.766360418	
DG Account 38	142.08	DG Customer Name 38	DG Address 38	0.77566187	
DG Account 39	446.50	DG Customer Name 39	DG Address 39	0.829126035	
DG Account 40	479.00	DG Customer Name 40	DG Address 40	0.85012596	
DG Account 41	278.00	DG Customer Name 41	DG Address 41	0.852251007	
DG Account 42	335.23	DG Customer Name 42	DG Address 42	0.855992061	
DG Account 43	261.00	DG Customer Name 43	DG Address 43	0.864705105	
DG Account 44	415.90	DG Customer Name 44	DG Address 44	0.865788694	
DG Account 45	371.08	DG Customer Name 45	DG Address 45	0.905854656	
DG Account 46	479.42	DG Customer Name 46	DG Address 46	0.914041101	
DG Account 47	461.33	DG Customer Name 47	DG Address 47	0.914242055	
DG Account 48	324.07	DG Customer Name 48	DG Address 48	0.955391413	
DG Account 49	419.25	DG Customer Name 49	DG Address 49	0.961824963	
DG Account 50	428.11	DG Customer Name 50	DG Address 50	0.965275826	
DG Account 51	237.50	DG Customer Name 51	DG Address 51	0.976422074	
DG Account 52	480.08	DG Customer Name 52	DG Address 52	0.987881766	

Stratum 2 501-900 kWh

Account No.	Total	Name	Address	Random No.	Customer Selected
DG Account 53	615.50	DG Customer Name 53	DG Address 53	0.[illegible]	
DG Account 54	661.50	DG Customer Name 54	DG Address 54	0.[illegible]	
DG Account 55	651.75	DG Customer Name 55	DG Address 55	0.[illegible]	
DG Account 56	731.50	DG Customer Name 56	DG Address 56	0.[illegible]	
DG Account 57	751.00	DG Customer Name 57	DG Address 57	0.[illegible]	
DG Account 58	607.08	DG Customer Name 58	DG Address 58	0.[illegible]	
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
DG Account 69	880 42	DG Customer Name 69	DG Address 69	0.903974473	
DG Account 70	887.25	DG Customer Name 70	DG Address 70	0 889072149	
DG Account 71	794 92	DG Customer Name 71	DG Address 71	0 898265436	
DG Account 72	535 75	DG Customer Name 72	DG Address 72	0 894256803	
DG Account 73	606.71	DG Customer Name 73	DG Address 73	0 886809395	
DG Account 74	654 00	DG Customer Name 74	DG Address 74	0 885508099	
DG Account 75	627 08	DG Customer Name 75	DG Address 75	0 882088043	
DG Account 76	663 33	DG Customer Name 76	DG Address 76	0.853429082	
DG Account 77	668.25	DG Customer Name 77	DG Address 77	0 839031606	
DG Account 78	857.50	DG Customer Name 78	DG Address 78	0.830389664	
DG Account 79	522.51	DG Customer Name 79	DG Address 79	0.829815546	
DG Account 80	577 92	DG Customer Name 80	DG Address 80	0.825893461	
DG Account 81	671 50	DG Customer Name 81	DG Address 81	0 824877025	
DG Account 82	859 25	DG Customer Name 82	DG Address 82	0 824044531	
DG Account 83	564.38	DG Customer Name 83	DG Address 83	0.817204775	
DG Account 84	532 38	DG Customer Name 84	DG Address 84	0 81459817	
DG Account 85	548 08	DG Customer Name 85	DG Address 85	0 811832948	
DG Account 86	843 75	DG Customer Name 86	DG Address 86	0 792439295	
DG Account 87	840 50	DG Customer Name 87	DG Address 87	0 791811617	
DG Account 88	619 33	DG Customer Name 88	DG Address 88	0 782302867	
DG Account 89	566 67	DG Customer Name 89	DG Address 89	0 779775569	
DG Account 90	839 33	DG Customer Name 90	DG Address 90	0 770089649	
DG Account 91	679 85	DG Customer Name 91	DG Address 91	0 757091493	
DG Account 92	651 33	DG Customer Name 92	DG Address 92	0 741782964	
DG Account 93	852 14	DG Customer Name 93	DG Address 93	0 731849464	
DG Account 94	780 87	DG Customer Name 94	DG Address 94	0 706622057	
DG Account 95	805 09	DG Customer Name 95	DG Address 95	0 696434531	
DG Account 96	788 00	DG Customer Name 96	DG Address 96	0 688348975	
DG Account 97	742.63	DG Customer Name 97	DG Address 97	0 682199346	
DG Account 98	654 50	DG Customer Name 98	DG Address 98	0 618786943	
DG Account 99	679 50	DG Customer Name 99	DG Address 99	0 611553002	
DG Account 100	537 17	DG Customer Name 100	DG Address 100	0 61009255	
DG Account 101	585 75	DG Customer Name 101	DG Address 101	0 608939658	
DG Account 102	821.17	DG Customer Name 102	DG Address 102	0 601784153	
DG Account 103	624 31	DG Customer Name 103	DG Address 103	0 586442148	
DG Account 104	890 00	DG Customer Name 104	DG Address 104	0 582186805	
DG Account 105	896 83	DG Customer Name 105	DG Address 105	0 571431347	
DG Account 106	667 83	DG Customer Name 106	DG Address 106	0.565960582	
DG Account 107	754 42	DG Customer Name 107	DG Address 107	0 56190097	
DG Account 108	661 58	DG Customer Name 108	DG Address 108	0.542811135	
DG Account 109	762.46	DG Customer Name 109	DG Address 109	0 525102672	
DG Account 110	542 30	DG Customer Name 110	DG Address 110	0.515309581	
DG Account 111	826 75	DG Customer Name 111	DG Address 111	0 506289433	
DG Account 112	844 33	DG Customer Name 112	DG Address 112	0.505715364	
DG Account 113	643.00	DG Customer Name 113	DG Address 113	0 494558367	
DG Account 114	570 92	DG Customer Name 114	DG Address 114	0 491079465	
DG Account 115	878 17	DG Customer Name 115	DG Address 115	0.468639468	
DG Account 116	825.08	DG Customer Name 116	DG Address 116	0 459262279	
DG Account 117	628.25	DG Customer Name 117	DG Address 117	0 433979682	
DG Account 118	587 98	DG Customer Name 118	DG Address 118	0.433958728	
DG Account 119	636 67	DG Customer Name 119	DG Address 119	0 428841517	
DG Account 120	690 92	DG Customer Name 120	DG Address 120	0 422802738	
DG Account 121	786 70	DG Customer Name 121	DG Address 121	0 41799787	
DG Account 122	764 33	DG Customer Name 122	DG Address 122	0 402318534	
DG Account 123	850.08	DG Customer Name 123	DG Address 123	0 402090717	
DG Account 124	879 58	DG Customer Name 124	DG Address 124	0 401480076	
DG Account 125	719 52	DG Customer Name 125	DG Address 125	0.396623072	
DG Account 126	602 08	DG Customer Name 126	DG Address 126	0 382522708	
DG Account 127	557 92	DG Customer Name 127	DG Address 127	0 354790407	
DG Account 128	663 67	DG Customer Name 128	DG Address 128	0 350513157	
DG Account 129	830 33	DG Customer Name 129	DG Address 129	0 343872603	
DG Account 130	652.67	DG Customer Name 130	DG Address 130	0 327361331	
DG Account 131	764 33	DG Customer Name 131	DG Address 131	0 323652147	
DG Account 132	882 67	DG Customer Name 132	DG Address 132	0 266341762	
DG Account 133	750 67	DG Customer Name 133	DG Address 133	0 257581449	
DG Account 134	612 23	DG Customer Name 134	DG Address 134	0.233172876	
DG Account 135	653 42	DG Customer Name 135	DG Address 135	0.22771743	
DG Account 136	866.25	DG Customer Name 136	DG Address 136	0 200508083	
DG Account 137	567 58	DG Customer Name 137	DG Address 137	0 19075717	
DG Account 138	512.65	DG Customer Name 138	DG Address 138	0 172151608	
DG Account 139	741.67	DG Customer Name 139	DG Address 139	0.158661565	
DG Account 140	848.25	DG Customer Name 140	DG Address 140	0 138645753	
DG Account 141	600 33	DG Customer Name 141	DG Address 141	0.101740398	
DG Account 142	649.25	DG Customer Name 142	DG Address 142	0.100970327	
DG Account 143	860.83	DG Customer Name 143	DG Address 143	0 098475796	
DG Account 144	693 31	DG Customer Name 144	DG Address 144	0 088151374	
DG Account 145	795.50	DG Customer Name 145	DG Address 145	0 083317929	
DG Account 146	737 71	DG Customer Name 146	DG Address 146	0 067287958	
DG Account 147	793.75	DG Customer Name 147	DG Address 147	0 046387172	
DG Account 148	703 00	DG Customer Name 148	DG Address 148	0.041422683	
DG Account 149	744 83	DG Customer Name 149	DG Address 149	0 031846613	
DG Account 150	580.26	DG Customer Name 150	DG Address 150	0.028093651	
DG Account 151	850.25	DG Customer Name 151	DG Address 151	0 020128184	
DG Account 152	651 30	DG Customer Name 152	DG Address 152	0 018673444	
DG Account 153	556.00	DG Customer Name 153	DG Address 153	0 013513602	

Stratum 3 901-1,300 kWh

Account No.	Total	Name	Address	Random No.	Customer Selected
DG Account 154	926.83	DG Customer Name 154	DG Address 154	0.9126633	*
DG Account 155	1,178.50	DG Customer Name 155	DG Address 155	0.0346095	*
DG Account 156	903.42	DG Customer Name 156	DG Address 156	0.0379048	
DG Account 157	1,211.42	DG Customer Name 157	DG Address 157	0.0455007	
DG Account 158	1,190.25	DG Customer Name 158	DG Address 158	0.0692719	
DG Account 159	1,260.50	DG Customer Name 159	DG Address 159	0.0650579	*
[redacted]					*
[redacted]					*
[redacted]					
[redacted]					
[redacted]					
[redacted]					
[redacted]					
[redacted]					
[redacted]					
[redacted]					
[redacted]					*
DG Account 170	1,167 69	DG Customer Name 170	DG Address 170	0 254718015	
DG Account 171	1,063 83	DG Customer Name 171	DG Address 171	0.261360287	
DG Account 172	1,247 44	DG Customer Name 172	DG Address 172	0 273344835	
DG Account 173	1,051.23	DG Customer Name 173	DG Address 173	0.277137395	
DG Account 174	1,216 08	DG Customer Name 174	DG Address 174	0 289010727	
DG Account 175	928.92	DG Customer Name 175	DG Address 175	0 290866045	
DG Account 176	1,159 00	DG Customer Name 176	DG Address 176	0 296673866	
DG Account 177	1,008 17	DG Customer Name 177	DG Address 177	0.326778961	
DG Account 178	925 58	DG Customer Name 178	DG Address 178	0 330772588	
DG Account 179	1,028 08	DG Customer Name 179	DG Address 179	0 331973466	
DG Account 180	1,128 42	DG Customer Name 180	DG Address 180	0.354465012	
DG Account 181	1,114.08	DG Customer Name 181	DG Address 181	0 365445993	
DG Account 182	976 40	DG Customer Name 182	DG Address 182	0.397762064	
DG Account 183	1,145 98	DG Customer Name 183	DG Address 183	0 404238141	
DG Account 184	942 50	DG Customer Name 184	DG Address 184	0 42385427	
DG Account 185	1,190.95	DG Customer Name 185	DG Address 185	0 445860854	
DG Account 186	1,169 50	DG Customer Name 186	DG Address 186	0 447078115	
DG Account 187	1,233 75	DG Customer Name 187	DG Address 187	0.452336925	
DG Account 188	1,052 38	DG Customer Name 188	DG Address 188	0 478564257	
DG Account 189	955 83	DG Customer Name 189	DG Address 189	0 482059986	
DG Account 190	1,080 00	DG Customer Name 190	DG Address 190	0 483422782	
DG Account 191	946 67	DG Customer Name 191	DG Address 191	0 499876986	
DG Account 192	1,163 27	DG Customer Name 192	DG Address 192	0 501522738	
DG Account 193	1,046 92	DG Customer Name 193	DG Address 193	0.505935879	
DG Account 194	1,283 65	DG Customer Name 194	DG Address 194	0 508047547	
DG Account 195	1,264.33	DG Customer Name 195	DG Address 195	0 51166534	
DG Account 196	955.79	DG Customer Name 196	DG Address 196	0.512633905	
DG Account 197	941.67	DG Customer Name 197	DG Address 197	0 540454387	
DG Account 198	1,227.92	DG Customer Name 198	DG Address 198	0 546164318	
DG Account 199	1,193 42	DG Customer Name 199	DG Address 199	0 566024388	
DG Account 200	927 08	DG Customer Name 200	DG Address 200	0 635099846	
DG Account 201	1,037 79	DG Customer Name 201	DG Address 201	0 668924839	
DG Account 202	1,240 33	DG Customer Name 202	DG Address 202	0 676253906	
DG Account 203	1,076 64	DG Customer Name 203	DG Address 203	0 678532355	
DG Account 204	984 00	DG Customer Name 204	DG Address 204	0 681509366	
DG Account 205	968 50	DG Customer Name 205	DG Address 205	0 681964854	
DG Account 206	1,134 28	DG Customer Name 206	DG Address 206	0 682617941	
DG Account 207	1,185.54	DG Customer Name 207	DG Address 207	0 686184734	
DG Account 208	1,087 92	DG Customer Name 208	DG Address 208	0 690238741	
DG Account 209	1,226 42	DG Customer Name 209	DG Address 209	0 742374824	
DG Account 210	1,130 50	DG Customer Name 210	DG Address 210	0 753470066	
DG Account 211	1,194 83	DG Customer Name 211	DG Address 211	0 785980493	
DG Account 212	1,191 67	DG Customer Name 212	DG Address 212	0 790294574	
DG Account 213	962 00	DG Customer Name 213	DG Address 213	0.791831482	
DG Account 214	1,137 92	DG Customer Name 214	DG Address 214	0 794324169	
DG Account 215	1,256 54	DG Customer Name 215	DG Address 215	0 794640768	
DG Account 216	1,260.00	DG Customer Name 216	DG Address 216	0 795434325	
DG Account 217	1,207 85	DG Customer Name 217	DG Address 217	0 802259431	
DG Account 218	922.83	DG Customer Name 218	DG Address 218	0 806747516	
DG Account 219	904 17	DG Customer Name 219	DG Address 219	0.853293165	
DG Account 220	1,114 25	DG Customer Name 220	DG Address 220	0 86374149	
DG Account 221	1,125 17	DG Customer Name 221	DG Address 221	0.875924711	
DG Account 222	1,162 42	DG Customer Name 222	DG Address 222	0 879379778	
DG Account 223	1,261.30	DG Customer Name 223	DG Address 223	0.912682771	
DG Account 224	1,098 75	DG Customer Name 224	DG Address 224	0 922058265	
DG Account 225	918 83	DG Customer Name 225	DG Address 225	0 932539279	
DG Account 226	1,199.63	DG Customer Name 226	DG Address 226	0 953771686	
DG Account 227	1,017 83	DG Customer Name 227	DG Address 227	0 956944306	
DG Account 228	1,038.00	DG Customer Name 228	DG Address 228	0.975803633	
DG Account 229	1,113 50	DG Customer Name 229	DG Address 229	0 985752711	
DG Account 230	1,073 75	DG Customer Name 230	DG Address 230	0 994228417	

Stratum 4 · 1,301-2,100 kWh

Account No.	Total	Name	Address	Random No.	Customer Selected
DG Account 231	1,427.92	DG Customer Name 231	DG Address 231	0.969770471	*
DG Account 232	1,659.01	DG Customer Name 232	DG Address 232	0.97110371	*
DG Account 233	1,310.33	DG Customer Name 233	DG Address 233	0.955610807	*
DG Account 234	1,850.75	DG Customer Name 234	DG Address 234	0.930254814	*
DG Account 235	2,097.33	DG Customer Name 235	DG Address 235	0.904294185	
DG Account 236	1,756.56	DG Customer Name 236	DG Address 236	0.902382497	*
DG Account 237	1,777.35	DG Customer Name 237	DG Address 237	0.870012068	*
[illegible]					
DG Account 253	1,488 29	DG Customer Name 253	DG Address 253	0 660590313	
DG Account 254	1,394.08	DG Customer Name 254	DG Address 254	0 659471163	
DG Account 255	2,034 16	DG Customer Name 255	DG Address 255	0.65934704	
DG Account 256	1,491 67	DG Customer Name 256	DG Address 256	0 651739689	
DG Account 257	1,615 50	DG Customer Name 257	DG Address 257	0 611681428	
DG Account 258	1,531 75	DG Customer Name 258	DG Address 258	0 597952584	
DG Account 259	1,639 67	DG Customer Name 259	DG Address 259	0 471302198	
DG Account 260	1,331 67	DG Customer Name 260	DG Address 260	0 453436097	
DG Account 261	1,414 67	DG Customer Name 261	DG Address 261	0 432192311	
DG Account 262	1,397 10	DG Customer Name 262	DG Address 262	0 377710869	
DG Account 263	1,713 00	DG Customer Name 263	DG Address 263	0 353461704	
DG Account 264	1,357 77	DG Customer Name 264	DG Address 264	0.337936756	
DG Account 265	1,546 08	DG Customer Name 265	DG Address 265	0.334241081	
DG Account 266	1,471 82	DG Customer Name 266	DG Address 266	0 306150882	
DG Account 267	1,999 71	DG Customer Name 267	DG Address 267	0 304960456	
DG Account 268	1,576 54	DG Customer Name 268	DG Address 268	0 267070885	
DG Account 269	1,643 67	DG Customer Name 269	DG Address 269	0 256574741	
DG Account 270	1,343 08	DG Customer Name 270	DG Address 270	0 243331399	
DG Account 271	1,630 40	DG Customer Name 271	DG Address 271	0 235293491	
DG Account 272	1,618 08	DG Customer Name 272	DG Address 272	0 225754774	
DG Account 273	1,372 42	DG Customer Name 273	DG Address 273	0 222365084	
DG Account 274	1,428 97	DG Customer Name 274	DG Address 274	0.16346351	
DG Account 275	1,651 97	DG Customer Name 275	DG Address 275	0 127099141	
DG Account 276	1,823.42	DG Customer Name 276	DG Address 276	0 106942055	
DG Account 277	1,498 97	DG Customer Name 277	DG Address 277	0.078776566	
DG Account 278	1,529.08	DG Customer Name 278	DG Address 278	0.050377637	

Stratum 5 2,101-18,500 kWh

Account No.	Total	Name	Address	Random No.
[redacted]				

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

APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
SOLAR ENERGY INDUSTRIES ASSOCIATION'S
TENTH SET OF REQUESTS FOR INFORMATION
QUESTION NOS. SEIA 10-1 THROUGH SEIA 10-6

SEIA 10-6:

Please refer to EPEs response to SEIA 4-4 where it states: "Customer generation creates redundancy in resources on a near term basis, and may potentially defer less expensive resources in the future, both of which can increase costs to the customer." Please elaborate on EPE's position on how customer generation creates redundancy in resources on a near term basis, how it potentially defers less expensive resources in the future, and how these both can increase costs to the customer.

RESPONSE:

Because EPE is required to maintain sufficient resources to serve gross customer load, in the near term, customer generation creates redundant utility generation resources when installed. The generation that EPE maintains for service to an individual customer remains available to serve the customers load, regardless of self-generation. Over time, load growth will account for those resources. The next rate proceeding would account for lower utility sales (other things equal) with marginally higher rates as the cost of existing generation capacity is spread over fewer kWh.

In the mid- to long-term, customer-owned generation could, under certain circumstances, result in delaying the addition of new generation resources. Typically, newer generation resources are more efficient and may result in reduced production costs. Delaying the implementation of new resources may therefore delay improvements in efficiency and defer savings to customers that would result from lower generation costs. This is especially true where rooftop solar generation defers additions of utility-scale solar, which is significantly more efficient and less expensive. In addition, to the extent that rooftop solar installations continue to be subsidized by other customers, the net effect may be to increase revenues requirements relative to a generation capacity expansion in future years using lower cost resources.

Preparer: Omar Gallegos Title: Director-Resource Planning & Management

Sponsor: James Schichtl Title: Vice President-Regulatory Affairs