SOAH DOCKET NO. 473-18-5091
PUC DOCKET NO. 48591

REVIEW OF RATE CASE EXPENSES INCURRED BY TEXAS NEW MEXICO POWER COMPANY AND MUNICIPALTIES IN DOCKET NOS. 48401, 35038, AND 41901	§ § § § §	**BERFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TEXAS-NEW MEXICO POWER COMPANY (TNMP) QUESTION NOS. STAFF 1-1 THROUGH 1-17

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff of the Public Utility Commission of Texas (Commission) requests that Texas-New Mexico Power Company (TNMP), by and through their attorneys of record, provide the following information and answer the following question(s) under oath. The questions 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 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. 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.

12

Dated: April 3, 2019

Respectfully submitted,

PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION

Margaret Uhlig Pemberton
Division Director

Stephen Mack
Managing Attorney

Rachelle Nicolette Robles
State Bar No. 24060508
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7255
(512) 936-7268 (facsimile)
rachelle.robles@puc.texas.gov

SOAH DOCKET NO. 473-18-5091
PUC DOCKET NO. 48591

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on April 3, 2019, in accordance with 16 TAC § 22.74.

Rachelle Nicolette Robles

SOAH DOCKET NO. 473-18-5091
PUC DOCKET NO. 48591

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TEXAS-NEW MEXICO POWER COMPANY (TNMP) QUESTION NOS. STAFF 1-1 THROUGH 1-17

DEFINITIONS

1) "TNMP", "the Company" or "you" refers to 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 exist and these documents will be provided.

SOAH DOCKET NO. 473-18-5091
PUC DOCKET NO. 48591

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TEXAS-NEW MEXICO POWER COMPANY (TNMP) QUESTION NOS. STAFF 1-1 THROUGH 1-17

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(h)(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. 473-18-5091
PUC DOCKET NO. 48591

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TEXAS-NEW MEXICO POWER COMPANY (TNMP) QUESTION NOS. STAFF 1-1 THROUGH 1-17

Staff 1-1 Reference Exhibit SRW-5 and Exhibit SRW-6. For each "Non-Legal – Internal" submission of expenses, please identify the employee(s) submitting and incurring the expense, the DN 48401 purpose of the expense, the date of the expense, the identity of the vendor, and a description of the expense that supplies the missing information on the receipt. For example, reference Bates page 261 of Exhibit SRW-6 that only provides a charged amount of $34.57 and a tip amount of $5.00. The information responsive to this RFI for that invoice would identify the requesting employee, the purpose of the expense, the date the expense was incurred, the identity of the vendor collecting the expense, and details of the service or product provided by the vendor.

Staff 1-2 Reference Exhibit SRW-5 and Exhibit SRW-6. For each "Non-Legal – Itron" submission of expenses, please provide a detailed description of the services performed by the consultant. For example, instead of "Labor", please provide the detailed description of the tasks performed by the individual. Please provide more than 3-5 words to describe the tasks performed.

Staff 1-3 Reference Exhibit SRW-5 and Exhibit SRW-6. For each "Non-Legal – Itron" submission of expenses in which only a partial copy of the invoice was submitted, please provide all pages of the invoice. For example, reference Bates page 243 of Exhibit SRW-6.

Staff 1-4 Reference Exhibit SRW- 6, page 60. Please explain in detail how the $918.33 listed under the heading "No Receipt Required" meets the standards of 16 TAC § 25.245(b)(4).

Staff 1-5 Reference Exhibit SRW-6, pages 61-63.

a) For each time entry in which travel is listed as a description, please provide the location of departure and arrival by individual.
b) For each entry in which travel is included in the description, separately identify the number of hours devoted to travel. Additionally, indicate whether travel time is billed at the individual's full hourly rate or at a discounted rate and justify.
c) Please define "deliverable" as used in the spreadsheet summary of tasks and identify by individual the number of hours per day devoted to "review of previous deliverables."
d) Please describe the tasks performed during the "review of previous deliverables."

e) Please define "workplan creation" as used in the spreadsheet summary of tasks and provide a copy of the workplan.
f) Please define "key milestones" as used in the spreadsheet summary of tasks.
g) Please define "interview guide" as used in the spreadsheet summary of tasks.
h) Please define "peer set" as used in the spreadsheet summary of tasks.
i) Please define "clean notes from kickoff" and describe the tasks that occur during the "cleanse data received" phase. Additionally, provide the number of hours by individual by day devoted to each of these tasks.
j) Please described the tasks performed during the "settlement process and data-tie-out."
k) Identify each individual that is considered "Team" and invoices at the $450/hour rate.
l) Identify each individual that is considered "Partner" and invoices at the $700/hour rate.

Staff 1-6 Reference Exhibit SRW -6, Bates pages 60 through 184. Please identify by Bates page number the invoices supporting the requested recovery of expenses by individual. For example, $5,012.10 represents the total airfare of Hannah Jeffers. Please identify the pages of invoices that support that amount.

Staff 1-7 Reference Exhibit SRW-6, Bates pages 60-184. For each meal receipt that represents the expenses of more than one person, please identify each person represented by charges on the receipt along with the business purpose.

Staff 1-8 Reference Exhibit SRW-6, Bates page 92. Please provide the next page of the hotel charges.

Staff 1-9 Reference Exhibit SRW-6, Bates page 31 and page 200. Please provide a detailed description of the services billed, the date the services were performed, and the hours per day that were worked.

Staff 1-10 Reference Exhibit SRW-6, Bates pages 206 - 208. Please explain the charges that are included in the "Miscellaneous Office Expenses" and that are billed at 5% of the Professional Services.

Staff 1-11 Reference Exhibit SRW-6, Bates pages 206 - 208. Please explain the purpose of the "PowerPlan Software Usage Fee Passthrough." Include a description of the method for determining the amount of the passthrough that appears on the consultant's monthly invoice.

Staff 1-12 Reference Exhibit SRW-6, Bates pages 206 - 208. Please define the billable activities associated with the following terms as used by Alliance Consulting Group.
a) Check SPR and Actuarial life data
b) Net Salvage

c) Plant Adjustments
d) Reload data
e) SPR Runs
f) Accrual template
g) Life Analysis – Act and SPR

Staff 1-13 Reference Exhibit SRW-6, Bates pages 219 - 223. Please define the billable activities associated with the following terms as used by Alliance Consulting Group.

a) Preliminary life/NS selections
b) Additional picks and decide on approach
c) Accrual
d) Report
e) SPR Plots

Staff 1-14 Reference Exhibit SRW-6, Bates pages 226 - 228. Please define the billable activities associated with the terms "Data Reconciliation" as used by Alliance Consulting Group.

Staff 1-15 Reference Exhibit SRW-6, Bates pages 226 - 228. Please provide the detailed timesheet that supports the 15.5 hours billed by Karen Ponder of the Alliance Consulting Group.

Staff 1-16 Reference Exhibit SRW-6, Bates pages 638-640. Please provide the detailed timesheet that supports the 7 hours billed by Rhonda Watts of the Alliance Consulting Group.

Staff 1-17 Reference Exhibit SRW-6, Bates pages 886. Please provide the detailed timesheet that supports the time billed by Dane Watson of the Alliance Consulting Group.