



Control Number: 48591



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

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PUBLIC UTILITY COMMISSION  
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REVIEW OF RATE CASE EXPENSES § BEFORE THE STATE OFFICE  
INCURRED BY TEXAS NEW MEXICO §  
POWER COMPANY AND § OF  
MUNICIPALITIES IN DOCKET NOS. § ADMINISTRATIVE HEARINGS  
48401, 35038, AND 41901 §

COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO  
TEXAS-NEW MEXICO POWER COMPANY (TNMP)  
QUESTION NO. STAFF 4-1

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.

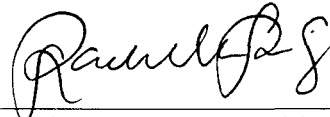
Dated: May 9, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Stephen Mack  
Managing Attorney



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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 9, 2019, in accordance with 16 TAC § 22.74.



Rachelle Nicolette Robles

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO  
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**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.

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**COMMISSION STAFF'S FOURTH REQUEST FOR INFORMATION TO  
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QUESTION NO. STAFF 4-1**

**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.

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**QUESTION NO. STAFF 4-1**

**Staff 4-1**

Regarding TNMP's response to Staff RFI 2-3:

- a) Please confirm that the "4CP gradualism" agreement in the settlement in Docket No. 48401 is not identical to the 4CP allocation gradualism adjustment proposed by TNMP in its application in Docket No. 48401. If the response is anything other than an unqualified "confirm," please provide a detailed and comprehensive explanation, including all workpapers or other documents relied upon.
- b) Please confirm that the "4CP gradualism" agreement in the settlement in Docket No. 48401 is not identical to an annual update to the TCRF class allocation factors based on periodic updates to the class 4CP load information. If the response is anything other than an unqualified "confirm," please provide a detailed and comprehensive explanation, including all workpapers or other documents relied upon.