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REVIEW OF RATE CASE  
EXPENSES INCURRED BY TEXAS-  
NEW MEXICO POWER COMPANY  
AND MUNICIPALITIES IN  
DOCKET NOS. 48401, 35038, AND  
41901

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BEFORE THE STATE OFFICE OF  
ADMINISTRATIVE HEARINGS

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**TEXAS-NEW MEXICO POWER COMPANY'S  
SECOND REQUEST FOR INFORMATION TO  
STAFF OF THE PUBLIC UTILITY COMMISSION OF TEXAS**

Texas-New Mexico Power Company ("TNMP") files its Second Request for Information to Staff of the Public Utility Commission of Texas ("Staff"). Staff is hereby requested to furnish one copy of each of all items of information enumerated on the attached sheets direct to the offices of Jackson Walker LLP, Attn: Patrick R. Cowlshaw, 2323 Ross Avenue, Suite 600, Dallas, Texas 75201 and to Texas New Mexico Power Company, Attn: Scott Seamster, 577 N. Garden Ridge, Lewisville, Texas 75067. These requests shall be deemed continuing so as to require further and supplemental responses if Staff receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing.

For the purposes of these RFIs, the following terms will have the following specific definitions:

(1) "Document[s]" shall mean all tangible things on which communication, impressions, notes, or studies have been recorded, including but not limited to e-mails, compact discs, oral or video recordings, overheads, PowerPoint presentations, spreadsheets, and paper documents.

Respectfully submitted,

/s/ Stephanie C. Sparks

Patrick R. Cowlshaw  
State Bar No. 04932700  
Stephanie C. Sparks  
State Bar No. 24042900  
JACKSON WALKER LLP  
2323 Ross Ave., Suite 600  
Dallas, Texas 75201  
T: 214.953.6000 F: 214.953.5822  
[pcowlshaw@jw.com](mailto:pcowlshaw@jw.com)  
[ssparks@jw.com](mailto:ssparks@jw.com)

Alisha Mehta  
State Bar No. 24102190  
JACKSON WALKER LLP  
100 Congress Ave., Suite 1100  
Austin, Texas 78701  
T: 512.236.2340 F: 512.691.4437  
[amehta@jw.com](mailto:amehta@jw.com)

Scott Seamster  
State Bar No. 00784939  
Corporate Counsel  
TEXAS NEW MEXICO POWER COMPANY  
577 N. Garden Ridge Blvd.  
Lewisville, Texas 75067  
T: 214-224-4143 F: 214-224-4156  
[scott.seamster@pnmresources.com](mailto:scott.seamster@pnmresources.com)

**ATTORNEYS FOR TEXAS-NEW MEXICO POWER  
COMPANY**

**CERTIFICATE OF SERVICE**

Counsel for Texas-New Mexico Power Company hereby certifies that a true and correct copy of *TNMP's Second Request for Information to Staff* was served on all parties of record on August 9, 2019 by electronic transmission, fax, or overnight delivery.

/s/ Stephanie C. Sparks

Counsel

## REQUESTS FOR INFORMATION

- TNMP-S-2-1**            Regarding Exhibit AG-8 Meals & Travel, please admit that the item identified on SRW-6 page 747 for \$189 is a hotel charge. If your response is anything other than an unqualified admission, please provide a detailed explanation of the basis for your response.
- TNMP-S-2-2**            Regarding Exhibit AG-8 Meals & Travel, please admit that the item identified on SRW-6 page 748 for \$146 is a Scott Madden. If your response is anything other than an unqualified admission, please provide a detailed explanation of the basis for your response.
- TNMP-S-2-3**            Regarding Exhibit AG-8 Meals & Travel, please admit that the item identified on SRW-6 page 655 for \$260 is a Kennedy Reporting Service invoice. If your response is anything other than an unqualified admission, please provide a detailed explanation of the basis for your response.
- TNMP-S-2-4**            With reference to Staff’s response to TNMP-S-2, is it Ms. Givens’ opinion that TNMP should have been able to obtain and present the direct testimony of Mr. Flaherty for some amount substantially less than Strategy& actually charged TNMP, as presented in the testimony of Mr. Whitehurst in this docket? If so, please state what would have been a reasonable amount for TNMP to incur for the expert opinion and analysis presented in Mr. Flaherty’s testimony, and provide a detailed explanation of the basis for Ms. Givens’ opinion that TNMP could have obtained these services for that reduced amount during the time frame in which the services were provided.
- TNMP-S-2-5**            With reference to Staff’s response to TNMP S-2, please list each and every reason for Ms. Givens’ opinion that the testimony and exhibits of Thomas Flaherty in Docket 48401 was “similar testimony and exhibits” to other Texas electric utilities, and provide a detailed explanation of the basis for Ms. Givens’ opinion.