

Control Number: 49148



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DOCKET NO. 49148

2019 MAR 18 PM 2:05

APPLICATION OF EL PASO ELECTRIC §
COMPANY FOR A TRANSMISSION §
COST RECOVERY FACTOR §

PUBLIC UTILITY COMMISSION
OF TEXAS

FILING CLERK

**COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION
TO EL PASO ELECTRIC COMPANY
QUESTION NOS. STAFF 3-1 THROUGH STAFF 3-5**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that El Paso Electric Company, by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit agreed to by the parties. It is the understanding of Commission Staff that EPE agrees to respond to the requests for information (RFI) included herein within 10 days of receipt. Please copy the question immediately above the answer to each question. These question(s) 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.

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Dated: March 18, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF
TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

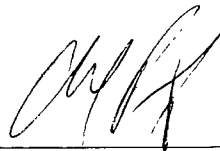
Karen S. Hubbard
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I certify that a copy of this document will be served on all parties of record March 18, 2019 in accordance with 16 TAC § 22.74.



Alexander Petak

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DEFINITIONS

- A. "EPE," "the Company," or "you" refers to El Paso Electric Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- B. "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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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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- Staff 3-1** Please refer to EPE's response to Staff 2-2. Please provide the components of the 0.031241 tax factor by tax and jurisdiction.
- Staff 3-2** For each component of the 0.031241 tax factor referenced above, please provide the individual state taxes and the calculations used to determine the tax factor.
- Staff 3-3** Reference the Company's Docket No. 46831 WP/A-3, Adjustment No. 17, page 6 of 6, lines 19-21. Please identify the revenue related taxes by type from Adjustment No. 17 that are included in the 0.031241 revenue related tax factor. For any tax factor that the Company updated, please provide a description of and justification for the update.
- Staff 3-4** Please refer to line 26 of the summary on exhibit JIB-1. What are the components of the "Schedule M Items-Permanent"?
- Staff 3-5** With respect to the ATC component of the Company's request, please provide copies of the test-period actual monthly bills for transmission services received by EPE, provided by others. Please also provide the actual monthly bills from the Test Year in Docket No. 46831.