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APPLICATION OF TEXAS-NEW § BEFORE THE STATE OFFICE
MEXICO POWER COMPANY §
TO ADJUST ITS ENERGY § OF
EFFICIENCY COST RECOVERY §
FACTOR § ADMINISTRATIVE HEARINGS

**TEXAS-NEW MEXICO POWER COMPANY'S SECOND SUPPLEMENTAL
RESPONSE TO CITIES SERVED BY TEXAS-NEW MEXICO POWER COMPANY'S
FIRST REQUEST FOR INFORMATION - CITIES 1-4**

TEXAS-NEW MEXICO POWER COMPANY ("TNMP") files this second supplemental response to The Cities Served by Texas-New Mexico Power Company ("Cities") First Request for Information. TNMP's first responses were filed on July 8, 2019. TNMP then filed a supplemental response on July 16, 2019. Since that time, Staff has requested some clarifying information and accordingly, TNMP now files this second supplemental response. All parties may treat the answers as if they were filed under oath.

TNMP files these responses without agreeing to the relevancy of the information sought and without waiving their right to object at the time of the hearing to the admissibility of information produced herein.

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Respectfully submitted,

/s/ Stephanie C. Sparks

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

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of July, 2019, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with 16 Tex. Admin. Code § 22.74.

/s/ Stephanie C. Sparks

Stephanie C. Sparks

**TEXAS-NEW MEXICO POWER COMPANY'S
SUPPLEMENTAL RESPONSE TO COMMISSION CITIES FIRST REQUEST FOR
INFORMATION – CITIES 1-4**

CITIES 1-4 Refer to Exhibit SRW 2-14, WP BILLING UNITS:

- a. Please explain if the reflected kWhs are weather-adjusted. If so, provide workpapers supporting the adjustments. If not, explain why not.
- b. Please provide TNMP's forecasted 2020 kWh by class.
- c. Please reconcile the annual opt out kWhs with the annual opt out kWhs reflected on Exhibit SMC-2, Table 4.

Prepared by: Stacy R. Whitehurst

Sponsored by: Stacy R. Whitehurst

Attachment: N/A

RESPONSE:

- a. The heading that states: "Forecasted 2019 kWh" should state "Forecasted 2020 kWh". The industrial opt-out kWh are actuals. Industrial opt-out customers are typically not impacted by weather, such as residential customers.
- b. See the response to (a.) above.
- c. SMC-2, Table 4, reflects prior period filed EEPR data updated for the current year. The five year data under WP Billing units pulls the historical data for the eligible out-outs. If prior industrial opt-outs are not renewed, the data is removed. If new industrial opt-outs have prior data, that amount is added to prior years. SMC-2, Table 4, for 2018 inadvertently left out the lighting kWh that is reflected in WP Billing units.

SUPPLEMENTAL RESPONSE:

The data referenced in response to Cities 1-4(a) is weather normalized over a 20 year period. Additionally, the "Forecasted 2019 kWh" is available in TNMP's prior EECRF docket, *Application of Texas-New Mexico Power Company to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 48404 (Oct. 12, 2018).

SECOND SUPPLEMENTAL RESPONSE:

For clarity, TNMP's demand-reduction goal is weather adjusted using weather data for the most recent 10 years, as required by § 25.181(e)(3). The 20 year period discussed above refers to the forecasted billing determinants.