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SOAH DOCKET NO. 473-21-2427  
PUC DOCKET NO. 52081

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APPLICATION OF EL PASO  
ELECTRIC COMPANY TO ADJUST  
ITS ENERGY EFFICIENCY COST  
RECOVERY FACTOR AND  
ESTABLISH REVISED COST CAP

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PUBLIC UTILITY COMMISSION  
OF TEXAS

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO EL PASO ELECTRIC COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that El Paso Electric Company 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 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 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 responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: June 3, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Rachelle Nicolette Robles  
Division Director

Rashmin J. Asher  
Managing Attorney

/s/ Kourtnee Jinks -signed with permission by  
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**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on June 3, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664

/s/ Kourtnee Jinks – signed with permission by  
Rashmin Asher  
Kourtnee Jinks

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO EL PASO ELECTRIC COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**DEFINITIONS**

- 1) "EPEC", "Company", or "you" refers to the 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.
  
- 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 FIRST REQUEST FOR INFORMATION  
TO EL PASO ELECTRIC COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

**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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TO EL PASO ELECTRIC COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-6**

- Staff 1-1 Please identify all incentive compensation costs included in the Company's EECRF request by incentive compensation plan type for the 2020, 2021, and 2022 program years.
- Staff 1-2 For each type of incentive compensation identified in Staff 1-1 above, please separate the payments for operational performance measures and financial performance measures. For purposes of this request, consider any incentive compensation to be financially based if its payment or amount is based on, derived from, or calculated using inputs from a balance sheet, income statement, or other financial report.
- Staff 1-3 Please confirm that there are no EECRF costs included in El Paso Electric, Inc.'s base rates. If deny, provide a detailed explanation and quantification of costs included in the Company's base rates.
- Staff 1-4 Please identify any affiliate expenses for which the Company seeks recovery in this proceeding by project code or work order number.
- Staff 1-5 Please provide a detailed breakdown of the administrative, and research and development costs outlined in Exhibit CAE-01, Table 10, at 25 for the 2020 program year. Provide copies of applicable invoices and contracts.
- Staff 1-6 Please provide a detailed breakdown of the research and development costs proposed for the 2021 and 2022 program years outlined in Exhibit CAE-01, Table 6, at 20. Provide copies of any applicable contracts.