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SOAH DOCKET NO. 473-21-2606
PUC DOCKET NO. 52195

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO CHANGE	§	OF
RATES	§	ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO CITY OF EL PASO'S EIGHTH REQUEST FOR INFORMATION QUESTION NOS. CEP 8-1 THROUGH CEP 87-13

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AUGUST 11, 2021

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CEP 8-1:

Please provide a workpaper that summarizes all of EPE's proposed test year adjustments to reflect the expense and revenue impacts of the COVID 19 pandemic on service provided to the Company's Texas Retail customers.

RESPONSE:

Please refer to CEP 8-1, Attachment 1, for a workpaper that summarizes El Paso Electric Company's ("EPE") proposed test year adjustments to reflect the regulatory asset, expense and revenue impacts of the COVID-19 pandemic on service provided to EPE's Texas Retail customers.

Preparer:	En Li Adrian Hernandez	Title:	Manager – Financial Accounting Senior Rate Analyst – Rates
Sponsor:	Cynthia S. Prieto Adrian Hernandez	Title:	Vice President – Controller Senior Rate Analyst – Rates

Line No.	(a) FERC Account and Description	(b) Total Company		(c) Texas	
1	**Expenses removed from Cost of Service into a Regulatory Asset (WP A-3, Adjustment No. 7, COVID-19 Costs):**				
2	506 - MISC STEAM POWER EXP	$ (82,700)	(B)	$ (67,120)	(D)
3	524 - MISC NUCLEAR POWER EXP	(1,546,840)	(B)	(1,255,431)	(D)
4	549 - MISC OTHER POWER GEN EXP	(36,076)	(B)	(29,267)	(D)
5	556 - SYSTM CONTROL & LOAD DISP	(2,935)	(B)	(2,393)	(D)
6	566 - MISC TRANSMISSION EXP	(9,598)	(B)	(7,639)	(D)
7	586 - METER EXPENSES	(1,885)	(B)	(1,492)	(D)
8	588 - MISC DISTR EXPENSE	(77,018)	(B)	(48,900)	(D)
9	903 - CUST RECORDS & COLL EXP	(131,276)	(B)	(100,657)	(D)
10	904 - UNCOLLECTIBLE ACCOUNTS	(803,227)	(A)	(624,638)	(D)
11	921 - OFFICE SUPPLIES & EXP	(632,746)	(B)	(499,519)	(D)
12	923 - OUTSIDE SVS EMPLOYED	(118,966)	(B)	(93,917)	(D)
13	926 - EMPLOYEE PENSIONS & BEN	(544,456)	(B)	(429,818)	(D)
14	**Total reduction from test year expense - WP/A-3, Adjustment No. 7, Page 1**	$ (3,987,723)		$ (3,160,791)	
15	Increase to Regulatory Asset	$ 3,987,723			
16	182.399 - OTHER REGULATORY ASSETS - amounts charged directly to regulatory assets and not to expense	3,213,020	(A)		
17	Forfeited late payment fees for 2020	944,710	WP/A-3, Adjustment No. 7, page 2		
18	Carrying costs calculated in WP/B-1, Adjustment No. 3 - Regulatory Assets and Liabilities, page 3, column (e), line 13.	199,870			
19	**Total COVID-19 Regulatory Asset - WP/B-1 Adjustment No. 3 - Regulatory Assets and Liabilities, Page 3, line 12, column (g)**	$ 8,345,323			
20	**Annual Revenue Requirement - WP/A-3 Adjustment No.11, Regulatory Asset Amortization, line 4, column (d)**	$ 2,781,774		$ 2,196,060	(D)
21	**Unamortized COVID-19 Regulatory Asset as calculated at WP/B-1 Adjustment No. 3, page 1, line 3**	$ 5,563,549		$ 5,563,549	
22	**Increase to revenues - WP/A-3 Adjustment No. 1 - Revenues & Uncollectibles, line 18, column (c)**	$ 844,298	(C)	$ 844,298	(C)

Notes:

(A) Refer to the direct testimony of EPE witness, Cynthia S. Prieto, page 36 of 57, line 9 through 13 for a discussion of the bad debt expense attributed to the COVID-19 pandemic.

(B) Refer to the direct testimony of EPE witness, Cynthia S. Prieto, page 36 of 57, line 25 through 28. The approximately $4.0 million in additional non-bad debt related COVID-19 cost is estimated to be approximately $3.2 million for Texas jurisdiction as calculated above (sum of (B)s) and $0.8 million for New Mexico. The New Mexico portion was not included in WP A-3, Adjustment No. 7 - COVID-19 Costs.

(C) Refer to the direct testimony of EPE witness, Manuel Carrasco, page 13 of 85, line 25 for additional details.

(D) Allocations from EPE Regulatory Case Working Model as filed in Dkt 52195.

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CEP 8-2:

Please identify the specific passages of EPE's direct testimony which address the prudence of investments whose costs have been recovered through the Company's DCRF since the Company's last base rate case.

RESPONSE:

Pages 37 to 48 of El Paso Electric Company ("Company") witness R. Clay Doyle's direct testimony address all of the Company's distribution investments since the last base rate case, some of which were reflected in the Company's Distribution Cost Recovery Factor ("DCRF") (per Commission final orders in Docket Nos. 49395 and 51348) since the last base rate case.[1] Accordingly, his testimony addresses the prudence of all investments whose costs have been and are being recovered through the Company's DCRF since the Company's last base rate case.

For example, Project No. DT359, Nuway New Distribution Substation, was first presented in Docket No. 51348, and the prudence of the project is specifically addressed in this docket on pages 40-41 of Mr. Doyle's direct testimony. Similarly, Project No. DT371, Executive (CE-1) New Substation was also first presented in Docket No. 51348, and the prudence of the project is specifically addressed in this docket on pages 41-42 of Mr. Doyle's direct testimony. Project No. DT229, Scottsdale Transformer & Switchgear Replacements, was

[1] In Docket No. 49395, the Company presented the distribution investments that had been added during the update period of October 1, 2016 through December 31, 2018, for inclusion in the DCRF.

In Docket No. 51348, the Company presented the distribution investments that had been added during the update period of October 1, 2016 through June 30, 2020, for inclusion in the DCRF.

In this docket, the Company addresses the prudence of all the distribution investments that had been added during the update period of October 1, 2016 through June 30, 2020, including those presented in Docket Nos. 49395 and 51348.

first presented in Docket No. 49395, and the prudence of the project is specifically addressed in this docket on pages 42-43 of Mr. Doyle's direct testimony.

As further example, distribution blanket project costs included in the DCRF filings are included in the distribution blanket project costs included in the Table RCD-5 on page 39 of EPE witness Doyle's testimony, and the prudence of the distribution blanket projects are addressed from page 38, line 17 of Mr. Doyle's direct testimony through page 39, line 21.

Additional support for the prudence of the Company's distribution investments since the Company's last base rate case, including those investments whose costs have been and are being recovered through the Company's DCRF since the last base rate case, include the following portions of Mr. Doyle's direct testimony:

- page 15, line 23 through page 17 line 21 (identifying how the need for new distribution investments, including the projects reflected in the DCRF, is identified); and
- page 17, line 24 through page 19, line 2 (identifying how EPE manages the reasonableness of costs for distribution investments, including for those investments included in the Company's DCRF).

The Company further notes that it has presented and supported the prudence of its additional distribution investments in this docket in a manner that is consistent with how the Company presented and supported its distribution investments in its past two base rate cases.

Preparer: R. Clay Doyle — Title: Vice President – Transmission & Distribution

Sponsor: R. Clay Doyle — Title: Vice President – Transmission & Distribution

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CEP 8-3:

Please provide the original budget, final cost, purpose and plant in service date of each of the top 20 highest distribution capital additions whose costs have been included in the Company's DCRF since the Company's last base rate case, along with information explaining the reasons for any increase in the original budget cost of each project of more than 10%.

RESPONSE:

Per the agreement with counsel for the City of El Paso, El Paso Electric Company received an extension to August 23, 2021.

Preparer: Darcy Welch — Title: Supervisor – AMS Financial Analysis & Planning

Sponsor: R. Clay Doyle — Title: Vice President – Transmission & Distribution

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CEP 8-4:

Please provide EPE's test year revenue requirement for AMS, along with the forecasted AMS revenue requirement for each of the next five calendar years.

RESPONSE:

There are no revenue requirements for AMS reflected in the 2020 test year in this case. The revenue requirement for AMS for 2021 is zero. The revenue requirements for the years 2022 through 2027 can be found in the Direct Testimony of Adrian Hernandez at page 6 (Table AH-1) and also in his Exhibit AH-2 in El Paso Electric Company's pending application before the Commission in Docket No. 52040.

Preparer: Adrian Hernandez Title: Senior Financial Analyst

Sponsor: Adrian Hernandez Title: Senior Financial Analyst

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CEP 8-5:

Please provide documentation of each energy efficiency and load management program offered by EPE that require AMS to implement such programs, and the Company's current forecast of energy and peak demand savings of such programs for each of the next five years.

RESPONSE:

El Paso Electric Company ("EPE") has not deployed AMS; therefore, EPE has not implemented energy efficiency nor load management programs that require AMS.

Preparer: Grisel Arizpe — Title: Supervisor – Emergent Technologies & Innovations

Sponsor: David C. Hawkins — Title: Vice President – Strategy and Sustainability

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CEP 8-6:

Please provide documentation of each time-of-use rate offered by EPE that require AMS to implement such programs, and provide the Company's current forecast of the number of Texas retail customers who are expected to take service under such rates for each of the next five years, along with the associated forecasted customer savings in each year.

RESPONSE:

The time-of-day rates offered by El Paso Electric ("EPE") in this filing do not require AMS to implement such programs.

Please refer to EPE's Application for Approval of its Advanced Metering System Deployment Plan, filed as PUCT Docket No. 52040, for discussion on EPE's 20-year rate initiative. EPE has not conducted an analysis to quantify forecasted customer savings from this initiative.

Preparer:	Manuel Carrasco	Title:	Manager – Rate Research
Sponsor:	Manuel Carrasco James Schichtl	Title:	Manager – Rate Research Vice President –Regulatory and Governmental Affairs

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CEP 8-7:

Please provide documentation describing the scope of EPE's winterization program and the activities that are performed at each EPE power plant to implement this program.

RESPONSE:

Please see CEP 8-7, Attachment 1. This attachment was effective in 2013 and has also been applied to the Montana Power Station and Copper Power Plant.

Additionally, please see the direct testimony of El Paso Electric Company ("EPE") witness J Kyle Olson, page 24, line 18 to page 25, line 8 and EPE's response to CEP 8-9.

Preparer: J Kyle Olson Title: Manager – Power Generation Engineering

Sponsor: J Kyle Olson Title: Manager – Power Generation Engineering

The Electric Company™ El Paso Electric	**Power Generation**	Document	PG-PR01-EOP-001
		Version	1.0
	Procedure	Effective	10/01/2013
Extreme Winter Weather Readiness			Internal Use

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1. Introduction

During the severe weather event of February 2-4, 2011, controlled load shedding was required due to loss of generation. During this weather event, cold weather conditions froze critical plant instrumentation and equipment, causing EPE to loose most of its local generation when it was critically needed. In the FERC-NERC report of the Southwest Cold Weather Event of February 1-5, 2011, NERC staff concluded there would be a reliability benefit to require Generator Owner/Operators to develop, maintain, and implement plans to winterize plants and units prior to extreme cold weather, in order to maximize generator output and availability. On June 5, 2013 the Standards Committee accepted the SAR drafting team's recommendation and stakeholder comments not to move forward with a Reliability Standard. Nonetheless, a Reliability Guidelines for Generating Unit Winter Weather Readiness was approved by the Operating Committee.

2. Purpose

Develop, maintain, and implement an extreme winter weather preparation plan for its generating units where extreme winter weather is defined as a significant deviation from normal average temperatures for EPE's service area.

3. Responsibilities

Each Power Plant's Operations Group or assigned personnel by the Plant Manager is responsible for this procedure.

4. Safety

Safety remains the top priority during winter weather events. Job safety briefings should be conducted during preparation for and in response to these events.

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5. Definitions

FERC- Federal Energy Regulatory Commission
NERC- North American Electric Reliability Corporation

6. Generating Unit Winter Weather Readiness -Current Industry Practices

A. Work Management System
   1) Review Work Management System to ensure adequate annual preventative work orders exist for freeze protection, winter weather preparedness, or both.
   2) Ensure all freeze protection, winter weather preparedness preventative work orders, or both are completed prior to the onset of the winter season.
   3) Review Work Management System for open corrective maintenance items that could affect plant operation and reliability in winter weather and ensure that they are completed prior to the onset of the winter season.
   4) As appropriate to your climate, suspend freeze protection measures and remove freeze protection equipment after the last probable freeze of the winter. This may be a plant specific date established by senior management.
   5) Ensure all engineered modification and construction activities are performed such that the changes maintain winter readiness for the plant. Newly built plants or engineered modifications can be more susceptible to winter weather.

B. Critical Instrumentation and Equipment Protection
   1) Ensure all critical site specific problem areas (as noted above in section III. Evaluation of Potential Problem Areas) have adequate protection to ensure operability during a severe winter weather event. Emphasize the points in the plant where equipment freezing would cause a generating plant trip, derate, or failure to start.
   2) Develop a list of critical instruments and transmitters that require increased surveillance during severe winter weather events.

C. Insulation, Heat Trace, and Other Protection Options – Ensure processes and procedures verify adequate protection and necessary functionality (by primary or alternate means) before and during winter weather. Consider the effect of wind chill when applying freeze protection. Considerations include but are not limited to:
   1) Insulation thickness, quality and proper installation
      i. Verify the integrity of the insulation on critical equipment identified in the winter weather preparation procedure. Following any maintenance, insulation should be re-installed to original specifications.
   2) Heat trace capability and electrical continuity/ground faults

i. Perform a complete evaluation of all heat trace lines, heat trace power supplies (including all breakers, fuses, and associated control systems) to ensure they maintain their accuracy. This inspection may include checking for loose connections, broken wires, corrosion, and other damage to the integrity of electrical insulation which could lead to the heat trace malfunctioning. Measure heat tracing amperage and voltage, if possible, to determine whether the circuits are producing the design output. If there are areas where heat tracing is not functional, an alternate means of protection should be identified in the winter weather preparation procedure.

ii. Evaluation of heat trace and insulation on critical lines should be performed during new installation, during regular maintenance activities, or if damage or inappropriate installation is identified (i.e., wrapped around the valve and not just across the valve body).

iii. Re-install removed or disturbed heat tracing following any equipment maintenance to restore heat tracing integrity and equipment protection.

iv. Update and maintain all heat tracing circuit drawings and labeling inside cabinets.

3) Wind Breaks

i. Install permanent or temporary wind barriers as deemed appropriate to protect critical instrument cabinets, heat tracing and sensing lines.

4) Heaters and Heat Lamps

i. Ensure operation of all permanently mounted and portable heaters.

ii. Evaluate plant electrical circuits to ensure they have enough capacity to handle the additional load. Circuits with Ground Fault Interrupters (GFIs) should be continuously monitored to make sure they have not tripped due to condensation.

iii. Fasten heaters and heat lamps in place to prevent unauthorized relocation.

5) Covers, Enclosures, and Buildings

i. Install a box or enclosure with inside heat for some transmitters.

ii. Install covers on valve actuators to keep the actuator from accumulating ice.

iii. Inspect building penetrations, windows, doors, fan louvers, and other openings for potential exposure of critical equipment to the elements.

D. Supplemental equipment – Prior to the onset of the winter season, ensure adequate inventories of all commodities, equipment and other supplies that would aid in severe winter weather event preparation or response, and that they are readily available to plant staff. Supplemental equipment might include:

1) Tarps
2) Portable heaters, heat lamps, or both
3) Scaffolding
4) Blankets
5) Extension cords

6) Kerosene/propane
7) Temporary enclosures
8) Temporary insulation
9) Plastic rolls
10) Portable generators
11) Portable lighting
12) Instrumentation tubing
13) Handheld welding torches
14) Ice removal chemicals and equipment
15) Snow removal equipment
16) Appropriate cold weather Personal Protective Equipment

E. Operational supplies – Prior to the onset of a severe winter weather event, conduct an inventory of critical supplies needed to keep the plant operational. Appropriate deliveries should be scheduled based on the severity of the event, lead times, etc. Operational supplies might include:

1) Aluminum Sulfate
2) Anhydrous Ammonia
3) Aqueous Ammonia
4) Carbon Dioxide
5) Caustic Soda
6) Chlorine
7) Diesel Fuel
8) Ferric Chloride
9) Gasoline (Unleaded)
10) Hydrazine
11) Hydrogen
12) Lighter Oil (#2 Diesel)
13) Sulfuric Acid
14) Calibration Gases
15) Lubricating Oils
16) Welding Supplies
17) Limestone

F. Staffing

1) Consider enhanced staffing (24x7) during severe winter weather events
   i. Maintenance
   ii. Engineering
   iii. Management.
2) Arrange for lodging and meals as needed.
3) Arrange for transportation as needed.
4) Arrange for support and appropriate staffing from responsible entity for plant switchyard to ensure minimal line outages.

G. Communications

1) Ensure appropriate communication protocols are followed during a severe winter weather event.
2) Identify a back-up communication option in case the primary system is not working (i.e. satellite phone).
3) Ensure communication is discussed as part of the job safety briefing during a severe winter weather event.

H. Special Operations Instruction (just prior to or during a severe winter weather event)

1) Consider employing the "buddy system" during severe winter weather events to promote personnel safety.
2) Institute operator rounds utilizing cold weather checklists to verify critical equipment is protected – i.e. pumps running, heaters operating, igniters tested, barriers in place, temperature gauges checked, etc.
    i. Monitor room temperatures, as required. Instrumentation and equipment in enclosed spaces (e.g. pump rooms) can freeze.
3) Test dual fuel capability and ensure adequate fuel supply (where applicable).
4) Consider pre-warming, early start-up, or both of scheduled units prior to a forecasted severe winter weather event.
5) Run emergency generators immediately prior to severe winter weather events to help ensure availability. Review fuel quality and quantity.
6) Place in service critical equipment such as intake screen wash systems, cooling towers, auxiliary boilers, and fuel handling equipment where freezing weather could adversely impact operations or forced outage recovery.

7. Preparations for Cold Weather Season at EPE

EPE maintains an extensive weatherization checklist specific for each of its local units. In preparation for the winter weather season operations personnel shall:

A. Schedule checklists in September.
B. Complete activities in checklist and generate work orders needed to complete items by October.
C. Open items in checklist should be completed by the end of October. If this timing cannot be met, an action plan shall be implemented until the item is closed.
D. The checklist shall be deemed completed until all items in the list are completed and any associated work orders are closed.
E. The checklists will be done as a visual inspection every day once temperature is expected to reach 38° Fahrenheit and a hardcopy of the checklist will be completed at least every two weeks through the winter season.
F. The checklists are located in each Plant's shared drive
    1) Newman and Copper power Plants:

        Operations\Newman Freeze Prot. Checklist\Freeze Protection Checklist.xlsx
    2) Rio Grande Power Plant:

        FREEZE PROTECTION\RG Freeze Protection Checklists.xlsx

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8. Approvals

Date	Name	Signature
9/25/2013	Jaime Viramontes Rio Grande Power Plant Manager	
9/25/2013	David Aranda Newman Power Plant Manager	

9. Revision History

Effective Date	Version	Revised By	Change Tracking
10/01/2013	1.0	David Barraza Pete Flores	New

10. Distribution

Date	By	To Department
9/25/2013	G Estrada	Posting in Livelink (NERC - Power Generation) System Operations Personnel and Plants' shared drive.

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CEP 8-8:

Please provide EPE's annual O&M and capital additions for winterization of power plants for each of the last five calendar years.

RESPONSE:

Please refer to El Paso Electric Company's ("EPE") response to CEP 5-26. Except for the projects referenced in CEP 5-26, costs related to maintenance of existing or installation of new winter protection are not specifically tracked by EPE. The majority of these expenses are recorded in annual operations and maintenance expenses. There is no FERC account that is specific to winterization activities.

Preparer: Pedro Vega Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson Title: Manager – Power Generation Engineering

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CEP 8-9:

Please provide a checklist of the winterization tasks for each EPE power plant and records of the winterization tasks that were performed in advance of the February 2021 winter weather event.

RESPONSE:

Please see CEP 8-9, Attachment 1, for Montana Power Station Freeze Protection Checklists for February 13, 2021.

Please see CEP 8-9, Attachment 2, for Newman Power Station Freeze Protection Checklists for February 14, 2021.

Please see CEP 8-9, Attachment 3, for Rio Grande Power Station Freeze Protection Checklists for February 14, 2021.

Please see CEP 8-9, Attachment 4, for Montana Power Station winterization work order summaries completed prior to February 14, 2021.

Please see CEP 8-9, Attachment 5, for Newman Power Station winterization work order summaries completed prior to February 14, 2021.

Please see CEP 8-9, Attachment 6, for Rio Grande Power Station winterization work order summaries completed prior to February 14, 2021.

The Copper unit was in outage at the time of the February 2021 winter event, therefore, no Freeze Protection Checklists or winterization work orders were completed.

Preparer: J Kyle Olson Title: Manager – Power Generation Engineering

Sponsor: J Kyle Olson Title: Manager – Power Generation Engineering

MONTANA POWER STATION

Operations Daily Freeze Protection Checklist

When temperatures reach 38degrees F. Perform checklist to verify that heat trace equipment throughout the site is in full operation.

If you should encounter a problem raise a fault/troubleshoot/repair.

EMAIL TO: joe.natividad@epelectric.com, Pete.Flores@epelectric.com, Abel.Bustillos@epelectric.com

ITEM	DESCRIPTION /LOCATION	PANEL/BKR	STATUS ON/OFF	NAME	DATE
1	BOP PDC MCC1 Ensure the main heat trace transformer power supply breaker is in th "ON" position.	HEAT TRACE TRANSFORMER BKR 1	ON/OFF		
2	Test the heat trace panel "HAND" function switch. Test the thermostat by holding down the setpoint button and raising the setpoint to greater than ambient temperature. After simulated testing is completed lower back to 39 degrees F.	BOP PDC1 HEAT TRACE PANEL 1	ON/OFF		
3	Ensure the 15 heat trace circuit breakers in Panel LDP2 lighting panel compartment are in the "ON" position. The panel is located in PCM(Power Control Module) Unit-1 and 2. Located in the center of building north wall.	LDP-2 Breakers 1,3 5,7 9,11 2,4 6,8 10,12 17,19,21	ON/OFF		
4	Ensure the 15 heat trace circuit breakers in Panel LDP2 lighting panel compartment are in the "ON" position. The panel is located in PCM(Power Control Module) Unit-3 and 4. Located in the center of building north wall.	LDP-2 Breakers 1,3 5,7 9,11 2,4 6,8 10,12 17,19,21	ON/OFF		
5	Ensure the Gas compressor heat trace circuit breakers are all on and not tripped. These are located in BOP PDC 1 MCC1 and MCC2.	Lighting Dist. Panel #1 MCC1 Breaker1,3,5,6,7,8,10, 12,13,15 Lighting Dist. Panel #1 MCC1 Breaker6,8	ON/OFF		
6	Ensure the heat trace circuit breaker in POWER PANEL EPEM-00-631-PPL-010 compartment is in the "ON" postion. The panel is located in Cooling Tower PDC on MCC-1. This is on the south wall west side.	LDP-2 Breaker 18	ON/OFF		
7	Ensure the heat trace circuit breaker in POWER PANEL EPEM-00-631-PPL-011 compartment is in the "ON" postion. The panel is located in Cooling Tower PDC on MCC-2. This is on the south wall east side.	LDP-2 Breaker 18	ON/OFF		
8	Blowdown all 4 air tanks in the plant using low point drains. Leave wet Header Tank drain slightly OPEN. Manually test dryer filter drains on air dryer system.	Air system	YES NO		
9	Monitor cooling towers for any possible icing. If icing occurs swap fans until ice melts. This can be done in the control room.	Cooling Towers	YES NO		

The Electric Company Newman Power Plant
El Paso Electric

Operations Daily Freeze Protection Checklist Unit-3

ITEM	DESCRIPTION/ LOCATION	PANEL/BKR	STATUS	NAME	DATE
1	Check all heat tracing circuits to be on. Panel located at #3 boiler feed pump area, mezzanine level, east wall.	UNIT 3 PANEL	(ON)/OFF	PAC	2/14
2	Check heat lamps on Unit 3 gas regulators located east side of #3 boiler, 3rd floor.		(ON)/OFF	PAC	2/14
3	Check space heater inside #3 chemical room.		(ON)/OFF	PAC	2/14
4	Check cooling water to forced draft fan and air preheater oil cooler for flow and heat lamp on inst. air supply line to forced draft fan IGV's positioner.	HEAT LAMP FLOW	(ON)/OFF (YES)/NO	PAC	2/14
5	Check heat lamp at #3 deaerator makeup regulator located at 6th floor west side of deaerator.		(ON)/OFF	PAC	2/14
6	Check heat lamp at #3 cooling tower inside acid feeder cabinet.		(ON)/OFF	PAC	2/14
7	Ensure a small amount of flow through the old side makeup at #3 cooling tower.	FLOW	(YES)/NO	PAC	2/14
8	Ensure cooling tower heat tracing single point control panel SP-900 power indicating light is on. Panel is fed from breaker 12 in distribution panel located next to circulating water pumps.	PANEL SP-900	(ON)/OFF	PAC	2/14
9	Check Unit 3 208V heat tracing panel HTPL 7000 located southwest of #3 boiler. All circuits that are in service are labeled. The thermostat is located on the panel. The test button is for lamp testing.	PANEL HTPL-7000 Breakers 1,2,3,4,5,& 7	(ON)/OFF (ON)/OFF	PAC	2/14
10	Ensure boiler feed pump area exhaust fans are off and inlet air louvers are closed. Fans are located at mezzanine level, east side. Louvers are located at 2nd. floor west side.	EXH FANS LOUVERS	ON/(OFF) OPEN/(CLOSED)	PAC	2/14
11	Check heat lamps on Unit 3 instrument air receivers located west side of #2 boiler.		(ON)/OFF	PAC	2/14
12	Open the fresh air dampers and close the recirculation flue dampers on Unit 3 boiler on DCS when ambient temp. approaches freezing point.		(OPEN)/CLOSED	PAC	2/14
13	Rotate cooling tower fans on and off as needed to minimize ice formation on cooling tower.		(YES)/NO	PAC	2/14
14	Check space heater in gold room near deluge system.		(YES)/NO	PAC	2/14

The Electric Company Newman Power Plant
El Paso Electric

Operations Daily Freeze Protection Checklist
UNIT-4

ITEM	DESCRIPTION/ LOCATION	PANEL/BKR	STATUS	NAME	DATE
1	Ensure #4 cooling tower heat tracing single point controller Panel SP-800 power indicating light is on. This panel is located on west side of cooling tower switchgear bldg. wall. Panel is fed from distribution panel inside cooling tower switchgear bldg.	Panel SP-800	(ON)/OFF	[illegible]	2/14
2	Ensure the aux. cooling water regulator heat tracing single point controller Panel SP-300 is in service. It is located on DI bldg. west wall outside by the regulator. Panel is fed from breaker inside DI bldg. distribution panel.	Panel SP-300	(ON)/OFF	[illegible]	2/14
3	Check heat lamp inside #4 cooling tower acid feeder cabinet.		(ON)/OFF	[illegible]	2/14
4	Check space heater inside Unit 4 Air Compressor Skid. Ensure exhaust fans are off and wet header blowdown valve inside skid is cracked open (approx. 1/4 turn).		(ON)/OFF	[illegible]	2/14
5	Check heat lamps at HRSG-1 & HRSG-2 feedwater and deaerator makeup regulators.		(ON)/OFF	[illegible]	2/14
6	Check heat tracing at 4B demin. water storage tank level transmitter. Breaker is located inside DI switchgear bldg. distribution panel.		(ON)/OFF	[illegible]	2/14
7	Ensure a small amount of flow on Unit 4 fire pumps pressure switch sensing line. Sensing line is located inside fire pump building.	FLOW	(YES)/NO	[illegible]	2/14
8	Check service water pumps pressure transmitters and pressure gauge heat tracing. Breaker is inside control panel bldg. breaker #2 in distribution panel.		(ON)/OFF	[illegible]	2/14
9	Ensure heat tracing 480V breakers for GT-1 (feeder #2), GT-2 (feeder #4), and Steam Turbine (feeder #5) are closed in their respective electrical skids.		(ON)/OFF	[illegible]	2/14
10	Check GT-1 and Steamer heat tracing panel HTPL-5000 located outside of GT-1 mechanical skid. All circuits that are in service are labeled. Panel is fed from 480V breaker in HRSG-1 electrical skid. The test button is for lamp testing only.	Panel HTPL-5000	(ON)/OFF	[illegible]	2/14
		Breakers 1,2,3,4,5,6,12	(ON)/OFF		
11	Check GT-2 heat tracing panel HTPL-4000 located outside of GT-2 mechanical skid. All circuits that are in service are labeled. Panel is fed from 480V breaker in HRSG-2 electrical skid. The test button is for lamp testing only.	Panel HTPL-4000	(ON)/OFF	[illegible]	2/14
		Breakers 2,3,4,5	(ON)/OFF		

12	Winterize GT-1 and GT-2 evaporative coolers.	SYS. DRAINED	YES/NO	PAC 1/14
13	Ensure flow on lines from 4B to 4A demin. water tanks through gravity flow valve and run transfer pump from 4A to 4B below at temps. below 32 degrees.	GRAVITY FLOW XFER PUMP	YES/NO ON/OFF	PAC 2/14
14	Check the heat lamps and space heaters inside the boiler feed pump skids for HRSG-1 and HRSG-2. They will be located at the PS&G (Pressure Switch & Gauge) cabinet.		ON/OFF	PAC 2/14
15	Check the heat lamps inside the 250# gas pressure reducing station cabinet. This cabinet is where the 250# gas pressure regulators are located.		ON/OFF	PAC 2/14
16	Check heat lamps at the main steam bypass instrument air receiver and on the main steam bypass regulator instrument air lines.		ON/OFF	PAC 2/14
17	Rotate cooling tower fans on and off to minimize ice buildup on cooling tower.		YES/NO	PAC 2/14
18	Block and drain park pumps and sprinkler system. Supply valve is at #1 cooling tower effluent water side makeup.	SYS. DRAINED	YES/NO	PAC 2/14
19	Check heat lamps on instrument air wet header blowdown valves between Unit 3 and GT-2. Crack open (approx. 1/4 turn) the blowdown valves.		ON/OFF	PAC 2/14
20	Check heat lamp on the Treated Sewage Water Tank level transmitter sensing line.		ON/OFF	PAC 2/14

The Electric Company — Newman Power Plant
El Paso Electric

Operations Daily Freeze Protection Checklist
UNIT-5

ITEM	DESCRIPTION/ LOCATION	PANEL/BKR	STATUS	NAME	DATE
1	Winterize Mee Fog system. Open all valves on the inlet and the outlet side of pumps including at the pumps. Block main water supply valve before prefilter. Drain prefilter and pull the filter.	Breakers Sys. Drained	ON/OFF YES/NO	PAE	2/14
2	Check heat trace panel HTP-01 located inside the simple cycle PDC building. Panel is fed from breaker #1 in distribution panel ELV-PN-0008.	Panel HTP-01 Breakers 1,2,4,5,6,8,9, 11 & 12	ON/OFF ON/OFF	PAE	2/14
3	Check HRSG-3 heat trace panel HT-PN-5003 located next to HRSG-3 boiler feed pumps. Panel is fed from 480V breaker inside HRSG's PDC. Circuits in use are labeled. Test button is for lamp testing only.	HT-PN-5003 Breakers 1,2,3,4,5,6,7	ON/OFF ON/OFF	PAE	2/14
4	Check HRSG-4 heat trace panel HT-PN-5004 located next to HRSG-4 boiler feed pumps. Panel is fed from 480V breaker inside HRSG's PDC. Circuits in use are labeled. Test button is for lamp testing only.	HT-PN-5004 Breakers 1,2,3,4,5,6,7	ON/OFF ON/OFF	PAE	2/14
5	Check heat trace panel HT-PN-5001 located by Unit 5 HRSG's sump. Circuits in use are labeled. Test button is for lamp testing only.	HT-PN-5001 Breakers 1,3,4,5,6,7,11, 12 & 13	ON/OFF ON/OFF	PAE	2/14
6	Check heat trace panel HT-PN-5005 located by U5 steam turbine condenser southwest side. Circuits in use are labeled. Test button is for lamp testing only. Panel is fed from 480V breaker inside steam turbine PDC.	HT-PN-5005 Breakers 1,2,3,4,5,6,7,9,11	ON/OFF ON/OFF	PAE	2/14
7	Check heat trace panel HT-PN-5002 located at #5 cooling tower southwest side of the circulators. Panel is fed from 480V breaker inside cooling tower PDC. Test button is for lamp testing only.	HT-PN-5002 Breakers 1,3,5	ON/OFF ON/OFF	PAE	2/14
8	Ensure #5 cooling tower fan operation is on Auto. Open circulating water return to cooling tower bypass if necessary to maintain circulating water temperature. This bypass is located at the northwest corner of the cooling tower.	BYPASS FANS	OPEN/CLOSED AUTO/MANUAL	PAE	2/14
9	Check HRSG-3 & HRSG-4 boiler feed pump flow and pressure transmitter cabinets for operation of heaters inside the cabinets. Check the HRSG's flow and pressure transmitter cabinet heaters as well. These cabinets are located between the HRSG's.	HEATERS	ON/OFF	PAE	2/14
10	Check space heaters inside skids, deluge system bldg., and fire pump bldg. Check heaters for the Simple Cycle PDC, PEEC's, HRSG's PDC, Steamer PDC, Steamer enclosure, and cooling tower PDC.	HEATERS	ON/OFF	PAE	2/14
11	Check thermostat breaker and status inside IAC housing. Vendor set limits at 50°F	THERMOSTAT	ON/OFF	PAE	2/14
12	Check Land shark at lake and shut down when temp gets about 35 degrees		ON/OFF		

The Electric Company Newman Power Plant
El Paso Electric

Operations Daily Freeze Protection Checklist
ZLD

ITEM	DESCRIPTION/ LOCATION	PANEL/BKR	STATUS	NAME	DATE
1	Ensure the 4 heat tracing circuit breakers in Panel 1 are in the "ON" position. Panel 1 is located in the 480V switchgear enclosure inside the ZLD bldg. at the south end.	Panel 1	ON/OFF	PAE	2/14
		Breakers 34,36,38,& 40	ON/OFF		
2	Ensure the 8 space heaters inside the ZLD bldg. are operating. They all have individual thermostats. SET AT 65 DEGREES F. The 480V breakers are located in Panel H2 located in the 480V switchgear enclosure inside the ZLD bldg. at the south end.	Panel H2	ON/OFF	PAE	2/14
		Breakers 3,4,9,10,15,16, 21 & 22	ON/OFF		
3	Ensure the ZLD bldg. exhaust fans (total of 4) located on the north wall are turned off. The inlet louvers (total of 4) located on the south wall should close also. The breakers are located in Panel P2 located on the east wall of the bldg. and in Panel P1 located in the 480V switchgear enclosure inside the ZLD bldg. at the south end.	Panel P1	ON/OFF	PAE	2/14
		Breakers 19, 21	ON/OFF		
		Panel P2	ON/OFF		
		Breakers 3,5,7,9,11,&13	ON/OFF		
4	Ensure the low point drains (4) on the lines outside of the ZLD building are open when the ZLD is not in operation. These low point drains are on the EC-1 & EC-2 pumps suction and discharge lines and on the product line to the effluent tank.	DRAINS	OPEN/CLOSED	PAE	2/14
	*ADDED SALT TO VARIOUS AREAS OF PLANT WHERE ICE WAS A CONCERN				

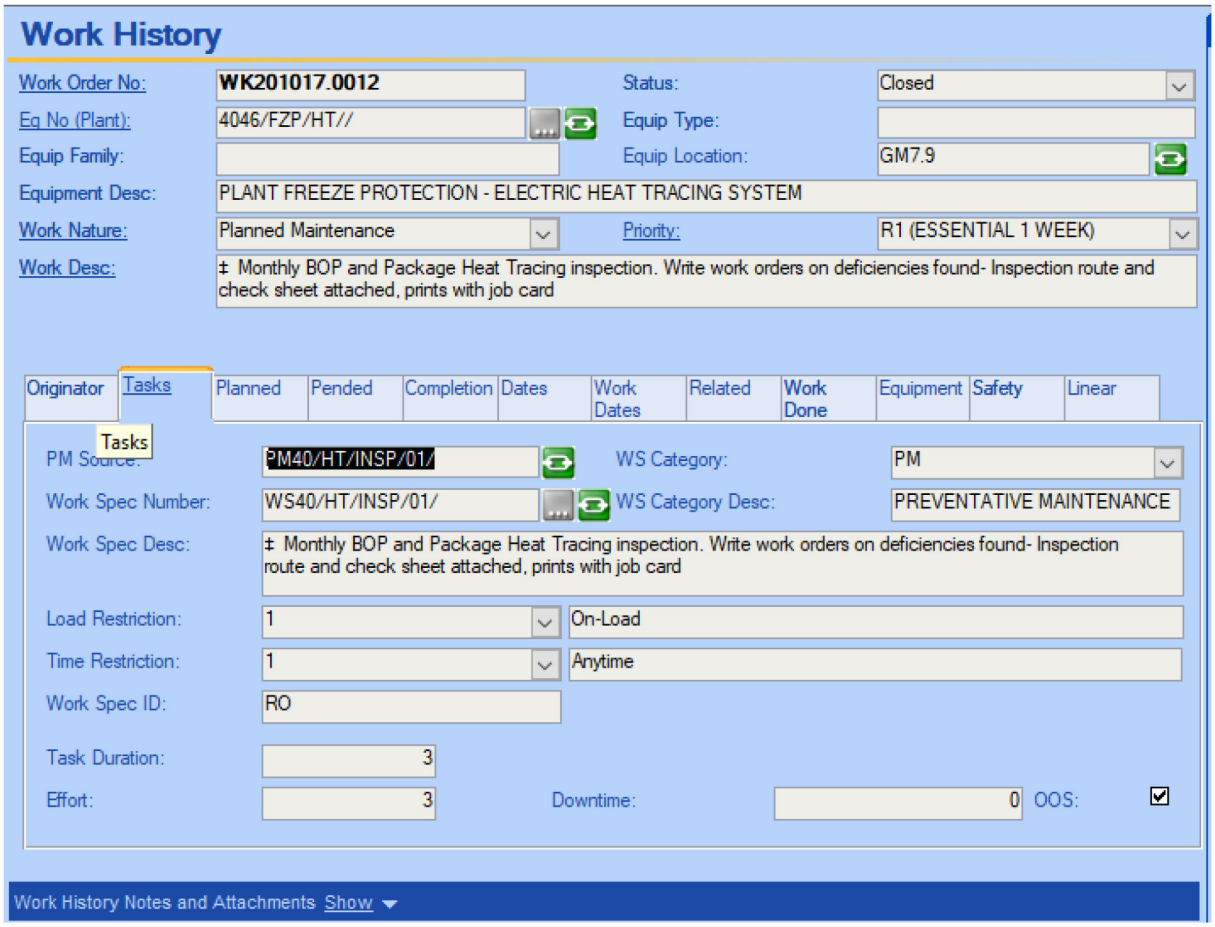
TIME: 0300
DATE: 2/14/2021
Crew: C
Supervisor: Alfredo Delgado
F

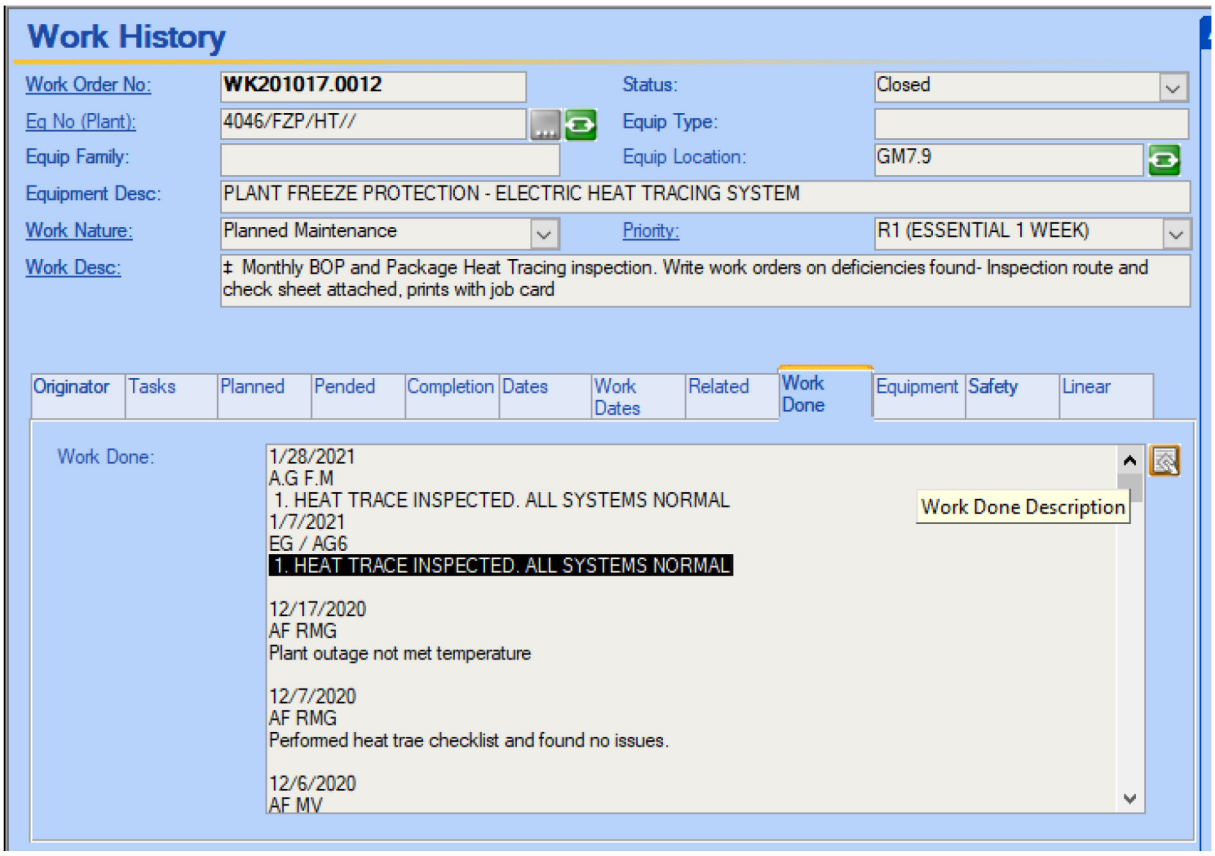
	Description	Notes	Name	Complete	Work Orders
1	A check should be made to insure that heat tracing, heat lamps and space heaters are on and operating.	W.O writen for not working heaters & lamps	AM/BP	✓	
2	Boiler instrument tube bundles on 6 – 7 – 8 boilers heat tracing on and operating properly.		BP	✓	
3	Crack drains at circulator priming jets.		BP	✓	
4	Exciter air wash water should be turned Off. and exciter air wash drained. Damper installed	OFF	BP	✓	
5	The suction should be open and the discharge valve cracked on idle H2 & oil cooling pumps.		BP	✓	
6	Check bypass on hydrogen seal oil unit water to oil cooler cracked.	Veryfyed bypass is cracked	BP	✓	
7	Boiler feed pump warming lines on idle pumps should be open.		BP	✓	
8	Blow condensate from instrument air receivers, compressor coolers, and reducing stations frequently.	Automatic	BP	✓	
9	Alternate instrument air dryers every 8 hours.	Automatic	AM	✓	
10	All cooling water to bearings and glands should be checked for good flow.	Every Hour	AM	✓	
11	Maintain condenser inlet water at not below 69°F and alternate cooling tower fans to prevent ice buildup.	Every Hour	AM	✓	
12	Crack emergency make up lines to 6 – 7 – 8 towers.	Not needed at this time	AM	✓	
13	Check heat lamps and heat tracing on at towers.	Heat lamps I/S	AM	✓	
14	Crack wash hoses at towers.	Not needed at this time	AM	✓	
15	Check showers at towers.		AM	✓	
16	If 6 and/or 7 units are off line, circulators and H2 & oil cooling pumps should be drained.		AM	✓	
17	When there is fog, check boiler forced draft fan inlet vanes for icing.	No Ice	AM	✓	
18	Make frequent rounds of equipment.	Every hour	AM	✓	
19	When outside air temperature drops to 5 F put a warming fire in the cold boilers.	N/A			

20	Keep a warming blanket of steam on idle units' deaearators.	U6 & U7 dry layup			
21	Refer any questions on freeze protection to Utility or Watch Engineer.	N/A			
22	Unit 6 and or 7 when off line drain water and shell side of air ejectors (jets)	U6 & U7 Drained	BP	✓	
23	**Torpedo Kerosene Heaters at unit 8 FD Fan**	Not needed a this time but in place	AM	✓	4 heat lamps
	U6 IR Lamp Checklist				
	Location	**No of Lamps**	**Name**	**On/Off**	**Work Orders**
1.	CASCADE drip regulator from 1st and 2nd point heaters. Lines from heaters tie into one common line to deareator only one drip regulator with	U6 dry layup	BP	Off	
2.	Condensate regulator to deareator top of deareator	U6 dry layup	BP	off	
3.	Gland Seal Tank sight glass, top landing of D.A	U6 dry layup	BP	Off	
4.	Gland Seal Tank supply regulator, top landing of D.A	U6 dry layup	BP	Off	
	U7 IR Lamp Checklist				
	Location	**No. of Lamps**	**Name**	**On/Off**	**Work Orders**
1.	Top of boiler on all three emergency steam	3 dry layup	BP	On	
2.	Condensate regulator to D.A. top of D.A	1 dry layup	BP	On	
3.	D.A. landing 1 on each of cascade drip regulators from 1st and 2nd point heaters	2 Dry layup	BP	On	
4.	Main Gas regulator	1 dry layup	BP	On	
5.	Forced Draft Fan Controller / Cabinet on 3rd floor	2 Dry layup	BP	Off	
6.	Forced Draft Fan Controller	2 Dry layup	AM	On	
	U8 IR Lamp Checklist				
	Location	**No. of Lamps**	**Name**	**On/Off**	**Work Orders**
1.	Primary emergency steam regulator top of boiler	1	BP	On	
2.	Secondary emergency steam regulator to of boiler	1	BP	On	
3.	Emergency steam to D.A., D.A. landing	1	BP	On	
4.	Condensate regulator to D.A., D.A. landing	1	BP	On	
5.	Cascade drip regulator from 2nd point heater to D.A., on D.A. landing	1	BP	On	
7.	Forced Draft Fan Controller	1	AM	off	Wk 210127.0003.
	Space Heater Schedule				
	Location	Notes	**Name**	**Operating**	**Work Orders**
1	U6 Aux Floor South wall	Gas	BP	Yes	

2	U7 Aux Floor South wall	Gas	BP	Yes	
3	U8 Aux Floor South wall (behind BFPs)	Gas	BP	Yes	
4	Unit 8 Chemical Room	Gas	AM	No	
5	U8 Aux Floor West wall by double doors (behind	Gas	AM	Yes	
6	U9 R.O Building by west corner	Electric	AM	Yes	
7	U9 R.O Building by east corner	Electric	AM	Yes	
8	Old DI Building east corner	Electric	AM	Yes	
	U9 oil Tanks				
	LOCATION	**Reading**	**Name**	**On/Off**	**Work Orders**
1.	Mineral Lube Oil Main Tank Level LT0135	80%			No Communication
2.	Mineral Lube Oil Main Tank Temperature	125			No Communication
3.	Synthetic Lube Oil Tank Level LT1002	89%			No Communication
4.	Synthetic Lube Oil Tank Temperature TE1013	100.3			No Communication
5.	Turbine Hydraulic Starter Oil tank Level LT6001	75%			No Communication
6.	Turbine Hydraulic Starter Oil tank Temperature TE6003	104			No Communication
7.	Gas Compressor Kobelco Lube Oil Header Temperature TT-102 A	60.3			No Communication
8.	102	44%			
	U9 Heat Tracing Panel Breaker				
	LOCATION	**Fault Y/N**	**BRKR #**	**On/Off**	**Work Orders**
1	U9 Below PCM Building	No	AM	On	
2	U9 Outside RO Building	No	AM	On	
	Cooling Towers				
	LOCATION	**Check For Icing**	**Name**	**On/Off**	**Work Orders**
1	U6 Cooling Tower	No Ice	AM	Unit Off Line	* basin drained
2	U7 Cooling Tower	No Ice	AM	unit offline	* basin drained
3	U8 Cooling Tower	No Ice	AM	Online	
4	U9 Cooling Tower	No Ice	AM	Unit Off Line	

Montana Power Station Winterization Work Order Summaries for Work Orders Completed prior to February 14, 2021





Newman Power Station Winterization Work Order Summaries for Work Orders Completed prior to February 14, 2021

(w) WO ID	(w) EQUIP DESC	(w) WO DESC
WK200205.0001	U4 ST COOLING TOWER	U4 freeze protection sp800 panel has Ground fault trip alarm. Reset and it keeps coming in. Panel has power but heat tracing circuits are not turning on.
WK201012.0023	U3 COOLING TOWER	On ct3 riser downcomers nozzles need to be cleaned. Water is not dispercsed evenly. May effect us during winter causing tower to freeze easily.
WK201012.0025	U2 COOLING TOWER	water downcomer nozzle for cooling tower need to be cleaned in preparation for winter. Water is not evenly dispersed and may cause tower to freeze easier.
WK201012.0026	U1 COOLING TOWER	Please clean downcomer nozzles for ct1. water is not evenly dispersed and may freeze easier during winter time.
WK201024.0004	U3 DEAREATOR 3RD POINT HEATER CONTROLS I&C	Electrical outlet on the 6th floor has a broken ground prong stuck inside the outlet. Unable to set up freeze protection for MU reg.
WK201028.0009	GENERAL PLANT FREEZE PROTECTION	YR - GENERAL PLANT SURVEY AND REPAIR ELECTRICAL HEAT TRACING or PORTABLE FREEZE PROTECTION CIRCUITS NOT UNIT SPECIFIC
WK201204.0002	U1 PLANT FREEZE PROTECTION	Several outlets on U1 do not work for freeze protection. Cords are being ran across walk areas to have heat lamps in service
WK201221.0004	GT2 FUEL GAS SYSTEM	The electricity and the thermostat need to be checked and repaired as needed to have Freeze protection for the Gas regulators
WK210114.0006	HRSG2 PLANT FREEZE PROTECTION	Install necessary thoermostats for freeze protection.
WK210114.0007	HRSG1 PLANT FREEZE PROTECTION	Install necessary thermostats for freeze protection.
WK210114.0008	U4 ST PLANT FREEZE PROTECTION	Install necessary thermostats for freeze protection.
WK210209.0007	U4 ST CONDENSER I&C	The 110 oulet needs to be replaced to provide power to our freeze protection heat lamps on the Main stm bypass and Main stm desuperheater and 2 inch bypass bypass desuperheater
WK210211.0001	U3 EMERGENCY STEAM REGULATOR	PACKING IS BLOWN OUT. MAY CAUSE ISSUES FOR UPCOMING FREEZE
WK210212.0003	HRSG1 PLANT FREEZE PROTECTION	Reinsulate all existing sensing lines that were deinsulated for the upgrade outage & insulate all new sensing lines in preparation for the upcoming freeze
WK210212.0004	HRSG2 PLANT FREEZE PROTECTION	Reinsulate all existing sensing lines that were deinsulated for the upgrade outage & insulate all new sensing lines in preparation for the upcoming freeze
WK210212.0007	U4 ST CONTROL SYSTEM	Reinsulate all existing sensing lines that were deinsulated for the upgrade outage & insulate all new sensing lines in preparation for the upcoming freeze

Rio Grande Power Station Winterization Work Order Summaries for Work Orders Completed prior to February 14, 2021

WK201006.0004 Check inspect all plant heat tracing for proper operation. Check auto thermostatic controls at panels. Fill out check sheets on S:/ drive. Report all additional work needed.

WK201012.0050 U9 HPC Stator Case 8th Stage Anti-Ice Bleed Hose Inspection - See attached GE Gas Turbine System Letter; Job Plan Template: I; Load Restriction: OFL; Time Restriction: 2; Q4 WO Source: 1; Total planned expenditure of man-hours: 12.0; MECH00

WK201018.0001 Request fabrication of covers for regular and back up regulators on CT 6. Heat resistant for use with heat lamps for freeze protection. - OPERATIONS TO CHECK IF THEY DO NOT ALREADY HAVE ONE IN THEIR FREEZE PROTECTION LOCKER. J. GARCIA 10/19/2020.

WK201018.0002 Request fabrication of covers for regular & back up regulators on CT7. Must be heat resistant for use with heat lamps for freeze protection. - OPERATIONS TO CHECK IF THEY DO NOT ALREADY HAVE ONE IN THEIR FREEZE PROTECTION LOCKER. J. GARCIA 10/19/2020.

WK201018.0003 Request fabrication of covers for regular and back up regulators on CT8. Heat resistant for use with heat lamps for freeze protection. - OPERATIONS TO CHECK IF THEY DO NOT ALREADY HAVE ONE IN THEIR FREEZE PROTECTION LOCKER. J. GARCIA 10/19/2020.

WK201018.0004 Fabricate a cover that covers heat lamp and regulator for freeze protection as well as make a door to access the controller - OPERATIONS TO CHECK IF THEY DO NOT ALREADY HAVE ONE IN THEIR FREEZE PROTECTION LOCKER. J. GARCIA 10/19/2020.

WK201018.0005 For u8 emergency steam south regulator - Fabricate a cover for heat lamp as well as regulator for freeze protection w/access door for controller - OPERATIONS TO CHECK IF THEY DO NOT ALREADY HAVE ONE IN THEIR FREEZE PROTECTION LOCKER. J. GARCIA 10/19/2020.

WK210214.0006 insulation blanket needs to be made for U8 main gas latch for winter time.

WK201217.0001 U7 FDF controller cabinet third floor has a heat bulb that broke in the socket also the thermostat is not working turned it to 80 and the other heat lamp will not turn on these are part of the freeze protection plan please check

WK201231.0141 Check inspect all plant heat tracing for proper operation. Check auto thermostatic controls at panels. Fill out check sheets on S:/ drive. Report all additional work needed.; Job Plan Template: PM; Load Restriction: ONL; Time Restriction: 1; Q4 WO Source: 1; Total planned expenditure of man-hours: 16.0; ELEC00

R201018.0010 3rd floor U8 heat trace panel has a tripped breaker 23/25 FD FAN BEARING COOLING WATER; Q4 WO Source: 3; Total planned expenditure of man-hours: 2.0; ELEC00; tripped breaker on U8 heat trace panel 23/25

R210219.0015 U8 heat trace panel has a tripped breaker #5 located on 3rd floor previous work order 210210.0001; Q4 WO Source: 3; Total planned expenditure of man-hours: 4.0; ELEC00; tripped breaker on heat trace panel

WK201014.0077 Lower and re-connect canvas skirts to condensers for cold weather protection. Make note on this work order on condition of skirts hold down brackets etc.

PM2013/IT/WNR/13955 Check and inspect plant instrument Freeze Protection equipment for proper operation. Check auto thermostatic controls at instruments panels and heat lamps.. Check covers installed by operations for leakage/good fit, etc. Status Operations Check list ongoing during winter months

PM2013/OP/TE/EQP/WNR OPERATIONS TO CHECK ALL PLANT HEAT TRACING FOR PROPER OPERATION. INSTALL HEAT LAMPS. REPORT ALL PROBLEMS VIA W.O. & ATTACHED R.I.T. BE SPECIFIC. ESTABLISH PROPER WATER FLOWS THROUGH EXPOSED SYSTEMS AS PER PROCEDURE. DATUM DATE CHANGES NOTE TO PLANNERS START THIS PMWO TO BEGIN IN MIDDLE OF SEPTEMBER, NO LATER THAN FIRST WEEK OF OCTOBER. DATUM DATE CHANGED TO REFLECT NOTE ABOVE, FREQUENCY CHANGED TO FIXED, FREQUENCY TO DAYS (364), FLOAT CHANGED TO 3. DATUM DATE CHANGED FROM 08/28/2006 TO 09/16/2006 TO REFECT START DATE OF 09/15/XXXX. THIS IS ALSO TO BRING INTO COMPLIANCE W/PM MASTER. TBM 09/06/07. Status Operations Check list ongoing during winter months

SOAH DOCKET NO. 473-21-2606
PUC DOCKET NO. 52195

APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S EIGHTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 8-1 THROUGH CEP 8-13

CEP 8-10:

Please provide the estimated annual savings in EPE's O&M and A&G expenses as a result of the Merger with IIF for each of the next three calendar years.

RESPONSE:

Please refer to CEP 8-11 for the estimated savings resulting from El Paso Electric Company's ("EPE") Merger. As mentioned on page 18 of EPE witness James Schichtl's direct testimony, the acquisition and merger were not done in order to achieve synergistic savings.

Preparer: Richard Gonzalez Title: Manager – Cash Management & Investor Relations

Sponsor: Lisa Budtke Title: Director – Treasury Services & Investor Relations

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CITY OF EL PASO'S EIGHTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 8-1 THROUGH CEP 8-13

CEP 8-11:

Please provide a workpaper that summarizes all adjustments to the test year for impacts of the IIF merger on EPE's Texas Retail expenses and revenues.

RESPONSE:

Please see below for adjustments to the test year related to the IIF merger.

Description	Total Company Amount	Texas Jurisdiction Amount	Work Paper Reference
Board of Directors expense	($ 673,429)	($ 531,636)	WP A-3 Adj 21 Miscellaneous General Expenses and the testimony of EPE witness Budtke
Directors and Officers Insurance expense	(388,562)	(306,749)	WP A-3 Adj 10 Injuries and Damages and the testimony of EPE witness Borden
NYSE listing fees	(72,804)	(57,475)	WP A-3 Adj 8 Outside Services Employed and the testimony of EPE witness Borden
Total	($ 1,134,795)	($ 895,860)	

Preparer: Melody Boisselier — Title: Principal Accountant – Regulatory Accounting

Sponsor: Jennifer I. Borden — Title: Director – Regulatory Accounting
Lisa D. Budtke — Director – Treasury Services and Investor Relations
Adrian Hernandez — Senior Rate Analyst – Rates

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CITY OF EL PASO'S EIGHTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 8-1 THROUGH CEP 8-13

CEP 8-12:

Please provide EPE's annual energy efficiency savings (MWh and $) for each of the last five calendar years including the test year, along with the Company's total costs associated with energy efficiency programs for each year.

RESPONSE:

Please see El Paso Electric Company's public website for the 2017 to 2021 El Paso Electric Company Energy Efficiency Plan and Reports (for program years 2016 to 2020). Table 8, Projected versus Reported Savings, includes the annual energy efficiency savings, and Table 10, Program Funding for Calendar Year, includes the total costs associated with energy efficiency programs for each year.

The link for this information is: https://www.epelectric.com/save-money-and-energy/energy-efficiency-filings (2017-2021 EPE Energy Efficiency Plan and Reports)

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SOAH DOCKET NO. 473-21-2427
PUC DOCKET NO. 52195

APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S EIGHTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 8-1 THROUGH CEP 8-13

CEP 8-13:

Please provide EPE's demand management program savings (peak MW and $) for each of the last five calendar years including the test year, along with the Company's total costs associated with demand management programs for each year.

RESPONSE:

Please see the response to CEP 8-12. EPE's demand management program savings and total costs are included in the El Paso Electric Company Energy Efficiency Plan and Reports.

Please see the 2017 to 2021 El Paso Electric Company Energy Efficiency Plan and Reports (for program years 2016 to 2020). Table 8, Projected versus Reported Savings, includes the annual demand management (load management) program savings, and Table 10, Program Funding for Calendar Year, includes the total costs associated with demand management (load management) programs for each year.

The link for this information is: https://www.epelectric.com/save-money-and-energy/energy-efficiency-filings (2017-2021 EPE Energy Efficiency Plan and Reports)

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CEP 08-01_Attachment 01.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.