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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

OFFICE OF PUBLIC UTILITY COUNSEL’S
FOURTH REQUEST FOR INFORMATION TO
EL PASO ELECTRIC COMPANY

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Fourth Request for Information to El Paso Electric Company (“EPE”). OPUC requests that EPE provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that EPE provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “EPE,” the “Company,” “Applicant,” “You,” and “Your” refer to El Paso Electric Company and its affiliates, subsidiaries, 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” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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- 4-1.** Please refer to the Direct Testimony of Mr. R Clay Doyle, page 26. Please provide copies of similar agreements referred to by Mr. Doyle with respect to the Isleta Pueblo Land Right Renewal agreement. Please include in your response the costs paid by other utilities for similar Right-of-Way agreements.
- 4-2.** Please refer to the Direct Testimony of Mr. R. Clay Doyle, pages 55-61. For each of the proposed changes to El Paso Electric Line Extension Policy, provide an example of another Texas electric utility service provider with a similar provision that has been adopted by the Public Utility Commission of Texas.
- 4-3.** Please refer to the Rate Filing Package ("RFP"), Schedule B-2. Please provide the same information by month for the accumulated balance of uncollectible accounts for the period January 2017 through December 2019.
- 4-4.** Please refer to the RFP, Schedule C-5. Please provide a copy of the study used to determine the rate at which administrative and general expense are capitalized as construction overhead. Please be sure to include in your response the capitalized percentages for each administrative and general department along with a description of the activities conducted by that department.
- 4-5.** Please refer to the Direct Testimony of Mr. R. Clay Doyle, pages 22-26. Please provide a copy of the analysis that was conducted that showed that rerouting the line that is currently on the Isleta Pueblo was costlier than the Right-of-Way agreement. Be sure to show the analysis of transmission costs by FERC account.
- 4-6.** Please refer to EPE's response to CEP RFI No. 5-41. Please provide a schedule showing the dates during which Rio Grande 6 was used to provide electric service to customers from January 2019 through the most recent date in which data is available.
- 4-7.** Please refer to EPE's response to CEP RFI No. 5-42. Please confirm or deny that EPE can meet its reserve requirements without the inclusion of the reserve provided by Rio Grande Unit 6. If deny, provide a detailed summary of why the capacity at Rio Grande 6 is necessary to meet any regulatory reserves.
- 4-8.** Please refer to EPE's response to CEP RFI No. 5-42. Please provide a schedule that details the total costs related to Rio Grande Unit 6 that have been included in the computation of revenue requirements for Total Company as well as for the Texas Jurisdiction.
- 4-9.** Please refer to EPE's response to OPUC 2-5. Please provide a description of the Tenants located in the Stanton Tower. Please confirm or deny that the Tenants are part of EPE's electric utility operations. If denied, please provide an explanation as to why the capital costs related to Tenants are included in rate base and the total amounts included by FERC account that relate to the Tenants.

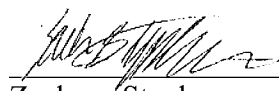
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- 4-10.** Please refer to the RFP, Schedule C-4.3. Please provide a detailed explanation for the planned expenditure of an additional \$12.5 million for the Customer Care & Billing ("CC&B") System Upgrade. Please include in your response an explanation of how these planned expenditures (of which \$4.6 million is currently included in the CWIP balance) will upgrade or enhance the current CC&B system.
- 4-11.** Please refer to the RFP, Schedule G-1.2. Please provide an explanation for the approximate increase of 6.7% in non-union base payroll from calendar year 2019 to calendar year 2020.
- 4-12.** Please refer to the RFP, Schedule G-1.2. Please provide an explanation for the approximate increase of 4.9% increase in union base payroll from calendar year 2019 to calendar year 2020.
- 4-13.** Please refer to the RFP, Schedule G-1.6. Please provide a detailed breakdown of the non-standard pay that is included as "Strategic Transaction Costs." Please include in your response the monthly Strategic Transaction Costs reported in 2019 with the same detailed breakdown of the purposes of this category of non-standard pay.
- 4-14.** Please refer to the RFP, Schedule G-2.1. Please provide the pension expense that was included in the rates developed in the last base rate case. Please provide this information on a Total Company basis and on a Texas Retail basis.
- 4-15.** Please refer to the Direct Testimony of Ms. Cynthia Prieto, page 29. Please provide a schedule that shows the computation of the \$20,748,433 in protected excess accumulated deferred income taxes ("EDFIT") that is considered to have become eligible for refund during the "stub period." Please include the breakdown of this amount by the same components shown as protected EDFIT on Schedule G-7-9a.

August 11, 2021

Respectfully submitted,

Chris Ekoh
Interim Public Counsel
State Bar No. 06507015

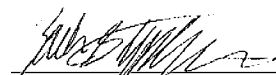


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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 11th day of August 2021 by facsimile, electronic mail, and/or first class, U.S. Mail.


Zachary Stephenson