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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
TEXAS COTTON GINNERS' ASSOCIATION'S
FIRST REQUEST FOR INFORMATION
QUESTION NOS. TCGA 1-1 THROUGH TCGA 1-10

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TCGA 1-1:

Provide the monthly peak loads for each Texas distribution substation for the test-year.

RESPONSE:

El Paso Electric Company records the peak loads for distribution substation transformers rather than the total peak for the substation. See TCGA 1-1, Attachment 1 – HSPM.

Preparer: William T. Pollard

Title: Superintendent – Distribution Systems

Sponsor: R. Clay Doyle

Title: Vice President – Transmission &
Distribution

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TCGA's 1st, Q. No. TCGA 1-1

Attachment 1

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TCGA 1-1 Attachment 1 is a CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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TCGA 1-2:

Provide the annual peak load and the month of the peak load for each distribution substation for the test-year.

RESPONSE:

El Paso Electric Company ("EPE") records the annual peak loads for distribution substation transformers. Please refer to EPE's response to TCGA 1-1, Attachment 1 – HSPM.

Preparer: William T. Pollard

Title: Superintendent – Distribution Systems

Sponsor: R. Clay Doyle

Title: Vice President – Transmission &
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TCGA 1-3:

Provide the name, location, transformer capacity and peak load for each distribution feeder that peaked during the months of November, December, January or February during the test-year.

RESPONSE:

Please see TCGA 1-3, Attachment 1 – HSPM where El Paso Electric Company provides a table showing only feeders that peaked during the 2020 months of November, December, January or February.

Preparer: William T. Pollard

Title: Superintendent – Distribution Systems

Sponsor: R. Clay Doyle

Title: Vice President – Transmission &
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TCGA 1-4:

Identify each cotton gin customer served by the Company during the test year.

CONFIDENTIAL RESPONSE:

Please see TCGA 1-4, Attachment 1 – HSPM.

Preparer: Manuel Carrasco

Title: Manager – Rate Research

Sponsor: Manuel Carrasco

Title: Manager – Rate Research

EL PASO ELECTRIC COMPANY

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TCGA 1-5:

For each cotton gin customer served during the test-year, identify whether the facility is served from underground or overhead primary voltage distribution facilities.

RESPONSE:

There are currently no cotton gin customers with a primary metered service.

Preparer: William T. Pollard

Title: Superintendent – Distribution Systems

Sponsor: R. Clay Doyle

Title: Vice President – Transmission &
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TCGA 1-6:

For each cotton gin customer served during the test-year, identify whether the facility is served from underground or overhead secondary voltage distribution lines.

RESPONSE:

Please see TCGA 1-6, Attachment 1 – HSPM.

Preparer: William T. Pollard

Title: Superintendent – Distribution Systems

Sponsor: R. Clay Doyle

Title: Vice President – Transmission &
Distribution

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TCGA 1-7:

For each cotton gin customer served during the test-year, provide a detailed description of the secondary voltage distribution facilities owned by the Company and for which the cotton gin customer did not make a contribution in aid of construction that are used to serve each cotton gin customer.

RESPONSE:

Please see TCGA 1-7, Attachment 1 – HSPM.

Preparer: Leslie Chagnon

Title: Senior Director – Distribution Design,
Construction and Maintenance

Sponsor: R. Clay Doyle

Title: Vice President – Transmission and
Distribution

EL PASO ELECTRIC COMPANY

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TCGA 1-8:

Does the Company differentiate between summer and winter peak loadings in their distribution planning or distribution construction standards? If so, please provide the basis of any differentiation. If not, please provide a detailed justification for not differentiating between the maximum loading capability between summer and winter conditions for distribution facilities.

RESPONSE:

No. El Paso Electric Company does not differentiate between summer and winter peak loads for distribution planning. Annual peaks are used regardless of when they occur for distribution planning purposes. See TCGA 1-8, Attachment 1 – Confidential.

Preparer: William T. Pollard

Title: Superintendent – Distribution Systems

Sponsor: R. Clay Doyle

Title: Vice President – Transmission &
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TCGA 1-9:

Provide any of the Company's distribution construction standards or planning manuals or other documents that address or discuss any distribution planning or design standard differences between summer and winter peak load capabilities for distribution facilities.

RESPONSE:

Please refer to El Paso Electric Company's response to TCGA 1-8, Attachment 1 – Confidential.

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TCGA 1-10:

Based on the average daily high temperatures each month on the Company's system, please state for each of the types of distribution equipment listed below whether the company would expect equipment would be able to carry higher kVA loading during a typical system peak day during the months of June through September compared to a typical system peak day during months of November through February:

- a. Distribution substation transformers (AC 362)
- b. Overhead primary distribution conductors (AC 365)
- c. Underground primary distribution conductors (AC 367)
- d. Distribution line transformers (AC 368)
- e. Overhead secondary distribution conductors (AC 365)
- f. Underground secondary distribution conductors (AC 367)
- g. Services (AC 369)

RESPONSE:

- a. No. While ambient temperatures can affect the load carrying capacity of a facility, El Paso Electric Company ("EPE") does not expect that more load can be supported from June through September versus November through February.
- b. Please refer to EPE's response to TCGA 1-10 a.

- c. Please refer to EPE's response to TCGA 1-10 a.
- d. Please refer to EPE's response to TCGA 1-10 a.
- e. Please refer to EPE's response to TCGA 1-10 a.
- f. Please refer to EPE's response to TCGA 1-10 a.
- g. Please refer to EPE's response to TCGA 1-10 a.

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**APPLICATION OF EL PASO
ELECTRIC COMPANY TO
CHANGE RATES**

§
§
§

**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**CONFIDENTIALITY STATEMENT UNDER
SECTION 4 OF THE PROTECTIVE ORDER**

The undersigned attorney for El Paso Electric Company (EPE) submits this statement under the section 4 of the Protective Order entered in this case. Materials provided in the responses to the following questions in the Texas Cotton Ginners' Association's first set of discovery are exempt from public disclosure pursuant to sections 552.101 and 552.110 of the Public Information Act (PIA) in addition to section 418.181 of the Texas Government Code and section 32.101(c) of the Public Utility Regulatory Act.

RFI	Attachment	Designation
TCGA 1-1	Attachment 1	HSPM
TCGA 1-3	Attachment 1	HSPM
TCGA 1-4	Attachment 1	HSPM
TCGA 1-6	Attachment 1	HSPM
TCGA 1-7	Attachment 1	HSPM
TCGA 1-8	Attachment 1	Confidential

Some of the information contained in the documents concern business operations that are commercially sensitive and not otherwise readily available to the public and that if released could cause substantial competitive harm to EPE. Additionally, other information included in the responses consists of customer information that is considered highly sensitive trade secrets. Finally, other documents contained within the responses concern highly sensitive, confidential critical infrastructure that EPE is required to keep confidential and the public release of which could jeopardize the security of EPE's system. The undersigned counsel for EPE has reviewed the information described above sufficiently to state in good faith that the information is exempt from disclosure under the PIA and merits the confidential designation given to it.

Respectfully submitted,

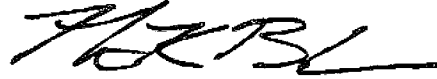
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By: 
Matthew K. Behrens

**ATTORNEYS FOR EL PASO ELECTRIC
COMPANY**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by email on all parties of record on August 11, 2021.

A handwritten signature in black ink, appearing to read 'MKBL', written over a horizontal line.

Matthew K. Behrens