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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
FIFTH 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 Fifth 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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- 5-1. For each new EPE-owned generation resource that began supplying energy to EPE's system after December 31, 2010, please provide the following information:
- a. Name of resource;
 - b. Location;
 - c. Type of resource (e.g. natural gas, wind, solar, etc.);
 - d. Commercial operation date;
 - e. Expected retirement date;
 - f. Rated Capacity;
 - g. Net dependable capacity;
 - h. Capacity included in EPE's current capacity and resource plan; and
 - i. Whether the resource is dedicated to a single jurisdiction, assigned by jurisdictions, or a system resource. Please provide a detailed explanation for the designation.
- 5-2. For each purchased power agreement ("PPA") with a contract term of more than one year and that was in effect during the test-year or is currently effective, please provide the following information:
- a. Identification of supplier;
 - b. Description of supplying resources (e.g., system resources, dedicated thermal generation, wind, solar, etc.);
 - c. Beginning date of contract;
 - d. Term of contract;
 - e. Firm or non-firm power supply;
 - f. Whether supplier is to provide capacity and energy, capacity only, or energy only;
 - g. Capacity included in EPE's current capacity and resource plan;
 - h. Is the power from the PPA dedicated to a single jurisdiction, assigned by jurisdictions, or a considered a system resource? Please provide a detailed explanation for the designation.
- 5-3. Since 2017, has EPE bought or received offers for purchased capacity with a term of less than five years? If so, please identify the amount of capacity offered or sold, the price per kW, the term of the transaction or proposed transaction, the date of the offer and/or transaction, and whether the transaction occurred.

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- 5-4. Since 2017, has EPE sold or offered for sale capacity with a term of less than five years? If so, please identify the amount of capacity offered or sold, the price per kW, the term of the transaction or proposed transaction, the date of the offer and/or transaction, and whether the transaction occurred.
- 5-5. For each EPE delivery point to its FERC wholesale customers, please provide the following information:
- a. Identification of delivery point;
 - b. Voltage at which the point of ownership of facilities changes from EPE to wholesale customer;
 - c. Voltage at which power is considered to be delivered to wholesale customer;
 - d. Voltage at which the wholesale customer is metered; and
 - e. If the wholesale customer is served through an EPE-owned distribution substation (i.e., low-side voltage below 60 kV) or other EPE-owned distribution facility, please provide a detailed explanation for how EPE is compensated for the use of its distribution facilities and how the associated costs and revenues are treated for jurisdictional cost allocation purposes.
- 5-6. For each EPE delivery point to FERC wholesale customers served using EPE-owned distribution facilities, please state whether the metered kW and kWh are adjusted for losses to reflect their level at transmission voltage, similar to the Meter Voltage Adjustment in EPE's Texas retail tariffs.
- 5-7. For each EPE delivery point to FERC wholesale customers served using EPE-owned distribution facilities, please provide the following information at the meter for each month of the test-year:
- a. Maximum Diversified Demands ("MDD");
 - b. Non-Coincident Peaks ("NCP");
 - c. billing demand; and
 - d. kWh.
- 5-8. For each EPE Texas retail customer that is billed as a transmission voltage customer, please provide the following information:
- a. Identification of customer;
 - b. Identification of the rate or tariff under which they are served;
 - c. Identification of the customer class in EPE's filed Texas retail class cost study in which they are included;

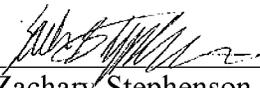
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- d. Voltage at which the point of ownership of facilities changes from EPE to customer;
 - e. Voltage at which power is considered to be delivered to customer;
 - f. Voltage at which the customer is metered; and
 - e. If the customer is served through an EPE-owned distribution substation (i.e., low-side voltage below 60 kV) or other EPE-owned distribution facility, please provide a detailed explanation for how EPE is compensated for the use of its distribution facilities and how the associated costs and revenues are treated for Texas retail class cost allocation purposes.
- 5-9. For each transmission voltage Texas retail customer served using EPE-owned distribution facilities, please state whether the metered kW and kWh are adjusted for losses to reflect their level at transmission voltage, pursuant to the Meter Voltage Adjustment in EPE's Texas retail tariffs.
- 5-10. For each transmission voltage Texas retail customer served using EPE-owned distribution facilities, please provide the following information at the meter for each month of the test-year:
- a. MDD;
 - b. NCP;
 - c. billing demand; and
 - d. kWh.

August 13, 2021

Respectfully submitted,

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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 13th day of August 2021 by facsimile, electronic mail, and/or first class, U.S. Mail.



Zachary Stephenson