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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
SEVENTH 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 Seventh 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.

SOAH Docket No. 473-21-2606
PUC Docket No. 52195
OPUC's Seventh Request for Information to
El Paso Electric Company

- 7-1. Please provide full organizational charts for all sections, departments and employees reporting to EPE's Vice President - Customer Care and Communication under the current organizational structure and under the organizational structure as it existed on December 31, 2020.
- 7-2. Does EPE have any sections, departments or distinct working groups that have a primary focus of working with national accounts, governmental and institutional customers, or large commercial and industrial customers (i.e., peak loads equal to or greater than 600 kilowatts ("kW"))? If so, please provide the following information for each section, department or distinct working group:
- a. Organizational charts up to director level;
 - b. Job descriptions for each employee;
 - c. Adjusted test year expenses for each group, department, or section; and
 - d. Estimated percentage of adjusted test year expenses for employees whose job descriptions includes a primary focus of working with national accounts, governmental and institutional customers, or large commercial and industrial customers.
- 7-3. Please provide the following information in Excel format by month for the test-year for EPE's Texas Residential Service Low Income Rider:
- a. Actual number of customers;
 - b. Adjusted number of customers;
 - c. Actual kWh billed;
 - d. Adjusted kWh billed;
 - e. Actual base rate revenues;
 - f. Adjusted base rate revenues;
 - g. Actual total revenues; and
 - h. Adjusted total revenues.
- 7-4. Please provide the following information in Excel format by month and by year for 2017, 2018, 2019, and for each month available in 2021 for EPE's Texas Residential Service Low Income Rider:
- a. Actual number of customers;
 - b. Actual kWh billed;
 - c. Actual base rate revenues; and
 - d. Actual total revenues.
- 7-5. Please provide the following information in electronic format for each month of the test year for each meter reading cycle or billing cycle, whichever designation applies:
- a. Start date and end date for each cycle;
 - b. Number of Texas retail customers in each cycle;
 - c. Number of Residential Service customers in each cycle;
 - d. Number of Small General Service customers in each cycle;

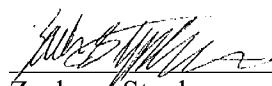
SOAH Docket No. 473-21-2606
PUC Docket No. 52195
OPUC's Seventh Request for Information to
El Paso Electric Company

- e. Billed kWh for Texas retail customers in each cycle; and
 - f. Base rate revenues for Texas retail customers in each cycle.
- 7-6. Please provide a detailed explanation and all calculations and workpapers supporting the proposed increase in the price differential between summer and non-summer charges for the Residential Service rates.
- 7-7. Please provide a detailed explanation and all calculations and workpapers supporting the proposed increase in the price differential between the first and second blocks of the summer energy charges for the Residential Service rates.
- 7-8. Please provide all customer impact analyses prepared by EPE that identifies or evaluates the impact of EPE's proposed change in the definition of summer season, the increase in the seasonal price differential and increase in the price differential between the first and second energy blocks for summer for the Residential Service rate, either separately by proposed change or for the total of all combined changes. Include any analysis of impacts by usage block frequency or by number of customers by impact percentage. Please identify the date each analysis was originally prepared.
- 7-9. Please provide a breakdown of the number of Residential Service customers by usage block frequency by month for the test year. If possible, the preferred block frequencies would be: 0 – 200, 201-400, 401 – 600, 601 – 800, 801 – 1000, 1001 – 1250, 1251 – 1500, 1501 – 2000, 2001 – 3000, and above 3000.
- 7-10. Please provide a breakdown of the number of Residential Service Low Income Rider customers by usage block frequency by month for the test year. If possible, the preferred block frequencies would be: 0 – 200, 201-400, 401 – 600, 601 – 800, 801 – 1000, 1001 – 1250, 1251 – 1500, 1501 – 2000, 2001 – 3000, and above 3000.
- 7-11. Please provide any customer communication plans that EPE has developed to fully inform Residential Service customers of the proposed changes to the summer season definition, increase in the summer-winter seasonal price differential and increase in the price differential between the first and second summer energy blocks, if the proposed changes or a version of the proposed changes are approved.
- 7-12. Please provide any customer service plans that EPE has developed to work with Residential Service customers who experience unexpectedly high summer bills if the proposed changes to the summer season definition, increase in the summer-winter seasonal price differential and increase in the price differential between the first and second summer energy blocks, or a version of the proposed changes are approved.

August 23, 2021

Respectfully submitted,

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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
SOAH DOCKET NO. 473-21-2606
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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 23rd day of August 2021 by facsimile, electronic mail, and/or first class, U.S. Mail.


Zachary Stephenson