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Received - 2021-08-24 01:48:24 PM

Control Number - 52195

ItemNumber - 133

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

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

**CITY OF EL PASO’S NINTH REQUESTS FOR INFORMATION
TO EL PASO ELECTRIC COMPANY QUESTIONS CEP 9-1THROUGH CEP 9-43**

The City of El Paso (the “City”) requests that the El Paso Electric Company (“EPE”) provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within twenty (20) calendar days. Please copy the question immediately above the answer to each question. The question(s) are continuing in nature, and if there is a relevant change in circumstances, such as that new or additional information or review reveals that an answer previously made is no longer complete or is inaccurate, that EPE submit an amended answer, under oath, as a supplement to your original answer within five days of the discovery of new or additional information. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

The City requests that EPE serve its respective responses to this Request on the following person via electronic mail and delivery of hard copies:

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DEFINITIONS AND INSTRUCTIONS

1. This Request is directed to El Paso Electric Company ("EPE"). Reference to EPE, "**you**" or "**your**" means all divisions, departments, bureaus, agencies, and all witnesses whose testimony EPE intends to present, and all persons acting or purporting to act for or on behalf of EPE, including its directors, officers, employees, and agents.

2. The terms "**document**" and "**documents**" are used in their broadest sense and shall mean and include all written, printed, electronic, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" or "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of personal conversations, minutes or summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultant reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

3. "**Person**" means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver syndicate, municipal corporation, government agency, any other form of legal entity, and other group or combination acting as a unit.

4. "**Relating to**" a subject means making a statement about, mentioning, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting or in any way pertaining, in whole or in part, to the subject.

5. "**Identify**" means:

- a. as to a "person," stating his, her or its:
 - (i) legal, full, and customarily used names;
 - (ii) present residential or business address;
 - (iii) job title; and
 - (iv) name of employer.
- b. as to a document, act, event, transaction or occurrence, stating:
 - (i) its date, authors or participants;
 - (ii) the place where it took place, was created or occurred;
 - (iii) its purpose and subject matter; and
 - (iv) a concise description of what transpired.

6. For each response, please state the Request for Information and identify the individual(s) responsible for preparing and sponsoring the response by name and title.

7. Pursuant to Rule 196.4, Texas Rules of Civil Procedure, any electronic or magnetic data included in the definition of document should be produced on a CD-ROM or similar media that is compatible with Microsoft Office software.

8. For each document produced that is generated by computer, please identify:

- a. the nature and source of the data constituting the input;
- b. the form of the input (e.g., tapes, punch cards);
- c. the recording system employed (e.g., program, flow charts); and
- d. the person(s) responsible for processing the input and/or performing the programming.

9. “**Each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**”.

10. “**Any**” shall be construed to include “**all**” and “**all**” shall be construed to include “**any**.”

11. The terms “**and**” and “**or**” shall be construed as either disjunctive or conjunctive as necessary to make this request inclusive rather than exclusive.

12. The term “**concerning**” includes the following meanings: relating to; pertaining to; regarding; discussion; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected to the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

13. The term “**including**” means and refers to “including but not limited to.”

14. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

15. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

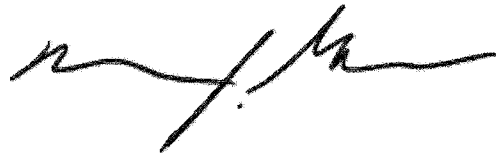
Dated August 24, 2021

Respectfully submitted,

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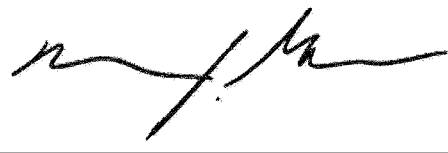
Attorneys for the City of El Paso



By: _____
Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on August 24, 2021.



PUC Docket No. 52195
City of El Paso's Ninth RFIs to EPE
Questions CEP 9-1---CEP 9-43

- CEP 9-1. Please provide refrigerated air conditioning vs. evaporative cooling appliance saturation in the residential class for each of the prior 10 years. What is the expected increase per year?
- CEP 9-2. Please explain how the increasing penetration of refrigerated air conditioning is taken into account during the weather normalization process. How does EPE ensure that refrigerated cooling increases are not a confounding impact for estimating CDD usage impact during the historic normalization period.
- CEP 9-3. Please state EPE's estimate of the elasticity of demand (electricity) for residential and commercial customers (separately stated) in the EPE service area.
- CEP 9-4. Please provide reports from the Palo Verde management during the past two years which show salaries and wages by FERC account.
- CEP 9-5. Provide any budgetary or reporting data regarding the composition of non-fuel O&M expense incurred at Palo Verde Nuclear Station.
- CEP 9-6. With respect to 2019 and 2020 EPE programs, are any of the EE energy efficiency programs new or redesigned programs? If yes, please identify the programs and the nature of the changes or a description of the new program.
- CEP 9-7. With respect to EPE's energy efficiency program, please provide monthly variances between budgeted and actual expended incentives for 2018 – 2020 program years. Provide the information in excel spreadsheet format.
- CEP 9-8.
- CEP 9-9. With respect to Schedule P-4, provide a description and breakdown of costs in A920 – A923 which are directly assigned as customer, production, distribution, transmission, and general. Describe the activities associated with specific costs, and describe how the amount of the functional component was determined (particularly for employees or contractors who perform work on more than one function).
- CEP 9-10. Provide the amounts and descriptions of any Palo Verde costs included in A920-926 (separately shown by account). Provide the classification and allocation of the costs.
- CEP 9-11. Identify, describe, and quantify any A&G or customer service expenses which are incurred to attract, maintain or increase the consumption of key account customers.
- CEP 9-12. Please provide the amounts, by FERC account, associated with major account representatives who are solely assigned to provide assistance and customer service to large commercial and industrial customers.

- CEP 9-13. (a) For each program year since 2015, provide the projected and actual kWh and kW savings achieved by each energy efficiency program. Please provide this information in excel spreadsheet format. (b) For each program year since 2015, provide the projected and actual program participants for each energy efficiency program. Please provide this information in excel spreadsheet format.
- CEP 9-14. For each of the last five program years, provide the amount of any unexpended funds for any energy efficiency program, and the unexpended funds as a percentage of program spending.
- CEP 9-15. Please provide all analyses, including assumptions, associated with projecting annual kWh and kW savings associated with each energy efficiency program.
- CEP 9-16. Please provide the amounts, by FERC account, associated with economic development programs. Describe the activities in the programs and identify any customers (and the associated customer class) successfully attracted by the programs.
- CEP 9-17. Describe and explain each change in allocation or classification methods for the class cost of service study (CCOSS) compared to the Company's filing in Docket No. 46831.
- CEP 9-18. Please provide the components of the residential customer charge, by FERC account, as requested in this filing.
- CEP 9-19. Provide the Company's stated residential customer charge at cost in the Docket No. 46831 filing. Please show the components by FERC account to compare with the information provided in response to No. 17 above.
- CEP 9-20. What production and demand allocation factors are used by FERC for EPE costs within that jurisdiction?
- CEP 9-21. Please set out the allocation methods used by the Western Electricity Coordinating Council to assign costs to member electric utilities.
- CEP 9-22. Please describe the method for assigning monthly demand costs for EPE's transmission facilities to FERC jurisdiction customers who purchase point-to-point or network transmission service from EPE.
- CEP 9-23. Please provide information regarding the impact of the February 2021 winter storm on generation reserve margins and transmission constraints. Please show the MW amount of available generation, February actual demand in MW, forced outages in MW, generation MWs and lost due to fuel deliverability. Provide internal reports which summarize the impact of the winter storm on the EPE system.
- CEP 9-24. Please provide a comparison which shows how Average & Excess/4 CP was calculated in Docket No. 46831 and the calculation method which EPE proposes in this case.
- CEP 9-25. Please provide the monthly capacity factor for each EPE generation plant.

- CEP 9-26. Please provide all supporting documents for development of EPE's incremental generation capacity costs as applied to EPE's interruptible credits. Provide the source for all assumptions, including the forecasted construction cost of peak generation.
- CEP 9-27. Please specify the criteria (including any numerical thresholds) for identifying generation capacity which is subject to the 4CP allocation method.
- CEP 9-28. Are interruptible loads excluded from the E1ENERGY allocation factor for both jurisdictional allocation and retail class allocation? Please explain why interruptible loads are excluded from the E1ENERGY allocation factor. Does the Company contend that interruptible customers receive no benefit from the generation output supported by non-fuel production O&M expense? Please explain this answer.
- CEP 9-29. Please provide all workpapers supporting the development of the interruptible credit.
- CEP 9-30. For the previous 10 years, identify the number of Large C&I customers who made bankruptcy filings or became insolvent by year. Provide dollar amounts of annual electric bills for those customers.
- CEP 9-31. Please identify (by FERC account) the production demand expenses allocated on the DPROD12 allocation factor.
- CEP 9-32. Please provide details regarding the costs included in Miscellaneous Distribution Expense.
- CEP 9-33. Please identify the components of major account representative expense as discussed by witness Hernandez at 24. Explain the basis for allocating these costs on a customer basis to non-residential classes. Provide the job description of major account representatives, particularly as it relates to defining the customer classes they assist.
- CEP 9-34. Please specify the items and amounts included in other operating revenues and miscellaneous service revenues. Explain the class allocation methods applied to other operating revenues and miscellaneous service revenues.
- CEP 9-35. To the extent feasible, for each of the revenue components provided in response to No. 33 above, provide the percentages paid by residential, C&I, and public authorities.
- CEP 9-36. Provide a full explanation of the circumstances pertaining to the interruptible customer penalized due to non-compliance as stated on page 11 of Mr. Carrasco's testimony. Please explain whether this customer had previously failed to comply with an interruption requirement. Did this customer comply with any interruption requirements in 2021?
- CEP 9-37. Provide correspondence pertaining to the interruptible penalty discussed on page 11 of Mr. Carrasco's testimony.

- CEP 9-38. Has EPE imposed any interruptible penalties in years prior to 2020? If yes specify the amounts by year.
- CEP 9-39. Referring to Carrasco at 34, l. 9-15, provide a customer charge comparison which includes the investor owned TDUs in ERCOT.
- CEP 9-40. For each class, provide the dollar amount of the summer/winter differential (i.e., the summer adder) if the differential is set at (a) the current one cent, or (b) the proposed two cents. Please explain how the cost of the low income rider is recovered.
- CEP 9-41. With respect to EPE's proposal to require TOD pricing for new General Service customers, as discussed by Carrasco at 51, please provide any internal reports or analyses of this policy.
- CEP 9-42. Currently, what percentage of General Service customers opted to participate in the optional TOD program.
- CEP 9-43. Will General Service mandatory TOD customers incur meter costs in excess of the standard service rate? If yes, please explain the monthly increase in cost.