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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
OFFICE OF PUBLIC UTILITY COUNSEL'S
FOURTH REQUEST FOR INFORMATION
QUESTION NOS. OPUC 4-1 THROUGH OPUC 4-15

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OPUC 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.

RESPONSE:

El Paso Electric Company (“EPE”) does not have copies of other utilities’ agreements. Information gathered about other utilities’ costs for rights-of-way across tribal lands was based on discussions with external sources. See CEP 5-12, Attachment 4 – Confidential Voluminous at pages 837 to 838 for documentation of the range of costs obtained from discussions with external sources. Those discussions indicated that EPE’s costs were in the range of the other utilities’ experience. The third-party information was also consistent with the DOE Report and Wall Street Journal article referenced in EPE witness R. Clay Doyle’s direct testimony on page 23, line 15, and page 24, line 23, and the analyses conducted by EPE are summarized in the presentation provided as Exhibit RCD-5.

Preparer: Darcy Welch

Title: Supervisor – Financial Analysis &
Planning

Sponsor: R. Clay Doyle

Title: Vice President – Transmission and
Distribution

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OPUC 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.

RESPONSE:

Please refer to the Direct Testimony of El Paso Electric Company (“EPE” or “Company”) witness 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.

The Company proposed changes to its Line Extension Policy for the reasons identified in Mr. Doyle’s testimony and not because of similarity to provisions of other Texas electric utility service providers. Accordingly, the Company has not performed an analysis of its proposed changes to the line extension policies of other Texas electric utility service providers.

Preparer: Leslie Chagnon

Title: Senior Director – Distribution Design
Construction and Maintenance

Sponsor: R. Clay Doyle

Title: Vice President –Transmission &
Distribution

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OPUC 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.

RESPONSE:

Please see OPUC 4-3, Attachment 1 for the accumulated balance of uncollectible accounts by month for the period of January 2017 through December 2019.

Preparer: Mayte Luna

Title: Supervisor – Revenue Collection

Sponsor: Cynthia S. Prieto

Title: Vice President – Controller

EL PASO ELECTRIC COMPANY
ACCUMULATED BALANCE OF UNCOLLECTIBLE ACCOUNTS

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Line No.	2017				2018				2019				
	Month	Revenue (A)	Uncollectible Expense (B)	Net Bad Debt Write-Off	Accumulated Balance Uncollectible Accounts	Revenue (A)	Uncollectible Expense (B)	Net Bad Debt Write-Off	Accumulated Balance Uncollectible Accounts	Revenue (A)	Uncollectible Expense (B)	Net Bad Debt Write-Off	Accumulated Balance Uncollectible Accounts
	Beginning Balance				\$ 2,155,780				\$ 2,299,990				\$ 2,033,446
1	Jan	\$ 55,697,727	\$ 117,000	\$ 412,888	1,859,891	\$ 56,638,018	\$ 233,000	\$ 434,340	2,098,650	\$ 49,909,212	\$ 111,000	\$ 354,341	1,790,105
2	Feb	52,210,735	122,000	256,549	1,725,342	52,356,260	86,000	354,973	1,829,677	47,805,788	65,000	239,301	1,615,804
3	Mar	53,559,060	168,000	177,418	1,715,924	48,686,023	201,000	247,866	1,782,812	44,972,003	41,000	179,615	1,477,188
4	Apr	52,062,696	140,000	143,781	1,712,144	49,424,819	173,000	200,541	1,755,271	41,965,443	139,000	110,228	1,505,961
5	May	66,187,626	194,000	224,008	1,682,136	60,254,554	158,000	290,874	1,622,397	56,852,509	232,000	282,412	1,455,549
6	Jun	89,661,284	211,000	210,839	1,682,297	81,021,820	167,000	173,247	1,616,150	71,094,469	107,000	128,832	1,433,717
7	Jul	102,231,307	358,000	217,066	1,823,231	93,780,316	287,000	180,953	1,722,197	85,759,603	197,000	133,263	1,497,454
8	Aug	94,775,657	446,000	136,286	2,132,945	90,939,400	331,000	126,674	1,926,523	90,464,930	176,000	84,433	1,589,021
9	Sep	89,283,484	505,000	205,556	2,432,389	87,568,760	489,000	177,167	2,238,356	94,846,728	405,000	161,033	1,832,988
10	Oct	74,302,323	299,000	217,759	2,513,630	68,968,297	289,000	237,879	2,289,477	71,440,029	287,000	152,761	1,967,227
11	Nov	50,035,481	298,000	370,717	2,440,913	44,633,248	203,000	338,763	2,153,714	45,031,719	194,000	266,995	1,894,231
12	Dec	49,982,027	283,000	423,923	2,299,990	48,141,012	201,000	321,268	2,033,446	45,499,654	245,000	369,155	1,770,077
13	Total	\$829,989,407	\$3,141,000	\$2,996,790	2,299,990	\$ 782,412,526	\$ 2,818,000	\$ 3,084,544	\$ 2,033,446	\$ 745,642,089	\$ 2,199,000	\$ 2,462,369	\$ 1,770,077

(A) Revenues reflect actual billed revenues via CC&B and does not include deferred fuel, unbilled

Notes: Monthly variations due to the seasonality of EPE's electric sales. Amounts may not add or tie to other schedules due to rounding.

(B) Amounts will not tie to Schedule G-3 due to rounding for purposes of the General Ledger.

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OPUC 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.

RESPONSE:

Please see Attachments 1 and 2 for a copy of the Administrative and General (“A&G”) Study used to determine the 5.32% A&G construction overhead rate and a copy of the survey distributed to all A&G employees, respectively.

The study involved surveying all employees whose payroll costs were charged to FERC Account 920 “Administrative and General Salaries” to determine what percentage of their efforts were dedicated to supporting construction. These percentages were then applied to the employee’s total payroll to derive the A&G construction overhead rate of 5.32%.

Preparer: Barbara Torres

Title: Principal Plant Accountant

Sponsor: Larry J. Hancock

Title: Manager – Plant Accounting

Department	Percentage of A&G Time Spent Supporting Construction (A)	Payroll (Excluding Capitalized Amounts) (B)	Amount of Payroll Related to Construction (C) = (A) * (B)	A&G Overhead Rate
TRANSMISSION AND DISTRIBUTION MANAGEMENT	1.75%	1,111,120	19,491	
EXECUTIVE MANAGEMENT	2.50%	239,144	5,978	
TREASURY DIVISION	4.10%	423,894	17,363	
FINANCIAL SERVICES	6.37%	224,144	14,280	
BUDGETS & CONTROL	0.00%	136,219	-	
FINANCIAL FORECAST	6.62%	76,921	5,089	
CORPORATE PROJECTS OFFICE	11.44%	260,410	29,797	
CASH & DEBT MANAGEMENT	13.63%	199,301	27,159	
RISK MANAGEMENT	0.00%	99,624	-	
CONTROLLER	1.46%	169,092	2,473	
FINANCIAL SYSTEMS DEPT	0.00%	173,031	-	
ACCOUNTING SERVICES	9.31%	228,254	21,255	
PAYROLL	0.00%	146,474	-	
PLANT ACCOUNTING	29.06%	136,724	39,732	
TAX ACCOUNTING	0.00%	221,477	-	
ADMINISTRATIVE MGT	3.18%	572,826	18,194	
INFORMATION SERVICES	0.00%	352,385	-	
DESKTOP SOLUTIONS TEAM	0.00%	365,032	-	
BUSINESS SYSTEMS - TEAM TWO	0.00%	336,538	-	
BUSINESS SYSTEMS - TEAM ONE	0.00%	475,061	-	
COMPUTER OPERATIONS	0.00%	126,470	-	
INFORMATION TECHNOLOGY SUPPORT	0.00%	207,550	-	
DOCUMENT MANAGEMENT SERVICES	1.02%	324,186	3,309	
EMPLOYEE RELATIONS	0.00%	179,264	-	
BENEFITS ADMINISTRATION	0.00%	70,916	-	
HUMAN RESOURCES MANAGEMENT	0.00%	71,966	-	
CLAIMS	0.00%	93,499	-	
SAFETY	2.36%	381,806	9,029	
OFFICE SERVICES	0.00%	98,310	-	
RESOURCE PLANNING	0.00%	232,286	-	
NEW MEXICO AFFAIRS	0.00%	178,836	-	
PROJECT MANAGEMENT & QUALITY ASSURANCE	18.35%	157,427	28,883	
COMMUNICATIONS	5.94%	423,549	25,179	
PURCHASING	28.71%	149,416	42,897	
SUPPLY CHAIN MANAGEMENT	31.60%	207,065	65,441	
SUPPORT SERVICES	16.48%	132,909	21,900	
ENVIRONMENTAL SUPPORT	22.06%	211,986	46,772	
GENERATION SUPPORT	7.47%	215,098	16,062	
GENERAL COUNSEL	8.40%	675,719	56,777	
GENERATION MANAGEMENT	10.00%	65,828	6,583	
SAFETY, ENVIRONMENTAL & RESOURCE PLANNING	13.87%	189,966	26,354	
		<u>10,341,722</u>	<u>549,999</u>	5.32% (b/a)

El Paso Electric Company Administrative and General Rate Survey

The Company is in the process of performing a study to revise its current methodology for capitalizing administrative & general (“A&G”) costs related to construction. FERC regulations allow companies to capitalize A&G related costs during the construction phase of a project. A&G costs include the portion of the pay and expenses of the officers and supporting administrative staff whose time is directly and/or indirectly devoted to construction and/or construction related activities.

The objective of this study is to determine the portion of payroll costs currently being charged to expense which qualify for capitalization, in accordance with FERC guidelines. Plant Accounting has performed an analysis of all cost centers to determine where payroll costs are currently being charged. As a part of this analysis, your cost center was identified as one that should be included in the A&G study.

To ensure that all A&G related costs are captured and accounted for properly, please provide the percentage of time you individually devote to construction and/or construction-related activities in the space provided below. If you have any questions, feel free to contact Larry Hancock (5965) or Barbara Torres (2275). Thank you in advance for your cooperation and timely response.

Name: _____ Employee No.: _____ Cost Center: _____

Please check one:

My employee status is: _____ Confidential
 _____ Non-Confidential

My current position is: _____ Executive
 _____ Management
 _____ Staff

The nature of my job is:

Check all that apply:		Estimated Percentage of Weekly Time:
_____	Construction related (*);	_____
_____	Non-construction (A&G)	_____
	Total:	<u>100%</u>

(*) Work in the field and/or office directly and/or indirectly contributing to the construction of the company’s assets.

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OPUC 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.

RESPONSE:

The calculation of estimated costs to reroute the line is presented on page 25 of El Paso Electric Company ("EPE") witness R. Clay Doyle's direct testimony from lines 3 to 13. The estimated costs to reroute the line were significantly greater than the projected costs of the right of way renewal as well as the ultimate actual costs of the renewal. EPE has provided all backup information created and/or retained supporting the analysis performed in its responses to CEP 5-1 through CEP 5-15. No analysis of transmission costs by FERC account was done.

Preparer: Darcy Welch

Title: Supervisor – T&D Financial Analysis &
Planning

Sponsor: R. Clay Doyle

Title: Vice President – Transmission and
Distribution

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OPUC 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.

RESPONSE:

Please see table below for a schedule showing the dates during which Rio Grande Unit 6 was online from January 1, 2019 through July 31, 2021:

Unit Name	Event Start	Event End	Event Description
Rio Grande 6	6/28/2021 15:50	6/28/2021 18:22	Online
Rio Grande 6	7/11/2021 12:18	7/14/2021 20:28	Online

Preparer: Aaron A. Arzaga

Title: Senior Data Scientist and Business
Intelligence Analyst

Sponsor: J Kyle Olson

Title: Manager – Power Generation Engineering

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OPUC 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.

RESPONSE:

El Paso Electric Company ("EPE") can neither confirm nor deny the question as it does not define a year in question. Please reference Exhibit DCH-3 in EPE witness David Hawkins' Direct Testimony in EPE's rate filing package, which provides EPE's most recent Loads and Resources table updated for the most recent load forecast and that incorporates the unprecedented 2020 peak load growth. Exhibit DCH-3 does not include Rio Grande Unit 6 in Line 1.1. Rio Grande Unit 6 was removed from rates in EPE's 2015 Texas Rate Case and has since been placed in In-Active Reserve status. As such, Rio Grande Unit 6 has not been meant for use in day-to-day operations and has been used to serve load during peak load periods when unforeseen contingencies have arisen. As indicated in line 2.5 of Exhibit DCH-3, EPE will be relying on some purchased power in order to meet projected peak loads and planning reserve margin requirements. Rio Grande Unit 6 provides added reserves in the event of any unplanned contingencies or unavailability of purchased power through EPE's next planned resource additions in 2022 and 2023.

Preparer: Omar Gallegos

Title: Senior Director – Resource Planning
Management

Sponsor: David C. Hawkins
J Kyle Olson

Title: Vice President – Strategy & Sustainability
Manager – Power Generation Engineering

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OPUC 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.

RESPONSE:

While El Paso Electric Company (“EPE”) did not include any direct cost for Rio Grande Unit 6 in cost of service and did not include investment in Rio Grande Unit 6 in rate base, there are certain indirect costs (such as payroll) that were spread to various regulatory accounts (including some related to Rio Grande Unit 6) and these indirect costs do appear in EPE’s cost of service model. The amounts for Total Company and Texas are shown in the table below.

	Total	
Account	<u>Company</u>	<u>Texas</u>
512000-RGU6-MAINT BOILER PLNT-LABOR	\$14,842	\$11,683
513000-RGU6-MAINT ELEC PLNT-LABOR	\$6,343	\$4,993
514000-RGU6-MAINT MSC STM PLT-LABOR	\$351	\$276
925000-RGU6-INJURIES AND DAMAGES	(\$23)	(\$18)
926000-RGU6-PENSIONS & BEN	\$6,581	\$5,342
	\$28,094	\$22,275

Preparer: Adrian Hernandez

Title: Senior Rate Analyst – Rates

Sponsor: Adrian Hernandez
J Kyle Olson

Title: Senior Rate Analyst – Rates
Manager – Power Generation Engineering

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OPUC 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.

RESPONSE:

The following is a list of tenants, other than El Paso Electric Company ("EPE"), that are currently in the Stanton Tower:

Keith & Miller P.C.
Huntleigh Technology Group, Inc.
TriWest Healthcare Alliance
United Way of El Paso
General Services Administration-EEOC
Atkins North America, Inc.
Best Real Estate Management
The Outsource Connection
Mounce, Green, Myers, Safi, Paxson

Deny. EPE incurred capital costs related to the Tenants in the amount of \$1,205,658 since its last rate case in Docket No. 46831 and those capital costs are included in FERC Account 390, Structures and Improvements. These capital costs are included in EPE's rate base since the rental income received from the Tenants of \$1,329,096 is reflected as a revenue credit in determining base rate revenue requirements. The revenue is included in FERC Account 454, Rent from Electric Property.

This treatment has been used by EPE, and unchallenged, in each of EPE's base rate filings since the purchase of the Stanton Tower, effective with Docket No. 37690.

Preparer: Larry J. Hancock

Title: Manager – Plant Accounting

Sponsor: Larry J. Hancock

Title: Manager – Plant Accounting

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OPUC 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.

RESPONSE:

The Customer Care and Billing (“CC&B”) upgrade will transition El Paso Electric Company (“EPE”) from an on-premise CC&B system to an Oracle cloud based software as a service (“SaaS”) environment called Customer Cloud Service, (“CCS”). The cloud version introduces new functionality three times per year that will allow EPE to take advantage of new functionality and, where applicable, offer the new functionality to customers via web self-service/mobile application and adapt to industry and business changes in a timelier fashion. On-premise upgrades are time consuming and resource intensive; this is why most upgrades are technical in nature as opposed to functional.

Oracle invests highly in cloud security and technology. As part of SaaS, Oracle is responsible for system monitoring, including hardware upgrades, managing system backups and disaster recovery. The SaaS solution is easily scalable, you buy what you need for as long as you need it, as opposed to the on-premises solution that is sized for maximum requirements upon implementation. In addition, as part of the SaaS offering, the system includes both a reporting visualization tool to aid in operations management and an asset management system. The system will set the foundation for future integrations with other systems such as meter data management. Please see OPUC 4-10, Attachment 1 – Confidential

Preparer: Marcela Candia

Title: Principal Plant Accountant

Sponsor: Larry J. Hancock

Title: Manager – Plant Accounting

EL PASO ELECTRIC COMPANY

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PUBLIC

OPUC 4-10 Attachment 1 is a CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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OPUC 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.

RESPONSE:

The actual increase in non-union base payroll, as shown on Schedule G-1.2, was actually 4.9%, not 6.7% as indicated in the question. The 4.9% increase in non-union base payroll was due to promotions, an increase in the number of employees, and annual salary increases averaging 3% for employees during the year.

Preparer: Magdalena Rodriguez

Title: Supervisor – Payroll

Sponsor: Cynthia S. Prieto

Title: Vice President – Controller

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OPUC 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.

RESPONSE:

The actual increase in union base payroll, as shown on Schedule G-1.2, was actually 6.7%, not 4.9% as indicated in the question. The increase of 6.7% in union base payroll was due to progressionary promotions (1.9%), an increase in the number of employees, an increase in shift differentials, and annual salary increases in accordance with the union contract (3.25% effective September 2019) for employees during the year.

Preparer: Magdalena Rodriguez

Title: Supervisor – Payroll

Sponsor: Cynthia S. Prieto

Title: Vice President – Controller

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OPUC 4-13:

Please refer to the RFP, Schedule G-1.6. Please provide a detailed breakdown of the nonstandard 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.

RESPONSE:

Pursuant to discussions with counsel for OPUC, El Paso Electric Company (“EPE”) confirms that Strategic Transaction Costs are not included in EPE’s requested revenue requirement as discussed on page 33 of the direct testimony of EPE witness Cynthia S. Prieto; as a result, no further information is required.

Preparer: Magdalena Rodriguez

Title: Supervisor – Payroll

Sponsor: Cynthia S. Prieto

Title: Vice President – Controller

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
OFFICE OF PUBLIC UTILITY COUNSEL'S
FOURTH REQUEST FOR INFORMATION
QUESTION NOS. OPUC 4-1 THROUGH OPUC 4-15

OPUC 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.

RESPONSE:

Since El Paso Electric Company's ("EPE") last rate case was a "blackbox" settlement, it is hard to say exactly how much pension expense is included in base rates. However, Staff and EPE's numbers for pension expense were approximately \$18.2 million for total company and \$14.6 million for the Texas jurisdiction.

Preparer: Adrian Hernandez

Title: Senior Rate Analyst – Rates

Sponsor: Adrian Hernandez

Title: Senior Rate Analyst – Rates

SOAH DOCKET NO. 473-21-2606
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FOURTH REQUEST FOR INFORMATION
QUESTION NOS. OPUC 4-1 THROUGH OPUC 4-15

OPUC 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.

RESPONSE:

Please refer to WP G 7-9(a).03, Tab WP 1a Excess TCJA for Rider, column J for a breakdown of the calculated protected excess accumulated deferred income taxes in the amount of \$20,748,433.

Preparer: Alejandra Guevara

Title: Senior Accountant – Technical

Sponsor: Cynthia S. Prieto

Title: Vice President – Controller

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

**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. Material provided in the responses to OPUC 4-10, Attachment 1 – Confidential is exempt from public disclosure pursuant sections 552.101 and 552.110 of the Public Information Act (PIA). The information contained in the document concerns 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 and those entities whose information is included in the material. 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 31, 2021.


Matthew K. Behrens

The following files are not convertible:

OPUC 04-03_Attachment 01.xlsx

OPUC 04-04_Attachment 01.xlsx

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Contact centralrecords@puc.texas.gov if you have any questions.