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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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

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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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-1:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide for EPE:

- a) a summary schedule of total rate case expenses by vendor within each discipline (legal, engineering, accounting, etc.) with subtotals for each month: estimated expenses, expenses incurred and paid to date, expenses incurred and not paid to date, remaining estimated expenditures, and specific areas of work by vendor;
- b) an explanation of the basis for any estimated rate case expenses requested and when the estimated expenses are expected to be incurred; and,
- c) assurance that the total amounts provided in response to item (a) equal your total requested rate case expenses.

RESPONSE:

- a) Please refer to Staff 6-1 Attachment 1 for the summary schedule of total rate case expenses and specific areas of work by vendor in Docket No. 52195. Please refer to Staff 6-1 Attachment 2 for the summary schedule of total rate case expenses and specific areas of work by vendor for Docket No. 46831, EPE's last base rate case, incurred after August 31, 2017. Pursuant to agreement, expenses for Docket No. 51780 (EPE's request for a waiver of Schedule S audit) have been excluded.

- b) EPE estimates total rate case expenses that would occur for the duration of the case, and the estimates were not broken down to specific time periods for when they would be incurred. The rate case expenses were estimated based on prior case costs and utilizing increases based on inflation or vendor hourly rate increases.
- c) The total amounts provided in response to item (a) equal the total requested rate case expenses shown in Schedule G-14.1.

Preparer: Alejandra Montalvo

Title: Staff Accountant – Regulatory Accounting

Sponsor: James Schichtl

Title: Vice President – Regulatory and
Governmental Affairs

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE
DOCKET NO. 52195
RATE CASE EXPENSES THROUGH JULY 31, 2021

SOAH Docket No. 473-21-2606
PUC Docket No. 52195
STAFF's 6th, Q. No. STAFF 6-1
Attachment 1
Page 1 of 2

(a)	(b)	(c)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
				Expenses paid through July 31, 2021						
Discipline	Vendor Name	Estimated Expenses	202103	202104	202105	202106	202107	Expenses paid to date through July 31, 2021	Expenses incurred and not paid to date	Remaining estimated expenses
NON-PAYROLL EMPLOYEE EXPENSES		\$ 66,550.00						\$ 647.68		\$ 65,902.32
	House Of Pizza Downtown (21 people)					253.38		\$ 253.38		
	Healthy Bite (3 people)					31.80		\$ 31.80		
	Subway (10 people)					80.41		\$ 80.41		
	Taco Cabana (10 people)					30.29		\$ 30.29		
	Rockstar Burger Bar (17 people)					251.80		\$ 251.80		
OFFICE SUPPLIES		\$ 2,000.00						\$ 1,023.50		\$ 976.50
	Olmsted-Kirk Paper Co. 1	2,000.00			1,023.50			\$ 1,023.50		976.50
SUBCONTRACTOR CHARGES		\$ 5,000.00						\$ 2,273.28		\$ 2,726.72
	Spectrum Technologies	5,000.00			1,136.64	1,136.64		\$ 2,273.28		2,726.72
OUTSIDE SVCS-CONSULTING		\$ 770,000.00						\$ 173,879.75		\$ 596,120.25
	Concentric Energy Advisors, Inc	435,000.00	8,898.75	49,565.00		38,421.25	6,536.25	\$ 103,421.25		331,578.75
	DGC Consulting	185,000.00	1,031.25	15,262.50	4,812.50	16,018.75	17,086.25	\$ 54,211.25		130,788.75
	Gannett Fleming Valuation and Rate Consultants, LLC	40,000.00		1,040.00		2,360.00	5,570.00	\$ 8,970.00		31,030.00
	TLG Services, Inc	10,000.00				3,496.00		\$ 3,496.00		6,504.00
	Wilson Consulting Group	100,000.00			3,781.25			\$ 3,781.25		96,218.75
DEFERRED LEGAL EXPENSES		\$ 2,500,000.00						\$ 464,080.75		\$ 2,035,919.25
	Duggins Wren Mann & Romero, LLP	2,500,000.00	86,218.50	136,876.50	124,803.00		133,644.75	\$ 481,542.75		2,018,457.25
	Docket No. 51780 Expenses		(2,646.00)	(1,188.00)	(10,910.00)		(2,718.00)	\$ (17,462.00)		
Total		\$ 3,343,550.00	\$ 96,148.50	\$ 202,744.00	\$ 135,556.89		\$ 162,837.25	\$ 641,904.96	\$ -	\$ 5,319,925.76

Amounts may not add or tie to other schedules due to rounding.

Concentric Energy Advisors Inc	Mr. Daniel Dane prepared a lead-lag study to determine the appropriate amount of cash working capital to be included in cost of service. His testimony and this study was included as part of EPE's filing. Mr. Dane also responded to discovery. Jennifer Nelson provided support for EPE's required rate of return on equity and addressed the Company's requested capital structure and overall rate of return. She provided testimony and responded to discovery in the rate case. Concentric also provided a review of rate case schedules prior to filing.
DGC Consulting	Mr. David Carpenter provided support to EPE witnesses regarding financial, tax and other accounting issues prior to and during the case. He also assisted with testimony and discovery.
Duggins Wren Mann & Romero LLP	DWMR provides legal services including paralegal services and other support services. DWMR invoices also include expenses such as telephone, copying, travel, lodging, etc.
Gannett Fleming Valuation and	Mr. John Spanos supported the 2020 depreciation study conducted under his direction and supervision for El Paso Electric Company. Mr. Spanos provided testimony and responded to discovery that he used the straight line remaining life method of depreciation with the average service life procedure in performing the 2020 study. His testimony details the processes by which he determined service lives, net salvage percentages, and estimated annual depreciation accrual rates.
Non-Payroll Employee Expenses	Non payroll employee expenses related to Docket No. 52195 including air fare, car rentals, taxi, hotels, meals, supplies and miscellaneous expenses.
Olmsted-Kirk Paper Co.	Olmsted-Kirk Paper Co. provides paper to EPE.
Spectrum Technologies	Spectrum Technologies provide printer support. These charges are for 24 hour support during production of the rate case.
TLG Services Inc	Mr. Roderick Knight presented the results of the 2017 decommissioning cost update prepared for the Palo Verde Nuclear Generating Station located in Tonopah, Arizona ("Palo Verde") by TLG. Mr. Knight provided testimony and responded to discovery during this case.
Wilson Consulting Group	Mr. Scott Wilson provided support to EPE witnesses regarding financial and other accounting issues prior to and during the case. He also assisted with testimony and discovery.

(a)	(b)	(c)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
						Expenses paid through July 31, 2021							
Discipline	Vendor Name	Estimated Expenses	201712	201802	201803	201804	201805	201806	201808	202102	Expenses paid to date through July 31, 2021	Expenses incurred and not paid to date	Remaining estimated expenses
NON-PAYROLL EMPLOYEE EXPENSES		\$ 1,138.07									\$ 1,138.07		\$ -
	TRAIN/TRAVEL-AIR TRANS												
	SOUTHWES 5268788123280	311.96		311.96							\$ 311.96		
	SOUTHWES 5268788176298	331.96		331.96							\$ 331.96		
	SOUTHWES 5268793336334	194.00		194.00							\$ 194.00		
	TRAIN/TRAVEL-GROUND TRANS												
	EPIA PARKING	10.00		10.00							\$ 10.00		
	SQ *ATX COOP TAXI # 104 G	25.00		25.00							\$ 25.00		
	TRAIN/TRAVEL-LODGING												
	DOUBLETREE SUITES ASTN	219.65		219.65							\$ 219.65		
	TRAIN/TRAVEL-MEALS												
	CASA COLOMBIA (5 people)	45.50		45.50							\$ 45.50		
OUTSIDE SVCS-CONSULTING		\$ 5,812.50									\$ 5,812.50		\$ -
	DGC Consulting	5,812.50	5,812.50								\$ 5,812.50		-
DEFERRED LEGAL EXPENSES		\$ 374,784.56									\$ 374,784.56		\$ -
	City of El Paso	62,240.55		13,717.47	8,670.58	2,519.00	2,005.30			35,328.20	\$ 62,240.55		
	City of San Elizario	1,470.15							1,470.15		\$ 1,470.15		
	Town of Clint	1,270.50							1,270.50		\$ 1,270.50		
	Town of Horizon City	1,270.50							1,270.50		\$ 1,270.50		
	City of Socorro	4,635.00			4,635.00						\$ 4,635.00		
	Duggins Wren Mann & Romero LLP	303,897.86	56,142.79	198,114.67	49,640.40						\$ 303,897.86		
Total		\$ 381,735.13	\$ 61,955.29	\$ 212,970.21	\$ 62,945.98				\$ 4,011.15	\$ 35,328.20	\$ 381,735.13	\$ -	\$ -

Amounts may not add or tie to other schedules due to rounding.

DGC Consulting	Mr. David Carpenter provided support to EPE witnesses regarding financial, tax and other accounting issues prior to and during the case. He also assisted with testimony and discovery.
Duggins Wren Mann & Romero LLP	DWMMR provides legal services including paralegal services and other support services. DWMMR invoices also include expenses such as telephone, copying, travel, lodging, etc.
City of El Paso	Payments to municipalities requesting reimbursement for rate-case expenses pursuant to PURA §33.023(b).
City of San Elizario	Payments to municipalities requesting reimbursement for rate-case expenses pursuant to PURA §33.023(b).
Town of Clint	Payments to municipalities requesting reimbursement for rate-case expenses pursuant to PURA §33.023(b).
Town of Horizon City	Payments to municipalities requesting reimbursement for rate-case expenses pursuant to PURA §33.023(b).
City of Socorro	Payments to municipalities requesting reimbursement for rate-case expenses pursuant to PURA §33.023(b).

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ELECTRIC COMPANY TO CHANGE	§	OF
RATES	§	ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-2:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide a detailed schedule of, and justification for, each individual whose hourly billing rate is \$500 an hour or greater. The schedule should include the vendor name, individual's name, individual's title, number of hours billed, and specific work areas. Please attach applicable invoices and receipts.

RESPONSE:

El Paso Electric Company's ("EPE") rate case expenses include only one individual who charges more than \$500 per hour. EPE believes this individual's rate is justified because of their extensive experience in a very specialized field. Please see Staff 6-2, Attachments 1 and 2 – Highly Sensitive Protected Materials.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

EL PASO ELECTRIC COMPANY

SOAH Docket No. 473-21-2606

PUC Docket No. 52195

STAFF's 6th, Q. No. STAFF 6-2

Attachments 1 and 2

Page 1 of 1

PUBLIC

STAFF 6-2 Attachments 1 and 2 are CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachments.

SOAH DOCKET NO. 473-21-2606
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EL PASO ELECTRIC COMPANY'S RESPONSE TO
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-3:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide an affidavit signed by each consultant stating that the rate charged is the normal hourly billing rate charged by the consultant, is comparable to the hourly rate charged by other consultants for similar services provided to other Texas utilities, and is the normal hourly billing rate charged by the consultant for services to non-regulated entities.

RESPONSE:

Please see STAFF 6-3, Attachments 1 through 5.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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

SOAH Docket No. 473-21-2606
PUC Docket No. 52195
STAFF's 6th, Q. No. STAFF 6-3
Attachment 1
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APPLICATION OF EL PASO
ELECTRIC COMPANY TO CHANGE
RATES

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§
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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**AFFIDAVIT REGARDING EL PASO ELECTRIC COMPANY'S RESPONSE TO STAFF'S
REQUEST FOR INFORMATION NO. 6-3**

STATE OF TEXAS

§
§
§

COUNTY OF HOOD

BEFORE ME, the undersigned authority, on this day personally appeared David G. Carpenter, who being by me first duly sworn, on oath, deposed and said the following:

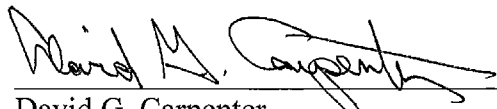
My name is David G. Carpenter. I am over the age of twenty-one years and am of sound mind and competent to testify as to the matters stated herein. I have personal knowledge of the facts set forth in this affidavit, and they are true and correct.

I am employed as Principal by DGC Consulting, and I was retained as a consultant in Docket No. 52195 on behalf of El Paso Electric Company (EPE).

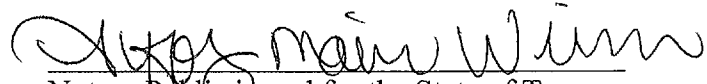
I make this affidavit to respond to Staff Request for Information No. 6-3.

For work I performed in Docket No. 52195, the rate that I charged is at or below the normal hourly billing rate for the firm and are charged to all clients, be they rate-regulated or competitive entities, for the types of services I provided in Docket No. 52195. To the best of my knowledge, my hourly rate for the work I performed related to Docket No. 52195 is comparable to the hourly billing rates currently charged by other consultants of similar experience and expertise to other Texas utilities for similar services.

Further affiant sayeth not.

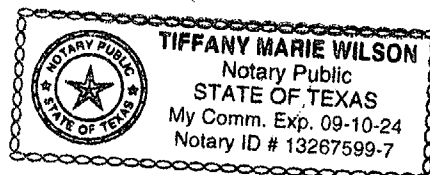

David G. Carpenter

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, in and for the State of Texas, this 30 day of August 2021.


Notary Public in and for the State of Texas

My commission expires:

09-10-2024



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

SOAH Docket No. 473-21-2606
PUC Docket No. 52195
STAFF's 6th, STAFF 6-3
Attachment 2
Page 1 of 1

APPLICATION OF EL PASO
ELECTRIC COMPANY TO CHANGE
RATES

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**AFFIDAVIT REGARDING EL PASO ELECTRIC COMPANY'S RESPONSE TO STAFF'S
REQUEST FOR INFORMATION NO. 6-3**

STATE OF MASSACHUSETTS

§
§
§

COUNTY OF MIDDLESEX

BEFORE ME, the undersigned authority, on this day personally appeared Daniel S. Dane, who being by me first duly sworn, on oath, deposed and said the following:

My name is Daniel S. Dane. I am over the age of twenty-one years and am of sound mind and competent to testify as to the matters stated herein. I have personal knowledge of the facts set forth in this affidavit, and they are true and correct.

I am employed as Senior Vice President by Concentric Energy Advisors, Inc., and I was retained as a consultant in Docket No. 52195 on behalf of El Paso Electric Company (EPE)..

I make this affidavit to respond to Staff Request for Information No. 6-3.

For work I performed in Docket No. 52195, the rate that I charged is at or below the normal hourly billing rate for the firm and are charged to all clients, be they rate-regulated or competitive entities, for the types of services I provided in Docket No. 52195. To the best of my knowledge, my hourly rate for the work I performed related to Docket No. 52195 is comparable to the hourly billing rates currently charged by other consultants of similar experience and expertise to other Texas utilities for similar services.

Further affiant sayeth not.

Daniel Dane

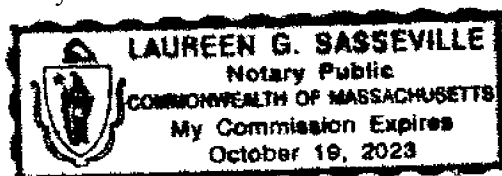
DANIEL S. DANE, Senior Vice President

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, in and for the State of MASSACHUSETTS, this 31st day of AUGUST 2021.

Laureen G. Sasdeville

Notary Public in and for the State of Massachusetts

My commission expires:
October 19, 2023



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

SOAH Docket No. 473-21-2606
PUC Docket No. 52195
STAFF's 6th, Q. No. STAFF 6-3
Attachment 3
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APPLICATION OF EL PASO
ELECTRIC COMPANY TO CHANGE
RATES

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§
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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**AFFIDAVIT REGARDING EL PASO ELECTRIC COMPANY'S RESPONSE TO STAFF'S
REQUEST FOR INFORMATION NO. 6-3**

COMMONWEALTH OF MASSACHUSETTS §
§
COUNTY OF WORCESTER §

BEFORE ME, the undersigned authority, on this day personally appeared Jennifer E. Nelson, who being by me first duly sworn, on oath, deposed and said the following:

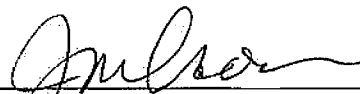
My name is Jennifer E. Nelson. I am over the age of twenty-one years and am of sound mind and competent to testify as to the matters stated herein. I have personal knowledge of the facts set forth in this affidavit, and they are true and correct.

I am employed as Assistant Vice President by Concentric Energy Advisors, Inc., and I was retained as a consultant in Docket No. 52195 on behalf of El Paso Electric Company (EPE).

I make this affidavit to respond to Staff Request for Information No. 6-3.

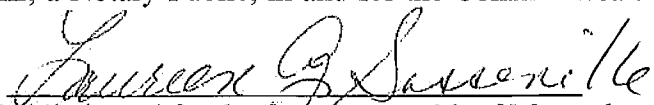
For work I performed in Docket No. 52195, the rate that I charged is at or below the normal hourly billing rate for the firm and are charged to all clients, be they rate-regulated or competitive entities, for the types of services I provided in Docket No. 52195. To the best of my knowledge, my hourly rate for the work I performed related to Docket No. 52195 is comparable to the hourly billing rates currently charged by other consultants of similar experience and expertise to other Texas utilities for similar services.

Further affiant sayeth not.

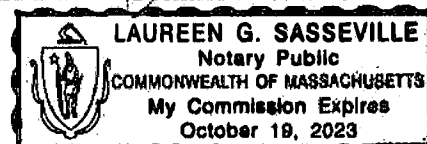


Jennifer E. Nelson

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, in and for the Commonwealth of Massachusetts, this 31st day of August 2021.



Notary Public in and for the Commonwealth of Massachusetts



My commission expires:

October 19, 2023

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

SOAH Docket No. 473-21-2606
PUC Docket No. 52195
STAFF's 6th, Q. No. STAFF 6-3
Attachment 4
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APPLICATION OF EL PASO § BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO CHANGE § OF
RATES § ADMINISTRATIVE HEARINGS

**AFFIDAVIT REGARDING EL PASO ELECTRIC COMPANY'S RESPONSE TO STAFF'S
REQUEST FOR INFORMATION NO. 6-3**

STATE OF ARIZONA §
COUNTY OF MARICOPA §

BEFORE ME, the undersigned authority, on this day personally appeared Todd A. Horton, who being by me first duly sworn, on oath, deposed and said the following:

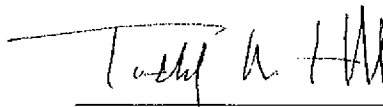
My name is Todd A. Horton. I am over the age of twenty-one years and am of sound mind and competent to testify as to the matters stated herein. I have personal knowledge of the facts set forth in this affidavit, and they are true and correct.

I am employed as Senior Vice President – Site Operations by Arizona Public Service Company, and I was retained as a consultant in Docket No. 52195 on behalf of El Paso Electric Company (EPE).

I make this affidavit to respond to Staff Request for Information No. 6-3.

For work I performed in Docket No. 52195, the rate that I charged is at or below the normal hourly billing rate for the firm and are charged to all clients, be they rate-regulated or competitive entities, for the types of services I provided in Docket No. 52195. To the best of my knowledge, my hourly rate for the work I performed related to Docket No. 52195 is comparable to the hourly billing rates currently charged by other consultants of similar experience and expertise to other Texas utilities for similar services.

Further affiant sayeth not.



Todd A. Horton

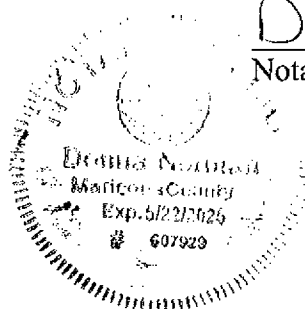
SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, in and for the State of Arizona, this 2nd day of Sept 2021.



Notary Public in and for the State of Arizona

My commission expires:

5/22/2026



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

SOAH Docket No. 473-21-2606
PUC Docket No. 52195
STAFF's 6th, Q. No. STAFF 6-3
Attachment 5
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APPLICATION OF EL PASO
ELECTRIC COMPANY TO CHANGE
RATES

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§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**AFFIDAVIT REGARDING EL PASO ELECTRIC COMPANY'S RESPONSE TO STAFF'S
REQUEST FOR INFORMATION NO. 6-3**

COMMONWEALTH OF PENNSYLVANIA §
§
COUNTY OF CUMBERLAND §

BEFORE ME, the undersigned authority, on this day personally appeared John J. Spanos, who being by me first duly sworn, on oath, deposed and said the following:

My name is John J. Spanos. I am over the age of twenty-one years and am of sound mind and competent to testify as to the matters stated herein. I have personal knowledge of the facts set forth in this affidavit, and they are true and correct.

I am employed as President by Gannett Fleming Valuation and Rate Consultants, LLC, and I was retained as a consultant in Docket No. 52195 on behalf of El Paso Electric Company (EPE).


I make this affidavit to respond to Staff Request for Information No. 6-3.

For work I performed in Docket No. 52195, the rate that I charged is at or below the normal hourly billing rate for the firm and are charged to all clients, be they rate-regulated or competitive entities, for the types of services I provided in Docket No. 52195. To the best of my knowledge, my hourly rate for the work I performed related to Docket No. 52195 is comparable to the hourly billing rates currently charged by other consultants of similar experience and expertise to other Texas utilities for similar services.

Further affiant sayeth not.

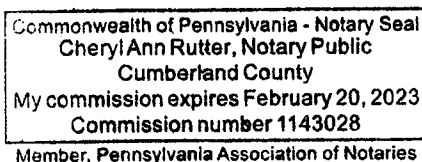

John J. Spanos

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary Public, in and for the Commonwealth of Pennsylvania, this 7th day of September 2021.


Notary Public in and for the Commonwealth of
Pennsylvania

My commission expires:

February 20, 2023



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EL PASO ELECTRIC COMPANY'S RESPONSE TO
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-4:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide a detailed schedule of, and justification for, any charges included in requested rate case expenses which result from a single person billing in excess of 12 hours per day.

RESPONSE:

As of this filing, there are no charges included in the requested rate case expenses which result from a single person billing in excess of 12 hours per day.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-5:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide a detailed schedule of, and justification for, any charges included in requested rate case expenses which result from a hotel or lodging rate in excess of \$100 per night. Please attach applicable invoices and receipts.

RESPONSE:

As of this filing, no charges included in the requested rate case expenses for Docket No. 52195 have resulted from a hotel or lodging rate in excess of \$100 per night.

In Docket No. 46831, expenses after August 31, 2017, there was a charge for one night at the Doubletree Hotel which in excess of \$100 per night. Please see El Paso Electric Company's ("EPE") response to Staff 6-1, Attachment 2. EPE personnel regularly stay at the Doubletree Hotel when in Austin due to its central location to the Commission offices, State Office of Administrative Hearings office, EPE's Austin office, and the offices of EPE's external attorneys. The Doubletree is within walking distance of these three locations and many restaurants in the close vicinity as well. This negates the need for a rental car while in Austin, reducing costs for rate proceedings. There are other hotels in the same general area as the Doubletree, but EPE also receives a corporate discounted rate, reducing costs. The other hotels in the area are higher priced. To find a hotel in Austin that is less than \$100 per night is difficult and would result in a remote location that would require the use of taxis or rental cars to go to the different locations listed above.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-6:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide a schedule of, and justification for, any charges included in requested rate case expenses which result from the use of non-commercial aircraft. Also, please provide a detailed narrative comparing the total cost per person flying on non-commercial aircraft to the cost per person for commercial airfare (based on the same travel date and itinerary). Please attach applicable invoices and receipts.

RESPONSE:

El Paso Electric Company did not have any charges in requested rate case expenses which result from the use of non-commercial aircraft.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-7:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide a schedule of, and justification for, any charges included in requested rate case expenses which result from first class air travel. Please attach applicable invoices and receipts.

RESPONSE:

El Paso Electric Company ("EPE") did not have any charges in requested rate case expenses which result from first class air travel.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-8:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide a schedule of, and justification for, any charges included in requested rate case expense which result from luxury items, such as limousine services, sporting events, alcoholic drinks, hotel movies, or other entertainment. Please attach applicable invoices and receipts.

RESPONSE:

El Paso Electric Company is not including in its rate case expenses items that Staff suggests are luxury items.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-9:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please provide a schedule of, and justification for, any charges included in requested rate case expenses resulting from meals which cost in excess of \$25 per person per meal. Please attach applicable invoices and receipts.

RESPONSE:

El Paso Electric Company ("EPE") is not including any charges in requested rate case expenses resulting from meals which cost in excess of \$25 per person per meal.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-10:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please describe in detail your selection procedure for consultants. For each category of consultant (legal, accounting, engineering, etc.), state whether your selection procedures include provisions for:

- a) review of the prior work products of each consultant;
- b) determination that the rate does not exceed the normal hourly billing rate charged by the vendor to other clients;
- c) an analysis of the rates charged by comparable consultants for similar services provided to other Texas utilities; and,
- d) competitive bidding for each contract--If competitive bidding is used, please describe the factors considered in evaluation and acceptance of bids.

RESPONSE:

The selection of legal counsel is based upon their knowledge and experience with electric utility regulation in Texas and experience with electric utility ratemaking in particular. In addition, El Paso Electric Company ("EPE" or "Company") has had a long-standing relationship with its outside regulatory counsel and values the knowledge that its regulatory

legal counsel has of the Company and its prior regulatory filings. EPE does not have specific selection procedures that include the provisions identified above. Although EPE considers the hourly billing rates charged to the Company and is generally familiar with rates charged by comparable regulatory counsel in Texas, EPE does not perform specific comparisons of rates nor does the Company utilize a competitive bidding process. EPE's regulatory legal counsel, Duggins Wren Mann & Romero, LLP, charges EPE discounted billing rates for certain regulatory filings.

The selection of other consultants is based upon their knowledge and experience with electric utility regulation in Texas and their knowledge and experience relative to the areas on which they will be asked to consult in the rate case. In addition, EPE values the knowledge that its consultants have of specific aspects of the Company or its operations relative to the areas on which they will be asked to consult. EPE does not have specific selection procedures that include the provisions identified above. Although EPE considers the hourly billing rates charged to the Company and is generally familiar with rates charged by comparable consultants in Texas, EPE does not perform specific comparisons of rates nor does the Company utilize a competitive bidding process. Negotiated billing rates are incorporated as attachments to all consulting agreements.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-11:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Prior to submission of rate case expenses to the Commission, has the Company performed a detailed review of all rate case expenses (including internal expenses, as well as outside consultants' expenses) to:

- a) determine that invoice terms and amounts are in agreement with contract specifications?
- b) determine that contract limits have not been exceeded?
- c) determine that adequate supporting documentation was provided for each charge for professional or secretarial services, travel expenses, and miscellaneous expenses (consistent with documentation requirements specified above)?
- d) verify the mathematical accuracy of each invoice?
- e) determine that the calculation of the charges is correct?
- f) determine that the individual charges and rates are reasonable?
- g) determine that the amount of each service (e.g., number of hours billed) is reasonable?
- h) determine that there is no double-billing of charges?

- i) determine that each invoice was approved for payment by an appropriate person before payment was actually made?

For each item listed above, please describe in detail the procedures for making such a determination.

RESPONSE:

Yes, all invoices are subject to the type of review outlined in a.) through i.) above with a three-tiered level of review. When invoices are received, they are reviewed by El Paso Electric Company ("EPE") personnel and accounting codes are assigned. The invoices are then sent to the appropriate executive for review and approval. After executive approval, the invoice is sent to EPE's Accounts Payable for further review, and ultimately, payment. Before rate case expenses are submitted to the Commission, outside counsel conducts an additional review to ensure compliance with PUCT precedent for rate case expense recovery.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO CHANGE	§	OF
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EL PASO ELECTRIC COMPANY'S RESPONSE TO
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-12:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Prior to submission of rate case expenses to the Commission, was a detailed review of all rate case expenses (including internal expenses, as well as outside consultants' expenses) performed to:

- a) determine that none of the charges included in requested rate case expenses have been included in other cost of service amounts included in the Rate Filing Package?
- b) determine that none of the charges included in requested rate case expenses should have been directly assigned to other jurisdictions?
- c) determine that any allocation of charges between jurisdictions is reasonable?
- d) determine that none of the charges included in requested rate case expenses have been recovered through reimbursement for other expenses?

For each item listed above, please describe in detail the procedures for making such a determination.

RESPONSE:

Please see EPE's response to STAFF 6-11.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-13:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

For each category of rate case expenses specified in the Summary of Rate Case Expense Schedule, please provide a schedule of all exceptions noted upon review of the rate case expenses. The schedule should be presented in the following format:

<u>Vendor ID.</u>	<u>Invoice No.</u>	<u>Explanation of Exception</u>	<u>How Exception Was Cleared</u>
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RESPONSE:

Please see Staff 6-13, Attachment 1. These amounts were removed from the actual expenses in El Paso Electric Company's response to Staff 6-1.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

Vendor ID	Invoice No.	Explanation of Exception	How Cleared
DGC Consulting	21-4	\$250 related to Docket No. 51780, EPE's request for waiver of certain rate filing package schedules. EPE agreed to not include the costs of that case in the rate case expenses for this case.	This amount is excluded from the rate case expense request.
Duggins Wren Mann & Romero LLP	35492, 35633, 35802, 35933, 36145	\$17,462 related to Docket No. 51780, EPE's request for waiver of certain rate filing package schedules. EPE agreed to not include the costs of that case in the rate case expenses for this case.	This amount is excluded from the rate case expense request.

Duggins Wren Mann & Romero, LLP

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
01/26/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Research re waiver of RFP Schedule S audit / PUCT/Overall Case Strategy		T-GCaseStr	1.50	420.00	\$ 630.00
01/28/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Research re RFP waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.60	420.00	252.00
01/29/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Work on waiver request re RFP / PUCT/Overall Case Administration		T-GCaseAdm	1.10	420.00	462.00
01/29/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Research re EMR waiver / PUCT/Overall Case Strategy		T-GCaseAdm	0.70	420.00	294.00
01/18/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate issues waiver of audit requirement / PUCT/General Accounting Issues		T-GAcct	0.90	420.00	378.00
01/18/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/M. Behrens re waiver of audit requirement / PUCT/General Accounting Issues		T-GAcct	0.20	420.00	84.00
01/29/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review application for waiver of rate filing schedules / PUCT/Overall Case Administration		T-GCaseAdm	0.30	420.00	126.00
02/05/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review SOAH order re request for RFP schedule waiver / PUCT/RFP Schedules		T-GRFP	0.20	420.00	84.00
02/01/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review request for waiver of audit / PUCT/Policy Issues		T-GPol	0.60	420.00	252.00
02/05/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review order requiring Staff recommendation in audit waiver filing / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00
03/08/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review notice affidavit re Schedule S waiver / PUCT/RFP Schedules		T-GRFP	0.50	420.00	210.00
03/04/2021	WCW	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Correspond w/J. Parsons re waiver of RFP schedules / PUCT/RFP Schedules		T-GRFP	0.20	480.00	96.00
03/22/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate scenarios re status of Schedule S waiver docket / PUCT/RFP Schedules		T-GRFP	0.30	420.00	126.00
03/04/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review order in waiver proceeding / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00
03/04/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate notice issues re request for waiver of Schedule S / PUCT/Overall Case Administration		T-GCaseAdm	0.80	420.00	336.00
03/04/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/J. Parsons re notice issues re waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00

Duggins Wren Mann & Romero, LLP

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
03/08/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review proof of notice for waiver request filing / PUCT/Overall Case Administration		T-GCaseAdm	0.40	420.00	168.00
03/17/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review Staff recommendation re sufficiency of filing and notice re waiver of Schedule S / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00
04/14/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case TC J. Parsons and team re Staff position on Schedule S waiver / PUCT/RFP Schedules		T-GRFP	0.60	420.00	252.00
04/14/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate alternatives to Staff position on Schedule S / PUCT/RFP Schedules		T-GRFP	0.40	420.00	168.00
04/14/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Research re Schedule S issues / PUCT/RFP Schedules		T-GRFP	1.00	420.00	420.00
04/15/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Research re Schedule S issue / PUCT/RFP Schedules		T-GRFP	1.80	420.00	756.00
04/15/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review table re proposed RFP schedules to audit / PUCT/RFP Schedules		T-GRFP	0.30	420.00	126.00
04/26/2021	KCO	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review issues relating to Schedule S audit waiver request / PUCT/RFP Schedules		T-GRFP	0.80	290.00	232.00
04/27/2021	KCO	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Analyze issues relating to Schedule S audit waiver request / PUCT/RFP Schedules		T-GRFP	0.50	290.00	145.00
04/30/2021	KCO	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Analyze Schedule S audit waiver issues / PUCT/RFP Schedules		T-GRFP	2.10	290.00	609.00
04/26/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Work on proposed order re Schedule S waiver / PUCT/RFP Schedules		T-GRFP	0.30	420.00	126.00
04/26/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review correspondence re Schedule S waiver / PUCT/RFP Schedules		T-GRFP	0.40	420.00	168.00
04/29/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate Schedule S waiver strategy / PUCT/RFP Schedules		T-GRFP	0.40	420.00	168.00
04/30/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review communication re Schedule S waiver / PUCT/RFP Schedules		T-GRFP	0.50	420.00	210.00
04/23/2021	LBK	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Draft notice of approval for Schedule S for Docket 51780 / PUCT/Overall Case Administration		T-GCaseAdm	0.30	300.00	90.00
04/26/2021	LBK	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Draft notice of approval for Schedule S in Docket 51780 / PUCT/Overall Case Administration		T-GCaseAdm	0.30	300.00	90.00

Duggins Wren Mann & Romero, LLP

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/27/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate plans for Schedule S waiver / PUCT/RFP Schedules		T-GRFP	0.30	420.00	126.00
04/14/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate potential settlement options for Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	2.40	420.00	1,008.00
04/14/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Conference call w/J. Parsons and others re Schedule S waiver case / PUCT/Overall Case Administration		T-GCaseAdm	0.70	420.00	294.00
04/14/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case TC Staff re Schedule S waiver case / PUCT/Overall Case Administration		T-GCaseAdm	0.10	420.00	42.00
04/15/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review FERC audit re potential Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.80	420.00	336.00
04/15/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate potential settlement options for Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	1.90	420.00	798.00
04/15/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/Staff re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.90	420.00	378.00
04/16/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/Staff re schedule for call re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00
04/19/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Conference call w/Staff re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.40	420.00	168.00
04/26/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review Staff proposal re waiver of Schedule S / PUCT/Overall Case Administration		T-GCaseAdm	0.70	420.00	294.00
04/27/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate strategies re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	1.50	420.00	630.00
04/27/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/Staff re extension of deadline re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00
04/28/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/Staff re further extension of Staff recommendation re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00
04/28/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Draft request for extension of Staff deadline for recommendation re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.90	420.00	378.00
04/29/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/Staff re status of waiver request proposal / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00

Duggins Wren Mann & Romero, LLP

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
04/29/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate potential settlement options re waiver request / PUCT/Overall Case Administration		T-GCaseAdm	0.80	420.00	336.00
04/30/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Conference call w/KPMG re Staff issues w/Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.90	420.00	378.00
04/30/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case TC M. Behrens re Staff's proposal re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00
04/30/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate counter proposal to Staff re Schedule S waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.60	420.00	252.00
04/30/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communications w/Staff re filing of second extension request for waiver case / PUCT/Overall Case Administration		T-GCaseAdm	0.70	420.00	294.00
04/30/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Draft second extension request for waiver case / PUCT/Overall Case Administration		T-GCaseAdm	0.80	420.00	336.00
04/30/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate potential settlement options re waiver request / PUCT/Overall Case Administration		T-GCaseAdm	1.90	420.00	798.00
04/30/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/N. Gordon re status of waiver case / PUCT/Overall Case Administration		T-GCaseAdm	0.20	420.00	84.00
05/05/2021	CAB	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Work on draft proposed notice of approval for Docket No. 51780 / PUCT/Overall Case Administration		T-GCaseAdm	0.60	350.00	210.00
05/05/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Work on notice of approval of waiver of Schedule S / PUCT/RFP Schedules		T-GRFP	0.30	420.00	126.00
05/05/2021	LBK	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Revise notice of approval for Docket No. 51780 / PUCT/Overall Case Administration		T-GCaseAdm	0.40	300.00	120.00
05/06/2021	LBK	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Revise notice of approval of waiver / PUCT/Overall Case Administration		T-GCaseAdm	0.40	300.00	120.00
05/13/2021	MSH	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review Staff's draft order re Schedule S waiver / PUCT/RFP Schedules		T-GRFP	0.30	420.00	126.00
05/04/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Draft request for extension for agreed notice of approval in waiver case / PUCT/General Accounting Issues		T-GAcct	0.40	420.00	168.00
05/04/2021	BJS	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communications w/Staff re status of waiver request / PUCT/General Accounting Issues		T-GAcct	0.20	420.00	84.00

Duggins Wren Mann & Romero, LLP

Date	Prof	Matter ID/Client Sort Matter Description Narrative	Activity Code	Component Task Code	Units	Price	Value
05/05/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communications w/Staff re extension in waiver request case / PUCT/General Accounting Issues		T-GAcct	0.20	420.00	84.00
05/05/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Evaluate Staff proposal re waiver request / PUCT/General Accounting Issues		T-GAcct	0.20	420.00	84.00
05/05/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review draft notice of approval of waiver request / PUCT/General Accounting Issues		T-GAcct	0.20	420.00	84.00
05/06/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communications w/J. Schichtl and M. Behrens re draft notice of approval of waiver / PUCT/General Accounting Issues		T-GAcct	0.30	420.00	126.00
05/06/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/Staff re draft notice of approval of waiver / PUCT/General Accounting Issues		T-GAcct	0.10	420.00	42.00
05/12/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review draft affidavit in support of waiver / PUCT/General Accounting Issues		T-GAcct	0.30	420.00	126.00
05/13/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Draft cover letter and joint motion for waiver case / PUCT/Overall Case Administration		T-GCaseAdm	1.70	420.00	714.00
05/13/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Review Staff's revisions to notice of approval of waiver request / PUCT/General Accounting Issues		T-GAcct	0.70	420.00	294.00
05/13/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/Staff re revisions of notice of approval of waiver request / PUCT/General Accounting Issues		T-GAcct	0.20	420.00	84.00
05/14/2021	BJs	000018-000234/ El Paso Electric El Paso Electric - 2021 TX Rate Case Communicate w/Staff re filing agreed notice of approval of waiver request / PUCT/Overall Case Administration		T-GCaseAdm	0.30	420.00	126.00
						Total \$	17,462.00

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-14:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Are payments to outside consultants delayed or invoices rejected if adequate supporting documentation is not provided? Please explain.

RESPONSE:

Yes. Payments can be delayed or rejected by the approving department if the invoice provides insufficient detail of the work performed or service provided or that is not otherwise in compliance with El Paso Electric Company's billing guidelines. Payment to any outside consultants cannot be made until an invoice is received, approved by management, and paid by Accounts Payable.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

SOAH DOCKET NO. 473-21-2606
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APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO CHANGE	§	OF
RATES	§	ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-15:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Is any amount or retainer withheld from payments to outside consultants? If yes, please provide details. Please explain.

RESPONSE:

No amounts or retainers are withheld from payments to outside consultants.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-16:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Have any outside parties (e.g., independent auditors) or internal auditors performed a review of the requested rate case expenses? If so, please describe the review performed and provide copies of the working papers prepared during this review.

RESPONSE:

To date, no such audits have been performed on the requested rate case expenses by independent or internal auditors. El Paso Electric Company's ("EPE") believes that an independent audit would result in unnecessary expense for EPE's customers. EPE's books and records are routinely audited by an independent auditor. Any rate application EPE files would be based on those books and records. However, as EPE's response to STAFF 6-11 explains, EPE's outside counsel also performs a review of rate case expenses.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-17:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Do you have the contractual right to perform audits of consultant's expenses? If you do have this right, have you audited any consultants currently included in rate case expenses? If so, please identify the consultants audited, the procedures performed and the results of the audit.

RESPONSE:

Regardless of whether there is an audit clause, the Company reviews all invoices and objects to charges or expenses that it deems improper under the contract.

To date no formal audits of consultant expenses have been performed. However, as EPE's response to STAFF 6-11 explains, EPE's outside counsel and EPE perform a review of rate case expenses.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-18:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Do you have any procedures for evaluating total costs for rate case expenses (actual vs. budgeted costs)? If so, please describe these procedures.

RESPONSE:

During the course of the preparation and filing of a rate case, El Paso Electric Company ("EPE") reviews the invoices as they are received as stated in EPE's response to Staff 6-11. Additionally, EPE periodically reviews the estimated costs provided in the filing versus the actual costs incurred during the case.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-19:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

For all requested rate case expenses, please provide details of any instances in which more than one law firm or other consultant was engaged to provide similar services for the same aspect of the rate case. Please provide evidence that such charges did not result from a duplication of services.

RESPONSE:

There were no instances in which more than one law firm or other consultant was engaged to provide similar services for the same aspect of this rate case. In instances where more than one law firm or other consultant was engaged with regard to the same aspect of the case, for example, organizational meetings or the review of a particular piece of testimony, they were serving a different purpose or providing a different perspective and not duplicating their services. For example, EPE's attorney who represents EPE in FERC matters was asked to review aspects of the case which concern FERC jurisdictional matters. The standards expected by the Commission require no less.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-20:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please list individually by entity, person, and amount any salaries, wages, employee benefits, or other payroll-related items which are included in requested rate case expenses.

RESPONSE:

El Paso Electric Company did not include any such expenses in its requested rate case expenses.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-21:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Has the Company excluded all expenses which are included in another component of requested cost of service for this Docket (such as payroll or lease expense) from its requested rate case expenses? If not, please provide a schedule listing the expenses and a detailed explanation.

RESPONSE:

Yes. El Paso Electric Company has excluded all expenses which are included in another component of the requested cost of service (such as payroll or lease expense included in the historic test year) from its requested rate case expenses.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-22:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Are any charges included in requested rate case expenses for legal or other services provided by your employees? If yes, provide a schedule by employee showing the total amount included in rate case expenses, and a detailed description of how the amount was determined (e.g., based on actual salary, based on comparable outside consultants' billing rates, etc.). Provide justification for any charges in excess of your actual costs.

RESPONSE:

There are no requested rate case expenses in this case for legal or other services that are provided by El Paso Electric Company employees.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

SOAH DOCKET NO. 473-21-2606
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APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO CHANGE	§	OF
RATES	§	ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-23:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Are any Company or consultant internal overhead charges included in requested rate case expenses? If yes, provide a schedule by type of overhead expense showing the total amount included in rate case expenses, and a detailed description of how the amount was determined (e.g., based on actual costs, based on market prices, etc.). Provide justification for any charges in excess of your actual costs.

RESPONSE:

As of this filing, no Company or consultant internal overhead charges are included in requested rate case expenses.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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
COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. STAFF 6-1 THROUGH STAFF 6-24

STAFF 6-24:

Rate Case Expenses

Please provide the following information regarding all requested rate case expenses for El Paso Electric Company (EPE) through July 31, 2021. If provided previously, please provide a cross-reference identifying the specific RFI response or other Commission filing that contains this information. Please update each of the requested schedules monthly for additional rate case expenses incurred.

Please identify and list any charges included in the requested rate case expenses which are contingent upon a certain outcome. For example, any payments, bonuses or incentives based on a specific event or result would be included in this schedule. Conversely, any reimbursements the Company will receive due to a negative outcome would also be included.

RESPONSE:

There are no requested rate case expenses which are contingent upon any specified outcome in the case.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: James Schichtl

Title: Vice President – Regulatory &
Governmental Affairs

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. Information provided in the response to STAFF 6-2, Attachment 1 HSPM and Attachment 2 HSPM is exempt from public disclosure pursuant to sections 552.101 and 552.110 of the Public Information Act (PIA). 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 the owner of the information. 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,

Matthew K. Behrens
State Bar No. 24069356
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El Paso Electric Company
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(915) 543-5882
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P.O. Box 1149
Austin, Texas 78767
(512) 744-9300
(512) 744-9399 (fax)

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 September 7, 2021.

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

Matthew K. Behrens

The following files are not convertible:

STAFF 06-01_Attachment 01.xlsx
STAFF 06-01_Attachment 02.xlsx
Staff 06-13_Attachment 01.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

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