



Control Number: 52195



Item Number: 17

Addendum StartPage: 0

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

2021 JUN 18 PM 2:04

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

**CITY OF EL PASO'S FIRST REQUESTS FOR INFORMATION
TO EL PASO ELECTRIC COMPANY QUESTIONS CEP 1-1 THROUGH CEP 1-28**

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

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

Norman J. Gordon
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El Paso, Texas, 79940
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ngordon@ngordonlaw.com

Manuel Arambula, Senior Assistant City Attorney
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Arambulaml@elpasotexas.gov

DEFINITIONS AND INSTRUCTIONS

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

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

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

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

5. "**Identify**" means:

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

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

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

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

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

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

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

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

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

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

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

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

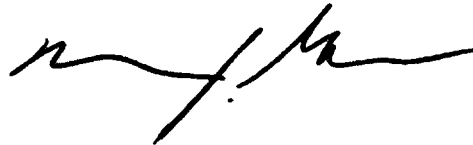
Dated June 18, 2021

Respectfully submitted,

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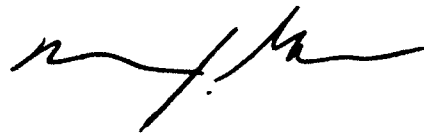
Attorneys for the City of El Paso



By: _____
Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on June 18, 2021.



Norman J. Gordon

PUC Docket No. 52195
City of El Paso's 1st RFIs
Questions CEP 1-1---CEP 1-28

- CEP 1-1. Please identify and provide documentation of any regulatory disallowances in other jurisdictions of EPE capital investments, O&M expenses, or purchased power costs incurred during any portion of the test year at issue in this case which have been ordered in other regulatory jurisdictions.
- CEP 1-2. Please provide the maximum net dependable capacity, commercial operation date, scheduled retirement date, and primary fuel type used for each existing or planned EPE generating unit as of the test year end.
- CEP 1-3. Please provide the start date, end date, duration, root cause and non-fuel O&M costs incurred for each outage of EPE generating units lasting more than 100 hours during the test year period.
- CEP 1-4. Please provide the total annual forced outage hours and planned outage hours for each EPE generating unit for the test year and each of the last four calendar years.
- CEP 1-5. Please provide copies of all EPE purchased power agreements that included non-fuel or capacity charges that were in effect during the test year period and provide costs for each agreement that are included in the Company's rate increase application in this case.
- CEP 1-6. Please provide copies of all invoices for EPE purchased power that included non-fuel or capacity charges that are included in the test year period purchased power charges.
- CEP 1-7. Please provide copies of each EPE wholesale power sale agreement that was in effect during the test year period and identify each such agreement that was not a full requirements sale with cost-based regulated charges.
- CEP 1-8. Please provide the total system net dependable generating capability (MW), firm purchased capacity (MW) and firm native system peak hour demand (MW) for the EPE system for each month of the test year.
- CEP 1-9. Please provide a copy of EPE's integrated resource plan reports that governed capacity planning decisions during the test year period.

- CEP 1-10. Please provide the test year requested purchased capacity costs, associated purchased capacity (MW) levels, contract start date and termination date, for each purchased capacity contract reflected in base rates in this case.
- CEP 1-11. Please provide non-fuel production O&M expenses for each EPE power plant by FERC account for each of the last four calendar years, the test year, and as requested in rates in this case.
- CEP 1-12. Please provide annual capital additions to plant in service for each EPE power plant for each of the last four calendar years, the test year, and as requested in rates for the first time in this case.
- CEP 1-13. Please provide project descriptions, in-service dates, and cost/benefit summaries for each production plant, distribution plant and transmission plant capital project having a cost more than \$2 million which is being included in EPE's rate base for the first time in this case.
- CEP 1-14. Please provide EPE's transmission O&M expenses by FERC account for each of the last four calendar years, the test year, and as requested in rates in this case.
- CEP 1-15. Please provide total EPE transmission capital additions to plant in service for each of the last four calendar years, the test year, and as requested in rates for the first time in this case.
- CEP 1-16. Please provide EPE's distribution O&M expenses by FERC account for each of the last four calendar years, the test year, and as requested in rates in this case.
- CEP 1-17. Please provide total EPE distribution capital additions to plant in service for each of the last four calendar years, the test year, and as requested in rates for the first time in this case.
- CEP 1-18. Please provide EPE's distribution system annual SAIDI and SAIFI with and without major storms for each of the last four years and for the test year in this case.
- CEP 1-19. Please provide EPE's transmission system annual SAIDI and SAIFI with and without major storms for each of the last four years and for the test year in this case.
- CEP 1-20. Please identify the docket number, jurisdiction and final order date of each base rate case filed by EPE in any jurisdiction during the last four calendar years.
- CEP 1-21. Please provide a copy of the joint operating agreement for PVNGS.

- CEP 1-22. Please provide the equivalent availability factor and capacity factor for each EPE generating unit for each month since January of 2017.
- CEP 1-23. Please provide EPE's current peak demand, capacity resource (MW) and reserves (MW) forecast, including capacity resource (MW) retirements and additions, for the next 10 calendar years.
- CEP 1-24. Please identify the planned in-service dates, nameplate capacity (MW) and estimated firm capability (MW) of each new EPE generating resource under construction or planned for the next 10 calendar years.
- CEP 1-25. Please identify any generating unit outages during the test year for which EPE has received or expect to receive insurance or vendor settlements and explain how these settlements have been treated for ratemaking purposes.
- CEP 1-26. Please identify and provide the capital investments placed in rate base for the first time in this case whose primary purpose is to increase the operating efficiency, availability or capacity rating of EPE generating facilities.
- CEP 1-27. Please provide the most recent economic analyses supporting the planned retirement dates for each EPE generating unit along with the dates of such analyses.
- CEP 1-28. Please provide the number of hours during each of the last three calendar years and during the test year that the delivery of energy produced from EPE's ownership share of the PVNGS units to EPE's Texas service area was limited by transmission constraints and explain the primary reasons for these constraints.