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**APPLICATION OF EL PASO
ELECTRIC COMPANY TO
CHANGE RATES**

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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

**THE UNIVERSITY OF TEXAS AT EL PASO'S FOURTH
REQUEST FOR INFORMATION TO EL PASO ELECTRIC COMPANY**

In connection with the Application filed by El Paso Electric Company ("EPE"), by and through its attorney of record, the University of Texas at El Paso ("UTEP") requests the following information within twenty (20) days of receipt of these requests. It is further requested that the answers to the requests for information be made under oath and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as supplement to your original answer.

Definitions and Explanatory Notes

1. When a request calls for identification of a "person or witness," the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, 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" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and conferences, summaries or other records of

negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' 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, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and "non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.

3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification of a "document," the identification should include the following:
 - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
 - b. the date of the document;
 - c. the title and/or 're' of the document;
 - d. the subject matter of the document;
 - e. the full name and address of the recipient and every person who received copies of the document;
 - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
 - g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term "studies" includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.

6. The term “El Paso Electric” and/or “EPE” includes El Paso Electric Company and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

Respectfully submitted,

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By: /s/ Alton J. Hall, Jr.

Alton J. Hall, Jr.

**ATTORNEYS FOR
THE UNIVERSITY OF TEXAS AT EL PASO**

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2021, a true and correct copy of the foregoing document was served via-email upon on all parties of record.

/s/ Alton J. Hall, Jr.

Alton J. Hall, Jr.

FOURTH REQUEST FOR INFORMATION

4-1. Please refer to Exhibit MC-3 of Mr. Manuel Carrasco's direct testimony and answer the following questions:

- a. Please explain in detail each of the programs included in the Large C&I Solutions MTP that results in the expected 4,059,431 kwh Energy Savings by the participants in the Large Power class, as shown on page 3 of Exhibit MC-3.
- b. Please explain in detail each of the programs included in the Texas Score MTP that results in the expected 550,785 kwh Energy Savings by the participants in the Large Power class, as shown on page 3 of Exhibit MC-3.
- c. Please refer to page 4 of Exhibit MC-3 and answer the following questions:
 - i. Please explain in detail how the incentives for each of the three energy efficiency programs for the Large Power customers as shown in the following table were determined:

Programs	Customer Incentives
Large C&I Solution MTP	\$325,531.44
Texas SCORE MTP	\$36,724.80
Commercial Load Management	\$400,553.28

- ii. Please provide the number of Large Power customers who receive the incentives in each of the three programs
- iii. Please provide the identify of each of these customers and the incentive for each of these customers.
- iv. Please explain if these customers' participation is on a voluntary basis and how the customers were made aware of these programs.
- v. Please explain in detail how the incentive percentage for each of the three energy efficiency programs as shown in the following table were determined:

Programs	Percentage of Incentives
Large C&I Solution MTP	38%
Texas SCORE MTP	13%
Commercial Load Management	95%

4-2. Please refer to EPE's response to Vinton Steel's first set RFI, RFI No. VS 1-27, and explain in detail how the present revenues for each calendar year from 2016-2019, as shown in the Attachment 1 to the response to VS1-27, were determined.