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

APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**COMMISSION STAFF'S THIRTEENTH REQUEST FOR INFORMATION TO
EL PASO ELECTRIC COMPANY
QUESTION NO. STAFF 13-1 THROUGH 13-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that El Paso Electric Company (EPE) by and through its attorney of record, 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 the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. 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.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: September 21, 2021

Respectfully submitted,
**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

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/s/ Robert Parish
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record on September 21, 2021 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Forrest Smith
Forrest Smith

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**COMMISSION STAFF'S THIRTEENTH REQUEST FOR INFORMATION TO
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DEFINITIONS

- 1) "EPE," "Company," or "you" refers to El Paso Electric Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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**COMMISSION STAFF'S THIRTEENTH REQUEST FOR INFORMATION TO
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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. 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.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 13-1** Please refer to WP-B-1 – Adj 01 Plant in Service, Page 3, Column (d) Incentive Compensation.
- a) Please provide detailed calculations by incentive plan type (ACBP, LTIP, etc.) for the adjustments to plant in service totaling \$10,073,841.
 - b) Are the adjustments to plant in service the amounts for the test year only? If more than the test year is included in the proposed adjustments, please provide the amounts included by plan by year. If not included in the calculation of the proposed adjustments, please provide the total financial-based incentive compensation capitalized to plant in service in the same format by plan by year since the end of the test year in Docket No. 46831.
 - c) Do the proposed adjustments to plant in service for incentive compensation include any adjustments for capitalized Palo Verde financial-based incentive compensation? If not, please provide the amount of Palo Verde financial-based incentive compensation capitalized to plant in service in the same format by plan type by year since the end of the test year in Docket No. 46831.
- Staff 13-2** Please refer to WP-B-1 – Adj 02 Accumulated Depreciation, page 3, Column (d) Incentive Compensation.
- a) Please provide detailed calculations of the adjustments to accumulated depreciation totaling \$1,005,890.
 - b) Are the adjustments to accumulated depreciation the amounts for the test year only? If more than the test year is included in the proposed adjustments, please provide the amounts included by year. If not included in the calculation of the proposed adjustments, please provide the total financial-based incentive compensation included in accumulated depreciation in the same format by year since the end of the test year in Docket No. 46831.
 - c) Do the proposed adjustments to accumulated depreciation for incentive compensation include any adjustments for capitalized Palo Verde financial-based incentive compensation? If not, please provide the amounts of Palo Verde financial-based incentive compensation included in accumulated depreciation in the same format by year since the end of the test year in Docket No. 46831.
- Staff 13-3** Please provide the amount of all non-qualified pension payments capitalized to plant in service by FERC account since the Docket No. 46831 test year end and

included in EPE's requested rate base. Please also provide the amount of any associated accumulated depreciation. If there are no capitalized non-qualified pension payments for the referenced period included in EPE's requested rate base, please provide a detailed calculation and reference to the adjustment where such amounts were removed from the request.