

This schedule presents various storage related attachments as listed below. The attachments are voluminous and portions are considered confidential.

Attachment 1 presents the physical layout of the Chevron Keystone Gas Storage Facility. The facility provided a 2011 update to its previous facility information. Pg. 2-6

Attachment 2 refers to the **confidential** storage contract in effect over the reconciliation period. The transition letter effective July 1, 2014, informing that Kinder Morgan Energy Partners purchased Chevron Keystone Gas Storage, L.L.C. is included. Pg. 7-10

Attachment 3 presents an itemized **confidential** record of all costs and storage Injection/withdrawal usage for each day and month over the reconciliation period. Pg. 11

Attachment 4 presents EPE's **confidential** estimated storage reservation charges over the rate year. Injection/withdrawal usage is not forecasted since imbalance needs are uncertain. Pg. 12

Attachment 1

Chevron Keystone Gas Storage Physical Layout

PUBLIC



Keystone Gas Storage
Winkler County, Texas

Keystone Gas Storage



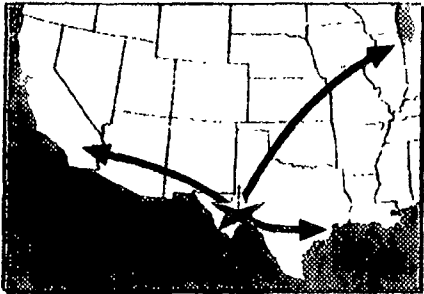
El Paso Electric Company

The Keystone Gas Storage Facility offers strategically located, high deliverability salt cavern storage capacity in the Permian Basin Producing Area, with access to Texas Intrastate, Midwest, and Western Markets.



Facility Data

	Current
Working Gas Capacity	5.0 BCF
Storage Caverns	5
Deliverability (45 day cycle)	
Withdrawal (MMCFD)	300+
Injection (MMCFD)	160
Pipeline Interconnects	El Paso Transwestern NNG

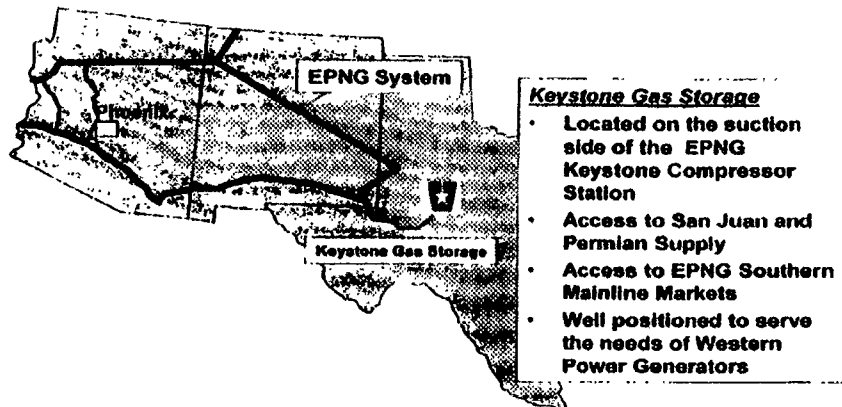


El Paso Electric Company

2

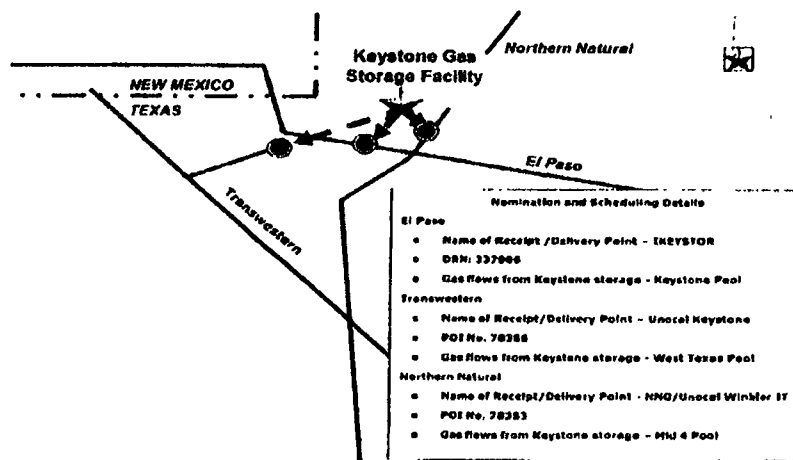
PUBLIC

Keystone Gas Storage Facility



4.10.2020 2015

Keystone Gas Storage Facility Pipeline Connections



4.10.2020 2015

PUBLIC

Chevron's Gas Storage Assets



Chevron owns and manages over 75 BCF of storage in the following storage facilities:

- Aitken Creek located in NE British Columbia Canada,
- Alberta Hub located in NW Alberta Canada,
- Bridgeline Storage located in Southern Louisiana, and
- Keystone located in West Texas.

Chevron operates the Aitken Creek, Bridgeline, and Keystone facilities.

For more information on Chevron's Gas Storage Assets, contact:

Keystone
Jim Avioff
Anne Fiedler

(713) 432-3688
(713) 432-2459

Aitken Creek & Alberta Hub
Shannon Day
Trevor Couldwell

(403) 234-5010
(403) 234-5011

Bridgeline
Kevin Cofer

(713) 432-3713

Chevron 2005



Customers

Investors

Governance

Responsibility

About Us

News Room

ONEOK TEXAS GAS STORAGE

ONEOK PARTNERS L.P. > CUSTOMERS > NATURAL GAS PIPELINES > ONEOK TEXAS GAS STORAGE

Print

• [Contacts](#)

• [Tariffs](#)

• [Internet Access Form](#)

• [Electronic Communication Agreement](#)

• [Customer Activity Site](#)

ONEOK Texas Gas Storage

ONEOK Texas Gas Storage offers natural gas storage services from a 4 Bcf working capacity storage complex located near the city of Loop in West Texas.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-7: NATURAL GAS STORAGE DESCRIPTION
SPONSOR: DAVID C. HAWKINS
PREPARER: DIANA GONZALEZ-CARRILLO & ZULMA MOLINA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-7
Page 7 of 12

PUBLIC

Attachment 2

Chevron Gas Storage Contract

**Kinder Morgan Energy Partners purchased
Chevron Keystone Gas Storage, L.L.C Transition Letter**

PUBLIC

KINDER MORGAN

July 16, 2014

El Paso Electric Company
Gas Supply
P.O. Box 982
El Paso, Texas 79960

Attention David Hawkins

RE: Keystone Gas Storage, L.L.C.

Dear Mr. Hawkins.

I am pleased to inform you that Kinder Morgan Energy Partners, L.P. ("KMP") has purchased Chevron Keystone Gas Storage, L.L.C. and wanted to share some general information with you. The transaction was effective July 1, 2014. Going forward, the natural gas storage company will be named Kinder Morgan Keystone Gas Storage, LLC. ("KGS"). With the exception of the company name and contact information updates noted below, KGS will conduct business under the terms of the current Operating Statement.

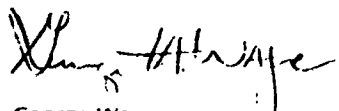
KMP will transition KGS to the new ownership quickly and seamlessly. In this regard, KMP and Chevron have executed a Transition Services Agreement whereby Chevron will continue to operate KGS from July 9, 2014 through August 9, 2014. However, nominations and scheduling will only continue to be handled by Chevron through July 31, 2014.

In the coming weeks, KGS will communicate the updated notice and payment information provided in your Operating Statement to be effective after the transition. KGS will also update this notice and payment information and its name in the Operating Statement on file at FERC. Finally, all required regulatory filings will be made at the Texas Railroad Commission and the FERC.

KGS will review its existing processes to assess their DART compatibility and develop a transition plan. The DART system is a Kinder Morgan Inc. proprietary customer activities system that provides a central location for managing contracts in terms of nominations scheduling, contracting and billing. Until then, please continue your current processes.

We appreciate your patience and attention in these matters. KGS looks forward to continued business with you. Please contact me should you have inquiries regarding the contents of this letter, storage services, or anything further.

Sincerely,



George Wayne
Director Account Services
(719) 667-7543

Transition Team Contact Information

Below is the contact information for questions related to the transition.

Natalie Grindle
Account Manager
Work: (719) 520-4818
Mobile: (979) 240-9034
Natalie_grindle@kindermorgan.com

Dan Tygret
Account Manager
Work: (719) 520-3765
Mobile: (719) 235-6076
Daniel_Tygret@kindermorgan.com

George Wayne
Director Account Services
Work: (719) 667-7543
Mobile: (719) 216-2965
George_Wayne@kindermorgan.com

Transition Team Manager Account Services

Ray Jordan, Jr.
Manager Account Services
(719) 520-4566
Jesus_jordan@kindermorgan.com

Transition Team Scheduling

Information

John Driscoll
Manager Scheduling
(719) 520-4471
john_driscoll@kindermorgan.com

Paul Haas
Director Scheduling
(719) 520-4658
Paul_haas@kindermorgan.com

PUBLIC

Contact Number: (877) 712-2288

Jim Cordaro
Director Pipeline Management
(719) 520-4282
jim_cordaro@kindermorgan.com

Sherry Saunders
Manager Contract Administration
(719) 520-3711
Sherry_saunders@kindermorgan.com

Francisco Tarin
Director Regulatory
(719) 667-7517
francisco_tarin@kindermorgan.com

Attachment 3

Itemized Record of Storage Costs

**Accounts may not add or tie to other schedules
due to rounding and/or accounting true-ups.**

Attachment 4

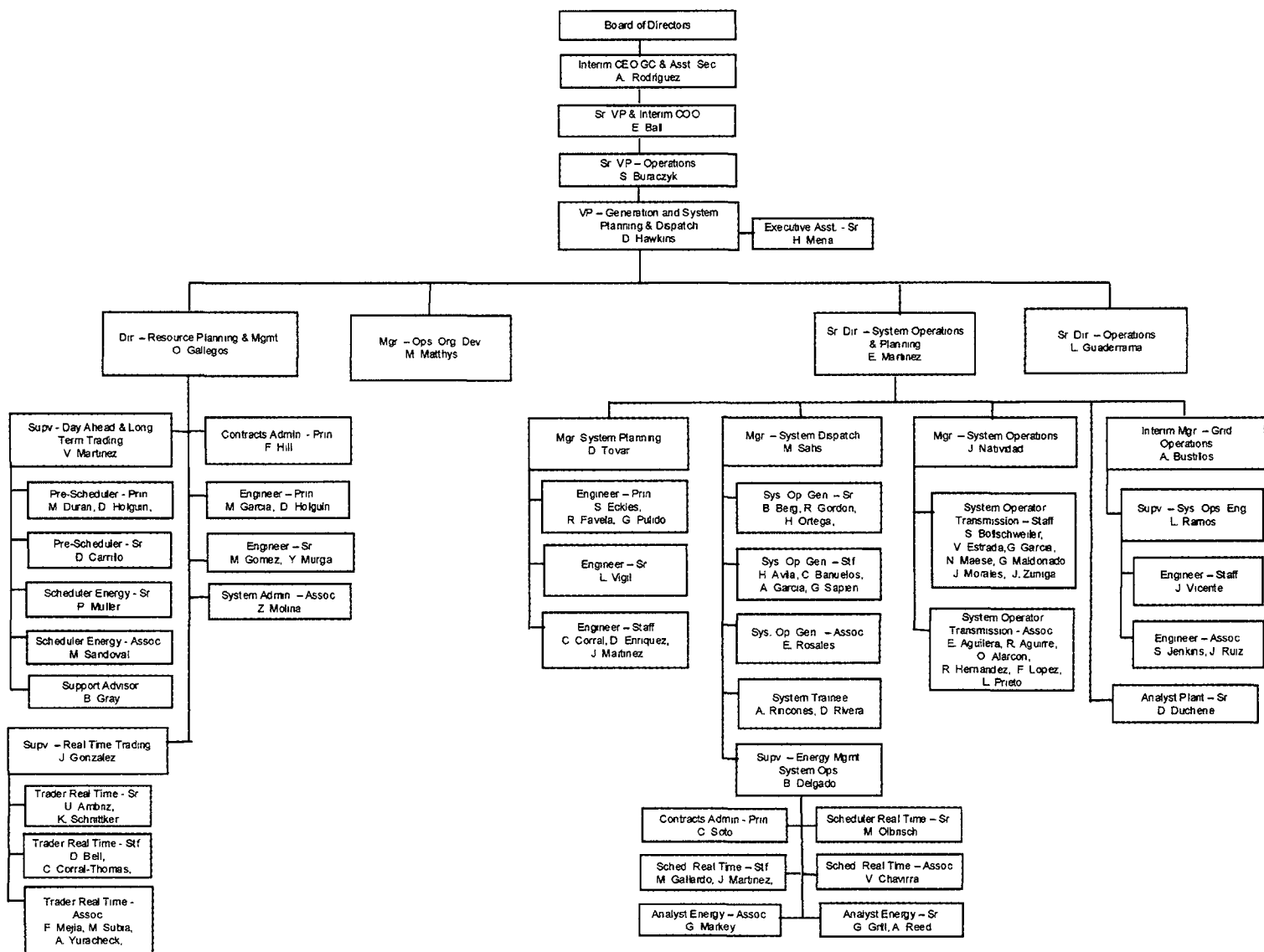
Projected Gas Storage Costs

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-8: FUEL PROPERTIES
SPONSOR: DAVID C. HAWKINS
PREPARER: PEARL MULLER
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-8
PAGE 1 OF 1

El Paso Electric Company does not own or control any fuel-related properties.

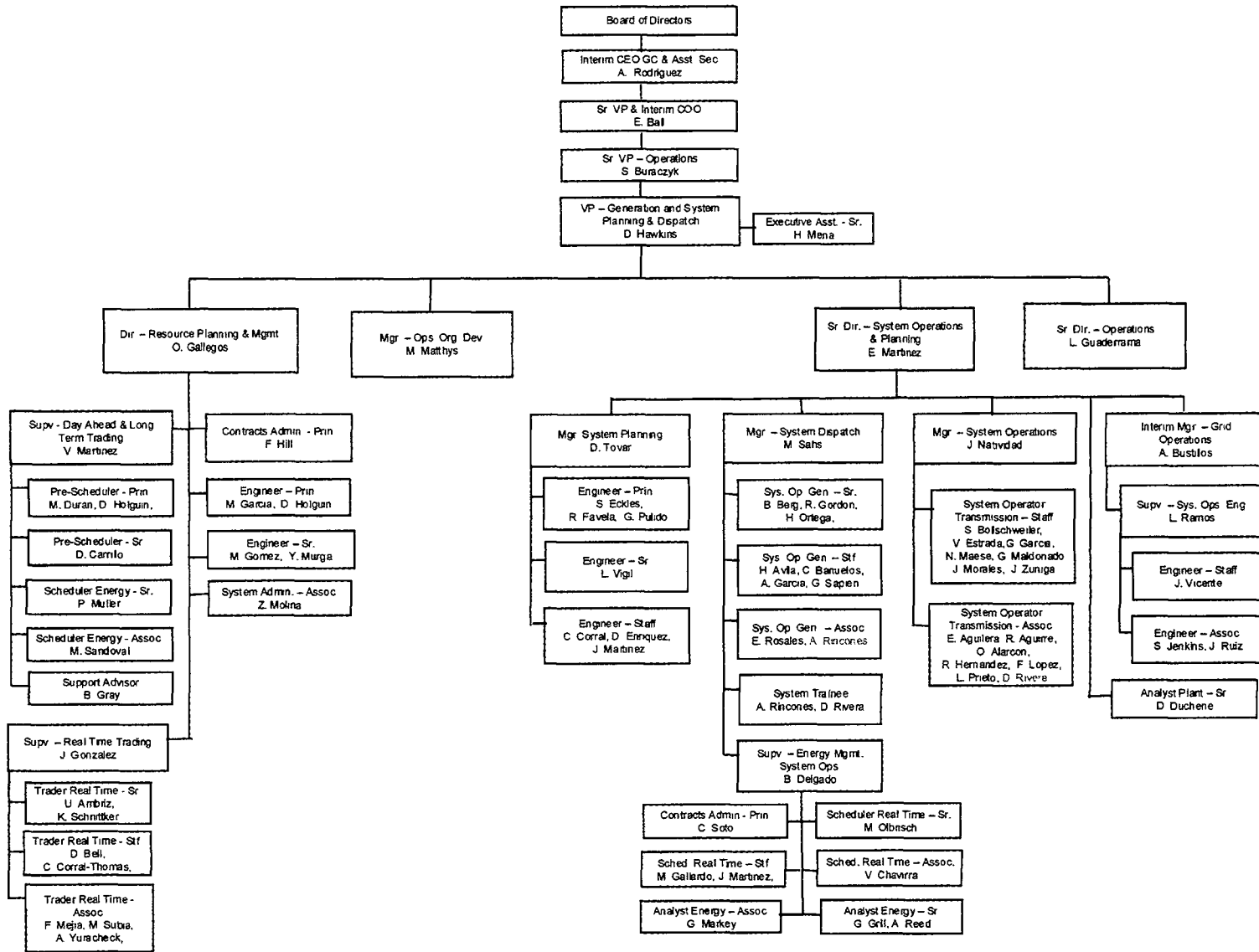
For the period of January 1, 2020 through January 5, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE 1-9
PAGE 1 OF 13

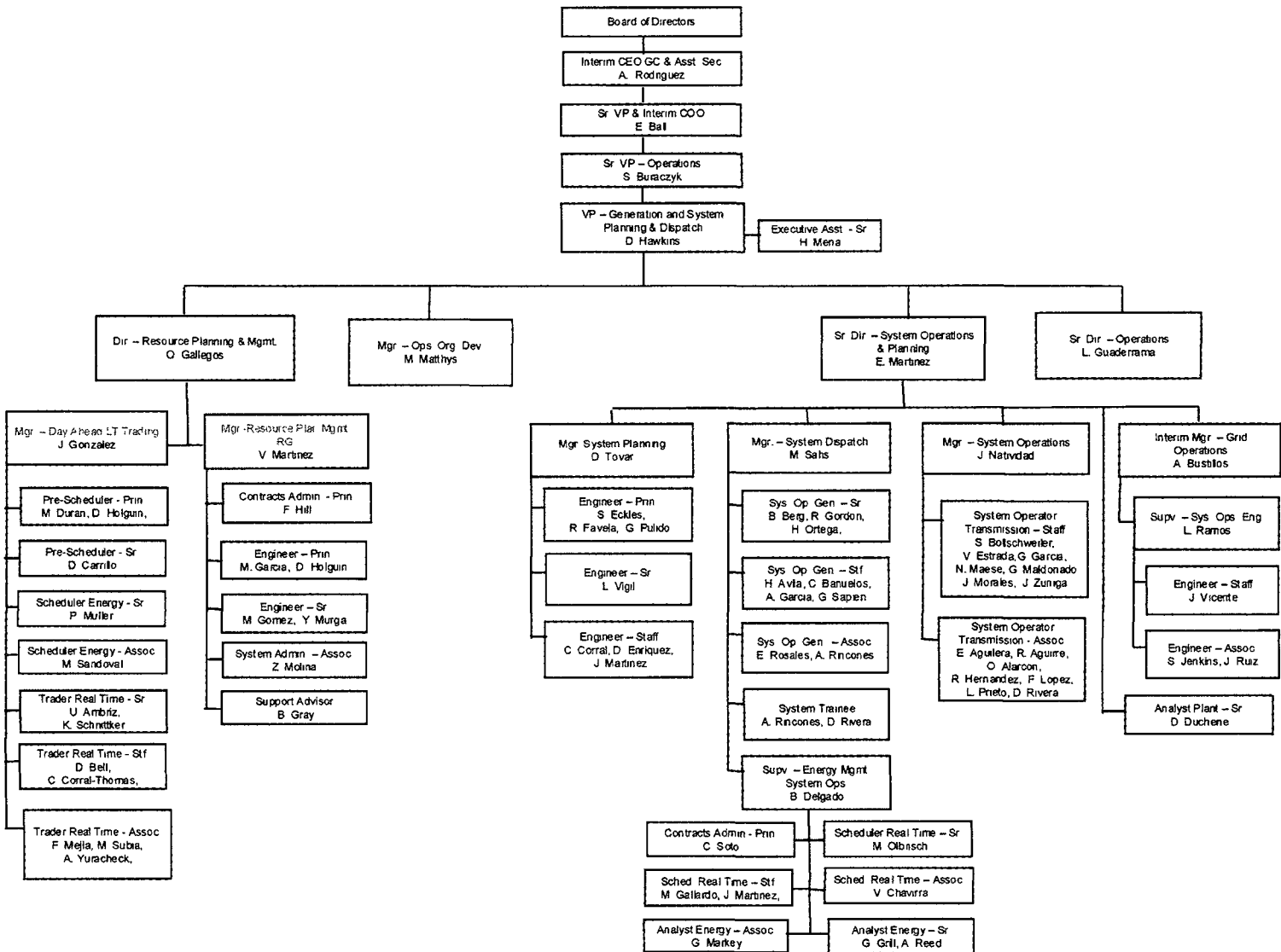
For the period of January 6, 2020 through January 19, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA AREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-9
PAGE 2 OF 13

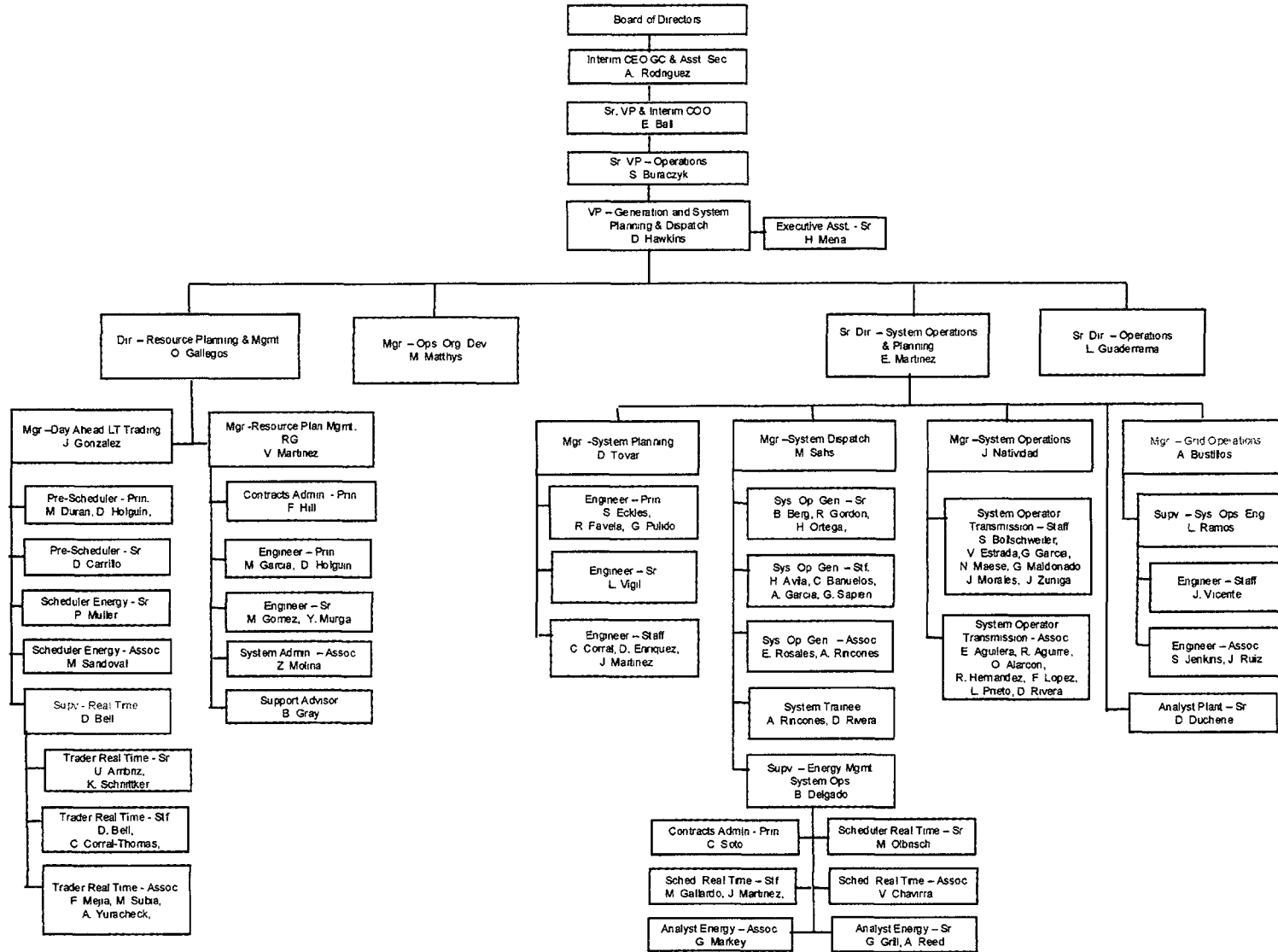
For the period of January 20, 2020 through April 12, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARED: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-9
PAGE 3 OF 13

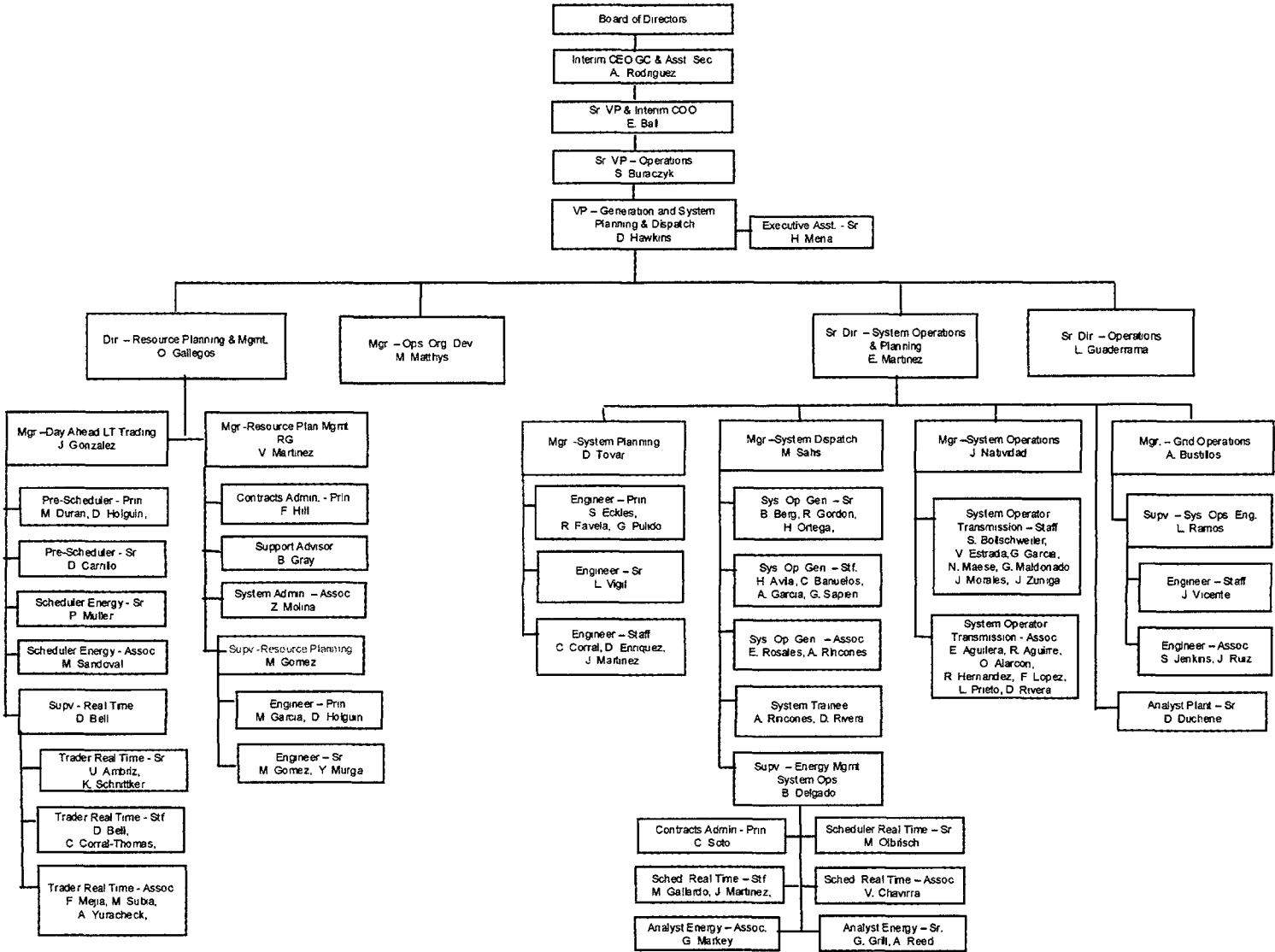
For the period of April 13, 2020 through May 10, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA AREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE 1-9
PAGE 4 OF 13

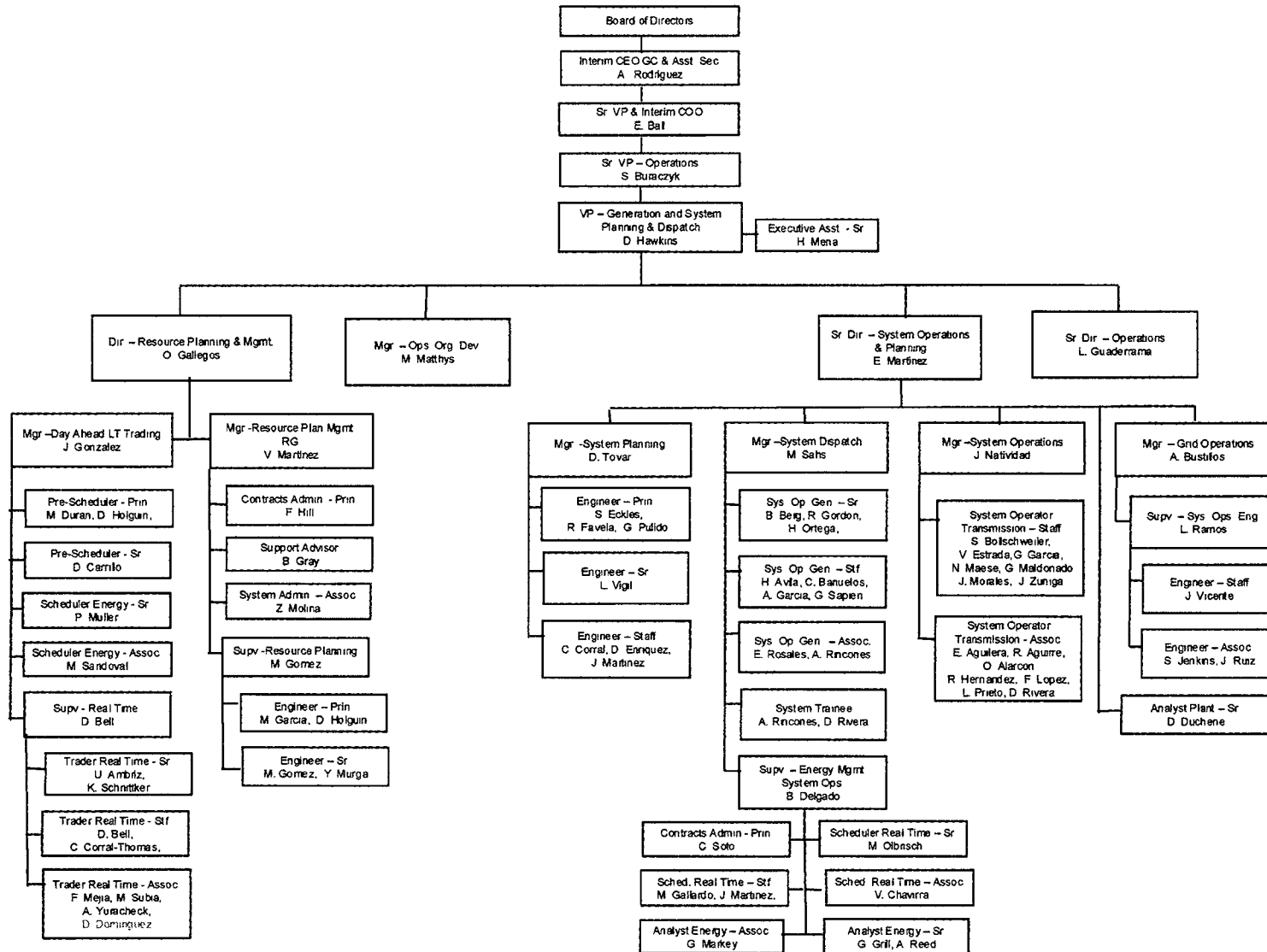
For the period of May 11, 2020 through June 7, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE 1-9
PAGE 5 OF 13

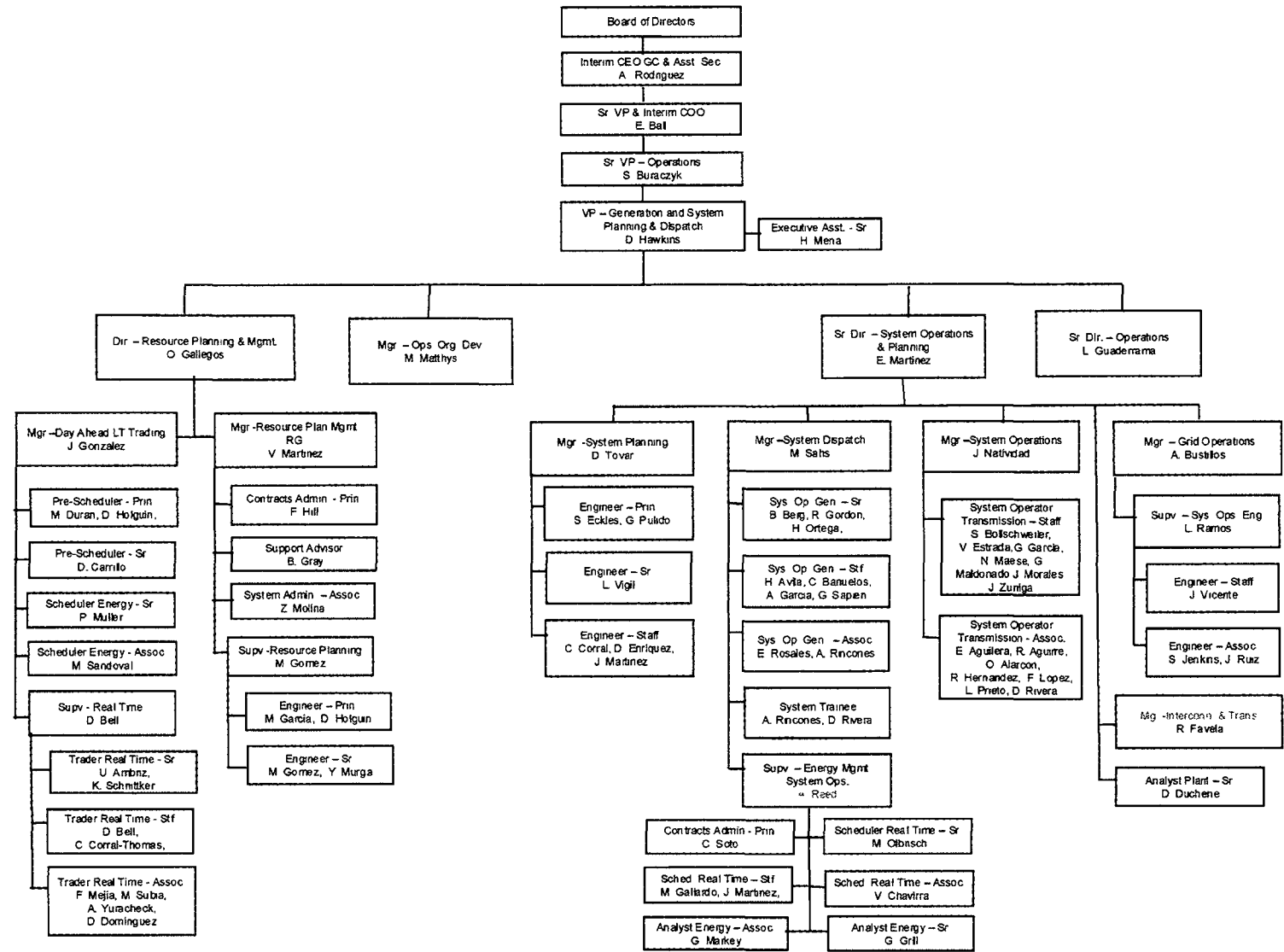
For the period of June 8, 2020 through June 21, 2020



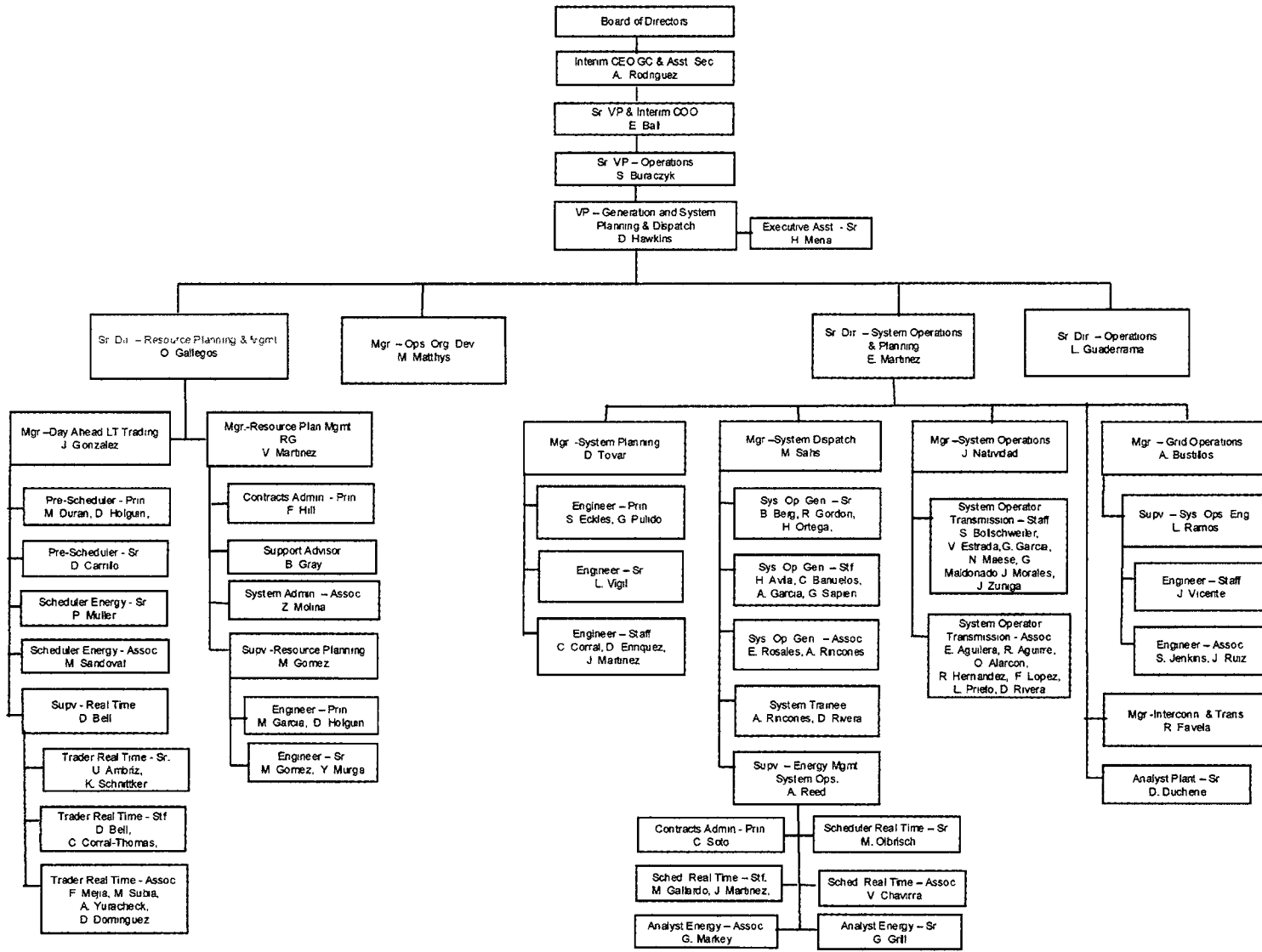
EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA AREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE 1-9
PAGE 6 OF 13

For the period of June 22, 2020 through July 19, 2020



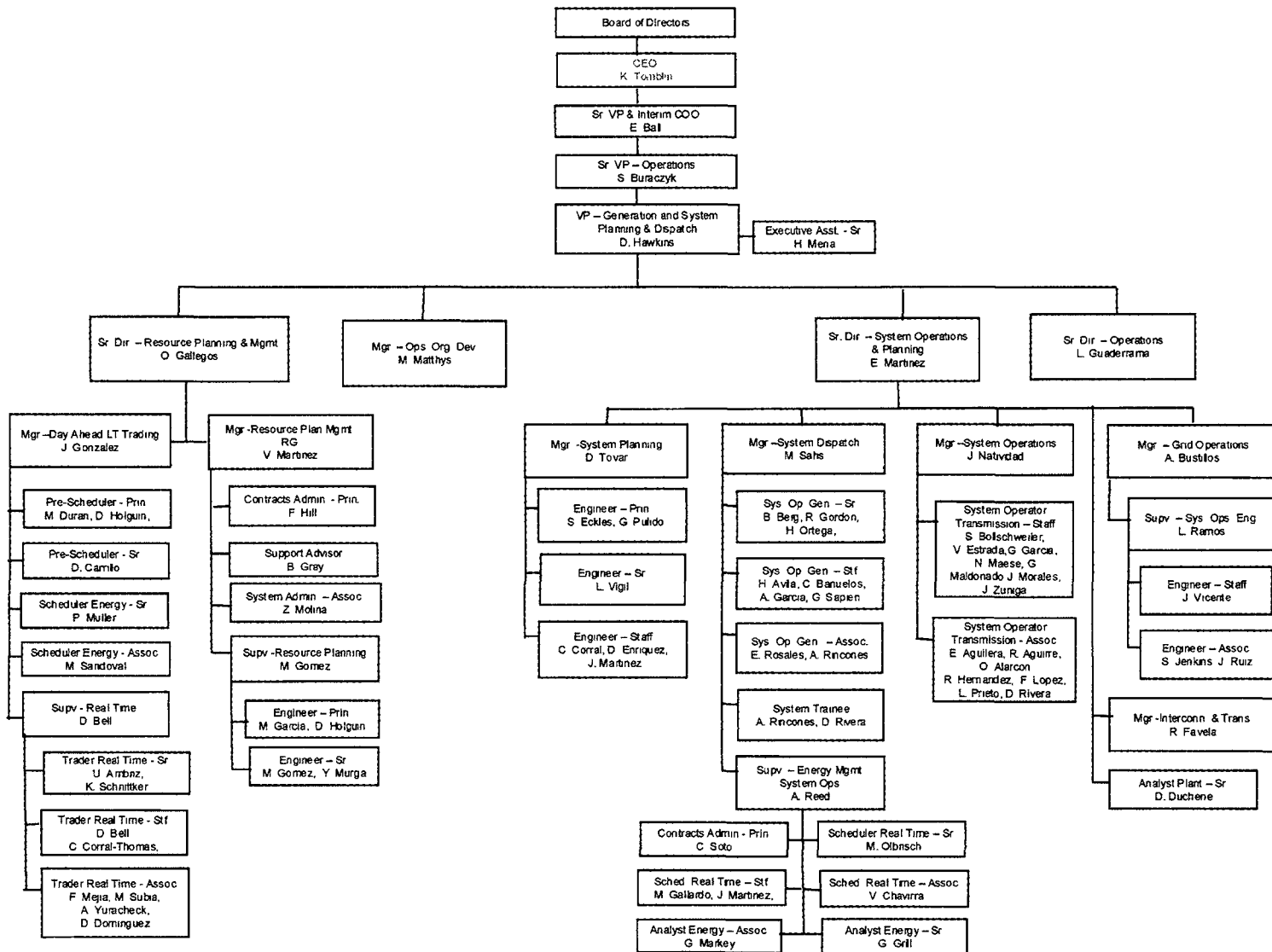
For the period of July 20, 2020 through August 30, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARED: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

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PAGE 8 OF 13

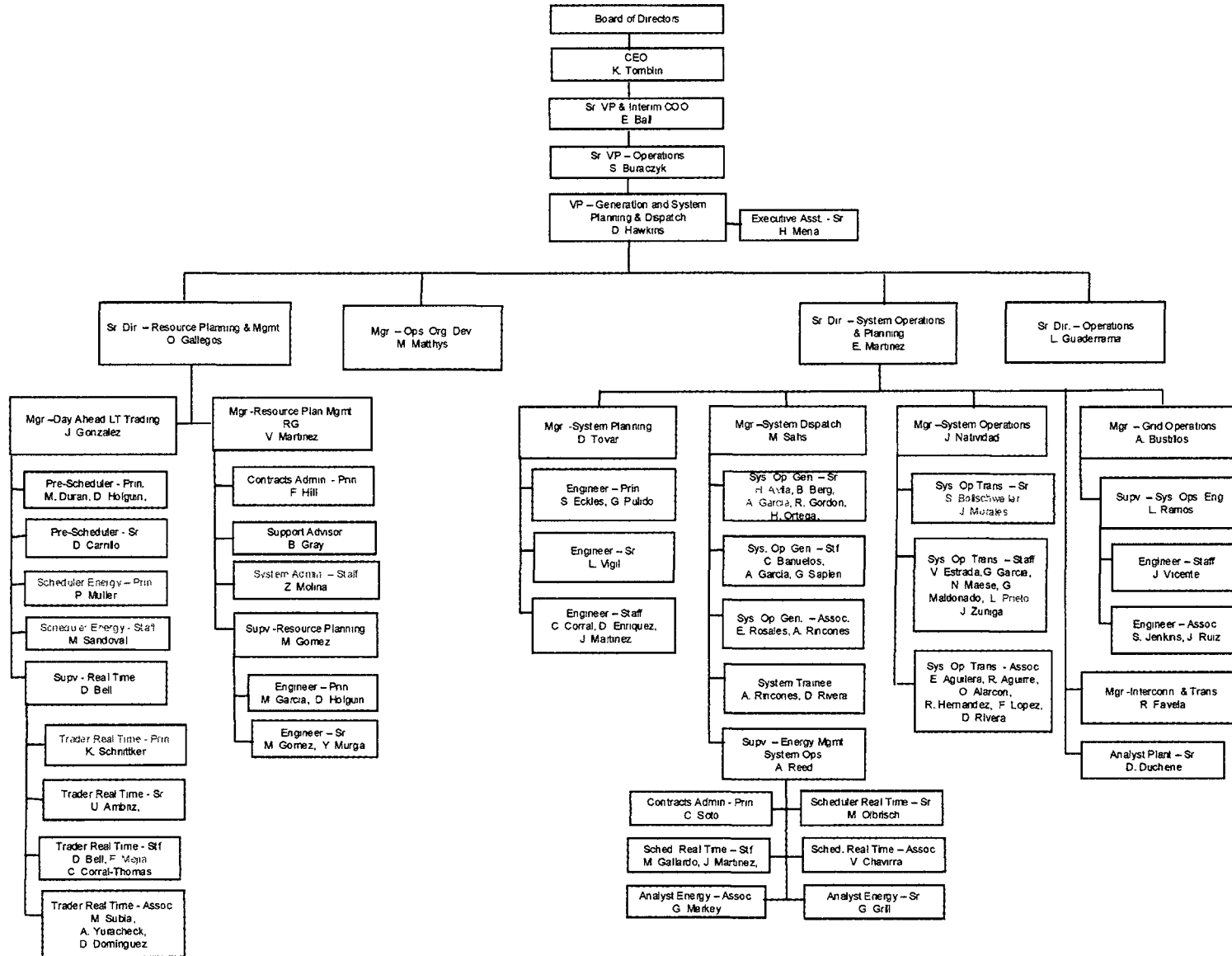
For the period of August 31, 2020 through September 13, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

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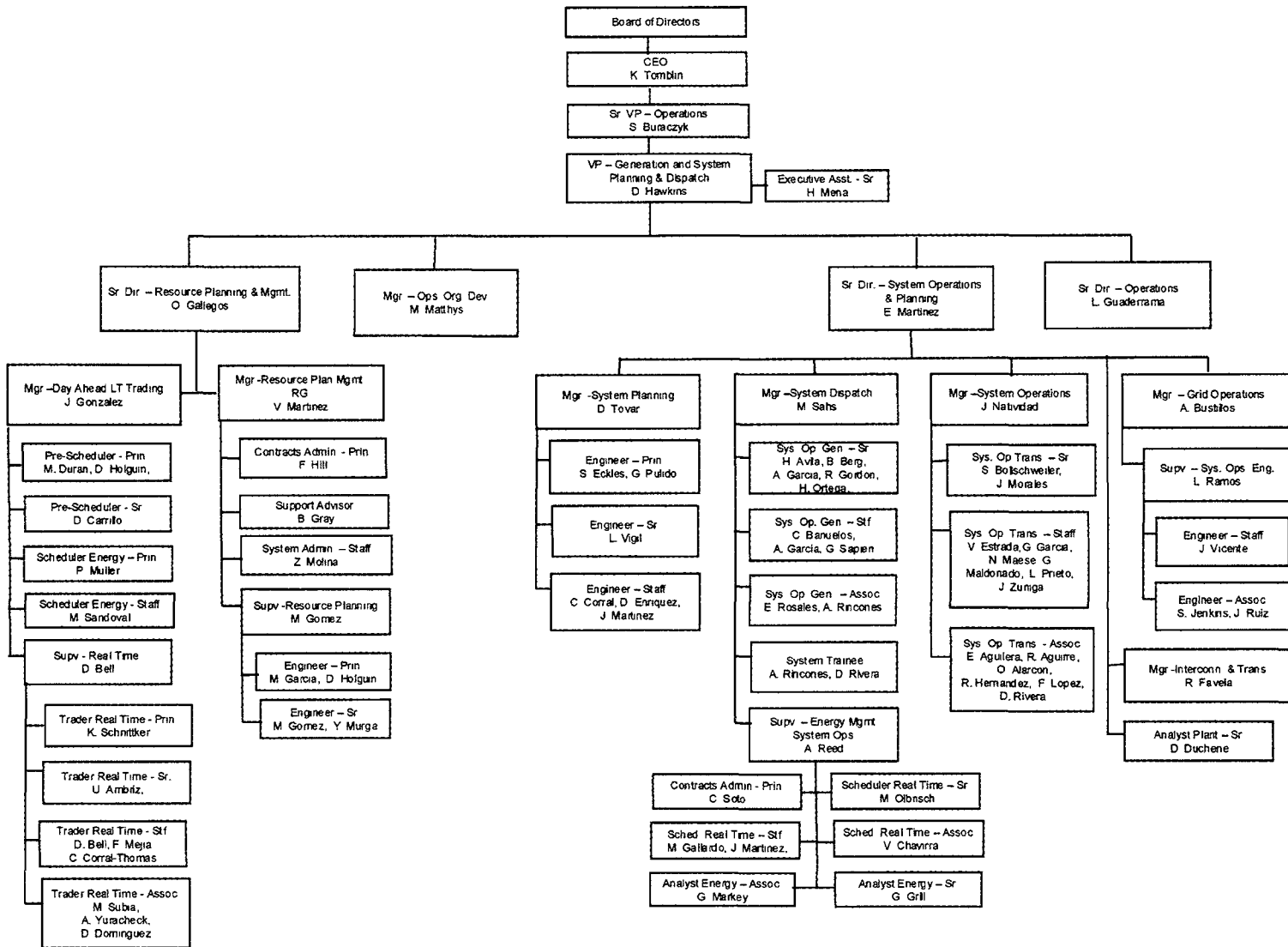
For the period of September 14, 2020 through October 1, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA AREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

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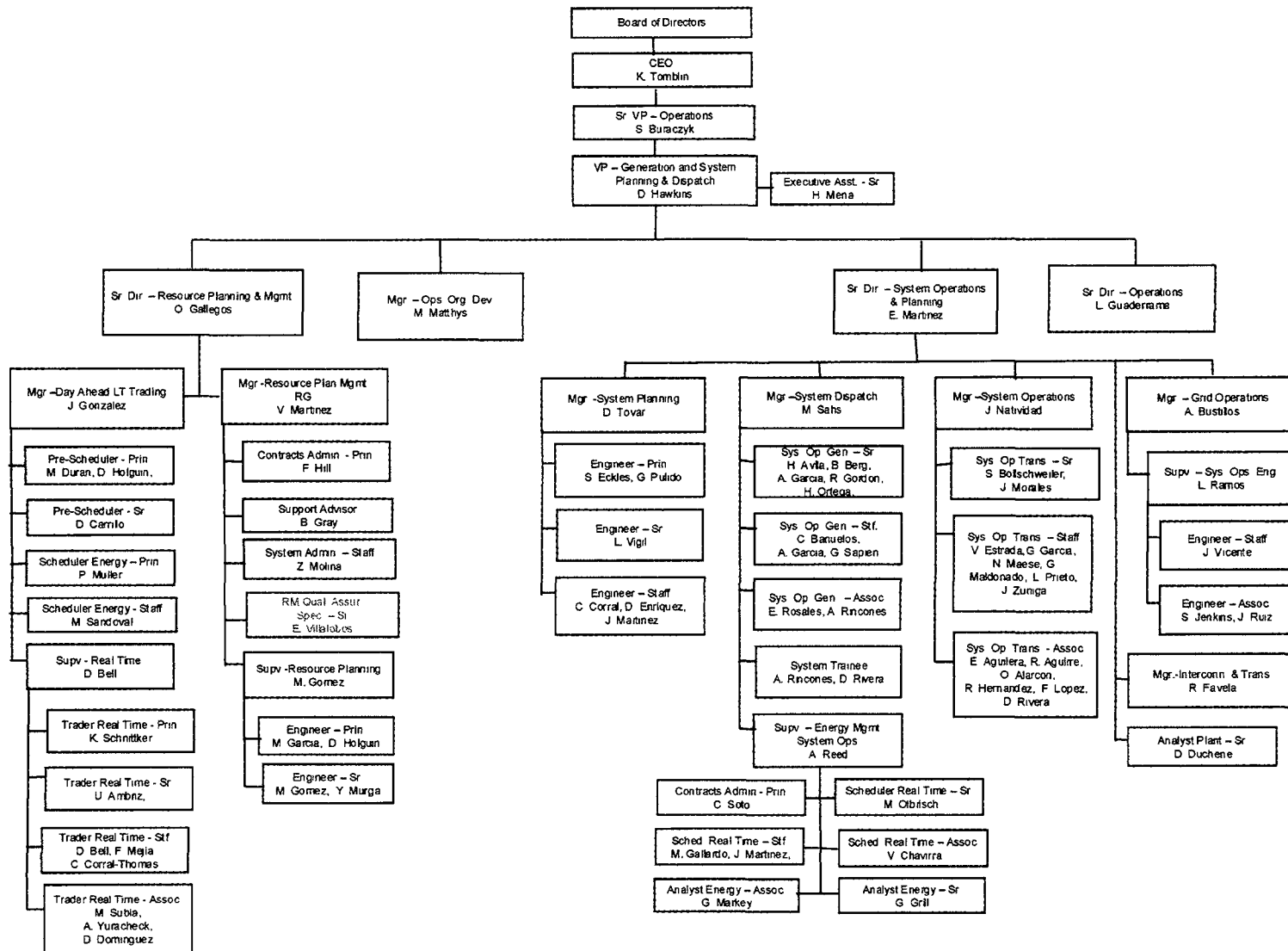
For the period of October 2, 2020 through November 1, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

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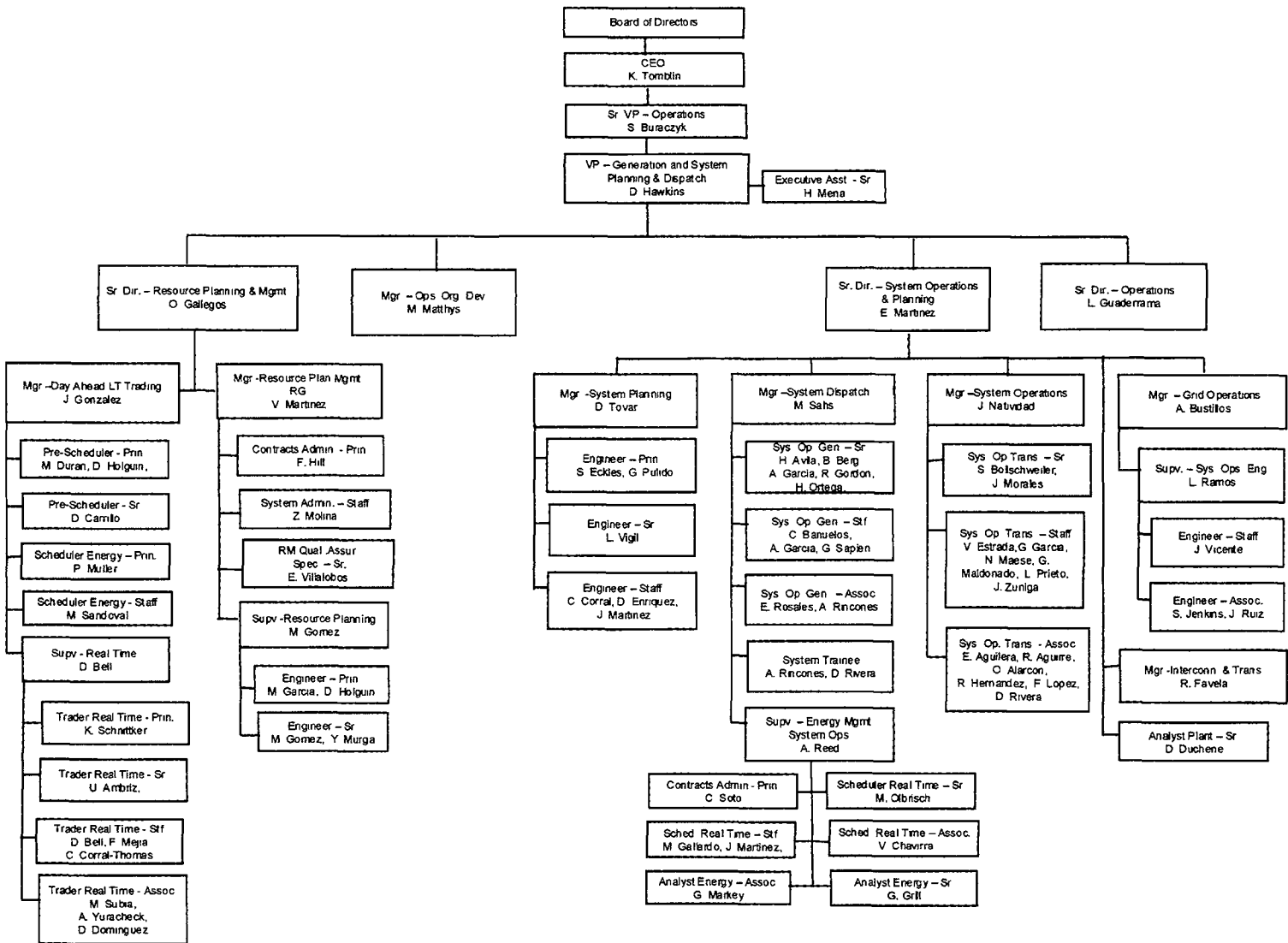
For the period of November 2, 2020 through November 29, 2020



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE 1-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE 1-9
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For the period of November 30, 2020 through December 31, 2020

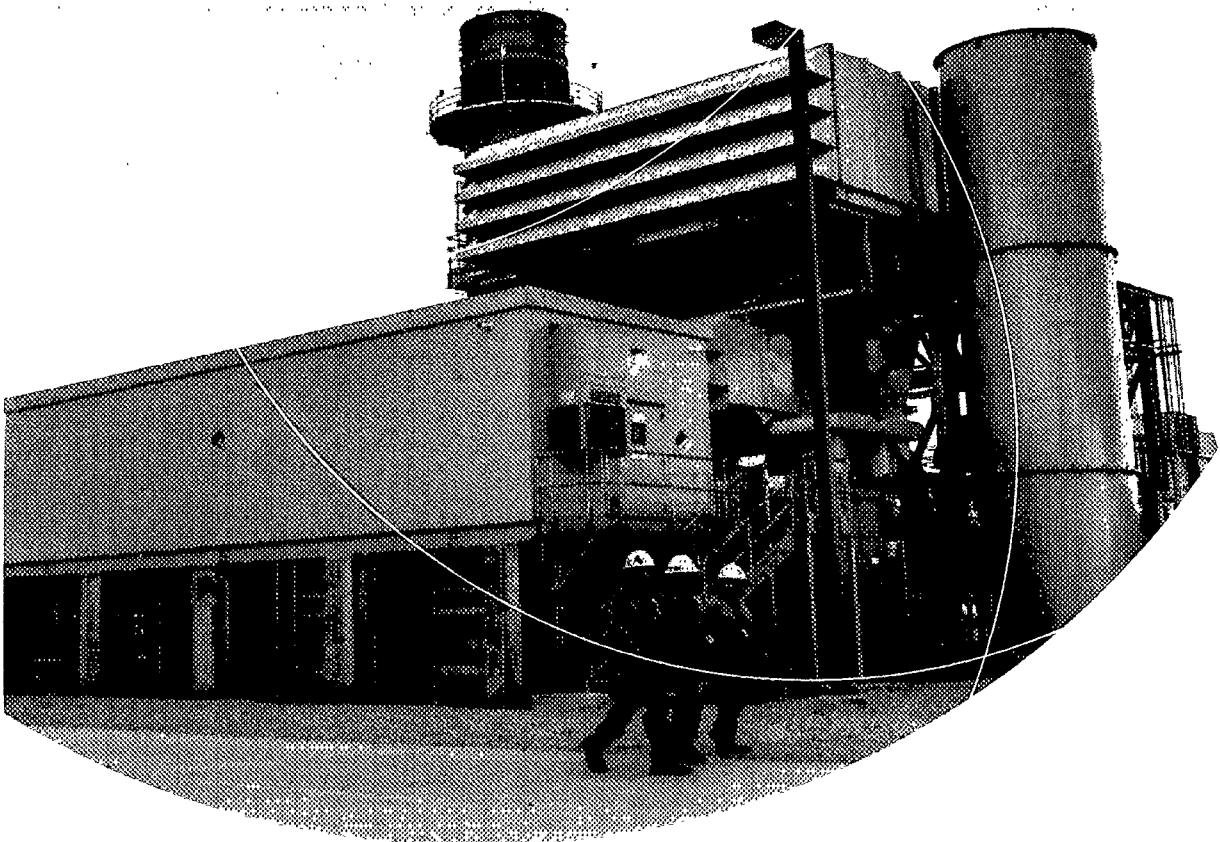


EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-9: EMPLOYEE ORGANIZATIONAL CHARTS
SPONSOR: DAVID C. HAWKINS
PREPARED: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-9
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Attached are “El Paso Electric Company Code of Ethics” policies in effect during the test year.

<u>Description</u>	<u>Page</u>
I. Code of Ethics – Effective October 16, 2019	2
II. Code of Ethics – Effective November 9 ,2020	26



CODE OF ETHICS

October 16, 2019
ENT_CC_091311



DEAR FELLOW EMPLOYEES

El Paso Electric Company has proudly and successfully served our customers and communities for more than 115 years. That success is a result of each employee's commitment to excellence, compliance and ethical business conduct.

EPE must continue to maintain public trust and confidence in all aspects of our business. Safeguarding the Company's reputation requires unwavering dedication by all employees. Our Code of Ethics (the "Code") is meant to help us in our safeguarding efforts. It provides a framework for use in our daily business decisions and in managing relationships with all of the stakeholders we interact with on a routine basis, including fellow employees, customers, shareholders, vendors and regulators. Although the Code does not cover every conceivable situation where ethical decisions must be made, our core values upon which the Code is rooted – Safety, Accountability, Teamwork, Quality of Service and Integrity – are constants, and must serve as the guiding principles which we rely upon in our work.

The Code applies to our Company's employees, officers and our board of directors. All of our employees, officers and directors must conduct themselves according to the language and spirit of this Code and seek to avoid even the appearance of improper behavior. Even well-intentioned actions that violate this Code may result in negative consequences for the Company and for the individuals involved.

Please take time to read and understand the Code. Each of us has a personal responsibility to follow the Code in our day-to-day business activities. The legal and ethical standing and the good name of our Company can be seriously damaged by the actions of just one or a few employees who violate the Code.

Whenever a situation arises that might conflict with the Code, employees and directors should consult with the Office of the General Counsel before proceeding. Remember, when in doubt, consult.

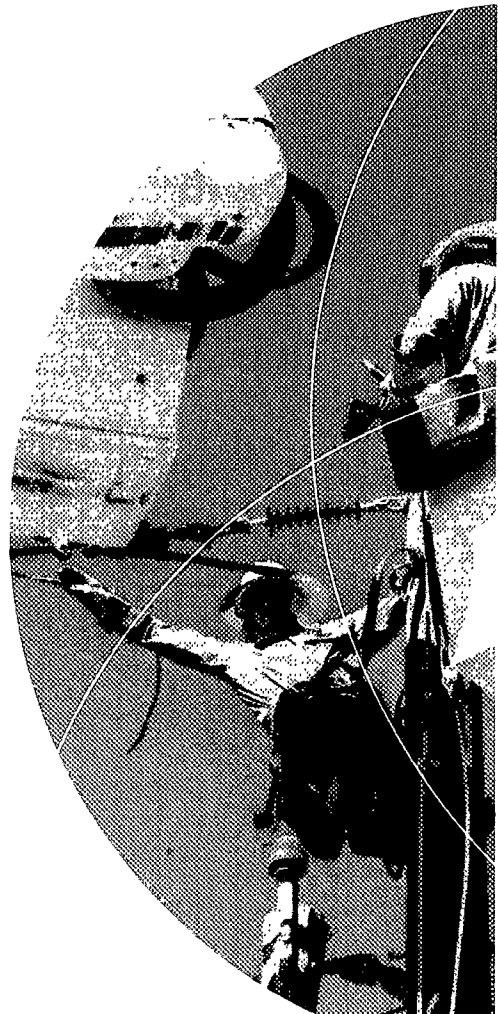
Thank you for joining me in our continued efforts to conduct our day-to-day business with the highest standards of integrity and in compliance with the laws, rules and regulations under which we serve the energy needs of the communities of the greater El Paso region and southern New Mexico.

Sincerely,

Adrian J. Rodriguez
Interim Chief Executive Officer, General Counsel and Assistant Secretary

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EL PASO ELECTRIC VISION, MISSION AND CORE VALUES

Our Vision

Our vision is to provide safe, clean, affordable and reliable energy through superior production, acquisition and delivery.

Our Mission

To accomplish our vision, we will build on our past, prepare for the future and be accountable to our key stakeholders including our customers, regulators, employees and shareholders.

Our Core Values

We are committed to performing our day-to-day business activities with the following five core values:

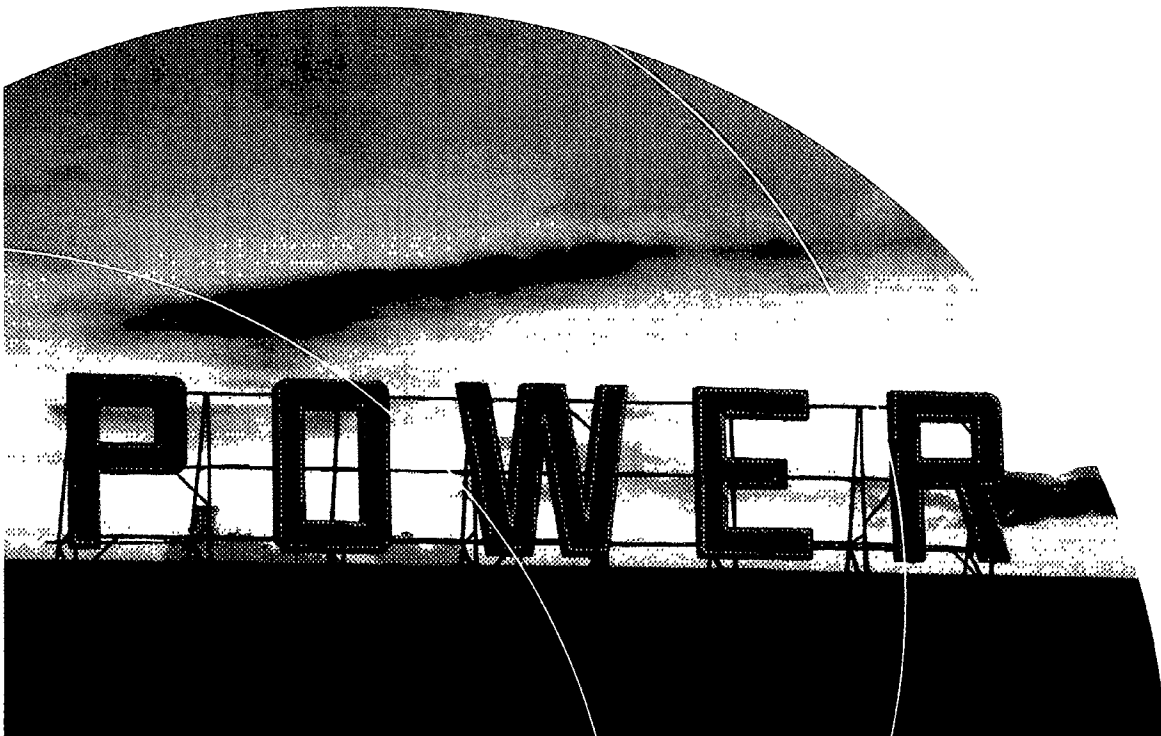
Safety – Safety is a core value that will not be compromised. No operating condition or urgency of service can justify “shortcuts” that place someone in danger. Our conduct in regard to safety impacts not only the lives of our employees but also the lives and property of others as well

Accountability – We all take responsibility for our daily business decisions and actions.

Teamwork – We work together as an efficient and effective team for the benefit of our customers, employees and shareholders.

Quality of Service – We will provide our customers quality service at a reasonable price, delivered in a safe and efficient manner.

Integrity – We will function in an ethical, respectful and deliberate manner with our customers, employees, regulators and shareholders.



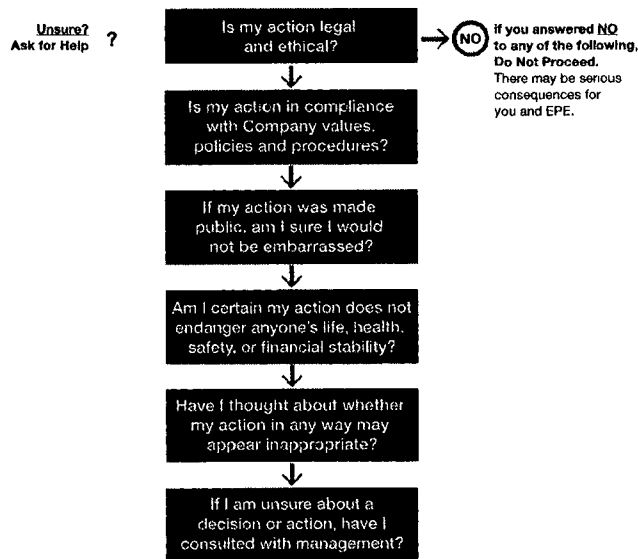
CODE OF ETHICS - PURPOSE AND COMMITMENT



Code of Ethics - Purpose and Commitment

This Code of Ethics ("Code") is intended to guide our day-to-day actions as we conduct the Company's business with the highest standards of integrity and fair dealing.

The Code identifies guidelines for conduct in areas that may pose ethical concerns. The Company also has other policies that address specific issues and actions in more detail. We must comply with those policies as well as this Code of Ethics. It is impossible to envision every conceivable situation involving an ethical dilemma. The Code is intended to help us to evaluate any ethical concerns with the Company's Core Values in mind: Safety, Accountability, Teamwork, Quality of Service and Integrity. You may find it helpful to ask the following questions before taking action in specific situations that raise ethical concerns:



The Company asks each employee, officer and member of its board of directors ("director") to make a personal commitment to the highest ethical standards and to the exercise of proper judgment in all aspects of Company business. This Code establishes guidelines for the conduct of business on behalf of the Company, and it should be employed together with common sense and good judgment.

Situations not covered by this Code or about which you are not certain should be discussed with your supervisor or manager or others listed in the Code under "Information Resources". Other Company policies on specific subject matters may also provide additional guidance. The Code should be interpreted in a manner that complements other applicable Company policies and procedures.

Responsibility for Compliance – All Employees, Officers, Directors

Every employee, officer and director is responsible for compliance with the standards and expectations outlined in this Code. Conducting our daily job responsibilities ethically and in compliance with Company policies and procedures as well as laws, rules, and regulations that impact our jobs is a responsibility we all shoulder. We also have the responsibility to report, promptly and in good faith, any issue or activity that may violate the Code, other Company policies and procedures, or any law or regulation that impacts our business.

Ethical issues and concerns should be discussed with higher levels of management, including the employee's supervisor or manager, or others identified in the "Information Resources" or "Reporting Violations" sections of this Code. These discussions may concern the activities of the employee or other employees and may involve apparent conflicts between actions the employee has been directed to take and the standards addressed in the Code

Additional Compliance Responsibilities – Management

Management assumes additional responsibilities for compliance including:

- Leading by example and ensuring employees understand and follow the Code,
- Maintaining an open-door policy creating an environment where employees feel comfortable raising concerns or asking questions,
- Ensuring employees complete required training,
- Encouraging employees under their supervision to speak up without fear of retaliation, and
- Supplementing Code standards, as necessary, to address any specific requirements of the various Company functions in their areas of responsibility, to add clarity or additional guidance tailored to specific activities or job responsibilities.

ACCURATE COMPANY RECORDS AND COMMUNICATION



Accurate Company Records and Communication

Employees, officers and directors are responsible and accountable for the reports and records they prepare. All Company records, accounts, financial reports, research reports, marketing information, sales reports, tax returns, expense accounts, time sheets, claims and any other Company documents, including those submitted to governmental agencies, must be accurate. All entries on the Company's books and records are to represent, and not conceal, the true nature of each transaction. The intentional falsification of records is always unethical and may also be illegal. Employees, officers and directors must never withhold or fail to communicate information that should be brought to the attention of any level of management.

All information transmitted, both within and outside the Company, must be honest and well-founded. Misrepresentations and shading of information to create a misleading business picture are not acceptable practices under this Code and will not be tolerated.

The Company also has in place a Disclosure Committee consisting of members of senior management who assist in monitoring disclosures of a financial nature. Company reporting and filings with the Securities and Exchange Commission and other public communications shall include full, fair, accurate, and timely disclosure in the manner required by governing authorities.

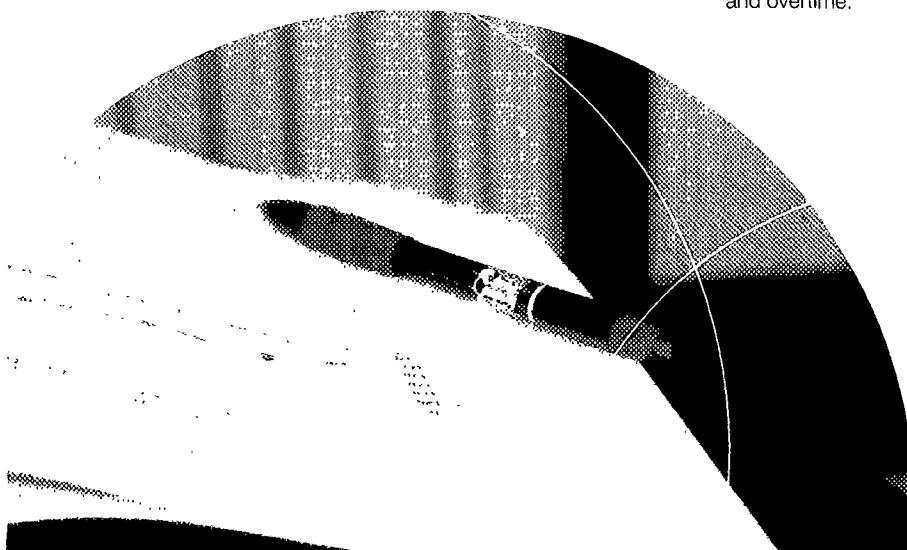
Q. My recent pay information indicated 4 PTO days instead of 5 actually taken. What should I do?

A. If you enter your own time, contact the payroll department for guidance on correcting the discrepancy. If you do not enter your own time, talk to your supervisor or other person who enters your time to have this issue corrected. PTO records must always reflect accurate information.

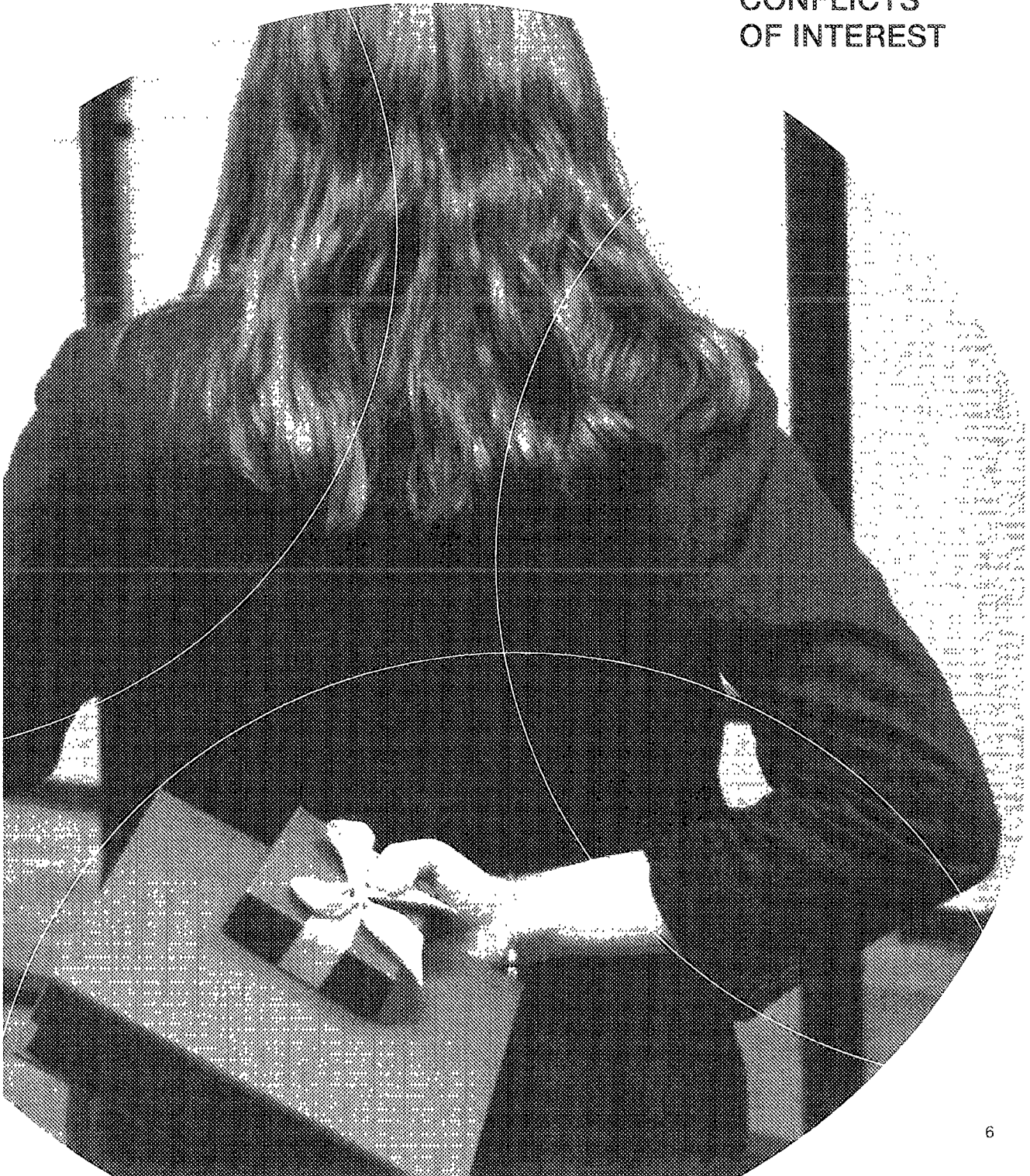
Dishonest Activities

Dishonest activities involving Company money, documents, transactions or equipment are not permitted. This includes:

1. Alteration or intentional misstatement of Company reports and records.
2. Forgery, alteration or misrepresentation of authorizations.
3. Misappropriation of funds, securities, supplies or any other Company asset.
4. Irregularity in the handling or reporting of money transactions.
5. Unauthorized purchases or use of services, supplies, furniture, fixtures and equipment.
6. Alteration or intentional misstatement in reporting items such as employee expenses, vacations, leave time, sick time and overtime.



AVOIDING CONFLICTS OF INTEREST



Avoiding Conflicts of Interest

Conflicts of interest exist whenever a person's interests, position or relationships compete or conflict in any way, or even appears to compete or conflict, with the best interest of the Company. A conflict of interest can arise when an employee, officer, or director.

- Takes an action or has a personal interest that may make it difficult to objectively and effectively perform Company duties and responsibilities, or
- Receives improper personal gifts or benefits for themselves or their family members as a result of their position in the Company.

All employees, officers and directors are to avoid any activity, investment, interest, or association that compromises (or even appears to compromise) their independent exercise of judgment and the performance of work in the best interest of the Company.

Although it would not be possible to describe every situation in which a conflict of interest may arise, the following are some examples of situations which may constitute a conflict of interest. References below to a person's "immediate family" include, for example, that person's spouse, parents, siblings, children, stepchildren, in-laws, aunts, uncles, cousins, as well as any other individual with a close personal relationship to that person.

Q. Can an employee hire a relative's company or award a relative a contract to perform EPE work?

A. The employee may not directly award his relative a contract or hire his relative's company to perform EPE work as the relative stands to benefit from this situation and this creates a conflict of interest. The employee's relative is welcome to compete for the job, but the employee should not have any role in the selection process.

Q. Can a manager or supervisor hire a relative as an EPE employee to become part of his or her team?

A. The manager or supervisor may not hire a relative and may not directly or indirectly supervise a relative that works within their division hierarchy.

Q. I was offered a second job outside the Company. Will this create any issues as an EPE employee?

A. Accepting a second job away from EPE is not an issue as long as the second job does not conflict or even appear to conflict with your ability to perform your job with EPE. You cannot use EPE's name, property, information or other EPE resources to perform your second job.

Outside Employment and Business Activities

Any outside employment or business activities must not conflict with, have the potential to conflict with, or even appear to conflict with, the employee's ability to properly perform work for the Company. Employees are not to seek financial gains for themselves, their families or their associates from third parties by holding themselves out to be representatives of the Company or by representing or implying to such third parties that they possess proprietary information or influence due to employment with the Company. In addition, employees should not wear clothing which displays the Company logo while working for financial gain outside of the Company. Employees shall not use their Company identification badge for any purpose other than to identify themselves as Company employees performing Company business. Employees should not engage in any outside employment which has a negative impact on their availability to the Company for work or their ability to perform assigned duties during their normal work hours.

Gifts, Entertainment and Gratuities

Employees and members of their immediate family may not directly or indirectly request or receive cash, bonuses, fees, discounts, commissions, gift cards or any other cash equivalent item from any person, customer, supplier, contractor, corporation or other entity with which the Company does business or is likely to do business.

The Code does not preclude employees from providing or accepting gifts, gratuities and entertainment that are business related, as long as the value of the offering is nominal (i.e. no more than \$50.00) and is infrequent, legal and reasonable.

If a gift or gratuity of more than nominal value is offered or received, the gift or gratuity should be refused or returned with a polite explanation of the Company's policy, and the employee should notify his or her supervisor or manager. Regardless of value, an employee should decline any item offered with the intent to improperly influence the employee in the performance of the employee's duties for the Company.

In limited circumstances, employees may receive permission to attend special events sponsored by suppliers or other organizations associated with the Company.

Competing for the Acquisition of Property or Services

Employees, officers and directors, and members of their immediate family, shall not knowingly acquire any material interest (whether direct or indirect) in any property that the Company is acquiring or is likely to acquire. Business transactions with businesses owned by any director or director's immediate family members are covered by a separate policy found on the Company's intranet site. Exceptions to this policy may be granted only after complying with the disclosure and exception procedures set out in the Waivers and Amendments section below. Some additional examples of conduct that constitutes a conflict of interest include:

- Having a material financial interest in a transaction involving the Company, or in entities with which the Company does business or is likely to do business, or in entities that compete against the Company (this generally does not include routine investments in publicly traded companies). A material financial interest is one that might compromise, or even appear to compromise, the independent exercise of a person's judgment in the best interest of the Company.
- Receiving a loan or guarantee of an obligation as a result of your position with the Company.
- Directing business to a supplier or contractor owned or managed by, or which employs, a relative or friend.
- Giving or receiving bribes or kickbacks.

In order to avoid conflicts of interest, each of the senior executive officers and directors must disclose to the Chief Compliance Officer any material transaction or relationship that reasonably could be expected to give rise to such a conflict. The Chief Compliance Officer shall notify the Nominating and Corporate Governance Committee of any such disclosure. Conflicts of interest involving the Chief Compliance Officer shall also be disclosed to the Nominating and Corporate Governance Committee.

Q. An EPE vendor sent me a \$100.00 gift card during the holidays. Can I accept this gift?

A. No, employees may not accept gifts of cash or cash equivalents such as gift cards from vendors. The Code of Ethics does not prevent an employee from receiving other types of business related gifts as long as the value of the gift is less than \$50.00 and not of a nature that would suggest intent to influence Company business decisions.

Community and Professional Organizations

The Company has a long-standing commitment to good corporate citizenship. The Company supports and encourages involvement in community activities and professional organizations. It expects its employees, officers and directors to pursue these interests in a responsible manner and in a manner that will reflect favorably upon the employee, officer or director and the Company. Before accepting any position with a community or professional organization, employees, officers and directors should evaluate carefully whether the position could cause, or even appear to cause, a conflict of interest.

Corporate Opportunities

Employees, officers and directors are prohibited from taking advantage of business opportunities that arise through their employment for personal gain. No employee, officer or director may use corporate property, information or position for personal gain, and no employee, officer or director may compete with the Company. Competing with the Company may involve engaging in the same line of business as the Company, or any situation where the employee, officer or director takes away from the Company opportunities for sales or purchases of products, services or interests.

BUSINESS CONDUCT





Fair Dealing

Each employee, officer and director of the Company should endeavor to deal fairly with customers, suppliers, contractors, competitors, the public and one another at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. No bribes, kickbacks or other similar payments in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. The Company and the employee, officer or director involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this policy.

Practices that are acceptable in commercial business environments may be against the law or the policies governing federal, state or local government employees. Therefore, no gifts or business entertainment of any kind may be given to any government employee or official without the prior approval of the Office of General Counsel.

Outside Business Contacts

In the course of performing assigned duties, employees, officers and directors frequently have business contacts outside the Company with customers, suppliers, competitors, governmental agencies, and the news media. Employees, officers and directors should only perform services, provide information, and answer questions that fall within the realm of their knowledge and responsibilities.

For example, inquiries from the news media should be directed to the Public Relations Department. Inquiries from shareholders and other investors in the Company, as well as analysts, should be directed to the Investor Relations Department. Other inquiries regarding stock ownership or record keeping should be directed to the Office of the Corporate Secretary.

Political Contributions and Activities

Any political contributions made by or on behalf of the Company and any solicitations for political contributions of any kind must be lawful and in compliance with Company policies. This policy applies solely to the use of Company assets and is not intended to discourage or prevent individual employees, officers or directors from making political contributions or engaging in political activities on their own behalf. No one may be reimbursed directly or indirectly by the Company for personal political contributions

Q. Is it acceptable to use an EPE copy machine to make flyers for a political campaign in which I am involved?

A. No, you may not use Company time or resources for personal participation in a political campaign.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-10: EMPLOYEE ETHICS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-10
Page 15 of 51

COMPLIANCE WITH LAWS, RULES AND REGULATIONS



Compliance with Laws, Rules and Regulations

Employees, officers and directors are expected to comply with all applicable laws, rules and regulations. The Company's activities are subject to a variety of federal, state and local laws and regulations. No employee, officer or director of the Company shall commit an illegal or unethical act or instruct others to do so, for any reason.

If you believe that any practice raises questions as to compliance with this Code or applicable laws, rules or regulations, please discuss your concerns with your supervisor or manager, or as otherwise set out in the "Information Resources" or "Reporting Violations" Sections of this Code.

Antitrust Laws

It is the policy of the Company to obey the antitrust laws and to avoid all conduct or behavior that unreasonably restrains competition. Among other things, antitrust laws prohibit any agreements between competitors on such matters as prices, terms of sale to customers and allocating markets or customers. Antitrust laws can be very complex, and failure to adhere to them may result in criminal sanctions, including fines, jail time and civil liability.

Contact the Office of General Counsel in advance, whenever you need specific guidance on the scope of permissible discussions as you interact on behalf of the Company with your counterparts in other utility or energy companies.

Foreign Corrupt Practices Act

Except in certain limited circumstances, the Foreign Corrupt Practices Act ("FCPA") prohibits giving anything of value directly or indirectly to any "foreign official" for the purpose of obtaining or retaining business. Due to our interconnection and other business with the Comisión Federal de Electricidad ("CFE") in Mexico, we include the CFE and its officials under this part of our Policy. When in doubt as to whether a contemplated payment or gift may violate the FCPA, contact the Office of General Counsel before taking any action.

Positions Requiring Reporting or Approval - FERC Interlocking Positions

Certain kinds of positions with other organizations, if held by certain types of Company employees or directors, are subject to reporting and approval requirements by governmental authorities. For example, there are government regulations that address permissible and impermissible positions that a utility employee and director may hold in another organization, without regard to whether the positions held are voluntary or paid. Please contact the Office of General Counsel to determine whether any advance reporting or approval of the third-party position is required.

Regulation Fair Disclosure

Each officer, employee or director who communicates with the investment community or others outside the Company on behalf of the Company must be familiar with the Company's disclosure controls and procedures and is required to comply with the Securities and Exchange Commission's ("SEC") Regulation Fair Disclosure ("Regulation FD"). Regulation FD generally requires simultaneous public disclosure when material nonpublic information is disclosed to any entity or person outside the Company. For more information, please refer to the Company's "Regulation Fair Disclosure Policy" located on the Company's intranet site or contact the Office of General Counsel.

Trading on Inside Information

Federal laws expressly prohibit employees from using "inside" or material non-public information when trading in Company securities. Information is considered "material" if there is a substantial likelihood that a reasonable investor would consider it important in arriving at a decision to buy, sell or hold stock of the Company. Examples of information that might be deemed material include preliminary income reports, earnings estimates, significant expansion or curtailment of operations, plans to sell or purchase substantial assets, the anticipation of major litigation, or other items that could have a significant effect on the Company.

Using material nonpublic information to trade in securities or providing a family member, friend or any other person with a "tip" is illegal. All nonpublic information should be considered inside information and should never be used for personal gain. For more information, please refer to the Company's "Policy on Inside Information and Insider Trading" located on the Company's intranet site. If you have questions about buying or selling Company stock, contact the Company's Office of General Counsel.

ENVIRONMENT, HEALTH AND SAFETY



Environment, Health And Safety

The Company complies with all applicable environmental, health and safety laws and regulations in order to provide a safe workplace and to protect the environment. It is the responsibility of each employee to do their part by complying with the Company's policies, as well as any applicable requirements established by federal, state and local law.

Employees are expected to report observed safety, health, or environmental potential or actual violations, potentially unsafe conditions, and any accidents resulting in injuries to employees or the public. All jobs at the Company are to be performed in a safe manner in accordance with all the established safety rules including the Safety Manual and the Cardinal Rules (found on the Company's intranet site). As a core value, safety will not be compromised. Every employee assumes the responsibility of individual and organizational safety. Failure to follow Company safety and health guidelines and conduct that places employees, the public, or the Company at risk will not be tolerated.

Workplace Violence

The Company seeks to provide a work environment where employees will not be subjected to acts of physical assault or threats of bodily harm while performing their official duties, wherever those duties are performed. Workplace violence includes implied, conditional or direct threats of violence, whether made in verbal, physical, or visual form. The Company is committed to providing a secure and safe work environment for all employees, contractors, visitors, customers, and vendors. Any threat in the workplace to people, property or information, will be taken seriously and acted upon appropriately. There shall

be zero tolerance of such threats or acts of violence. Employees are required to immediately report any incidents of workplace violence to their supervisor, Human Resources or any other resource listed in this Code under "Reporting Violations."

GOVERNMENT INQUIRIES AND INVESTIGATIONS

Much of the Company's activities are subject to governmental review. The Company's policy is to cooperate fully and responsibly with any appropriate governmental agency conducting an investigation with assistance from legal counsel and subject matter experts who can help represent the Company during such investigations. Contact the Office of General Counsel before taking action or responding to questions on behalf of the Company when government agents arrive to conduct an investigation. This also applies when the government inquiry comes in the form of a written subpoena or written request for information. Although it is the Company's policy to cooperate fully with such investigations, the Company has a right to have representation from legal counsel and appropriate subject matter experts.

Q. I am a new EPE employee. During an on-site visit at a substation, I noticed an oil spill next to a barrel. What should I do?

A. If an employee is not specifically trained to handle an environmental emergency situation, the issue should be reported to the supervisor on-site and the Environmental Department. All environmental releases must be properly cleaned up and potentially reported to a regulatory agency. The situation will be assessed and depending on the amount of the release and conditions surrounding the release the Environmental Department will coordinate proper handling, disposal, paperwork and regulatory reporting.

Q. I had a minor accident at work that I am not sure needs to be reported.

A. All work related accidents are required to be reported immediately to the supervisor and the Safety Department. When immediate reporting is not possible, employees should report as soon as practicable. Your report may help bring light to a potential safety hazard and may also help alleviate any future similar accidents from occurring.

Q. What should I do if I see an unsafe condition at work?

A. Safety is one of EPE's core values. Unsafe conditions should immediately be reported to your supervisor. If a job has become unsafe, stop the job until safety issues are resolved. We all share the responsibility of safety and part of this involves fostering an injury free workplace.

SAFEGUARDING COMPANY ASSETS



Cybersecurity

Employees work with electronic data every day in carrying out work-related tasks and activities. This electronic data is on computers, servers, within email and USB drives and is stored in a multitude of formats. Employees must protect the Company's electronic data and comply with all information and information system policies located on the Company's intranet site. The Company provides employees with cybersecurity awareness training and it is each employee's responsibility to ensure that the techniques and processes discussed in training are applied to ensure the security of the Company's electronic data.

Loans and Gifts of Company Goods

The Company does not extend or maintain credit, arrange for the extension of credit, or renew credit in the form of a personal loan to or for any director or officer of the Company. Similarly, an employee may not offer to anyone else, inside or outside the Company, any Company asset (property, loans, contributions, unpaid services, etc.). In certain limited situations, such as in the context of charitable giving activities where contributions of cash or goods are sought for a community or charitable purpose, exceptions are permitted, with advance Company approval.



Q. One of EPE's construction sites has some left over supplies and material no one seems to be using. Is it ok to take this home?

A. No, it is never okay to take EPE property and equipment for personal use. Unauthorized appropriation of EPE property is an act of theft which is prohibited by the Code and may also have criminal consequences.

Protection and Proper Use of Company Assets

The safeguarding of Company assets against unauthorized use, damage or theft is critical. Unauthorized use, misuse, or theft of Company assets directly impacts the Company on many levels, not just with respect to our financial strength. The misuse of Company assets includes, for example, the use of any Company asset for personal gain, including the use of equipment, material, supplies, contractors, or personnel. It also includes taking or selling leftover Company property and scrap materials without express permission from the Company.

Protection of Confidential and Proprietary Information

Confidential and proprietary information generated and gathered in our business is a valuable Company asset. Protecting this information plays a vital role in our continued growth and ability to compete. All proprietary information should be maintained in strict confidence, except when disclosure is authorized by the Company or required by law.

All employees, officers and directors must protect proprietary information, both technical and commercial, that is confidential, privileged or valuable to the Company. Confidential and proprietary information includes all nonpublic information that might be useful to competitors or that could be harmful to the Company, the Company's reputation or its customers or vendors if disclosed. Intellectual property such as trade secrets, patents, trademarks and copyrights, as well as

research and new product plans, objectives and strategies, records, databases, salary and benefits data, employee medical information, customer information, employee personal data, supplier lists and any unpublished financial or pricing information must also be protected. These same protections apply to information supplied to the Company by customers and vendors.

The use or disclosure of this information is for Company purposes only and not for personal benefit or for the benefit of others. To preserve confidentiality, disclosure and discussion of proprietary or competitive information should be limited to those employees who have a need to know the information.

Information concerning employees, customers or shareholders constitutes confidential and proprietary information that should not be disclosed to others, within or outside the Company, except as authorized by an appropriate Company officer or Company counsel for a legitimate Company need or if required by government agencies or courts.

Every employee, officer and director shall respect copyright and intellectual property laws and shall observe the terms and conditions of any license agreements to which the Company has agreed. In most cases, this means that the Company does not have a right to copy copyrighted or other protected materials, including computer software that is licensed. Copyright and intellectual property laws and Company policy also prohibit individuals from using or reproducing, for personal purposes, programs or materials they use at work.

Q. Some of my job responsibilities include working with confidential customer information. Am I restricted from talking to other employees about this information?

A. The sharing of confidential customer information should be limited to employees who have a legitimate business need to know.

Q. What should I do if I overhear co-workers discussing EPE non-public business at lunch and other public places?

A. Discuss your concerns with the co-workers or talk to your supervisor. Employees should always use extreme caution when discussing business in public places.

Unauthorized use or distribution of proprietary information violates Company policy and could be illegal. Such use or distribution could result in negative consequences for both the Company and the individuals involved, including potential legal and disciplinary actions. We respect the property rights of other companies and their proprietary information and require our employees, officers and directors to observe such rights.

The obligation to protect and hold confident all confidential and proprietary information shall survive termination of employment or service. Upon termination of employment or service, all confidential and proprietary information shall be returned to the Company.

Social Media

The Company recognizes that the internet provides unique opportunities to participate in interactive discussions and share information with others using a wide variety of social media venues including Twitter, LinkedIn, Facebook, YouTube and other nontraditional means of communication. However, employees' use of social media can pose risks to the Company's confidential and proprietary information, reputation and brands. As a result, employees should participate responsibly when engaging in social media outlets. Confidential and proprietary Company information should never be disclosed or discussed. No one should speak on behalf of the Company unless specifically authorized to do so. The Company, however, recognizes and respects employees' rights to communicate with one another about the terms and conditions of their employment under the National Labor Relations Act (NLRA). For additional information, please refer to the Company's "Social Media Policy" located on the Company's intranet site.

WORKPLACE CONDUCT



Alcohol and Drug-Free Workplace

The Company has a zero tolerance policy regarding alcohol and controlled substance use by employees. Employees are prohibited from manufacturing, distributing, possessing, or using alcohol or any illegal substance during work hours, while on Company business, or while on or in Company property. Employees shall not report to work or remain at work while under the influence of alcohol, an illegal substance, or any controlled substances or inhalants that affect their ability to safely perform their job duties. The Company requires drug and/or alcohol testing for all job applicants prior to employment. Employees are subject to drug and/or alcohol testing when there is reasonable suspicion of substance use by an employee, on a random basis, and following an on-the-job accident and/or pursuant to Department of Transportation ("DOT") requirements.

Employees testing positive for drugs or alcohol are in violation of the Code and are subject to termination. The Company will terminate an employee for any positive drug or alcohol test result. For purposes of the Company's policies, an alcohol positive is .02 or greater blood alcohol concentration on a confirmed test. A refusal of consent to testing or to submit a sample for testing, or any attempts to circumvent or sabotage the drug/alcohol testing procedures will also subject an employee to termination.

Harassment-Free Workplace

The Company prohibits harassment of any kind. Unlawful harassment consists of any derogatory action, whether verbal, physical, or visual, directed against an individual because of the individual's age, disability, national origin, race, religion, sex, sexual orientation, gender identity, workers' compensation status, veteran status, genetic information, familial responsibilities, or other legally recognized protected category.

Sexual harassment includes any unwelcome sexual advances, requests for sexual favors, or other visual, verbal or physical conduct of a sexual or offensive nature (such as sexual jokes, comments and/or crude pictures), made by a coworker, Supervisor or non-employee toward an individual where:

- Submission to the conduct is made either explicitly or implicitly as a term or condition of employment;
- Submission to or rejection of the conduct by an individual is used as the basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile or offensive work environment.

Any individual who is being harassed or is aware of the harassment of others must report the harassment immediately. All reports will be investigated promptly and appropriate action will be taken when necessary to prevent any recurrence of the misconduct toward the complaining individual or any others within the workplace.

Nondiscrimination

Employees, officers, and directors are not to discriminate against anyone on the basis of age, disability, national origin, race, religion, sex, sexual orientation, gender identity, workers' compensation status, veteran status, genetic information, familial responsibilities, or other legally protected categories. In addition, the Company is committed to complying with all relevant and applicable federal, state and local laws pertaining to equal employment opportunity and nondiscrimination in the workplace.

Each employee has a different and unique background, and the diversity of these backgrounds provides the Company with a special strength.

Q. I received a complaint from one of my employees accusing a supervisor under my direction of discrimination however I am confident the accusation is false.

A. It is not your decision to determine whether a potential discrimination issue is true or false. You need to escalate the issue to Human Resources. Equal Employment Opportunity issues such as discrimination may have legal consequences.

No Retaliation

Open communication of issues and concerns by all employees without fear of retaliation is vital to the successful implementation of this Code. The Company strictly prohibits any retaliation against anyone who has, in good faith, filed an internal complaint or participated in an investigation. Good faith does not mean that you have absolute proof, but that you honestly believe your report to be true. Any person who believes that they have been subjected to retaliation should report it immediately.

Records Retention

The Company's Records and Information Management Program establishes document retention process to ensure information is retained, accessible, and protected to satisfy legal, regulatory and operational requirements. The Office of General Counsel may suspend the retention/destruction schedule of certain documents in the event that they may relate to an open investigation or litigation matter. When this occurs, the Office of General Counsel will notify pertinent employees through issuance of a "Litigation Hold" for relevant documents. Employees who receive a "Litigation Hold" notification must preserve applicable documents. A "Litigation Hold Release" will be issued by the Office of General Counsel once pertinent documents no longer need to be preserved. Additional information and policies on records management are located on the Company's intranet site.



CONSEQUENCES OF VIOLATIONS

All employees are responsible for ensuring that their conduct and the conduct of anyone reporting to them comply fully with policies governing the Company's business dealings, including this Code. Compliance, both personal and by subordinates, will be a factor in annual performance reviews. The Code will be enforced throughout the Company, and employees whose conduct is not in line with the Code may face disciplinary action up to and including the termination of employment with the Company. The Company may also be obligated to report to the appropriate authorities any violations of the Code that involve illegal behavior.

INFORMATION RESOURCES

The best way to protect yourself and the Company if you have any doubts about what is proper business conduct is to ask before you act. If you have questions or need clarification concerning the Code, discussing the matter with your supervisor or manager is a good place to start.

You may also contact

- Office of General Counsel at (915) 543-2018
- Vice President-Compliance and Chief Risk Officer at (915) 543-4097
- Corporate Compliance Department at (915) 543-2230

Q. Two years ago I received a "Litigation Hold Memorandum" from the Office of General Counsel concerning a former employee in our area. How long do I have to hold on to relevant documents?

A. You should not destroy any documents related to the litigation hold until you receive a "Litigation Hold Release" from the Office of General Counsel.

REPORTING VIOLATIONS

It may not always be clear exactly what is unethical or illegal. Employees should report any concerns or questions about possible violations of laws, rules, or regulations or any conduct that may be unethical or not permitted under this Code to any of the following:

- Employee's supervisor or manager
- Human Resource Department at (915) 543-2241
- Office of General Counsel at (915) 543-2018
- Safety Department (for matters involving safety issues) at (915) 351-4229
- Senior Vice President and Chief Compliance Officer at (915) 543-5797
- Any other member of Management
- EthicsPoint Hotline at (866) 384-4277 or www.ethicspoint.com

EthicsPoint Hotline provides an avenue for employees to anonymously and confidentially report violations of the Code or actual or suspected activities that involve unlawful or unethical conduct. EthicsPoint is available twenty-four (24) hours per day, seven (7) days per week at (866) 384-4277 or is accessible online at www.ethicspoint.com. Information on EthicsPoint is also located on the Company's intranet site. An anonymous report should provide enough information about the incident or situation to allow the Company to investigate properly. If concerns or complaints require confidentiality, including keeping an employee's identity anonymous, the Company will endeavor to protect this confidentiality, subject to applicable laws, regulations or legal proceedings. In certain situations, the person filing a complaint may have to disclose their own identity to allow the Company to conduct a proper investigation and remedy the situation. Nevertheless, in those situations the Company will work to limit the disclosure to those with a need to know.

Any concerns about violations of laws, rules, or regulations, or any conduct that may be unethical or impermissible under this Code, by any officer or director should be reported promptly to the Office of General Counsel. The Office of General Counsel is to notify the Nominating and Corporate Governance Committee of any violation.

The Company encourages all employees, officers and directors to report any suspected violations promptly so that it can thoroughly investigate them. You are expected to cooperate in internal investigations and failure to do so may implicate you if it is later determined that you participated in or covered up the misbehavior or had an obligation to act upon your knowledge of the situation and failed to do so.

The Company recognizes the need for this Code to be applied equally to everyone it covers. The Office of General Counsel will have primary authority and responsibility for the enforcement of this Code, subject to the supervision of the Nominating and Corporate Governance Committee, or, in the case of accounting, internal accounting controls or auditing matters, the Audit Committee of the Board of Directors.

WAIVERS AND AMENDMENTS

Any waivers of the provisions in this Code for any officers or directors may only be granted by the Board of Directors or the Nominating and Corporate Governance Committee and will be promptly disclosed to the Company's shareholders as required by federal law or applicable rules. Any waivers of this Code for other employees may only be granted by the Office of General Counsel. Amendments to this Code must be approved by the Board of Directors and amendments of the provisions in this Code applicable to the CEO and the senior financial officers will also be disclosed to the Company's shareholders.

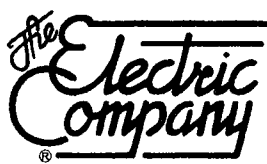
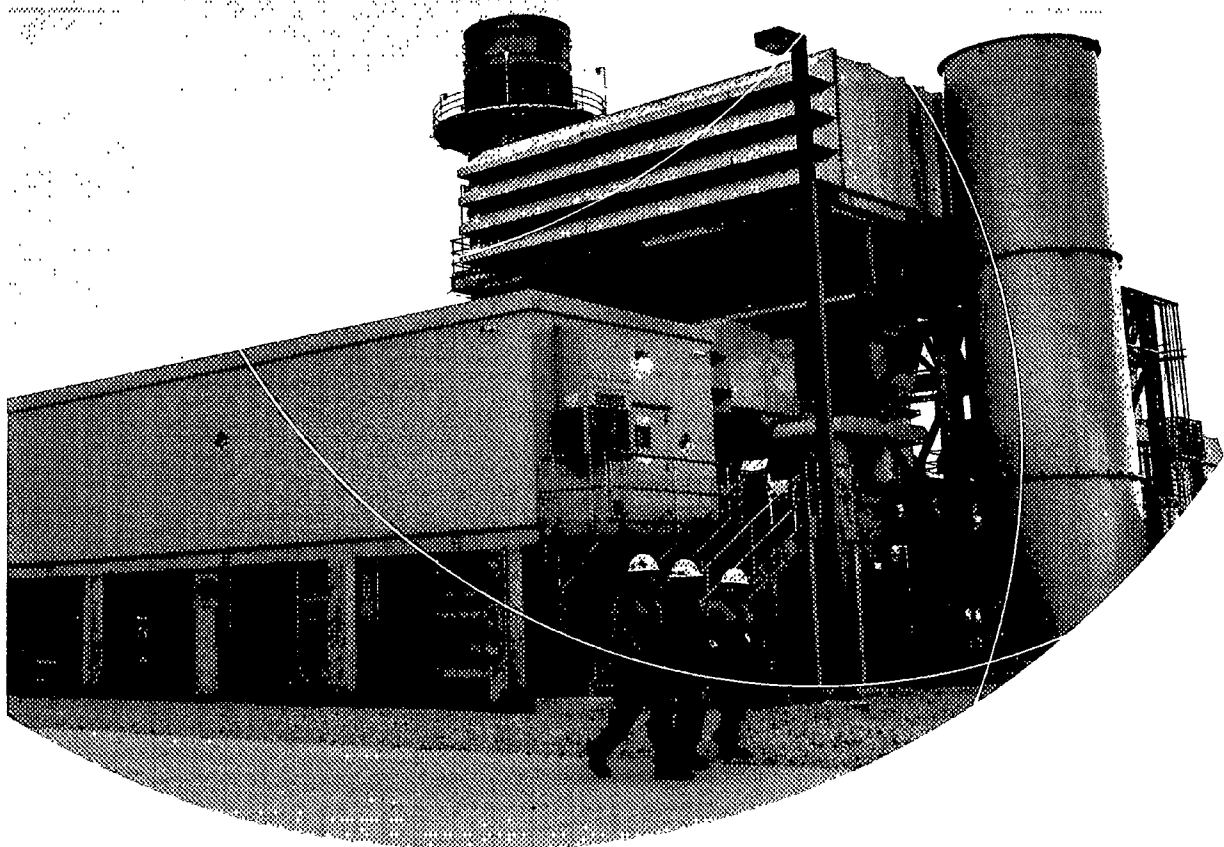
Q. What types of issues can employees report to EPE's hotline, EthicsPoint?

A. Any potential or actual violations of law or Company policy can be reported through the Company hotline. However, employees are encouraged to report less serious issues or concerns to their supervisor or any of the other reporting channels listed in this section.



CODE OF ETHICS





El Paso Electric
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CODE OF ETHICS



DEAR FELLOW EMPLOYEES

El Paso Electric Company has proudly and successfully served our customers and communities for more than 115 years. That success is a result of each employee's commitment to excellence, compliance and ethical business conduct.

EPE must continue to maintain public trust and confidence in all aspects of our business. Safeguarding the Company's reputation requires unwavering dedication by all employees. Our Code of Ethics (the "Code") is meant to help us in our safeguarding efforts. It provides a framework for use in our daily business decisions and in managing relationships with all of the stakeholders we interact with on a routine basis, including fellow employees, customers, shareholders, vendors and regulators. Although the Code does not cover every conceivable situation where ethical decisions must be made, our core values upon which the Code is rooted – Safety, Accountability, Teamwork, Quality of Service and Integrity – are constants, and must serve as the guiding principles which we rely upon in our work.

The Code applies to our Company's employees, officers and our board of directors. All of our employees, officers and directors must conduct themselves according to the language and spirit of this Code and seek to avoid even the appearance of improper behavior. Even well-intentioned actions that violate this Code may result in negative consequences for the Company and for the individuals involved.

Please take time to read and understand the Code. Each of us has a personal responsibility to follow the Code in our day-to-day business activities. The legal and ethical standing and the good name of our Company can be seriously damaged by the actions of just one or a few employees who violate the Code.

Whenever a situation arises that might conflict with the Code, employees and directors should consult with the Office of the General Counsel before proceeding. Remember, when in doubt, consult.

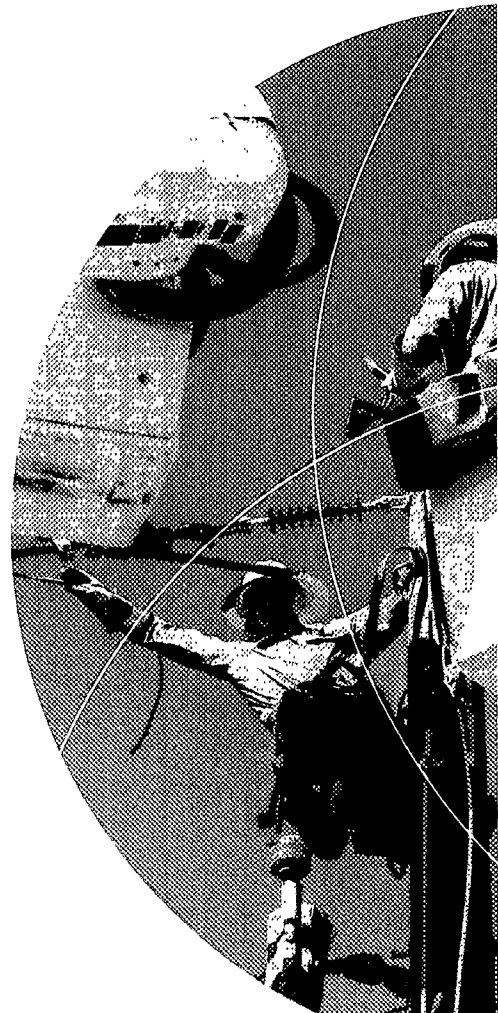
Thank you for joining me in our continued efforts to conduct our day-to-day business with the highest standards of integrity and in compliance with the laws, rules and regulations under which we serve the energy needs of the communities of the greater El Paso region and southern New Mexico.

Sincerely,

Kelly A. Tomblin
Chief Executive Officer

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EL PASO ELECTRIC VISION, MISSION AND CORE VALUES

Our Vision

Our vision is to provide safe, clean, affordable and reliable energy through superior production, acquisition and delivery.

Our Mission

To accomplish our vision, we will build on our past, prepare for the future and be accountable to our key stakeholders including our customers, regulators, employees and shareholders.

Our Core Values

We are committed to performing our day-to-day business activities with the following five core values:

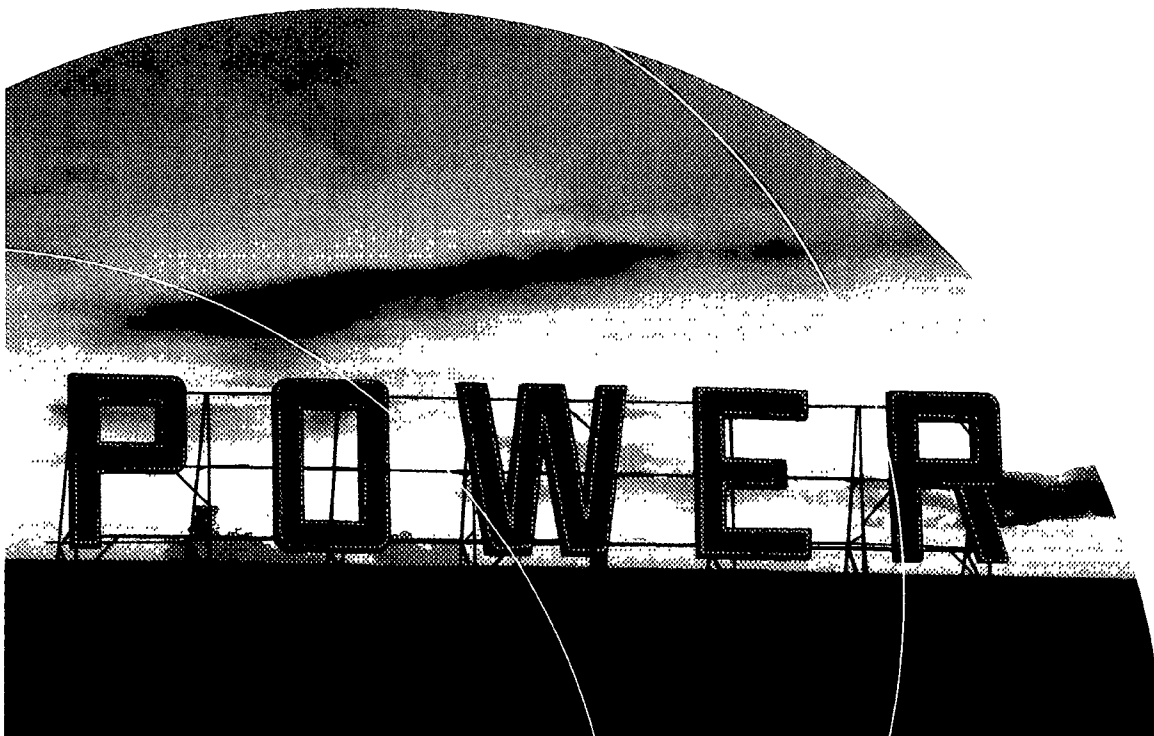
Safety – Safety is a core value that will not be compromised. No operating condition or urgency of service can justify “shortcuts” that place someone in danger. Our conduct in regard to safety impacts not only the lives of our employees but also the lives and property of others as well.

Accountability – We all take responsibility for our daily business decisions and actions.

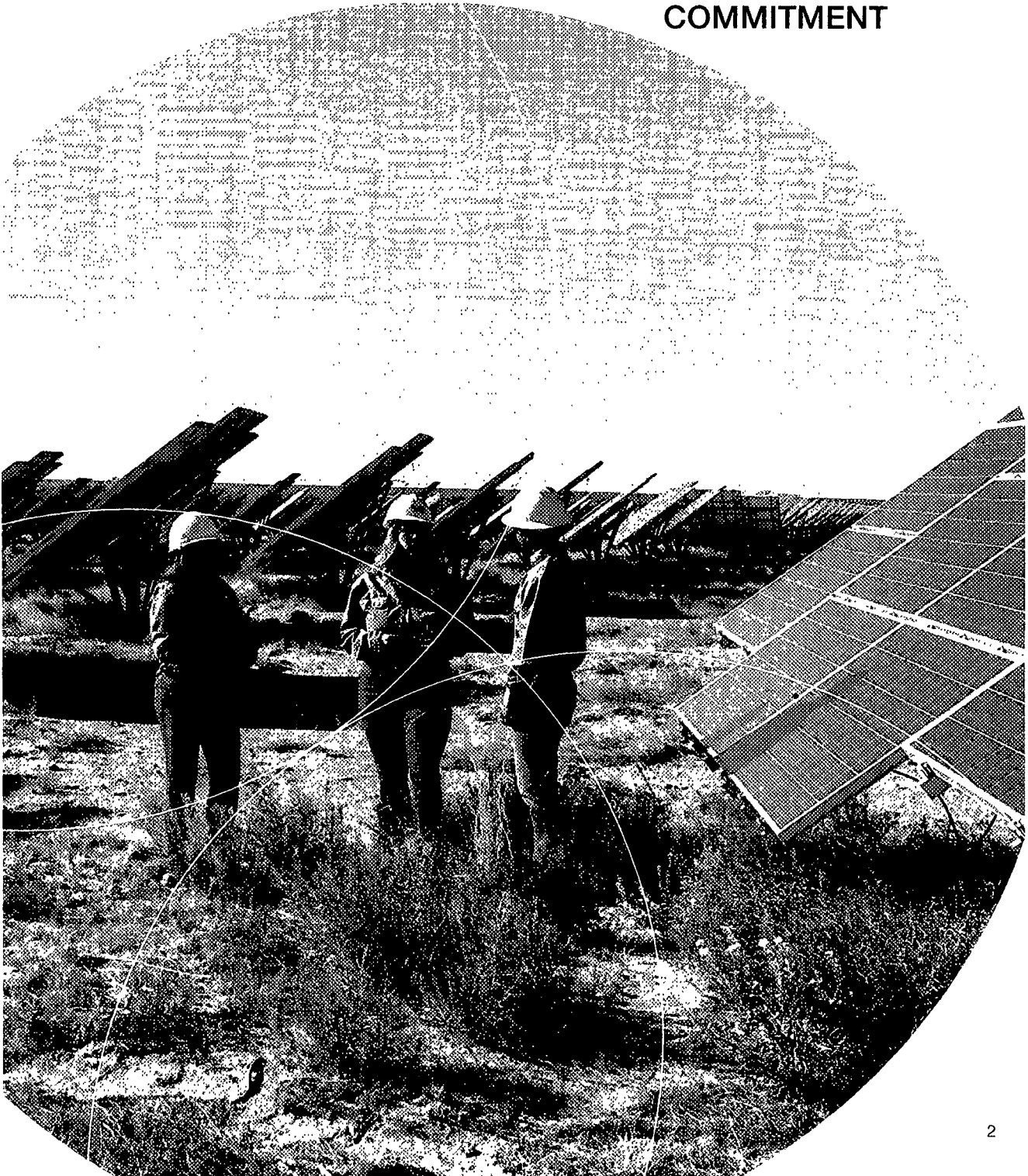
Teamwork – We work together as an efficient and effective team for the benefit of our customers, employees and shareholders.

Quality of Service – We will provide our customers quality service at a reasonable price, delivered in a safe and efficient manner.

Integrity – We will function in an ethical, respectful and deliberate manner with our customers, employees, regulators and shareholders.



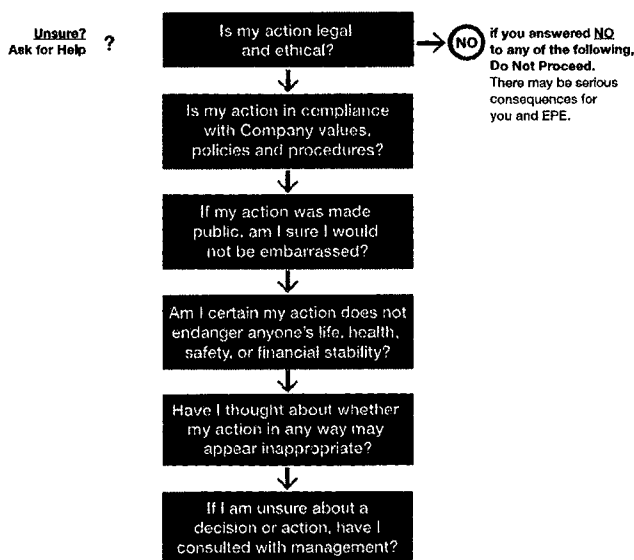
CODE OF ETHICS - PURPOSE AND COMMITMENT



Code of Ethics - Purpose and Commitment

This Code of Ethics ("Code") is intended to guide our day-to-day actions as we conduct the Company's business with the highest standards of integrity and fair dealing.

The Code identifies guidelines for conduct in areas that may pose ethical concerns. The Company also has other policies that address specific issues and actions in more detail. We must comply with those policies as well as this Code of Ethics. It is impossible to envision every conceivable situation involving an ethical dilemma. The Code is intended to help us to evaluate any ethical concerns with the Company's Core Values in mind: Safety, Accountability, Teamwork, Quality of Service and Integrity. You may find it helpful to ask the following questions before taking action in specific situations that raise ethical concerns:



The Company asks each employee, officer and member of its board of directors ("director") to make a personal commitment to the highest ethical standards and to the exercise of proper judgment in all aspects of Company business. This Code establishes guidelines for the conduct of business on behalf of the Company, and it should be employed together with common sense and good judgment.

Situations not covered by this Code or about which you are not certain should be discussed with your supervisor or manager or others listed in the Code under "Information Resources". Other Company policies on specific subject matters may also provide additional guidance. The Code should be interpreted in a manner that complements other applicable Company policies and procedures.

Responsibility for Compliance – All Employees, Officers, Directors

Every employee, officer and director is responsible for compliance with the standards and expectations outlined in this Code. Conducting our daily job responsibilities ethically and in compliance with Company policies and procedures as well as laws, rules, and regulations that impact our jobs is a responsibility we all shoulder. We also have the responsibility to report, promptly and in good faith, any issue or activity that may violate the Code, other Company policies and procedures, or any law or regulation that impacts our business.

Ethical issues and concerns should be discussed with higher levels of management, including the employee's supervisor or manager, or others identified in the "Information Resources" or "Reporting Violations" sections of this Code. These discussions may concern the activities of the employee or other employees and may involve apparent conflicts between actions the employee has been directed to take and the standards addressed in the Code.

Additional Compliance Responsibilities – Management

Management assumes additional responsibilities for compliance including:

- Leading by example and ensuring employees understand and follow the Code,
- Maintaining an open-door policy creating an environment where employees feel comfortable raising concerns or asking questions,
- Ensuring employees complete required training,
- Encouraging employees under their supervision to speak up without fear of retaliation, and
- Supplementing Code standards, as necessary, to address any specific requirements of the various Company functions in their areas of responsibility, to add clarity or additional guidance tailored to specific activities or job responsibilities.

ACCURATE COMPANY RECORDS AND COMMUNICATION



Accurate Company Records and Communication

Employees, officers and directors are responsible and accountable for the reports and records they prepare. All Company records, accounts, financial reports, research reports, marketing information, sales reports, tax returns, expense accounts, time sheets, claims and any other Company documents, including those submitted to governmental agencies, must be accurate. All entries on the Company's books and records are to represent, and not conceal, the true nature of each transaction. The intentional falsification of records is always unethical and may also be illegal. Employees, officers and directors must never withhold or fail to communicate information that should be brought to the attention of any level of management.

All information transmitted, both within and outside the Company, must be honest and well-founded. Misrepresentations and shading of information to create a misleading business picture are not acceptable practices under this Code and will not be tolerated.

The Company also has in place a Disclosure Committee consisting of members of senior management who assist in monitoring disclosures of a financial nature. Company reporting and filings with the Securities and Exchange Commission and other public communications shall include full, fair, accurate, and timely disclosure in the manner required by governing authorities.

Q. My recent pay information indicated 4 PTO days instead of 5 actually taken. What should I do?

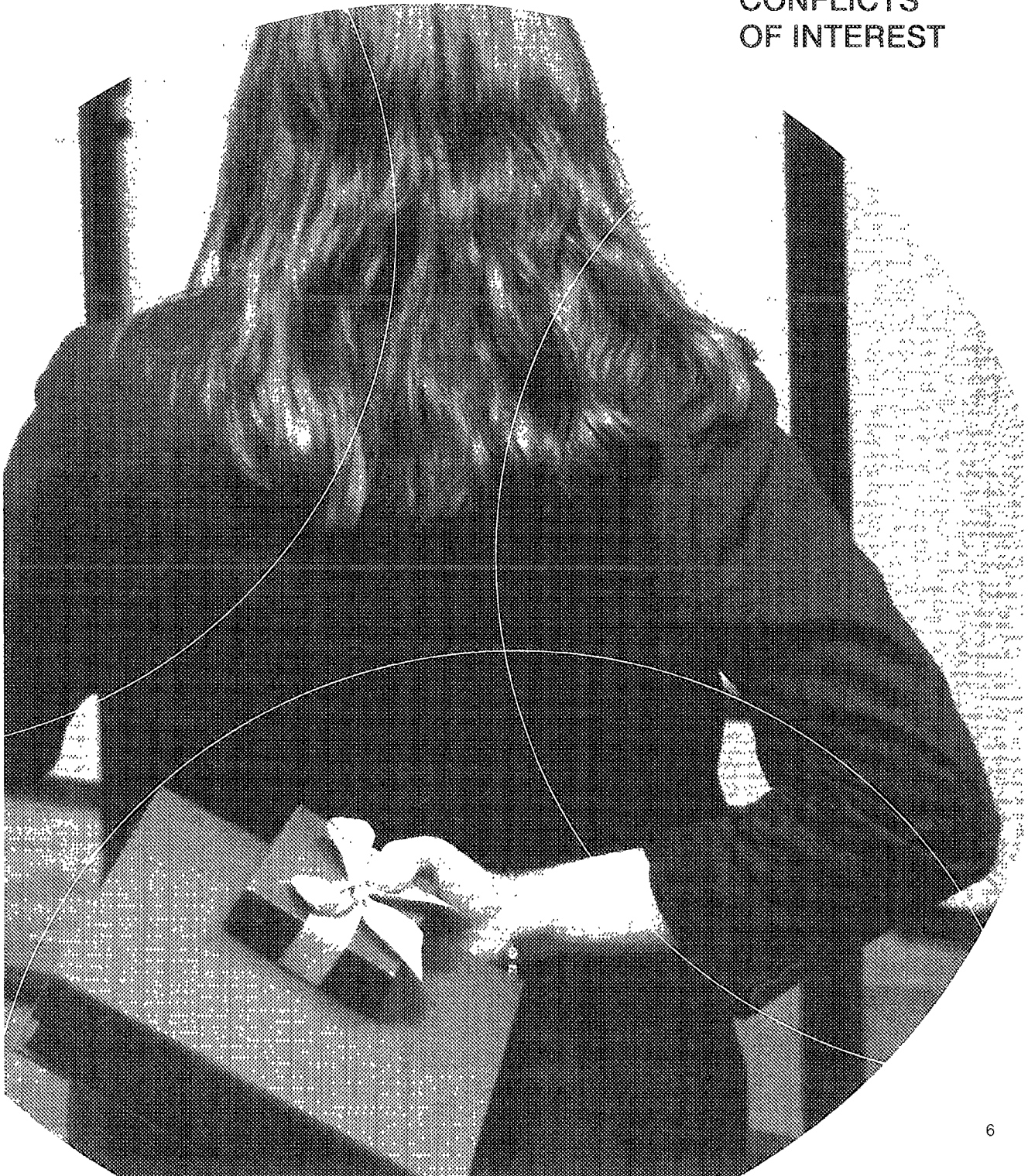
A. If you enter your own time, contact the payroll department for guidance on correcting the discrepancy. If you do not enter your own time, talk to your supervisor or other person who enters your time to have this issue corrected. PTO records must always reflect accurate information.

Dishonest Activities

Dishonest activities involving Company money, documents, transactions or equipment are not permitted. This includes:

1. Alteration or intentional misstatement of Company reports and records.
2. Forgery, alteration or misrepresentation of authorizations.
3. Misappropriation of funds, securities, supplies or any other Company asset.
4. Irregularity in the handling or reporting of money transactions.
5. Unauthorized purchases or use of services, supplies, furniture, fixtures and equipment.
6. Alteration or intentional misstatement in reporting items such as employee expenses, vacations, leave time, sick time and overtime.

AVOIDING CONFLICTS OF INTEREST



Avoiding Conflicts of Interest

Conflicts of interest exist whenever a person's interests, position or relationships compete or conflict in any way, or even appears to compete or conflict, with the best interest of the Company. A conflict of interest can arise when an employee, officer, or director:

- Takes an action or has a personal interest that may make it difficult to objectively and effectively perform Company duties and responsibilities, or
- Receives improper personal gifts or benefits for themselves or their family members as a result of their position in the Company.

All employees, officers and directors are to avoid any activity, investment, interest, or association that compromises (or even appears to compromise) their independent exercise of judgment and the performance of work in the best interest of the Company

Although it would not be possible to describe every situation in which a conflict of interest may arise, the following are some examples of situations which may constitute a conflict of interest. References below to a person's "immediate family" include, for example, that person's spouse, parents, siblings, children, stepchildren, in-laws, aunts, uncles, cousins, as well as any other individual with a close personal relationship to that person.

Q. Can an employee hire a relative's company or award a relative a contract to perform EPE work?

A. The employee may not directly award his relative a contract or hire his relative's company to perform EPE work as the relative stands to benefit from this situation and this creates a conflict of interest. The employee's relative is welcome to compete for the job, but the employee should not have any role in the selection process.

Q. Can a manager or supervisor hire a relative as an EPE employee to become part of his or her team?

A. The manager or supervisor may not hire a relative and may not directly or indirectly supervise a relative that works within their division hierarchy.

Q. I was offered a second job outside the Company. Will this create any issues as an EPE employee?

A. Accepting a second job away from EPE is not an issue as long as the second job does not conflict or even appear to conflict with your ability to perform your job with EPE. You cannot use EPE's name, property, information or other EPE resources to perform your second job.

Outside Employment and Business Activities

Any outside employment or business activities must not conflict with, have the potential to conflict with, or even appear to conflict with, the employee's ability to properly perform work for the Company. Employees are not to seek financial gains for themselves, their families or their associates from third parties by holding themselves out to be representatives of the Company or by representing or implying to such third parties that they possess proprietary information or influence due to employment with the Company. In addition, employees should not wear clothing which displays the Company logo while working for financial gain outside of the Company. Employees shall not use their Company identification badge for any purpose other than to identify themselves as Company employees performing Company business. Employees should not engage in any outside employment which has a negative impact on their availability to the Company for work or their ability to perform assigned duties during their normal work hours.

Gifts, Entertainment and Gratuities

Employees and members of their immediate family may not directly or indirectly request or receive cash, bonuses, fees, discounts, commissions, gift cards or any other cash equivalent item from any person, customer, supplier, contractor, corporation or other entity with which the Company does business or is likely to do business.

The Code does not preclude employees from providing or accepting gifts, gratuities and entertainment that are business related, as long as the value of the offering is nominal (i.e. no more than \$50.00) and is infrequent, legal and reasonable.

If a gift or gratuity of more than nominal value is offered or received, the gift or gratuity should be refused or returned with a polite explanation of the Company's policy, and the employee should notify his or her supervisor or manager. Regardless of value, an employee should decline any item offered with the intent to improperly influence the employee in the performance of the employee's duties for the Company.

In limited circumstances, employees may receive permission to attend special events sponsored by suppliers or other organizations associated with the Company.

Competing for the Acquisition of Property or Services

Employees, officers and directors, and members of their immediate family, shall not knowingly acquire any material interest (whether direct or indirect) in any property that the Company is acquiring or is likely to acquire. Business transactions with businesses owned by any director or director's immediate family members are covered by a separate policy found on the Company's intranet site. Exceptions to this policy may be granted only after complying with the disclosure and exception procedures set out in the Waivers and Amendments section below. Some additional examples of conduct that constitutes a conflict of interest include:

- Having a material financial interest in a transaction involving the Company, or in entities with which the Company does business or is likely to do business, or in entities that compete against the Company (this generally does not include routine investments in publicly traded companies). A material financial interest is one that might compromise, or even appear to compromise, the independent exercise of a person's judgment in the best interest of the Company.
- Receiving a loan or guarantee of an obligation as a result of your position with the Company.
- Directing business to a supplier or contractor owned or managed by, or which employs, a relative or friend.
- Giving or receiving bribes or kickbacks.

In order to avoid conflicts of interest, each of the senior executive officers and directors must disclose to the Chief Compliance Officer any material transaction or relationship that reasonably could be expected to give rise to such a conflict. The Chief Compliance Officer shall notify the Nominating and Corporate Governance Committee of any such disclosure. Conflicts of interest involving the Chief Compliance Officer shall also be disclosed to the Nominating and Corporate Governance Committee.

Q. An EPE vendor sent me a \$100.00 gift card during the holidays. Can I accept this gift?

A. No, employees may not accept gifts of cash or cash equivalents such as gift cards from vendors. The Code of Ethics does not prevent an employee from receiving other types of business related gifts as long as the value of the gift is less than \$50.00 and not of a nature that would suggest intent to influence Company business decisions.

Community and Professional Organizations

The Company has a long-standing commitment to good corporate citizenship. The Company supports and encourages involvement in community activities and professional organizations. It expects its employees, officers and directors to pursue these interests in a responsible manner and in a manner that will reflect favorably upon the employee, officer or director and the Company. Before accepting any position with a community or professional organization, employees, officers and directors should evaluate carefully whether the position could cause, or even appear to cause, a conflict of interest.

Corporate Opportunities

Employees, officers and directors are prohibited from taking advantage of business opportunities that arise through their employment for personal gain. No employee, officer or director may use corporate property, information or position for personal gain, and no employee, officer or director may compete with the Company. Competing with the Company may involve engaging in the same line of business as the Company, or any situation where the employee, officer or director takes away from the Company opportunities for sales or purchases of products, services or interests.

BUSINESS CONDUCT





Fair Dealing

Each employee, officer and director of the Company should endeavor to deal fairly with customers, suppliers, contractors, competitors, the public and one another at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. No bribes, kickbacks or other similar payments in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. The Company and the employee, officer or director involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this policy.

Practices that are acceptable in commercial business environments may be against the law or the policies governing federal, state or local government employees. Therefore, no gifts or business entertainment of any kind may be given to any government employee or official without the prior approval of the Office of General Counsel.

Outside Business Contacts

In the course of performing assigned duties, employees, officers and directors frequently have business contacts outside the Company with customers, suppliers, competitors, governmental agencies, and the news media. Employees, officers and directors should only perform services, provide information, and answer questions that fall within the realm of their knowledge and responsibilities.

For example, inquiries from the news media should be directed to the Public Relations Department. Inquiries from shareholders and other investors in the Company, as well as analysts, should be directed to the Investor Relations Department. Other inquiries regarding stock ownership or record keeping should be directed to the Office of the Corporate Secretary.

Political Contributions and Activities

Any political contributions made by or on behalf of the Company and any solicitations for political contributions of any kind must be lawful and in compliance with Company policies. This policy applies solely to the use of Company assets and is not intended to discourage or prevent individual employees, officers or directors from making political contributions or engaging in political activities on their own behalf. No one may be reimbursed directly or indirectly by the Company for personal political contributions.

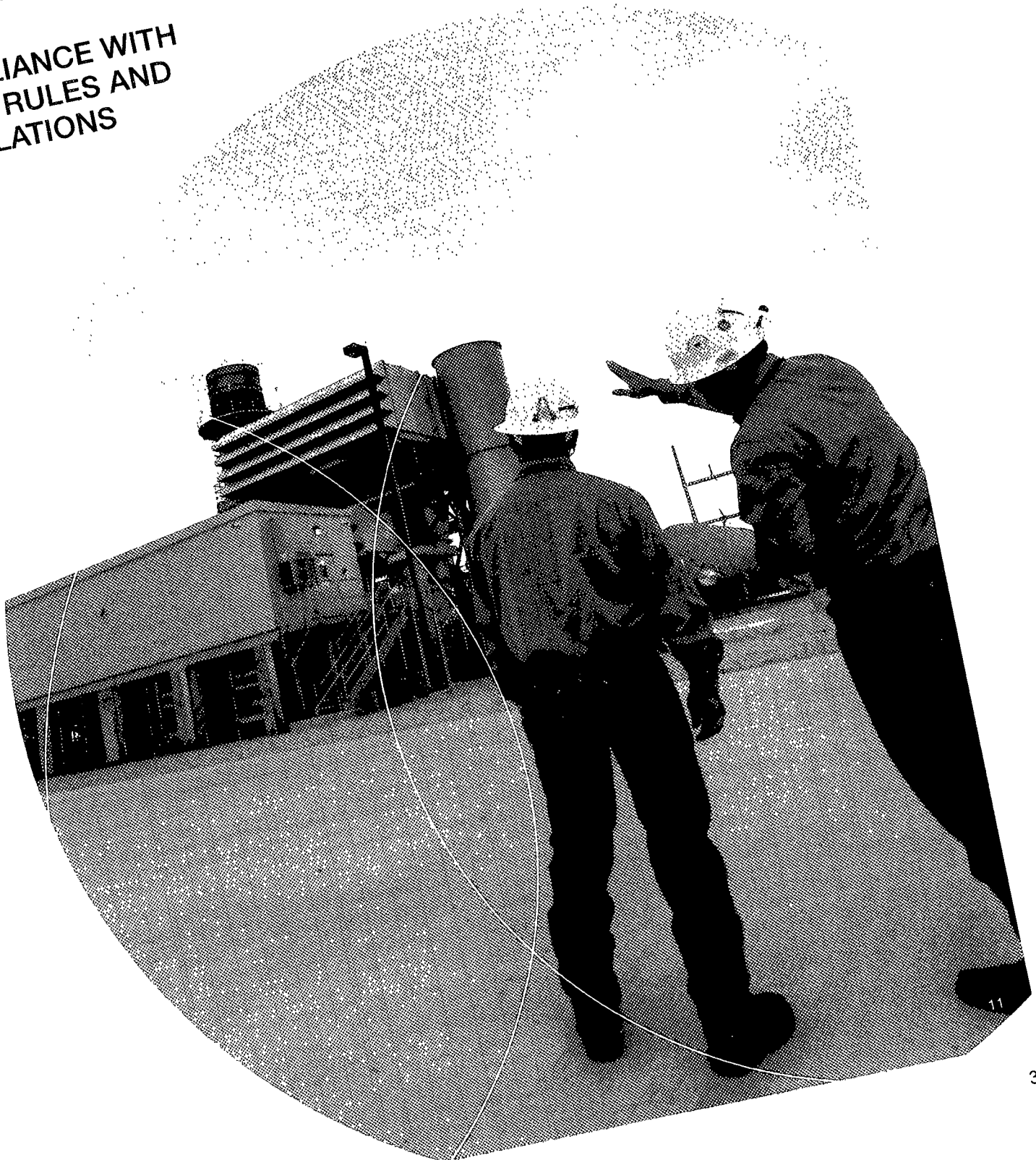
Q. Is it acceptable to use an EPE copy machine to make flyers for a political campaign in which I am involved?

A. No, you may not use Company time or resources for personal participation in a political campaign.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-10: EMPLOYEE ETHICS
SPONSOR: DAVID C. HAWKINS
PREPARER: ANGELICA ARREOLA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-10
Page 40 of 51

COMPLIANCE WITH LAWS, RULES AND REGULATIONS



Compliance with Laws, Rules and Regulations

Employees, officers and directors are expected to comply with all applicable laws, rules and regulations. The Company's activities are subject to a variety of federal, state and local laws and regulations. No employee, officer or director of the Company shall commit an illegal or unethical act or instruct others to do so, for any reason.

If you believe that any practice raises questions as to compliance with this Code or applicable laws, rules or regulations, please discuss your concerns with your supervisor or manager, or as otherwise set out in the "Information Resources" or "Reporting Violations" Sections of this Code.

Antitrust Laws

It is the policy of the Company to obey the antitrust laws and to avoid all conduct or behavior that unreasonably restrains competition. Among other things, antitrust laws prohibit any agreements between competitors on such matters as prices, terms of sale to customers and allocating markets or customers. Antitrust laws can be very complex, and failure to adhere to them may result in criminal sanctions, including fines, jail time and civil liability.

Contact the Office of General Counsel in advance, whenever you need specific guidance on the scope of permissible discussions as you interact on behalf of the Company with your counterparts in other utility or energy companies.

Foreign Corrupt Practices Act

Except in certain limited circumstances, the Foreign Corrupt Practices Act ("FCPA") prohibits giving anything of value directly or indirectly to any "foreign official" for the purpose of obtaining or retaining business. Due to our interconnection and other business with the Comisión Federal de Electricidad ("CFE") in Mexico, we include the CFE and its officials under this part of our Policy. When in doubt as to whether a contemplated payment or gift may violate the FCPA, contact the Office of General Counsel before taking any action.

Positions Requiring Reporting or Approval - FERC Interlocking Positions

Certain kinds of positions with other organizations, if held by certain types of Company employees or directors, are subject to reporting and approval requirements by governmental authorities. For example, there are government regulations that address permissible and impermissible positions that a utility employee and director may hold in another organization, without regard to whether the positions held are voluntary or paid. Please contact the Office of General Counsel to determine whether any advance reporting or approval of the third-party position is required.

Regulation Fair Disclosure

Each officer, employee or director who communicates with the investment community or others outside the Company on behalf of the Company must be familiar with the Company's disclosure controls and procedures and is required to comply with the Securities and Exchange Commission's ("SEC") Regulation Fair Disclosure ("Regulation FD"). Regulation FD generally requires simultaneous public disclosure when material nonpublic information is disclosed to any entity or person outside the Company. For more information, please refer to the Company's "Regulation Fair Disclosure Policy" located on the Company's Intranet site or contact the Office of General Counsel.

Trading on Inside Information

Federal laws expressly prohibit employees from using "inside" or material non-public information when trading in Company securities. Information is considered "material" if there is a substantial likelihood that a reasonable investor would consider it important in arriving at a decision to buy, sell or hold stock of the Company. Examples of information that might be deemed material include preliminary income reports, earnings estimates, significant expansion or curtailment of operations, plans to sell or purchase substantial assets, the anticipation of major litigation, or other items that could have a significant effect on the Company.

Using material nonpublic information to trade in securities or providing a family member, friend or any other person with a "tip" is illegal. All nonpublic information should be considered inside information and should never be used for personal gain. For more information, please refer to the Company's "Policy on Inside Information and Insider Trading" located on the Company's intranet site. If you have questions about buying or selling Company stock, contact the Company's Office of General Counsel.

ENVIRONMENT, HEALTH AND SAFETY



Environment, Health And Safety

The Company complies with all applicable environmental, health and safety laws and regulations in order to provide a safe workplace and to protect the environment. It is the responsibility of each employee to do their part by complying with the Company's policies, as well as any applicable requirements established by federal, state and local law.

Employees are expected to report observed safety, health, or environmental potential or actual violations, potentially unsafe conditions, and any accidents resulting in injuries to employees or the public. All jobs at the Company are to be performed in a safe manner in accordance with all the established safety rules including the Safety Manual and the Cardinal Rules (found on the Company's intranet site). As a core value, safety will not be compromised. Every employee assumes the responsibility of individual and organizational safety. Failure to follow Company safety and health guidelines and conduct that places employees, the public, or the Company at risk will not be tolerated.

Workplace Violence

The Company seeks to provide a work environment where employees will not be subjected to acts of physical assault or threats of bodily harm while performing their official duties, wherever those duties are performed. Workplace violence includes implied, conditional or direct threats of violence, whether made in verbal, physical, or visual form. The Company is committed to providing a secure and safe work environment for all employees, contactors, visitors, customers, and vendors. Any threat in the workplace to people, property or information, will be taken seriously and acted upon appropriately. There shall

Q. I had a minor accident at work that I am not sure needs to be reported.

A. All work related accidents are required to be reported immediately to the supervisor and the Safety Department. When immediate reporting is not possible, employees should report as soon as practicable. Your report may help bring light to a potential safety hazard and may also help alleviate any future similar accidents from occurring.

Q. What should I do if I see an unsafe condition at work?

A. Safety is one of EPE's core values. Unsafe conditions should immediately be reported to your supervisor. If a job has become unsafe, stop the job until safety issues are resolved. We all share the responsibility of safety and part of this involves fostering an injury free workplace.

be zero tolerance of such threats or acts of violence. Employees are required to immediately report any incidents of workplace violence to their supervisor, Human Resources or any other resource listed in this Code under "Reporting Violations."

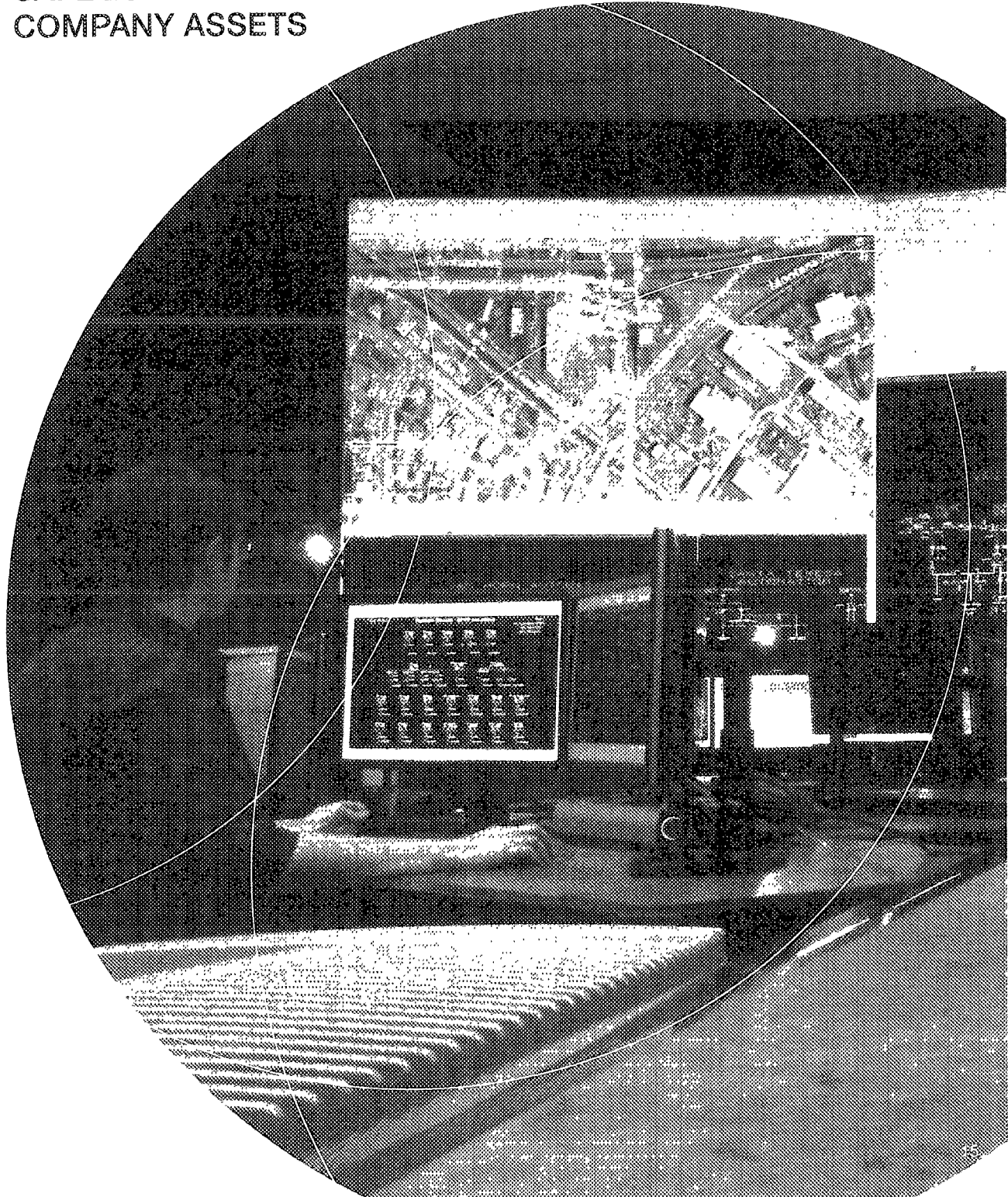
GOVERNMENT INQUIRIES AND INVESTIGATIONS

Much of the Company's activities are subject to governmental review. The Company's policy is to cooperate fully and responsibly with any appropriate governmental agency conducting an investigation with assistance from legal counsel and subject matter experts who can help represent the Company during such investigations. Contact the Office of General Counsel before taking action or responding to questions on behalf of the Company when government agents arrive to conduct an investigation. This also applies when the government inquiry comes in the form of a written subpoena or written request for information. Although it is the Company's policy to cooperate fully with such investigations, the Company has a right to have representation from legal counsel and appropriate subject matter experts.

Q. I am a new EPE employee. During an on-site visit at a substation, I noticed an oil spill next to a barrel. What should I do?

A. If an employee is not specifically trained to handle an environmental emergency situation, the issue should be reported to the supervisor on-site and the Environmental Department. All environmental releases must be properly cleaned up and potentially reported to a regulatory agency. The situation will be assessed and depending on the amount of the release and conditions surrounding the release the Environmental Department will coordinate proper handling, disposal, paperwork and regulatory reporting.

SAFEGUARDING COMPANY ASSETS



Cybersecurity

Employees work with electronic data every day in carrying out work-related tasks and activities. This electronic data is on computers, servers, within email and USB drives and is stored in a multitude of formats. Employees must protect the Company's electronic data and comply with all information and information system policies located on the Company's intranet site. The Company provides employees with cybersecurity awareness training and it is each employee's responsibility to ensure that the techniques and processes discussed in training are applied to ensure the security of the Company's electronic data.

Loans and Gifts of Company Goods

The Company does not extend or maintain credit, arrange for the extension of credit, or renew credit in the form of a personal loan to or for any director or officer of the Company. Similarly, an employee may not offer to anyone else, inside or outside the Company, any Company asset (property, loans, contributions, unpaid services, etc.). In certain limited situations, such as in the context of charitable giving activities where contributions of cash or goods are sought for a community or charitable purpose, exceptions are permitted, with advance Company approval.



Q. One of EPE's construction sites has some left over supplies and material no one seems to be using. Is it ok to take this home?

A. No, it is never okay to take EPE property and equipment for personal use. Unauthorized appropriation of EPE property is an act of theft which is prohibited by the Code and may also have criminal consequences.

Protection and Proper Use of Company Assets

The safeguarding of Company assets against unauthorized use, damage or theft is critical. Unauthorized use, misuse, or theft of Company assets directly impacts the Company on many levels, not just with respect to our financial strength. The misuse of Company assets includes, for example, the use of any Company asset for personal gain, including the use of equipment, material, supplies, contractors, or personnel. It also includes taking or selling leftover Company property and scrap materials without express permission from the Company.

Protection of Confidential and Proprietary Information

Confidential and proprietary information generated and gathered in our business is a valuable Company asset. Protecting this information plays a vital role in our continued growth and ability to compete. All proprietary information should be maintained in strict confidence, except when disclosure is authorized by the Company or required by law.

All employees, officers and directors must protect proprietary information, both technical and commercial, that is confidential, privileged or valuable to the Company. Confidential and proprietary information includes all nonpublic information that might be useful to competitors or that could be harmful to the Company, the Company's reputation or its customers or vendors if disclosed. Intellectual property such as trade secrets, patents, trademarks and copyrights, as well as

research and new product plans, objectives and strategies, records, databases, salary and benefits data, employee medical information, customer information, employee personal data, supplier lists and any unpublished financial or pricing information must also be protected. These same protections apply to information supplied to the Company by customers and vendors.

The use or disclosure of this information is for Company purposes only and not for personal benefit or for the benefit of others. To preserve confidentiality, disclosure and discussion of proprietary or competitive information should be limited to those employees who have a need to know the information.

Information concerning employees, customers or shareholders constitutes confidential and proprietary information that should not be disclosed to others, within or outside the Company, except as authorized by an appropriate Company officer or Company counsel for a legitimate Company need or if required by government agencies or courts.

Every employee, officer and director shall respect copyright and intellectual property laws and shall observe the terms and conditions of any license agreements to which the Company has agreed. In most cases, this means that the Company does not have a right to copy copyrighted or other protected materials, including computer software that is licensed. Copyright and intellectual property laws and Company policy also prohibit individuals from using or reproducing, for personal purposes, programs or materials they use at work.

Q. Some of my job responsibilities include working with confidential customer information. Am I restricted from talking to other employees about this information?

A. The sharing of confidential customer information should be limited to employees who have a legitimate business need to know.

Q. What should I do if I overhear co-workers discussing EPE non-public business at lunch and other public places?

A. Discuss your concerns with the co-workers or talk to your supervisor. Employees should always use extreme caution when discussing business in public places.

Unauthorized use or distribution of proprietary information violates Company policy and could be illegal. Such use or distribution could result in negative consequences for both the Company and the individuals involved, including potential legal and disciplinary actions. We respect the property rights of other companies and their proprietary information and require our employees, officers and directors to observe such rights.

The obligation to protect and hold confidential all confidential and proprietary information shall survive termination of employment or service. Upon termination of employment or service, all confidential and proprietary information shall be returned to the Company

Social Media

The Company recognizes that the internet provides unique opportunities to participate in interactive discussions and share information with others using a wide variety of social media venues including Twitter, LinkedIn, Facebook, YouTube and other nontraditional means of communication. However, employees' use of social media can pose risks to the Company's confidential and proprietary information, reputation and brands. As a result, employees should participate responsibly when engaging in social media outlets. Confidential and proprietary Company information should never be disclosed or discussed. No one should speak on behalf of the Company unless specifically authorized to do so. The Company, however, recognizes and respects employees' rights to communicate with one another about the terms and conditions of their employment under the National Labor Relations Act (NLRA). For additional information, please refer to the Company's "Social Media Policy" located on the Company's intranet site.

WORKPLACE CONDUCT



Alcohol and Drug-Free Workplace

The Company has a zero tolerance policy regarding alcohol and controlled substance use by employees. Employees are prohibited from manufacturing, distributing, possessing, or using alcohol or any illegal substance during work hours, while on Company business, or while on or in Company property. Employees shall not report to work or remain at work while under the influence of alcohol, an illegal substance, or any controlled substances or inhalants that affect their ability to safely perform their job duties. The Company requires drug and/or alcohol testing for all job applicants prior to employment. Employees are subject to drug and/or alcohol testing when there is reasonable suspicion of substance use by an employee, on a random basis, and following an on-the-job accident and/or pursuant to Department of Transportation ("DOT") requirements.

Employees testing positive for drugs or alcohol are in violation of the Code and are subject to termination. The Company will terminate an employee for any positive drug or alcohol test result. For purposes of the Company's policies, an alcohol positive is .02 or greater blood alcohol concentration on a confirmed test. A refusal of consent to testing or to submit a sample for testing, or any attempts to circumvent or sabotage the drug/alcohol testing procedures will also subject an employee to termination.

Harassment-Free Workplace

The Company prohibits harassment of any kind. Unlawful harassment consists of any derogatory action, whether verbal, physical, or visual, directed against an individual because of the individual's age, disability, national origin, race, religion, sex, sexual orientation, gender identity, workers' compensation status, veteran status, genetic information, familial responsibilities, or other legally recognized protected category.

Sexual harassment includes any unwelcome sexual advances, requests for sexual favors, or other visual, verbal or physical conduct of a sexual or offensive nature (such as sexual jokes, comments and/or crude pictures), made by a coworker, Supervisor or non-employee toward an individual where:

- Submission to the conduct is made either explicitly or implicitly as a term or condition of employment;
- Submission to or rejection of the conduct by an individual is used as the basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile or offensive work environment.

Any individual who is being harassed or is aware of the harassment of others must report the harassment immediately. All reports will be investigated promptly and appropriate action will be taken when necessary to prevent any recurrence of the misconduct toward the complaining individual or any others within the workplace.

Nondiscrimination

Employees, officers, and directors are not to discriminate against anyone on the basis of age, disability, national origin, race, religion, sex, sexual orientation, gender identity, workers' compensation status, veteran status, genetic information, familial responsibilities, or other legally protected categories. In addition, the Company is committed to complying with all relevant and applicable federal, state and local laws pertaining to equal employment opportunity and nondiscrimination in the workplace.

Each employee has a different and unique background, and the diversity of these backgrounds provides the Company with a special strength.

Q. I received a complaint from one of my employees accusing a supervisor under my direction of discrimination however I am confident the accusation is false.

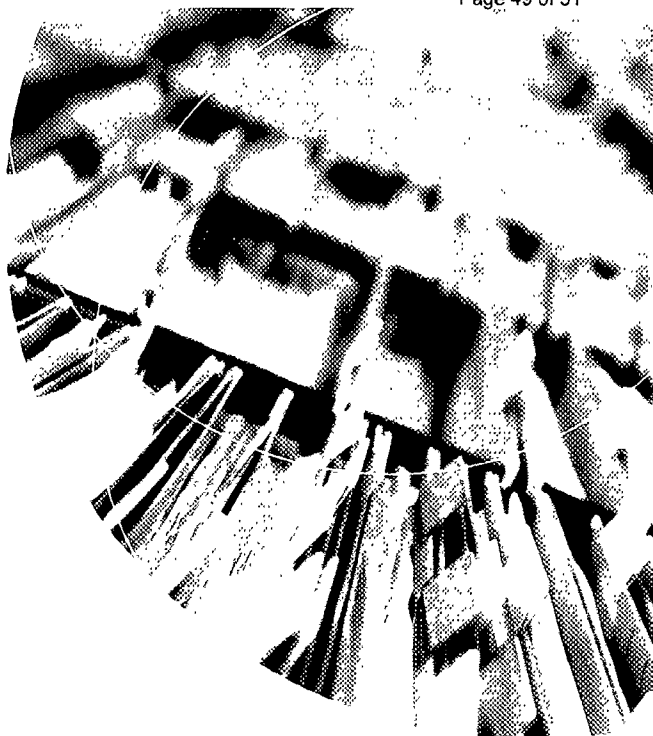
A. It is not your decision to determine whether a potential discrimination issue is true or false. You need to escalate the issue to Human Resources. Equal Employment Opportunity issues such as discrimination may have legal consequences.

No Retaliation

Open communication of issues and concerns by all employees without fear of retaliation is vital to the successful implementation of this Code. The Company strictly prohibits any retaliation against anyone who has, in good faith, filed an internal complaint or participated in an investigation. Good faith does not mean that you have absolute proof, but that you honestly believe your report to be true. Any person who believes that they have been subjected to retaliation should report it immediately.

Records Retention

The Company's Records and Information Management Program establishes document retention process to ensure information is retained, accessible, and protected to satisfy legal, regulatory and operational requirements. The Office of General Counsel may suspend the retention/destruction schedule of certain documents in the event that they may relate to an open investigation or litigation matter. When this occurs, the Office of General Counsel will notify pertinent employees through issuance of a "Litigation Hold" for relevant documents. Employees who receive a "Litigation Hold" notification must preserve applicable documents. A "Litigation Hold Release" will be issued by the Office of General Counsel once pertinent documents no longer need to be preserved. Additional information and policies on records management are located on the Company's intranet site.



CONSEQUENCES OF VIOLATIONS

All employees are responsible for ensuring that their conduct and the conduct of anyone reporting to them comply fully with policies governing the Company's business dealings, including this Code. Compliance, both personal and by subordinates, will be a factor in annual performance reviews. The Code will be enforced throughout the Company, and employees whose conduct is not in line with the Code may face disciplinary action up to and including the termination of employment with the Company. The Company may also be obligated to report to the appropriate authorities any violations of the Code that involve illegal behavior.

INFORMATION RESOURCES

The best way to protect yourself and the Company if you have any doubts about what is proper business conduct is to ask before you act. If you have questions or need clarification concerning the Code, discussing the matter with your supervisor or manager is a good place to start.

You may also contact:

- Office of General Counsel at (915) 543-2018
- Vice President-Compliance and Chief Risk Officer at (915) 543-4097
- Corporate Compliance Department at (915) 543-2230

Q. Two years ago I received a "Litigation Hold Memorandum" from the Office of General Counsel concerning a former employee in our area. How long do I have to hold on to relevant documents?

A. You should not destroy any documents related to the litigation hold until you receive a "Litigation Hold Release" from the Office of General Counsel.

REPORTING VIOLATIONS

It may not always be clear exactly what is unethical or illegal. Employees should report any concerns or questions about possible violations of laws, rules, or regulations or any conduct that may be unethical or not permitted under this Code to any of the following:

- Employee's supervisor or manager
- Human Resource Department at (915) 543-2241
- Office of General Counsel at (915) 543-2018
- Safety Department (for matters involving safety issues) at (915) 351-4229
- Senior Vice President and Chief Compliance Officer at (915) 543-5797
- Any other member of Management
- EthicsPoint Hotline at (866) 384-4277 or www.ethicspoint.com

EthicsPoint Hotline provides an avenue for employees to anonymously and confidentially report violations of the Code or actual or suspected activities that involve unlawful or unethical conduct. EthicsPoint is available twenty-four (24) hours per day, seven (7) days per week at (866) 384-4277 or is accessible online at www.ethicspoint.com. Information on EthicsPoint is also located on the Company's intranet site. An anonymous report should provide enough information about the incident or situation to allow the Company to investigate properly. If concerns or complaints require confidentiality, including keeping an employee's identity anonymous, the Company will endeavor to protect this confidentiality, subject to applicable laws, regulations or legal proceedings. In certain situations, the person filing a complaint may have to disclose their own identity to allow the Company to conduct a proper investigation and remedy the situation. Nevertheless, in those situations the Company will work to limit the disclosure to those with a need to know.

Any concerns about violations of laws, rules, or regulations, or any conduct that may be unethical or impermissible under this Code, by any officer or director should be reported promptly to the Office of General Counsel. The Office of General Counsel is to notify the Nominating and Corporate Governance Committee of any violation.

The Company encourages all employees, officers and directors to report any suspected violations promptly so that it can thoroughly investigate them. You are expected to cooperate in internal investigations and failure to do so may implicate you if it is later determined that you participated in or covered up the misbehavior or had an obligation to act upon your knowledge of the situation and failed to do so.

The Company recognizes the need for this Code to be applied equally to everyone it covers. The Office of General Counsel will have primary authority and responsibility for the enforcement of this Code, subject to the supervision of the Nominating and Corporate Governance Committee, or, in the case of accounting, internal accounting controls or auditing matters, the Audit Committee of the Board of Directors.

WAIVERS AND AMENDMENTS

Any waivers of the provisions in this Code for any officers or directors may only be granted by the Board of Directors or the Nominating and Corporate Governance Committee and will be promptly disclosed to the Company's shareholders as required by federal law or applicable rules. Any waivers of this Code for other employees may only be granted by the Office of General Counsel. Amendments to this Code must be approved by the Board of Directors and amendments of the provisions in this Code applicable to the CEO and the senior financial officers will also be disclosed to the Company's shareholders.

Q. What types of issues can employees report to EPE's hotline, EthicsPoint?

A. Any potential or actual violations of law or Company policy can be reported through the Company hotline. However, employees are encouraged to report less serious issues or concerns to their supervisor or any of the other reporting channels listed in this section.



CODE OF ETHICS



EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-11: FUEL AND PURCHASED POWER
ASSUMPTIONS NARRATIVE
SPONSOR: DAVID C. HAWKINS
PREPARER: VICTOR MARTINEZ
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-11
PAGE 1 OF 1

Not applicable. El Paso Electric Company's fuel factor is based on a Commission approved formula and is not being changed in this proceeding.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-12: FOSSIL FUEL MIX
SPONSOR: DAVID C. HAWKINS
PREPARER: VICTOR MARTINEZ
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-12
PAGE 1 OF 1

Not applicable. El Paso Electric Company's fuel factor is based on a Commission approved formula and is not being changed in this proceeding.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-13: ETHICS – RELATIONSHIP WITH FUEL SUPPLIER
SPONSOR: DAVID C. HAWKINS
PREPARER: JESUS GONZALEZ
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-13
PAGE 1 OF 1

El Paso Electric Company ("EPE") has no knowledge of any current or former manager, executive, or director, nor does it have any knowledge of any affiliate of the Company who has been involved in any capacity with the management of any provider of fuel or fuel supply to EPE during the reconciliation period.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-14: FUEL AUDITS
SPONSOR: JAMES SCHICHTL
PREPARER: JULISSA I. REZA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-14
PAGE 1 OF 1

Gas Audits

<u>Company Audited</u>	<u>Services Provided</u>	<u>Period Audit Covered</u>	<u>Date Audit Completed</u>	<u>Audit Conducted By</u>
		None		

Nuclear Fuel Audits

<u>Company Audited</u>	<u>Services Provided</u>	<u>Period Audit Covered</u>	<u>Date Audit Completed</u>	<u>Audit Conducted By</u>
Arizona Public Service as Operating Agent for Palo Verde Generating Station	Audit of Palo Verde Nuclear Generating Station Operation and Maintenance, Capital Improvements, and Nuclear Fuel Costs	Year Ended 12/31/2018	January 28, 2020	Non-operating Palo Verde Participants coordinated by Los Angeles Department of Water and Power
Arizona Public Service as Operating Agent for Palo Verde Generating Station	Audit of Palo Verde Nuclear Generating Station Operation and Maintenance, Capital Improvements, and Nuclear Fuel Costs	Year Ended 12/31/2019	February 26, 2021	Non-operating Palo Verde Participants coordinated by Public Service Company of New Mexico

Coal Audits

<u>Company Audited</u>	<u>Services Provided</u>	<u>Period Audit Covered</u>	<u>Date Audit Completed</u>	<u>Audit Conducted By</u>
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NOTE: Not applicable as EPE sold its portion of the Four Corners plant in July 2016.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-15: FUEL CONTRACT ANALYSES
SPONSOR: DAVID C. HAWKINS
PREPARER: ZULMA I MOLINA
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-15
PAGE 1 OF 1

Not applicable. El Paso Electric Company is not requesting a fuel reconciliation in this proceeding.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-16: RECONCILABLE FUEL COSTS
SPONSOR: JENNIFER I. BORDEN / DAVID C. HAWKINS
PREPARER: ANA R. BOISSELIER
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-16
PAGE 1 OF 1

Not applicable. EPE has not included a fuel reconciliation in this proceeding.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-16.1: FOSSIL FUEL MIX (BURNED)
SPONSOR: JENNIFER I. BORDEN / DAVID C. HAWKINS
PREPARER: ANA R. BOISSELIER
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-16.1
PAGE 1 OF 1

Not applicable. EPE has not included a fuel reconciliation in this proceeding.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-16.2: FOSSIL FUEL MIX (PURCHASED)
SPONSOR: JENNIFER I. BORDEN / DAVID C. HAWKINS
PREPARER: ANA R. BOISSELIER
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-16.2
PAGE 1 OF 1

Not applicable. EPE has not included a fuel reconciliation in this proceeding.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-16.3 COMPETITIVE SPOT FOSSIL FUEL PURCHASES
SPONSOR: JENNIFER I. BORDEN / DAVID C. HAWKINS
PREPARER: ANA R. BOISSELIER
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-16.3
PAGE 1 OF 1

Not applicable. EPE has not included a fuel reconciliation in this proceeding.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-16.4: OTHER SPOT FOSSIL FUEL PURCHASES
SPONSOR: DAVID C. HAWKINS
PREPARER: MELANEE DURAN
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-16.4
PAGE 1 OF 1

Not applicable. El Paso Electric Company is not requesting a fuel reconciliation in this proceeding.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-17.1: COAL COST BREAKDOWN
SPONSOR: DAVID C. HAWKINS
PREPARER: ANA R. BOISSELIER
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-17.1
PAGE 1 OF 1

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
					----- OTHER HANDLING COSTS -----			
LINE NO.		COAL TONS	COAL \$ (R)	COAL \$ / TON d = c / b	RECLAMATION CHARGES \$ (R) \$ (NR)		HANDLING COSTS \$ (NR)	RESIDUAL WASTE \$ (NR)
TEST PERIOD (TP)			(1)		(2)	(1)	(3)	(3)
1	Jan 2020	0	0	0.00	55,044	0	0	0
2	Feb	0	0	0.00	55,044	0	0	0
3	Mar	0	0	0.00	55,044	0	0	0
4	Apr	0	0	0.00	55,044	0	0	0
5	May	0	0	0.00	55,044	0	0	0
6	Jun	0	0	0.00	55,044	0	0	0
7	Jul	0	0	0.00	55,044	0	0	0
8	Aug	0	0	0.00	55,044	0	0	0
9	Sep	0	0	0.00	55,044	0	0	0
10	Oct	0	0	0.00	55,044	0	0	0
11	Nov	0	0	0.00	55,044	0	0	0
12	Dec	0	0	0.00	55,044	0	0	0
13	Total TP	0	0	0.00	660,528	0	0	0

Notes:

- (1) Coal costs ended in July 2016 due to sale of EPE's share in Four Corners Station.
- (2) Includes recovery of coal reclamation costs in Texas pursuant to PUC Docket No. 46308 of \$55,044 per month.
- (3) Non-Reconcilable (non-eligible) fuel costs per the Texas fuel rule are recovered through Texas base rates.

(R) Reconcilable (eligible) fuel cost.
(NR) Non-Reconcilable (non-eligible) fuel cost.

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

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-17.2: LIGNITE COST BREAKDOWN
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-17.2
PAGE 1 OF 1

This schedule is not applicable to EPE. EPE does not use lignite as a fuel source.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-17.3: COAL COST BREAKDOWN
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-17.3
PAGE 1 OF 1

This schedule is not applicable to EPE. EPE sold its ownership interest in the Four Corners Project Units 4 and 5 coal-fired generating station on July 6, 2016.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-18: COAL AND LIGNITE SUPPLIER LOCATIONS
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-18
PAGE 1 OF 1

This schedule is not applicable to EPE. EPE sold its ownership interest in the Four Corners Project Units 4 and 5 coal-fired generating station on July 6, 2016. Furthermore, EPE does not utilize lignite as a fuel source.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-19.1: RAIL HAUL DISTANCE
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-19.1
PAGE 1 OF 1

This schedule is not applicable to EPE because EPE does not utilize trains.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-19.2: UNIT TRAINS
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-19.2
PAGE 1 OF 1

This schedule is not applicable to EPE because EPE does not utilize trains.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-19.3: CYCLE TIME
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-19.3
PAGE 1 OF 1

This schedule is not applicable to EPE because EPE does not utilize trains.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-19.4: RAIL CARS
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-19.4
PAGE 1 OF 1

This schedule is not applicable to EPE because EPE does not utilize rail cars.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-19.5: RAIL CAR LEASES
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-19.5
PAGE 1 OF 1

This schedule is not applicable to EPE because EPE does not utilize rail cars.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-19.6: RAIL CAR MAINTENANCE
SPONSOR: DAVID C. HAWKINS
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-19.6
PAGE 1 OF 1

This schedule is not applicable to EPE because EPE does not utilize rail cars.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-19.7: RAIL CAR REPAIRS
SPONSOR: J KYLE OLSON
PREPARER: DANIEL BELL
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-19.7
PAGE 1 OF 1

This schedule is not applicable to El Paso Electric Company.

EL PASO ELECTRIC COMPANY
2021 TEXAS RATE CASE FILING
SCHEDULE I-20: FUEL MANAGEMENT TRAVEL
SPONSOR: JENNIFER I. BORDEN
PREPARER: ALEJANDRA MONTALVO
FOR THE TEST YEAR ENDED DECEMBER 31, 2020

SCHEDULE I-20
PAGE 1 OF 1

There were no expenses incurred for overnight travel to non-company facilities charged to any reconcilable fuel account. These expenses are charged to various A&G accounts.

PUBLIC

It is EPE's continuous goal to improve the operation of its system by incorporating fuel programs and projects that enhance the provision of reliable, high-quality, low-cost electric service to its customers.

EPE's fuel strategy is to maintain an economical and reliable fuel supply for all its generation assets. This is accomplished by utilizing a portfolio-based fuel procurement strategy that encompasses a combination of long-term, monthly, and spot market fuel supply contracts, when feasible. EPE maintains transportation contracts that allow EPE to use multiple suppliers and multiple transportation providers to control costs.

EPE purchases natural gas under various contractual arrangements for EPE's local gas-fired units located at Rio Grande Power Plant, Newman Power Plant, Montana Power Station (MPS) and Copper. These arrangements include long-term, mid-term and spot market contracts utilizing either indexed or fixed pricing terms to implement a portfolio strategy. EPE's portfolio strategy is designed to help mitigate the volatility of natural gas prices while maintaining a reliable supply. EPE utilizes a spot and monthly competitive bid procurement program for its interstate and intrastate gas supply to procure gas volumes on a "least-cost" basis and to ensure efficient and reliable service. In addition, EPE enters fixed-price interstate gas contracts for periods greater than one month if gas prices are expected to be at risk of increasing over the term. As such, EPE utilizes its portfolio approach to combine short-term market-based gas prices with longer-term fixed prices as part of its efforts to help mitigate the effects of any large price swings over the short- and long-term due to uncertainties such as national storage levels, winter (cold) / summer (heat, hurricanes) weather, supply production, and general economy supply/demand issues.

Since March 31, 2019, the end of EPE's last fuel reconciliation Docket No. 50058, EPE engaged in fixed-price interstate natural gas mid-term contracts (MTC) that reduced fuel costs in the April 2020 - October 2020 months. EPE leveraged a notably weak natural gas market in the Southwest caused by concerns of growing production outpacing export and consumption capability in the Permian Basin region.¹ As a result, EPE procured a total of CONFIDENTIAL Dth/day at a weighted cost of CONFIDENTIAL/Dth. Of the total MTC gas purchases for April 2020 - October 2020, CONFIDENTIAL Dth/day were purchased at a negotiated price of CONFIDENTIAL/Dth. This was an 85% decrease from previous year, MTC gas purchases for a similar period. When compared to the daily Waha Basin Index price, EPE realized a fuel cost savings of approximately CONFIDENTIAL million for the April 2020 - October 2020 period.

The nuclear fuel cycle involves several steps over a period of 18 months, various vendors at different locations, and sequential coordination of material and service deliveries. These steps include: (1) the purchase of triuranium octaoxide ("U₃O₈"), a powder, also referred to as "yellowcake"; (2) the conversion of the U₃O₈ to uranium hexafluoride ("UF₆"), a gas, via conversion services; (3) the enrichment of the UF₆ to obtain an appropriate percentage of the isotope U₂₃₅ to create the desired amount of enriched uranium product ("EUP") via enrichment services; (4) the fabrication of the EUP into fuel assemblies via fabrication services; and finally

¹ S&P Global Market Intelligence, "Low gas prices continue to affect oil, gas producers amid cold weather"