



## Filing Receipt

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

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**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

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

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

**Definitions and Explanatory Notes**

1. When a request calls for identification of a "person or witness," the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or summaries or other records of meetings and

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

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

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

Respectfully submitted,

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

Alton J. Hall, Jr.

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

**CERTIFICATE OF SERVICE**

I hereby certify that on October 8, 2021, a true and correct copy of the foregoing document was served via-email upon on all parties of record.

/s/ Alton J. Hall, Jr.

Alton J. Hall, Jr.

## **SIXTH REQUEST FOR INFORMATION**

- 6-1. Please refer to Attachment 1 (Highly Sensitive Protected Material) of EPE's response to UTEP's third set of RFI, RFI No. 3-1 and provide the calculation (as shown in Attachment 1) based on the billing determinants for 2019, instead of the 2020 billing determinants.
- 6-2. Please perform a detailed bill impact analysis for UTEP accounts, taking service under the General Service rate class (Rate 24) and comparing the rates these accounts paying to the proposed rates. Please include:
  - a. A detailed calculation showing how the current bills and the proposed bills for the total of all of UTEP's accounts in Rate 24 are determined;
  - b. The calculation based on the consolidated billing determinants for all of UTEP's Rate 24 accounts. In the calculation, please provide all of the information, including monthly consolidated bill determinants, to calculate the current and proposed total base charges.
  - c. Show the calculation and all of the consolidated billing determinants in an excel spreadsheet format similar to that of Attachment 1 (Highly Sensitive Protected Material) of EPE's response to UTEP's third set of RFI, RFI No. 3-1.
- 6-3. Please refer to lines 12 to 13 of page 53 of the testimony of Mr. Manuel Carrasco and answer the following questions:
  - a. Are the customers applying the new service for Thermal Energy Storage ("TES") rider required to install new thermal energy storage systems?
  - b. Does EPE have any incentive programs to help the customers to install TES systems?
  - c. If the answer to (b) is yes, please identify the relevant incentive programs.
- 6-4. Please refer to EPE's response to UTEP's first set of RFI, RFI No. 1-6 and answer the following questions:
  - a. Do any of the following EPE Energy Efficiency Programs provide financial assistance to Rate 25 customers to install thermal energy storage systems to reduce its peak demand usage?
    - i. Large Commercial & Industrial Solution MTP
    - ii. Texas Score MTP
    - iii. The Commercial Load Management SOP
  - b. If the answer to (a) is yes, please identify the programs that would provide financial assistance for Rate 25 customers to install TES and how the financial assistance would be determined.
- 6-5. Please refer to EPE's response to UTEP's first set of RFI, RFI No. 1-6 and answer the following questions:
  - a. Does UTEP currently participate in any of the following EPE Energy Efficiency Programs?

- i. Large Commercial & Industrial Solution MTP
  - ii. Texas Score MTP
  - iii. The Commercial Load Management SOP
- b. If the answer to (a) is yes, please identify the programs that EPE is currently participating and the amount of financial incentive that EPE has received in 2020 and in 2021, respectively.
- c. For the programs that are available for UTEP and are not participated by UTEP, has EPE approached UTEP for its participation of these programs?
- d. If the answer to (c) is no, please explain why.
- e. If the answer to (c) is yes, please explain why UTEP is not participating these programs even the programs are available for UTEP.