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

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO  
THE UNIVERSITY OF TEXAS AT EL PASO'S  
FOURTH REQUEST FOR INFORMATION  
QUESTION NOS. UTEP 4-1 THROUGH UTEP 4-2

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UTEP 4-1:

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

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

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

- ii. Please provide the number of Large Power customers who receive the incentives in each of the three programs
- iii. Please provide the identify of each of these customers and the incentive for each of these customers.
- iv. Please explain if these customers' participation is on a voluntary basis and how the customers were made aware of these programs.

- v. Please explain in detail how the incentive percentage for each of the three energy efficiency programs as shown in the following table were determined:

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

**RESPONSE:**

- a. For a detailed explanation of the Large C&I Solutions Market Transformation Program (“MTP”), please refer to the program manual included on the El Paso Electric (“EPE”) website at <https://www.epelectric.com/save-money-and-energy/energy-efficiency-filings>. Also refer to the Public Utility Commission of Texas (“PUCT”)-approved Technical Reference Manual (“TRM”) at <https://www.epelectric.com/save-money-and-energy/energy-efficiency-filings>. Based on the methodologies for each measure in the TRM, and as verified by the Evaluation Measurement & Verification (“EM&V”) evaluator, the savings of 4,089,431 kWh were achieved.
- b. For a detailed explanation of the Texas SCORE MTP, please refer to the program manual included on the EPE website at <https://www.epelectric.com/save-money-and-energy/energy-efficiency-filings>. Also refer to the PUCT-approved TRM at <https://www.epelectric.com/save-money-and-energy/energy-efficiency-filings>. Based on the methodologies for each measure in the TRM, and as verified by the EM&V evaluator, the savings of 550,785 kWh were achieved.
- c. i. As shown in the Large C&I Solutions MTP and the Texas SCORE MTP program manuals, the incentive for eligible energy efficiency measures is computed by multiplying the average demand kW savings achieved by the incentive rate of \$240 per peak kW reduced, except for HVAC tune-up measures, which is a measure in many of the EPE energy efficiency programs and has an incentive rate structure based on the capacity of the unit and the type of tune-up performed. Commercial Load Management Standard Offer Program (“SOP”) incentives are computed by multiplying the average demand kW savings achieved by the incentive rate. As shown in the Commercial Load Management SOP manual, the incentive is capped at \$48 per kW for average demand kW savings achieved, not to exceed the participant’s contracted demand kW savings. Please refer to the program manual included on the EPE website at <https://www.epelectric.com/save-money-and-energy/energy-efficiency-filings>.
- ii. Eleven Customers received the \$325,531.44 of incentives in the Large C&I Solution MTP, one customer received the \$36,724.80 of incentives in the Texas SCORE MTP and ten Customers received the \$400,553.28 of incentives in the Commercial Load Management SOP.

- iii. Please see UTEP 4-1, Attachment 1 - Highly Sensitive Protected Materials.
- iv. Participation in the three energy efficiency programs for the Large Power customers is on a voluntary basis. Customers are made aware of these programs through annual kick-off meetings and via the EPE website. The use of the EPE website is one of the primary methods of communication to provide potential project sponsors and customers with program information. EPE also offers occasional outreach workshops.

Commercial Load Management SOP customers are notified through the EPE website and past participants are notified via email when the program is open for enrollment.

- v. The incentive percentage of 38% for the Large C&I Solution MTP for the Large Power customers was determined by dividing the incentives paid to Rate Class TXRT25 for the Large C&I Solution MTP (\$325,531.44) by the total incentives paid for the Large C&I Solution MTP (\$865,569.60) with rounding.

The incentive percentage of 13% for the Texas SCORE MTP for the Large Power customers was determined by dividing the incentives paid to Rate Class TXRT25 for the Texas SCORE MTP (\$36,724.80) by the total incentives paid for the Texas SCORE MTP (\$285,883.68) with rounding.

The incentive percentage of 95% for the Commercial Load Management SOP for the Large Power customers was determined by dividing the incentives paid to Rate Class TXRT25 for the Commercial Load Management SOP (\$400,553.28) by the total incentives paid for the Commercial Load Management SOP (\$423,754.08) with rounding.

Preparer: Geoffrey L. Becker

Title: Energy Efficiency Accountant

Sponsor: Manuel Carrasco

Title: Manager – Rate Research

PUBLIC

UTEP 4-1 Attachment 1 is a CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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UTEP 4-2:

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

RESPONSE:

The present revenues for each calendar year from 2016-2019, as shown in the Attachment 1 to the response to VS 1-27, were determined from El Paso Electric Company's ("EPE") monthly billing records for its Texas retail jurisdiction and as recorded in EPE's book and records. Each month, at the closing of its books, a complete extract of the billing units and dollar amounts billed at each premise served is provided by EPE's Customer Information Systems department. EPE's Revenue Accounting department also provides billing data, but to a much lesser extent. The billing data from both departments is then summarized by the Rate Research team, including by the retail customer classes listed in VS 1-27, Attachment 1.

Preparer: Manuel Carrasco

Title: Manager – Rate Research

Sponsor: Manuel Carrasco

Title: Manager – Rate Research

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

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**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

**CONFIDENTIALITY STATEMENT UNDER  
SECTION 4 OF THE PROTECTIVE ORDER**

The undersigned attorney for El Paso Electric Company (EPE) submits this statement under section 4 of the Protective Order entered in this case. Materials provided in the responses to the following questions in University of Texas El Paso's fourth set of discovery are exempt from public disclosure pursuant to section and 552.101 of the Texas Government Code and Public Utility Regulatory Act (PURA)<sup>1</sup> § 32.101(c):

UTEP 4-1	UTEP 4-1, Attachment 1 HSPM
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Information is excepted from disclosure if it is information considered to be confidential by law.<sup>2</sup> PURA § 32.101(c) requires the Commission to consider customer names and usage information as highly sensitive trade secrets not subject to disclosure under Chapter 552, Government Code. The information contained in UTEP 4-1, Attachment 1 HSPM contains customer names and usage information.

Respectfully submitted,

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<sup>1</sup> Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016.

<sup>2</sup> Tex. Gov't. Code Ann. § 552.101.



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**ATTORNEYS FOR EL PASO ELECTRIC  
COMPANY**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served by email on all parties of record on October 11, 2021.

  
Laura B. Kennedy