



## Filing Receipt

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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  
TEXAS INDUSTRIAL ENERGY CONSUMERS'  
EIGHTH REQUEST FOR INFORMATION  
QUESTION NOS. TIEC 8-1 THROUGH TIEC 8-8

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TIEC 8-1:

Please provide the Effective Load Carrying Capability (ELCC) of the following solar resources, expressed as a percentage of nameplate capacity:

- a. Hatch
- b. NRG
- c. Sun Edison 1
- d. Sun Edison 2
- e. Rio Grande solar
- f. Holloman
- g. Wrangler
- h. Stanton Tower
- i. EPCC
- j. Van Horn
- k. Newman carport
- l. Newman 10
- m. Macho Springs

RESPONSE:

The Effective Load Carrying Capability (“ELCC”) value for all the listed resources in 2022, as calculated in El Paso Electric Company’s 2021 Integrated Resource Plan, was 54% of the nameplate capacity. ELCC is not developed for individual resources, since it is a function of the characteristics of all of the cumulative solar resources at a given point in time. Please reference EPE’s response to CEP 13-29, Attachment 1, page 310 of 379.

Preparer: Omar Gallegos

Title: Senior Director – Resource Planning  
Management

Sponsor: David C. Hawkins

Title: Vice President – Strategy and  
Sustainability

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TIEC 8-2:

Please provide the imputed capacity charges for the Macho Springs PPA and the Newman 10 PPA requested in this case, on a \$ per-kW basis and provide the Total Company and Texas-allocated revenue requirement associated with the imputed capacity.

RESPONSE:

Please refer to TIEC 8-2, Attachment 1.

Preparer: Melody Boisselier

Title: Principal Accountant – Regulatory  
Accounting

Sponsor: Jennifer I. Borden  
Adrian Hernandez

Title: Director – Regulatory Accounting  
Senior Rate Analyst – Rates

EL PASO ELECTRIC COMPANY  
FOR THE TEST YEAR ENDED DECEMBER 31, 2020  
IMPUTED DEMAND CHARGES

SOAH Docket No. 473-21-2606  
PUC Docket No. 52195  
TIEC's 8th, Q. No. TIEC 8-2  
Attachment 1  
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(a)		(b)		(c)	(d)	(e)
Line No.	Month	Imputed Demand Charge Macho Springs	(A)	Imputed Demand Charge Newman Solar (B)	Total Company (C)	Texas Jurisdiction (D)
1	January 2020	\$	117,500	\$ 23,300	\$ 140,800	
2	February		117,500	23,300	140,800	
3	March		117,500	23,300	140,800	
4	April		117,500	23,300	140,800	
5	May		117,500	23,300	140,800	
6	June		117,500	23,300	140,800	
7	July		117,500	23,300	140,800	
8	August		117,500	23,300	140,800	
9	September		117,500	23,300	140,800	
10	October		117,500	23,300	140,800	
11	November		117,500	23,300	140,800	
12	December		117,500	23,300	140,800	
13	Total Imputed Demand Charges	\$	1,410,000	\$ 279,600	\$ 1,689,600	\$ 1,371,296

(A) - Represents Macho Springs Imputed Demand @ \$2.35 x 50,000 KW

(B) - Represents NewSol Imputed Demand @ \$2.33 x 10,000 KW

(C) - Refer to the testimony of EPE Witness Hawkins for discussion of imputed demand charges

(D) - Test year amount is allocated with D1PROD allocator in the cost of service.

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TIEC 8-3:

Please provide the workpapers in Excel format that were used to derive the Macho Springs PPA and Newman 10 PPA imputed capacity charges per kW.

RESPONSE:

Please see El Paso Electric Company's response to FMI 1-5a., Attachments 1 and 2.

Preparer: Jesus S. Gonzalez

Title: Manager – Day Ahead & Long-Term  
Trading

Sponsor: David C. Hawkins

Title: Vice President – Strategy & Sustainability

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TIEC 8-4:

Please provide the workpapers in Excel format used to derive the Macho Springs PPA and Newman 10 PPA revenue requirements.

RESPONSE:

Please refer to El Paso Electric Company's response to TIEC 8-2.

Preparer: Melody Boisselier

Title: Principal Accountant – Regulatory  
Accounting

Sponsor: Jennifer I. Borden  
Adrian Hernandez

Title: Director – Regulatory Accounting  
Senior Rate Analyst – Rates

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TIEC 8-5:

Please explain the method utilized by EPE to derive the Macho Springs PPA and Newman 10 PPA imputed capacity charges per kW.

RESPONSE:

Please see El Paso Electric Company's response to FMI 1-5a.

Preparer: Jesus S. Gonzalez

Title: Manager – Day Ahead & Long-Term  
Trading

Sponsor: David C. Hawkins

Title: Vice President – Strategy & Sustainability



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TIEC 8-6:

Please confirm that customers served at 115 kV voltage (i.e. Rate 25 T/115, Rate 26, Rate 30 T/115, Rate 31, and Rate 38 115 kV customers) do not utilize EPE's 69 kV lines. If denied, please explain how EPE's 69 kV lines are directly utilized in the provision of service to customers served at 115 kV.

RESPONSE:

The 115 kV and 69 kV transmission systems are part of an interconnected system. Power flowing to customers taking service at transmission voltages (115 kV or 69 kV) can easily flow from the 69 kV system to the 115 kV system, or conversely, from the 115 kV system to the 69 kV system, depending on the system configuration at any point in time. Therefore, the power flowing to a customer taking transmission service at 115 kV could be utilizing a path that includes the 69 kV system, along with the 115 kV system.

Refer to El Paso Electric Company ("EPE") witness Adrian Hernandez's direct testimony (page 11, lines 12 to 13) for EPE's cost allocation approach.

Preparer: Darcy Welch

Title: Supervisor – Financial Analysis and  
Planning

Sponsor: R. Clay Doyle

Title: Vice President – Transmission and  
Distribution

Adrian Hernandez

Senior Rate Analyst – Rates

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TIEC 8-7:

Please refer to WP A-03, Adjustment No. 01 – Revenues & Uncollectibles, the “Uncollectibles P2” tab.

- a. Please explain why EPE uses the uncollectible rate of 0.003609 (cell H42) to calculate the uncollectibles adjustment for requested revenues instead of the uncollectible rate of 0.002592 (cell E42).
- b. Please confirm that EPE calculates the uncollectibles adjustment for requested revenues using the uncollectible rate that includes the COVID uncollectibles expense of \$803,227.

RESPONSE:

- a. This was an oversight that will be corrected in rebuttal. The correct rate is 0.002592. Please refer to El Paso Electric Company (“EPE”) witness Jennifer Borden’s direct testimony (page 6, lines 1 to 9).
- b. Confirm. The incorrect rate of 0.003609 includes COVID uncollectible expense of \$803,227. As stated in part a, EPE will correct the rate in rebuttal testimony to exclude the \$803,227, making the correct rate 0.002592.

Preparer: Adrian Hernandez

Title: Senior Rate Analyst – Rates

Sponsor: Jennifer I. Borden

Title: Director – Regulatory Accounting

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TIEC 8-8:

Please refer to EPE's response to RFI TIEC 5-1.

- a. According to EPE's response to RFI TIEC 5-1, each of the COVID-19 costs are allocated among EPE's jurisdictions and none are directly assigned to Texas. Please explain why the entire unamortized balance of the COVID-19 regulatory asset (i.e., the \$5,563,548.95 "182399-TX-PANDEMIC REG ASSETS" item shown on row 3058 of the Jurisdiction Allocation tab of EPE Regulatory Case Working Model - As Filed - Dkt 52195) is directly assigned to Texas.
- b. Does EPE agree that the COVID-19 regulatory asset should be allocated between jurisdictions instead of directly assigned to Texas? If so, please provide the amount of the unamortized COVID-19 regulatory asset that EPE believes should be allocated to Texas and the amount that should be allocated to the OTHER jurisdictions.

RESPONSE:

- a. The amount in account "182399-TX-PANDEMIC REG ASSETS" should have only included the Texas amount, but it does appear to be the total company amount. El Paso Electric Company ("EPE") will move the total company balance to another account to properly allocate the total company amount in its rebuttal cost of service.
- b. Yes. Using the LABOR allocator, the Texas amount would be \$4,392,119.55 and the amount allocated to "Other" would be \$1,171,429.40 at this point in time. EPE will make the change in its rebuttal cost of service.

Preparer: Adrian Hernandez

Title: Senior Rate Analyst – Rates

Sponsor: Adrian Hernandez

Title: Senior Rate Analyst – Rates

The following files are not convertible:

TIEC 08-02\_Attachment 1.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.