



Filing Receipt

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SOAH DOCKET NO. 473-21-2606

PUC DOCKET NO. 52195

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

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§**

**BEFORE THE
STATE OFFICE OF
ADMINISTRATIVE HEARINGS**

WORKPAPERS TO

DIRECT TESTIMONY OF

SCOTT NORWOOD

ON BEHALF OF

THE CITY OF EL PASO

OCTOBER 25, 2021

SOURCE: CEP 1-11

<u>Generating Station</u>	<u>2016-2019 Avg O&M</u>	<u>TY Adjusted O&M</u>
Newman	\$29,127,246	\$33,076,042
Rio Grande (Steam)	\$10,673,570	\$10,644,887
Rio Grande ((CT)	\$1,334,957	\$1,739,816
Copper (CT)	\$472,615	\$971,816
Montana (CT)	\$5,830,335	\$8,698,615
Hueco Wind and Solar	<u>\$131,375</u>	<u>\$378,642</u>
	\$47,570,097	\$55,509,818

Recommended Adjustments

<u>Adjustment</u>	<u>FERC Account</u>	<u>Adjustment</u>	<u>In-Service Date</u>	<u>Depreciation Rate</u>	<u>Source</u>
1. Production O&M Expense (Total Co)					
Newman	512 - Maintenance of Boiler Plant	-\$996,915			CEP 1-11
Newman	513 - Maintenance of Electric Plant	-\$2,000,600			CEP 1-11
Copper	553 - Maintenance of Generating & Electric Plant	-\$495,340			CEP 1-11
Montana	553 - Maintenance of Generating & Electric Plant	<u>-\$2,546,419</u>			CEP 1-11
Subtotal Production O&M		-\$6,039,273			
2. Transmission O&M Expense (Total Co)	566 - Miscellaneous Transmission Expense	-\$2,389,050			CEP 1-14
3. Gas Turbine Spares (Rate Base, Total Co)					
LMS100 Power Turbine	343 - Other Production Prime Movers	-\$5,737,590	N/A	2.27%	CEP 5-34
LMS100 Booster	343 - Other Production Prime Movers	<u>-\$1,894,232</u>	N/A	2.27%	CEP 5-35
Subtotal GT Spares		-\$7,631,822			
4. Distribution Reliability Projects (Rate Base, TexRetail)					
DT359 - NUWAY	362 - Distribution Station Equipment	-\$10,331,928	12/17/19	1.33%	CEP 8-3
DT186 - LEO Sub	362 - Distribution Station Equipment	-\$3,214,808	3/23/17	1.33%	CEP 8-3
DT382 - Ripley T2 XFMR	362 - Distribution Station Equipment	-\$1,216,948	7/18/19	1.33%	CEP 8-3
DT379 - Pendale T2 XFMR	362 - Distribution Station Equipment	-\$1,731,086	12/6/19	1.33%	CEP 8-3
DT291 - Global Reach T2	362 - Distribution Station Equipment	-\$1,465,267	8/2/18	1.33%	CEP 8-3
DT184 - Rio Bosque Capacitor Bank	362 - Distribution Station Equipment	<u>-\$1,889,566</u>	5/15/19	1.33%	CEP 8-3
Subtotal Reliability Projects		-\$19,849,603			

SOURCE: CEP 1-11

<u>Generating Station</u>	<u>2016-2019 Avg O&M</u>	<u>TY Adjusted O&M</u>
Newman	\$29,127,246	\$33,076,042
Rio Grande (Steam)	\$12,008,527	\$12,384,703
Montana	\$5,830,335	\$8,698,615
Copper	\$472,615	\$971,816
Hueco Wind and Solar	<u>\$131,375</u>	<u>\$378,642</u>
	\$47,570,097	\$55,509,818
Rio Grande (Steam)	\$10,673,570	\$10,644,887
Rio Grande (CT)	<u>\$1,334,957</u>	<u>\$1,739,816</u>
Rio Grande (Total)	\$12,008,527	\$12,384,703

<u>TY O&M Increase</u>	<u>TY Increase</u>
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\$3,948,796	13.6%
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\$376,176	3.1%
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\$2,868,280	49.2%
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\$499,201	105.6%
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<u>\$247,267</u>	<u>188.2%</u>
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\$7,939,721	16.7%
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-\$28,683	-0.3%
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<u>\$404,859</u>	<u>30.3%</u>
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\$376,176	3.1%
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SOURCE: EPE'S RESPONSE TO CEP 1-11

<u>FERC Acct.</u>	<u>Description</u>	<u>2017-19 Avg</u>
500000	Operation Supervision & Engineering	\$1,281,684
502000	Steam Expenses	\$1,453,427
505000	Electric Operating Expenses	\$3,415,907
506000	Miscellaneous Steam Power Expenses	\$1,930,280
507000	Rents	\$485,258
	Total Operations Expense	\$8,566,556
	<u>Maintenance Expense</u>	
510000	Maintenance Supervision & Engineering	\$1,412,021
511000	Maintenance of Structures	\$934,630
512000	Maintenance of Boiler Plant	\$5,487,916
513000	Maintenance of Electric Plant	\$10,695,360
514000	Maintenance of Miscellaneous Steam Plant	\$2,030,762
	Total Maintenance Expense	\$20,560,690
	Total Steam Power Generation Expense-Newm:	\$29,127,246

TBL 2		
<u>FERC Acct.</u>	<u>Description</u>	<u>2016-19 Avg</u>
505000	Electric Operating Expenses	\$3,415,907
512000	Maintenance of Boiler Plant	\$5,487,916
513000	Maintenance of Electric Plant	\$10,695,360

<u>FERC</u>	<u>Description</u>	<u>2017-19 AVG</u>
<u>Acct.</u>		

546000	Operation Supervision & Engineering	\$535,280
548000	Generation Expenses	\$1,002,022
549000	Misc. Other Power Generation Expenses	\$1,136,780
550000	Rents	\$68,673
	Total Operations Expense	\$2,742,755
	<u>Maintenance Expense</u>	
551000	Maintenance Supervision & Engineering	\$32,131
552000	Maintenance of Structures	\$80,999
553000	Maintenance of Generating & Electric Plant	\$2,525,303
554000	Maintenance of Miscellaneous Other Power	\$449,146
	Total Maintenance Expense	\$3,087,580
	Total Other Power Generation Expense-MPS	\$5,830,335

TBL 3		
<u>FERC Acct.</u>	<u>Description</u>	<u>2017-19 Avg</u>
553000	Maintenance of Generating & Electric Plant	\$2,525,303

<u>FERC</u>		
<u>Acct.</u>	<u>Description</u>	<u>2016-19 AVG</u>
	<u>Other Power Generation Expenses</u>	
546000	Operation Supervision & Engineering	\$0
548000	Generation Expenses	\$4
549000	Misc. Other Power Generation Expenses	\$81,265
550000	Rents	<u>\$871</u>

Total Operations Expense	<u>\$82,140</u>
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Maintenance Expense

551000	Maintenance Supervision & Engineering	\$655
552000	Maintenance of Structures	\$6,115
553000	Maintenance of Generating & Electric Plant	\$351,937

TBL 4

<u>FERC Acct.</u>	<u>Description</u>	<u>2016-19 Avg</u>
553000	Maintenance of Generating & Electric Plant	\$351,937

<u>Test Year Req.</u>	<u>Test Year Increase</u>	<u>Percent Increase</u>	
\$1,265,292	-\$16,392	-1.3%	
\$1,475,034	\$21,607	1.5%	
\$4,619,548	\$1,203,641	35.2%	<u>Newman Station</u>
\$2,268,058	\$337,778	17.5%	
\$655,198	\$169,940	35.0%	
<u>\$0</u>			
<u>\$10,283,130</u>	\$1,716,574	20.0%	

\$1,192,782	-\$219,239	-15.5%
\$901,531	-\$33,099	-3.5%
\$6,484,831	\$996,915	18.2%
\$12,695,960	<u>\$2,000,600</u>	18.7%
\$1,517,808	-\$512,954	-25.3%
<u>\$22,792,912</u>	\$2,232,222	10.9%
<u><u>\$33,076,042</u></u>	\$3,948,796	13.6%
Newman Adj	\$2,997,515	

<u>Test Year Req.</u>	<u>Test Year Increase</u>	<u>Percent Increase</u>
\$4,619,548	\$1,203,641	35.2%
\$6,484,831	\$996,915	18.2%
\$12,695,960	<u>\$2,000,600</u>	18.7%
Total:	\$4,201,156	

Test Year #REF!	TY vs Avg Change	TY ADJ INCREASE
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\$4,201,156

\$661,538	\$126,258	23.6%
\$914,450	-\$87,572	-8.7%
\$745,919	-\$390,861	-34.4%
<u>\$187,358</u>	<u>\$118,685</u>	<u>172.8%</u>
<u>\$2,509,265</u>	<u>-\$233,490</u>	<u>-8.5%</u>

\$197,408	\$165,277	514.4%	
\$219,319	\$138,320	170.8%	
\$5,071,722	\$2,546,419	100.8%	<u>Montana Station</u>
<u>\$700,901</u>	<u>\$251,755</u>	<u>56.1%</u>	
<u>\$6,189,350</u>	<u>\$3,101,770</u>	<u>100.5%</u>	
<u><u>\$8,698,615</u></u>	<u>\$2,868,280</u>	<u>49.2%</u>	

Montana Adj: \$2,546,419

<u>Test Year Req.</u>	<u>Test Year Increase</u>	<u>Percent Increase</u>
\$5,071,722	\$2,546,419	100.8%

Test Year Adjusted	TY vs Avg Change	TY Adj Increase
\$0	\$0	#DIV/0!
\$1,454	\$1,450	36250.0%
\$38,473	-\$42,792	-52.7%
<u>\$3,579</u>	<u>\$2,708</u>	<u>310.9%</u>

	\$0	
<u>\$43,506</u>	-\$38,634	<u>-47.0%</u>
	\$0	
	\$0	
	\$0	
\$3,560	\$2,905	443.7%
\$36,537	\$30,422	497.5%
\$847,276	\$495,340	140.7%
Total Increase	\$7,242,915	

Copper Station

Copper Adj. \$495,340

<u>Test Year Req.</u>	<u>Test Year Increase</u>	<u>Percent Increase</u>
\$847,276	\$495,340	140.7%

CEP 1-4

TBL 5

	<u>2016-2019 Avg</u>	<u>2020 TY</u>
<u>Newman</u>		
Forced Outage Hours	6,306	5,016
Planned Outage Hours	<u>10,714</u>	<u>15,197</u>
Total Outage Hours	17,020	20,212
<u>Montana</u>		
Forced Outage Hours	745	518
Planned Outage Hours	<u>3,278</u>	<u>4,656</u>
Total Outage Hours	4,023	5,174
<u>Copper</u>		
Forced Outage Hours	182	3,567
Planned Outage Hours	<u>522</u>	<u>320</u>
Total Outage Hours	705	3,887

CEP 1-4

FORCED OUTAGE HOURS

	2020
Copper	3567.40
Montana 1	39.95
Montana 2	229.60
Montana 3	216.18
Montana 4	31.92
Newman 1	818.58
Newman 2	28.58
Newman 3	959.97
Newman 4-GT1	1271.23
Newman 4-GT2	876.42
Newman 4-ST	915.85
Newman 5-GT3	93.47
Newman 5-GT4	10.57
Newman 5-ST	40.97

Rio Grande 6	0.00
Rio Grande 7	3930.05
Rio Grande 8	1113.85
Rio Grande 9	5.55
PVGS 1	0.00
PVGS 2	98.00
PVGS 3	197.00

PLANNED OUTAGE HOURS

	2020
Copper	319.50
Montana 1	681.55
Montana 2	633.59
Montana 3	2690.01
Montana 4	650.93
Newman 1	1295.20
Newman 2	651.80
Newman 3	1245.93
Newman 4-GT1	3249.69
Newman 4-GT2	3698.45
Newman 4-ST	3227.58
Newman 5-GT3	636.69
Newman 5-GT4	660.60
Newman 5-ST	530.68
Rio Grande 6	0.00
Rio Grande 7	99.20
Rio Grande 8	1284.95
Rio Grande 9	3271.48
PVGS 1	1311.00
PVGS 2	749.00
PVGS 3	0.00

2020 TY Increase

-20%

42%

19%

-31%

42%

29%

1858%

-39%

452%

Source: CEP 1-14

TBL6	
<u>Description</u>	<u>2016-19 AVG</u>
Operations Excluding Wheeling (Acct 565)	\$12,574,940
Maintenance	<u>\$2,339,220</u>
Total O&M Excluding Wheeling	\$14,914,160

Test Year <u>Adjusted</u>	<u>TY vs Avg</u>	<u>TY vs Avg</u>
\$15,170,298	\$2,595,358	20.6%
<u>\$1,892,982</u>	<u>-\$446,238</u>	<u>-19.1%</u>
\$17,063,280	\$2,149,120	14.4%

CEP 1-14

TBL7

<u>FERC Acct.</u>	<u>Description</u>	<u>2016-19 AVG</u>
566000	Miscellaneous Transmission Expenses	\$6,660,057

Test Year

Adjusted

\$9,049,107

TY vs Avg

\$2,389,050

TY vs Avg

35.9%

TBL8 & 9		
<u>Projects</u>	<u>Cost Requested</u>	<u>Budget Overage</u>
DT359 - NUWAY	\$14,431,157	\$10,331,928
DT186 - LEO Sub	\$6,899,678	\$3,214,808
DT382 - Ripley T2 XFMR	\$3,397,392	\$1,216,948
DT379 - Pendale T2 XFMR	\$3,351,288	\$1,731,086
DT291 - Global Reach T2	\$3,009,279	\$1,465,267
DT184 - Rio Bosque Capacitor Bank	<u>\$2,139,566</u>	<u>\$1,889,566</u>
Projects Total	\$33,228,360	\$19,849,603

<u>Overage %</u>
252%
87%
56%
107%
95%
<u>756%</u>
148%

TBL10

	<u>SAIDI</u>	<u>SAIFI</u>	<u>RELIABILITY</u>
2011	48.4	0.45	99.991%
2012	38.3	0.33	99.993%
2013	37.5	0.37	99.993%
2014	49.2	0.53	99.991%
2015	51.5	0.53	99.990%
2016	43.1	0.41	99.992%
2017	47.0	0.58	99.991%
2018	38.8	0.49	99.993%
2019	64.5	0.72	99.988%
2020	<u>48.6</u>	<u>0.53</u>	<u>99.991%</u>
AVG 2011-2015	45.0	0.44	99.991%
AVG 2016-2020	48.4	0.55	99.991%
AVG 2011-2020	46.7	0.49	99.991%

R

EP 1-4

Steam Power Generating Plants

	(d)	(e)	
	11,577,970	#DIV/0!	#DIV/0!
	<u>10,714</u>	<u>15,197</u>	<u>42%</u>
	11,588,684	Acct.	#VALUE!
	#VALUE!	33,209,023	#VALUE!
	<u>2,463</u>	<u>4,656</u>	<u>89%</u>
	Acct.	Acct.	#VALUE!
		500,000	50000000%
		502,000	50200000%
	3,169,104	6,000,314	89%
	<u>522</u>	<u>320</u>	<u>-39%</u>
	Acct.	Acct.	#VALUE!
	\$3,169,626	\$0	\$3,344,227

EP 1-4

\$1,379,197	\$1,553,447	\$1,412,021
\$849,264	\$1,061,751	\$934,630
\$6,000,314	\$4,603,216	\$5,487,916
\$10,392,872	\$9,401,702	\$10,695,360
\$2,097,252	\$1,912,602	\$2,030,762
\$20,718,899	\$18,532,718	\$20,560,690
\$23,888,525	\$18,532,718	\$23,904,917

MONTANA POWER STATION UNITS

(d)	(e)	
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2018

2019

2017-19 AVG

PLANNED OUTAGE HOURS

	2020
Coppe	319.50
Montar	681.55
Montar	633.59
Montar	2690.01
Montar	650.93
Newma	1295.20
Newma	651.80
Newma	1245.93
Newma	3249.69
Newma	3698.45
Newma	3227.58
Newma	636.69
Newma	660.60
Newma	530.68
Rio Gr	0.00
Rio Gr	99.20
Rio Gr	1284.95
Rio Gr	3271.48
PVGS	1311.00
PVGS	749.00
PVGS	0.00

\$471,459	\$563,346	\$535,280
\$1,174,804	\$912,897	\$1,002,022
\$1,118,045	\$983,427	\$1,136,780
\$50,226	\$98,110	\$68,673
<hr/>		
\$2,814,534	\$2,557,780	\$2,742,755
<hr/>		
\$2,913	\$92,247	\$32,131
\$67,700	\$101,163	\$80,999

\$2,561,350	\$3,005,267	\$2,525,303
\$346,211	\$659,451	\$449,146
<hr/>		
\$2,978,174	\$3,858,128	\$3,087,580
<hr/>		
\$5,792,708	\$6,415,908	\$5,830,335
<hr/> <hr/>		

COPPER GENERATING

(d)	(e)	
2018	2019	2016-19 AVG
<hr/>		
\$0	\$0	\$0
\$0	\$0	\$4
\$85,560	\$61,276	\$81,265
\$2,090	\$1,353	\$871
<hr/>		
\$87,650	\$62,629	\$82,140
<hr/>		
\$0	\$150	\$655
\$7,096	\$3,849	\$6,115
\$262,388	\$423,207	\$351,937
\$26,771	\$25,288	\$31,769
<hr/>		
\$296,255	\$452,494	\$390,475
<hr/>		
\$383,905	\$515,123	\$472,615
<hr/> <hr/>		

(f)	(g)	(h)	
Test Year Ended December 31, 2020	Adjustments to Test Year	Test Year Adjusted	Test Year vs 2016-19 Avg
\$1,269,531	-\$4,239	\$1,265,292	\$765,292
\$1,501,231	-\$26,197	\$1,475,034	\$973,034
\$4,624,823	-\$5,275	\$4,619,548	\$4,619,547
\$2,314,223	-\$46,165	\$2,268,058	\$2,268,058
\$655,198	\$0	\$655,198	#VALUE!
		\$0	
\$10,365,006	-\$81,876	\$10,283,130	\$6,938,903
\$1,196,149	-\$3,367	\$1,192,782	-\$219,239
\$902,987	-\$1,456	\$901,531	-\$33,099
\$6,490,432	-\$5,601	\$6,484,831	\$996,915
\$12,892,629	-\$196,669	\$12,695,960	\$2,000,600
\$1,518,966	-\$1,158	\$1,517,808	-\$512,954
\$23,001,163	-\$208,251	\$22,792,912	\$2,232,222
\$33,366,169	-\$290,127	\$33,076,042	\$9,171,125
Newman Adj			\$7,617,062

1, 2, 3, 4 AND COMMON

(f)	(g)	(h)
Test Year Ended		

December 31, #REF!	Adjustments to #REF!	Test Year #REF!	TY vs Avg Change
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\$666,563	-\$5,025	\$661,538	\$126,258
\$914,450	\$0	\$914,450	-\$87,572
\$761,430	-\$15,511	\$745,919	-\$390,861
\$187,358	\$0	\$187,358	\$118,685
<hr/>			
\$2,529,801	-\$20,536	\$2,509,265	-\$233,490
<hr/>			
\$198,333	-\$925	\$197,408	\$165,277
\$219,656	-\$337	\$219,319	\$138,320

\$4,933,150	\$138,572	\$5,071,722	\$2,546,419
\$701,569	-\$668	\$700,901	\$251,755
\$6,052,708	\$136,642	\$6,189,350	\$3,101,770
\$8,582,509	\$116,106	\$8,698,615	\$2,868,280
Total Ajust			\$10,658,820

G STATION

(f) Test Year Ended December 31, 2020	(g) Adjustments to Test Year	(h) Test Year Adjusted	TY vs Avg Change
\$0	\$0	\$0	\$0
\$1,454	\$0	\$1,454	\$1,450
\$38,473	\$0	\$38,473	-\$42,792
\$3,579	\$0	\$3,579	\$2,708
\$43,506	\$0	\$43,506	-\$38,634
			\$0
			\$0
			\$0
\$3,560	\$0	\$3,560	\$2,905
\$36,537	\$0	\$36,537	\$30,422
\$847,276	\$0	\$847,276	\$495,340
\$40,937	\$0	\$40,937	\$9,168
\$928,310	\$0	\$928,310	\$537,835
\$971,816	\$0	\$971,816	\$499,201

TY OVER AVG

153.1%
193.8%
517087224.7%
-584042016.3%
#VALUE!

207.5%

-15.5%
-3.5%
18.2%
18.7%
-25.3%

10.9%

38.4%

TY ADJ INCREASE

23.6%
-8.7%
-34.4%
172.8%

-8.5%

514.4%
170.8%

100.8%

56.1%

100.5%

49.2%

TY Adj Increase

#DIV/0!

36250.0%

-52.7%

310.9%

-47.0%

443.7%

497.5%

140.7%

28.9%

137.7%

105.6%

SOURCE: EPE'S RESPONSE TO CEP 1-14

Line No.	FERC Acct.	(a) Description	(b) 2016
		<u>Transmission Expenses</u>	
		<u>Operations Expense</u>	
1	560000	Operation Supervision & Engineering	\$1,641,654
2	561100	Load Dispatch - Reliability	\$76,925
3	561200	Load Dispatch - Monitor & Oper Trans Sys	\$770,296
4	561300	Load Dispatch - Trans Service & Sched	\$771,095
5	561400	Scheduling, Sys Control & Dispatch Ser	\$628,585
6	561500	Reliability, Planning & Standards Development	\$975,328
7	561600	Transmission Service Studies	\$0
8	561700	Generation Interconnection Studies	\$0
9	561800	Reliability, Plan & Standards Develop Services	\$0
10	562000	Station Expenses	\$312,087
11	563000	Overhead Line Expenses	\$305,124
12	565000	Transmission of Electricity by Others	\$6,274,714
13	566000	Miscellaneous Transmission Expenses	\$6,277,658
14	567000	Rents	\$299,485
15		Total Operations Expense	<u>\$18,332,951</u>
		<u>Maintenance Expense</u>	
16	568000	Maintenance Supervision & Engineering	\$75,245
17	569000	Maintenance of Structures	\$14,182
18	569100	Maintenance of Computer Hardware	\$0
19	569200	Maintenance of Computer Software	\$0
20	569300	Maintenance of Communication Equipment	\$0
21	569400	Maintenance of Misc. Regional Trans Plant	\$0
22	570000	Maintenance of Station Equipment	\$584,272
23	571000	Maintenance of Overhead Lines	\$1,286,512
24	573000	Maintenance of Misc. Transmission Plant	\$50,467
25		Total Maintenance Expense	<u>\$2,010,678</u>

Total Transmission Expenses	<u>\$20,343,629</u>
TOTAL EXCL 565	\$14,068,915

- (1) Represents Adjustment #3 Salaries and Wages.
- (2) Represents Adjustment #7 to remove COVID -19 related costs.
- (3) Represents Adjustment #24 to remove non-recoverable membership dues from

(c)	(d)	(e)	
2017	2018	2019	2016-19 AVG
\$1,427,707	\$1,769,333	\$1,894,111	\$1,683,201
\$63,127	\$100,775	\$128,245	\$92,268
\$818,846	\$847,523	\$869,313	\$826,495
\$866,803	\$944,247	\$971,535	\$888,420
\$599,757	\$610,891	\$618,115	\$614,337
\$979,739	\$902,274	\$741,277	\$899,655
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$323,624	\$296,197	\$267,776	\$299,921
\$211,172	\$500,681	\$303,759	\$330,184
\$6,806,326	\$7,094,447	\$6,123,189	\$6,574,669
\$6,552,528	\$6,148,745	\$7,661,298	\$6,660,057
\$289,370	\$282,705	\$250,050	\$280,403
\$18,938,999	\$19,497,818	\$19,828,668	\$19,149,609
\$53,239	\$36,372	\$20,533	\$46,347
\$32,317	\$31,286	\$17,124	\$23,727
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$625,143	\$324,329	\$631,007	\$541,188
\$1,412,178	\$2,455,709	\$1,656,209	\$1,702,652
\$15,663	\$18,625	\$16,467	\$25,306
\$2,138,540	\$2,866,321	\$2,341,340	\$2,339,220

\$21,077,539	\$22,364,139	\$22,170,008	\$21,488,829
\$14,271,213	\$15,269,692	\$16,046,819	\$14,914,160

n cost of service.

(f) Test Year Ended December 31, 2020	(g) Adjustments to Test Year	(h) Test Year Adjusted	TY OVER AVG
\$2,169,209	-\$11,282	\$2,157,927	\$474,726
\$128,147	-\$636	\$127,511	\$35,243
\$932,103	-\$3,954	\$928,149	\$101,655
\$1,092,216	-\$4,887	\$1,087,329	\$198,909
\$652,858	-\$3,235	\$649,623	\$35,286
\$678,638	-\$2,983	\$675,655	-\$224,000
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$137,496	-\$172	\$137,324	-\$162,597
\$240,539	-\$809	\$239,730	-\$90,454
\$6,728,666	\$0	\$6,728,666	\$153,997
\$8,942,379	\$106,728	\$9,049,107	\$2,389,050
\$117,943	\$0	\$117,943	-\$162,460
			\$0
\$21,820,194	\$78,770	\$21,898,964	\$2,749,355
\$15,516	\$0	\$15,516	-\$30,831
-\$1,705	\$0	-\$1,705	-\$25,432
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$0	\$0	\$0	\$0
\$317,863	-\$4	\$317,859	-\$223,329
\$1,525,242	-\$3,616	\$1,521,626	-\$181,026
\$39,726	-\$40	\$39,686	\$14,381
			\$0
\$1,896,642	-\$3,660	\$1,892,982	-\$446,238
			\$0

\$23,716,836	\$75,110	\$23,791,946	\$2,303,117
\$16,988,170		\$17,063,280	\$2,149,120
Trans Adj (TotalCo)		<u>-\$2,389,050</u>	
Recom TransO&M		\$21,402,896	

TY OVER AVG

28.2%
38.2%
12.3%
22.4%
5.7%
-24.9%

-54.2%
-27.4%
2.3%
35.9%
-57.9%

14.4%

-66.5%
-107.2%

-41.3%
-10.6%
56.8%

-19.1%

10.7%

14.4%

Olson Direct, pg 12

	<u>Cost Requested</u>
LMS100 Power Turbine	\$5,737,590
LMS100 Booster	<u>\$1,894,232</u>
	\$7,631,822

Source

CEP 5-34

CEP 5-35

TY O&M Increase

\$3,948,796

-\$28,683

\$404,859

\$499,201

\$2,868,280

\$247,267

\$7,939,721

16.7%

		NEWMAN GENERATING STATION											
		(a)	(b)	(c)	(d)	(e)	(f)		(g)		(h)		
Line No.	FERC Acct.	Description	2016	2017	2018	2019	2016-19 AVG	Test Year Ended December 31, 2020	Adjustments to Test Year		Test Year Adjusted	Test Year vs 2016-19 Avg	TY OVER AVG
		Steam Power Generation Expense											
		Operations Expense											
1	500000	Operation Supervision & Engineering	\$ 1,611,125	\$ 1,636,665	\$ 1,135,956	\$ 1,072,432	\$ 1,281,684	\$ 1,269,531	\$ (4,239)	(1)	\$ 1,265,292	\$ (16,392)	-1.3%
2	502000	Steam Expenses	1,230,874	1,316,507	1,433,397	1,610,378	\$ 1,453,427	1,501,231	(26,197)	(1)	1,475,034	\$ 21,607	1.5%
3	505000	Electric Expenses	2,845,063	2,809,591	3,666,741	3,771,388	\$ 3,415,907	4,624,823	(5,275)	(1)	4,619,548	\$ 1,203,641	35.2%
4	506000	Miscellaneous Steam Power Expenses	2,170,351	1,944,532	1,684,007	2,162,302	\$ 1,930,280	2,314,223	(46,165)	(2)	2,268,058	\$ 337,778	17.5%
5	507000	Rents	458,672	466,271	464,612	524,890	\$ 485,258	655,198	-		655,198	\$ 169,940	35.0%
6		Total Operations Expense	8,316,085	8,173,566	8,384,713	9,141,390	\$ 8,566,556	10,365,006	(81,876)		10,283,130	\$ 1,716,574	20.0%
		Maintenance Expense											
7	510000	Maintenance Supervision & Engineering	1,104,281	1,303,419	1,379,197	1,553,447	\$ 1,412,021	1,196,149	(3,367)	(1)	1,192,782	\$ (219,239)	-15.5%
8	511000	Maintenance of Structures	724,656	892,876	849,264	1,061,751	\$ 934,630	902,987	(1,456)	(1)	901,531	\$ (33,099)	-3.5%
9	512000	Maintenance of Boiler Plant	3,135,095	5,860,217	6,000,314	4,603,216	\$ 5,487,916	6,490,432	(5,601)	(1)(3)	6,484,831	\$ 996,915	18.2%
10	513000	Maintenance of Electric Plant	6,493,264	12,291,507	10,392,872	9,401,702	\$ 10,695,360	12,892,629	(196,669)	(1)(3)	12,695,960	\$ 2,000,600	18.7%
11	514000	Maintenance of Miscellaneous Steam Plant	1,423,942	2,082,433	2,097,252	1,912,602	\$ 2,030,762	1,518,966	(1,158)	(1)(3)	1,517,808	\$ (512,954)	-25.3%
12		Total Maintenance Expense	12,881,238	22,430,452	20,718,899	18,532,718	\$ 20,560,690	23,001,163	(208,251)		22,792,912	\$ 2,232,222	10.9%
13		Total Steam Power Generation Expense-Newman	\$ 21,197,323	\$ 30,604,018	\$ 29,103,612	\$ 27,674,108	\$ 29,127,246	\$ 33,366,169	\$ (290,127)		\$ 33,076,042	\$ 3,948,796	13.6%

		RIO GRANDE GENERATING STATION											
(a)		(b)	(c)	(d)	(e)	(f)		(g)		(h)			
FERC Acct.	Description	2016	2017	2018	2019	2016-19 AVG	Test Year Ended December 31, 2020	Adjustments to Test Year		Test Year Adjusted			TY ADJ INCREASE
<u>Steam Power Generation Expense</u>													
<u>Operations Expense</u>													
14	500000	Operation Supervision & Engineering	\$ 1,021,020	\$ 970,389	\$ 907,843	\$ 838,140	\$ 934,348	\$ 1,102,710	\$ (7,469)	(1)	\$ 1,095,241	\$ 160,893	17.2%
15	502000	Steam Expenses	1,685,120	1,727,769	1,362,841	1,528,134	\$ 1,575,966	1,580,447	13,922	(1)	1,594,369	\$ 18,403	1.2%
16	505000	Electric Expenses	150,421	178,383	220,348	241,757	\$ 197,727	314,657	(309)	(1)	314,348	\$ 116,621	59.0%
17	506000	Miscellaneous Steam Power Expenses	1,366,715	1,450,173	1,169,845	1,374,006	\$ 1,340,185	1,544,457	(41,652)	(2)	1,502,805	\$ 162,620	12.1%
18	507000	Rents	538	0	-	1,699	\$ 559	-	-		-	\$ (559)	
19		Total Operations Expense	4,223,814	4,326,714	3,660,877	3,983,736	\$ 4,048,785	4,542,271	(35,508)		4,506,763	\$ 457,978	11.3%
<u>Maintenance Expense</u>													
20	510000	Maintenance Supervision & Engineering	974,514	980,840	818,896	923,834	\$ 924,521	1,107,499	(7,993)	(1)	1,099,506	\$ 174,985	18.9%
21	511000	Maintenance of Structures	179,159	542,690	393,338	281,825	\$ 349,253	216,916	(341)	(1)	216,575	\$ (132,678)	-38.0%
22	512000	Maintenance of Boiler Plant	2,038,748	1,831,339	2,018,253	1,405,798	\$ 1,823,535	2,308,034	(1,966)	(1)(3)	2,306,068	\$ 482,534	26.5%
23	513000	Maintenance of Electric Plant	2,390,212	1,279,603	4,955,418	2,159,888	\$ 2,696,280	1,481,723	138,983	(1)(3)	1,620,706	\$ (1,075,574)	-39.9%
24	514000	Maintenance of Miscellaneous Steam Plant	742,532	836,163	876,837	869,252	\$ 831,196	896,288	(1,019)	(1)(3)	895,269	\$ 64,073	7.7%
25		Total Maintenance Expense	6,325,165	5,470,635	9,062,742	5,640,597	\$ 6,624,785	6,010,460	127,664		6,138,124	\$ (486,661)	-7.3%
26		Total Steam Power Generation Expense-Rio Grande	\$ 10,548,979	\$ 9,797,349	\$ 12,723,619	\$ 9,624,333	\$ 10,673,570	\$ 10,552,731	\$ 92,156		\$ 10,644,887	\$ (28,683)	-0.3%

		FOUR CORNERS GENERATING STATION (4)										
FERC Acct.	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)				
		Description	2016	2017	2018	2019	2016-19 AVG	Test Year Ended December 31, 2020	Adjustments to Test Year	Test Year Adjusted		

Steam Power Generation Expense												
Operations Expense												
27	500000	Operation Supervision & Engineering	\$	141,672	\$	-	\$	-	\$	-	\$	-
28	502000	Steam Expenses		577,476		-		-		-		-
29	505000	Electric Expenses		51,742		-		-		-		-
30	506000	Miscellaneous Steam Power Expenses		574,055		-		-		-		-
31	507000	Rents		505,813		-		-		-		-
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32		Total Operations Expense		1,850,758		-		-		-		-
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Maintenance Expense												
33	510000	Maintenance Supervision & Engineering		120,103		-		-		-		-
34	511000	Maintenance of Structures		324,730		-		-		-		-
35	512000	Maintenance of Boiler Plant		3,340,918		-		-		-		-
36	513000	Maintenance of Electric Plant		1,175,671		-		-		-		-
37	514000	Maintenance of Miscellaneous Steam Plant		601,908		-		-		-		-
			<hr/>									
38		Total Maintenance Expense		5,563,330		-		-		-		-
			<hr/>									
39		Steam Power Generation Expense-Four Corners	\$	7,414,088	\$	-	\$	-	\$	-	\$	-
			<hr/>									
40	556000	System Control & Load Dispatching	\$	46,709								
			<hr/>									
41		Total Other Power Supply Expense	\$	46,709	\$	-	\$	-	\$	-	\$	-
			<hr/>									
42		Total Steam Power Generation Expense-Four Corners	\$	7,460,797	\$	-	\$	-	\$	-	\$	-
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43		Total Steam Power Generation Expense	\$	39,207,099	\$	40,401,367	\$	41,827,231	\$	37,298,441	\$	39,683,535
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Nuclear Power Generating Plant

		PALO VERDE							
		(a)	(b)	(c)	(d)	(e)		(f)	(g)
Line No.	FERC Acct.	Description	2016	2017	2018	2019	2016-19 AVG	Test Year Ended December 31, 2020	Adjustments to Test Year
		<u>Nuclear Power Generation Expense</u>							
		<u>Operations Expense</u>							
1	517000	Operation Supervision & Engineering	\$ 14,243,112	\$ 13,376,786	\$ 12,412,372	\$ 11,575,930	\$ 12,902,050	\$ 11,982,723	\$ -
2	519000	Coolants & Water	7,029,685	7,373,188	7,276,917	7,525,415	\$ 7,301,301	7,586,858	-
3	520000	Steam Expenses	6,387,000	6,095,977	5,136,717	5,207,636	\$ 5,706,833	4,895,908	-
4	523000	Electric Expenses	4,533,307	4,932,079	5,554,019	6,305,448	\$ 5,331,213	6,268,555	-
5	524000	Miscellaneous Nuclear Power Expenses	22,224,590	23,628,866	23,275,900	23,458,605	\$ 23,146,990	42,735,916	(1)
6	525000	Rents	-	-	-	-	-	-	(1,770,781) (2)
7		Total Operations Expense	54,417,694	55,406,896	53,655,925	54,073,034	\$ 54,388,387	73,469,960	(1,770,781)
		<u>Maintenance Expense</u>							
8	528000	Maintenance Supervision & Engineering	3,383,141	2,671,279	2,885,471	2,722,531	\$ 2,915,606	2,441,613	-
9	529000	Maintenance of Structures	1,362,011	1,130,948	1,198,839	1,208,914	\$ 1,225,178	1,276,999	-
10	530000	Maintenance of Reactor Plant Equipment	7,766,159	8,433,669	8,937,099	6,899,626	\$ 8,009,138	6,513,634	-
11	531000	Maintenance of Electric Plant	7,940,162	6,609,391	7,063,948	6,106,306	\$ 6,929,952	5,909,822	-
12	532000	Maintenance of Miscellaneous Nuclear Plant	2,108,836	2,021,557	2,073,945	2,001,184	\$ 2,051,381	1,807,475	-
13		Total Maintenance Expense	22,560,309	20,866,844	22,159,302	18,938,561	\$ 21,131,254	17,949,543	-
14		Total Nuclear Power Generation Expense	\$ 76,978,003	\$ 76,273,740	\$ 75,815,227	\$ 73,011,595	\$ 75,519,641	\$ 91,419,503	\$ (1,770,781)
15	556000	System Control & Load Dispatching - PV	\$ 1,051,671	\$ 1,183,821	\$ 1,132,200	\$ 986,729	\$ 1,088,605	\$ 944,580	\$ -
16		Total Other Power Supply Expense	\$ 1,051,671	\$ 1,183,821	\$ 1,132,200	\$ 986,729	\$ 1,088,605	\$ 944,580	\$ -
17		Total Nuclear Power Production Expenses-Palo Verde	\$ 78,029,674	\$ 77,457,561	\$ 76,947,427	\$ 73,998,324	\$ 76,608,247	\$ 92,364,083	\$ (1,770,781)
(1)	As explained in the direct testimony of Cynthia S. Prieto, in compliance with the FERC audit report in Docket No. PA19-3-000, in December 2020, the Company reclassified portions of the billings from Arizona expenses (A&G) into Account 524000, Miscellaneous Nuclear Power Expenses for the operation and maintenance (O&M) of the Palo Verde Generation Station. This reclassification represents a shift from A&G year ended December 31, 2020.								
(2)	Represents Adjustment #3 Salaries and Wages, Adjustment #6 Palo Verde O&M Expense, and Adjustment #7 Covid-19 Related Costs.								

(h)		
Test Year		
Adjusted	TY ADJ INCREASE	
\$ 11,982,723	\$ (919,327)	-7.1%
7,586,858	\$ 285,557	3.9%
4,895,908	\$ (810,925)	-14.2%
6,268,555	\$ 937,342	17.6%
40,965,135	\$ 17,818,145	77.0%
-	\$ -	
	\$ -	
71,699,179	\$ 17,310,792	31.8%
	\$ -	
	\$ -	
	\$ -	
2,441,613	\$ (473,993)	-16.3%
1,276,999	\$ 51,821	4.2%
6,513,634	\$ (1,495,504)	-18.7%
5,909,822	\$ (1,020,130)	-14.7%
1,807,475	\$ (243,906)	-11.9%
	\$ -	
17,949,543	\$ (3,181,711)	-15.1%
	\$ -	
\$ 89,648,722	\$ 14,129,081	18.7%
	\$ -	
	\$ -	
\$ 944,580	\$ (144,025)	
	\$ -	
\$ 944,580	\$ (144,025)	
	\$ -	
	\$ -	
\$ 90,593,302	\$ 13,985,056	

Public Service Company recorded as administrative and general
into O&M accounts not an increase in costs incurred during the test

Combustion Turbine Generating Plants

COPPER GENERATING STATION								
Line No.	FERC Acct.	(a)	(b)	(c)	(d)	(e)	(f)	(g)
		Description	2016	2017	2018	2019	2016-19 AVG	Test Year Ended December 31, 2020
		Other Power Generation Expenses						Adjustments to Test Year
		<u>Operations Expense</u>						
1	546000	Operation Supervision & Engineering	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	548000	Generation Expenses	16	-	-	-	4	1,454
3	549000	Misc. Other Power Generation Expenses	110,279	67,945	85,560	61,276	81,265	38,473
4	550000	Rents	-	41	2,090	1,353	871	3,579
5		Total Operations Expense	110,295	67,986	87,650	62,629	82,140	43,506
		<u>Maintenance Expense</u>						
6	551000	Maintenance Supervision & Engineering	-	2,469	-	150	655	3,560
7	552000	Maintenance of Structures	8,586	4,928	7,096	3,849	6,115	36,537
8	553000	Maintenance of Generating & Electric Plant	606,333	115,818	262,388	423,207	351,937	847,276
9	554000	Maintenance of Miscellaneous Other Power	47,044	27,972	26,771	25,288	31,769	40,937
10		Total Maintenance Expense	661,963	151,187	296,255	452,494	390,475	928,310
11		Total Other Power Generation Expense-Copper	\$ 772,258	\$ 219,173	\$ 383,905	\$ 515,123	\$ 472,615	\$ 971,816

RIO GRANDE UNIT 9 GENERATING STATION								
Line No.	FERC Acct.	(a)	(b)	(c)	(d)	(e)	(f)	(g)
		Description	2016	2017	2018	2019	2016-19 AVG	Test Year Ended December 31, 2020
		Other Power Generation Expenses						Adjustments to Test Year
		<u>Operations Expense</u>						
12	546000	Operation Supervision & Engineering	\$ -	\$ -	\$ 429,842	\$ 458,831	\$ 222,168	\$ 437,742
13	548000	Generation Expenses	-	197	-	-	49	-
14	549000	Misc. Other Power Generation Expenses	148	-	17	7,177	1,836	1,184
15	550000	Rents	-	-	-	-	-	-
16		Total Operations Expense	148	197	429,859	466,008	224,053	438,926
		<u>Maintenance Expense</u>						
17	551000	Maintenance Supervision & Engineering	-	-	5,328	9,670	3,750	12,541
18	552000	Maintenance of Structures	4,564	12,605	4,479	24,488	11,534	1,823
19	553000	Maintenance of Generating & Electric Plant	1,341,696	857,871	851,135	1,180,908	1,057,903	1,031,917
20	554000	Maintenance of Miscellaneous Other Power	30,805	19,343	23,606	77,118	37,718	255,793
21		Total Maintenance Expense	1,377,065	889,819	884,548	1,292,184	1,110,904	1,302,074
22		Total Other Power Generation Expense-Rio Grande 9	\$ 1,377,213	\$ 890,016	\$ 1,314,407	\$ 1,758,192	\$ 1,334,957	\$ 1,741,000

MONTANA POWER STATION UNITS 1, 2, 3, 4 AND COMMON								
Line No.	FERC Acct.	(a)	(b)	(c)	(d)	(e)	(f)	(g)
		Description	2016	2017	2018	2019	2017-19 AVG	Test Year Ended December 31, 2020
		Other Power Generation Expenses						Adjustments to Test Year
		<u>Operations Expense</u>						
23	546000	Operation Supervision & Engineering	\$ 380,255	\$ 571,035	\$ 471,459	\$ 563,346	535,280	\$ 666,563
24	548000	Generation Expenses	695,011	918,364	1,174,804	912,897	1,002,022	914,450
25	549000	Misc. Other Power Generation Expenses	1,289,341	1,308,868	1,118,045	983,427	1,136,780	761,430
26	550000	Rents	30,481	57,684	50,226	98,110	68,673	187,358
27		Total Operations Expense	2,395,088	2,855,951	2,814,534	2,557,780	2,742,755	2,529,801
		<u>Maintenance Expense</u>						
28	551000	Maintenance Supervision & Engineering	521	1,234	2,913	92,247	32,131	198,333
29	552000	Maintenance of Structures	24,972	74,134	67,700	\$101,163	80,999	\$219,656.00
30	553000	Maintenance of Generating & Electric Plant	570,697	2,009,293	2,561,350	3,005,267	2,525,303	4,933,150
31	554000	Maintenance of Miscellaneous Other Power	275,485	341,776	346,211	659,451	449,146	701,569
32		Total Maintenance Expense	871,675	2,426,437	2,978,174	3,858,128	3,087,580	6,052,708
33		Total Other Power Generation Expense-MPS	\$ 3,266,763	\$ 5,282,388	\$ 5,792,708	\$ 6,415,908	5,830,335	\$ 8,582,509

- (1) Represents Adjustment #3 Salaries and Wages.
(2) Represents Adjustment #3 Salaries and Wages and Adjustment #7 Covid-19 Related Costs.

(h)		
Test Year Adjusted	TY vs Avg Change	TY ADJ INCREASE
\$ -	\$ -	#DIV/0!
1,454	\$ 1,450	36250.0%
38,473	\$ (42,792)	-52.7%
3,579	\$ 2,708	310.9%
	\$ -	
43,506	\$ (38,634)	-47.0%
	\$ -	
	\$ -	
	\$ -	
3,560	\$ 2,905	443.7%
36,537	\$ 30,422	497.5%
847,276	\$ 495,340	140.7%
40,937	\$ 9,168	28.9%
928,310	\$ 537,835	137.7%
\$ 971,816	\$ 499,201	105.6%

(h)		
Test Year Adjusted	TY vs Avg Change	TY ADJ INCREASE
\$ 437,742	\$ 215,574	97.0%
-	\$ (49)	-100.0%
-	\$ (1,836)	-100.0%
-	\$ -	#DIV/0!
	\$ -	
437,742	\$ 213,689	95.4%
12,541	\$ 8,792	234.5%
1,823	\$ (9,711)	-84.2%
1,031,917	\$ (25,986)	-2.5%
255,793	\$ 218,075	578.2%
1,302,074	\$ 191,170	17.2%
\$ 1,739,816	\$ 404,859	30.3%

(h)		
Test Year Adjusted	TY vs Avg Change	TY ADJ INCREASE
\$ 661,538	\$ 126,258	23.6%
914,450	\$ (87,572)	-8.7%
745,919	\$ (390,861)	-34.4%
187,358	\$ 118,685	172.8%
2,509,265	\$ (233,490)	-8.5%
197,408	\$ 165,277	514.4%
219,319	\$ 138,320	170.8%
5,071,722	\$ 2,546,419	100.8%
700,901	\$ 251,755	56.1%
6,189,350	\$ 3,101,770	100.5%
\$ 8,698,615	\$ 2,868,280	49.2%
Total Ajust	3,259,833	

Renewable Generating Facilities

HUECO MOUNTAIN WIND GENERATING STATION AND PHOTOVOLTAIC SOLAR FACILITIES (1)										
(a)			(b)	(c)	(d)	(e)	(f)		(g)	(h)
Line No.	FERC Acct.	Description	2016	2017	2018	2019	2016-19 AVG	Test Year Ended December 31, 2020	Adjustments to Test Year	Test Year Adjusted
Other Power Generation Expenses										
<u>Operations Expense</u>										
1	546000	Operation Supervision & Engineering	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	548000	Generation Expenses	-	-	-	-	-	-	-	-
3	549000	Misc. Other Power Generation Expenses	-	-	-	87,941	\$ 21,985	22,929	(22,929) (2)	-
4	550000	Rents	12,577	-	-	-	\$ 3,144	-	-	-
5		Total Operations Expense	12,577	-	-	87,941	\$ 25,130	22,929	(22,929)	-
<u>Maintenance Expense</u>										
6	551000	Maintenance Supervision & Engineering	-	-	-	-	-	-	-	-
7	552000	Maintenance of Structures	-	-	-	-	-	-	-	-
8	553000	Maintenance of Generating & Electric Plant	187,317	23,107	52,754	45,887	\$ 77,266	144,912	(144,912) (3)	-
9	554000	Maintenance of Miscellaneous Other Power	-	-	-	-	\$ -	-	-	-
10		Total Maintenance Expense	187,317	23,107	52,754	45,887	\$ 77,266	144,912	(144,912)	-
11		Total Other Power Generation Expense-Others	\$ 199,894	\$ 23,107	\$ 52,754	\$ 133,828	\$ 102,396	\$ 167,841	\$ (167,841)	\$ -
<u>Other Power Supply Expenses</u>										
12	557000	Other Expenses (4)	\$ 85,500	\$ 115,000	\$ -	\$ 325,000	\$ 131,375	\$ 378,642	\$ -	\$ 378,642

- (1) EPE retired Hueco Mountain Wind Generation Station in June 2016, costs in subsequent years were related to photovoltaic solar facilities.
(2) Represents Adjustment #3 Salaries and Wages and Adjustment #7 Covid-19 Related Costs.
(3) Represents Adjustment #3 Salaries and Wages.
(4) **These expenses are for the purchase of Renewable Energy Credits and are not specific to a particular generating plant.**

TY ADJ INCREASE

#DIV/0!
#DIV/0!
-100.0%
-100.0%

-100.0%

#DIV/0!
#DIV/0!
-100.0%
#DIV/0!

-100.0%

-100.0%

TY ADJ INCREASE

188.2%

The following files are not convertible:

01.xlsx	Copy of PROD OM CEP 01-11_Attachment
	Copy of SNWork EPE Dkt 52195.xlsx

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

Contact centralrecords@puc.texas.gov if you have any questions.