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**SOAH DOCKET NO. 473-21-2606
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APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
	§	
ELECTRIC COMPANY TO	§	OF
	§	
CHANGE RATES	§	ADMINISTRATIVE HEARINGS

**CITY OF EL PASO’S FIRST REQUESTS FOR INFORMATION
TO PUBLIC UTILITY COMMISSION STAFF
QUESTIONS CEP Staff-1 THROUGH CEP-STAFF-6**

The City of El Paso (the “City”) requests that the Public Utility Commission Staff (“Staff”) provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within five (5) business days. Please copy the question immediately above the answer to each question. The question(s) are continuing in nature, and if there is a relevant change in circumstances, such as that new or additional information or review reveals that an answer previously made is no longer complete or is inaccurate, that Staff submit an amended answer, under oath, as a supplement to your original answer within five days of the discovery of new or additional information. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

The City requests that Staff serve its respective responses to this Request on the following person via electronic mail and delivery of hard copies:

Norman J. Gordon
PO Box 8
El Paso, Texas, 79940
221 N. Kansas, Suite 700
El Paso, Texas, 79901

Manuel Arambula, Senior Assistant City Attorney
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DEFINITIONS AND INSTRUCTIONS

1. This Request is directed to The Public Utility Commission of Texas Staff. Reference to Staff, "**you**" or "**your**" means all divisions, departments, bureaus, agencies, and all witnesses whose testimony Staff has prefiled or intends to present, and all persons acting or purporting to act for or on behalf of Staff, including its directors, officers, employees, and agents.

2. The terms "**document**" and "**documents**" are used in their broadest sense and shall mean and include all written, printed, electronic, 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" or "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of personal conversations, minutes or summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultant 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, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

3. "**Person**" means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver syndicate, municipal corporation, government agency, any other form of legal entity, and other group or combination acting as a unit.

4. "**Relating to**" a subject means making a statement about, mentioning, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting or in any way pertaining, in whole or in part, to the subject.

5. "**Identify**" means:

- a. as to a "person," stating his, her or its:
 - (i) legal, full, and customarily used names;
 - (ii) present residential or business address;
 - (iii) job title; and
 - (iv) name of employer.
- b. as to a document, act, event, transaction or occurrence, stating:
 - (i) its date, authors or participants;
 - (ii) the place where it took place, was created or occurred;
 - (iii) its purpose and subject matter; and
 - (iv) a concise description of what transpired.

6. For each response, please state the Request for Information and identify the individual(s) responsible for preparing and sponsoring the response by name and title.

7. Pursuant to Rule 196.4, Texas Rules of Civil Procedure, any electronic or magnetic data included in the definition of document should be produced on a CD-ROM or similar media that is compatible with Microsoft Office software.

8. For each document produced that is generated by computer, please identify:

- a. the nature and source of the data constituting the input;
- b. the form of the input (e.g., tapes, punch cards);
- c. the recording system employed (e.g., program, flow charts); and
- d. the person(s) responsible for processing the input and/or performing the programming.

9. “**Each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**”.

10. “**Any**” shall be construed to include “**all**” and “**all**” shall be construed to include “**any**.”

11. The terms “**and**” and “**or**” shall be construed as either disjunctive or conjunctive as necessary to make this request inclusive rather than exclusive.

12. The term “**concerning**” includes the following meanings: relating to; pertaining to; regarding; discussion; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected to the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

13. The term “**including**” means and refers to “including but not limited to.”

14. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

15. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

Dated November 5, 2021

Respectfully submitted,

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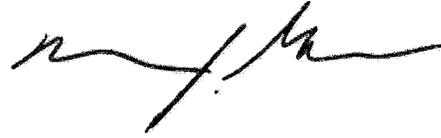
Attorneys for the City of El Paso



By: _____
Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on November 5, 2021.

A handwritten signature in black ink, appearing to read 'N. J. Gordon', written over a horizontal line.

Norman J. Gordon

PUC Docket No. 52195
City of El Paso's RFIs to Commission Staff
Questions CEP – Staff -1---CEP-Staff -6

- CEP-Staff-1. Reference the testimony of Adrian Nevarez at page 5, please provide:
- a. Copies of all recommendations from Staff witness William Abbott provided to Mr. Nevarez and used in the Staff's Class Cost of Service Study (CCOSS)
 - b. Copies of all recommendations provided to Mr. Nevarez utilized in the development of the recommended Revenue Distribution contained in the Staff's Rate Design Model ("52195 Staff's Rate Design Model.xlsx" filed as Workpapers of Adrian Nevarez on November 1, 2021)
 - c. Copies of all recommendations from Staff witness William Abbott or others utilized in the development of Staff proposed rates in Staff's Rate Design Model.
- CEP-Staff-2. With respect to the "Rev Distribution" sheet in the Staff Rate Design Model workbook, please provide a narrative description of the steps taken in each line, 6 thru 15.
- CEP-Staff-3. Is the Staff recommendation for revenue distribution based on the Company's proposed cap/floor method? If the Staff revised the Company's revenue distribution method, please describe the revisions.
- CEP-Staff-4. With respect to the Staff Rate Design Model excel file, when "enable content" is activated, the model produces error messages that the file cannot link to the Northwest Energy web site. Please explain why the model attempts to link to that web site and whether links in the model need to be edited.
- CEP-Staff-5. Please identify and explain any changes which were made to the Company's external allocation factors in the Staff CCOS study.
- CEP-Staff-6. Did the Staff accept the Company's production demand allocation factors for Texas retail classes? Please explain this answer.