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**SOAH DOCKET NO. 473-21-2606
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**APPLICATION OF EL PASO
ELECTRIC COMPANY TO CHANGE
RATES**

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S RESPONSE TO FREEPORT-MCMORAN, INC.'S
FIRST REQUEST FOR INFORMATION
QUESTION NOS. FMI 1-1 THROUGH FMI 1-3**

The Staff of the Public Utility Commission of Texas (Staff) stipulates that the following responses to requests for information may be treated by all parties as if the answers were filed under oath.

Dated: November 10, 2021

Respectfully submitted,
PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION

Rachelle Nicolette Robles
Division Director

/s/ Robert Dakota Parish
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on November 10, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664

/s/ Robert Dakota Parish
Robert Dakota Parish

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**COMMISSION STAFF'S RESPONSE TO FREEPORT-MCMORAN, INC.'S
FIRST REQUEST FOR INFORMATION
QUESTION NOS. FMI 1-1 THROUGH FMI 1-3**

- FMI 1-1** Regarding Attachment AN-2, please confirm that Staff is recommending a \$25.4 million decrease to EPE's base revenue requirement. If not confirmed:
- a. Provide Staff's recommended base revenue requirement for EPE, as well as the revenue deficiency/sufficiency.
 - b. Provide Staff's proposed revenue allocation using Staff's recommended base rate revenue.

- RESPONSE:** Deny. Please refer to the Errata to the Direct Testimony of Adrian Narvaez filed on Tuesday, November 9, 2021 at Attachment AN-2.
- a. Staff is recommending a Texas retail revenue requirement of \$545,583,237. This represents a revenue deficiency of \$11,767,793 from the Staff-adjusted EPE Texas retail present revenues of \$533,815,444.
 - b. Staff did not recommend any adjustments to EPE's proposed revenue distribution. Please refer to worksheet "Rev Distribution" in Excel file "52195 - Staff's Rate Design Model" in the workpapers to the Direct Testimony of Adrian Narvaez for the revenue distribution consistent with EPE's proposed revenue distribution and Staff's recommended CCOSS.

Prepared by: Adrian Narvaez
Sponsored by: Adrian Narvaez

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FMI 1-2 Regarding Mr. Narvaez's workpapers, please confirm that the proposed rates shown in Staff's workpaper titled Rate Design Model are correct. If not confirmed, please provide Staff's correct proposed rate for each rate class.

RESPONSE: Confirm.

Prepared by: Adrian Narvaez
Sponsored by: Adrian Narvaez

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FMI 1-3 Regarding Staff's proposed revenue allocation, as shown in Mr. Narvaez's workpaper titled Staff's Rate Design Model, please confirm that the proposed base revenue increases are not based on the proposed base rate revenues from Attachment AN-2.

RESPONSE: Confirm with regards to the Direct Testimony of Adrian Narvaez filed on Friday, October 29, 2021; Deny with regards to the Errata to the Direct Testimony of Adrian Narvaez filed on Tuesday, November 9, 2021.

Prepared by: Adrian Narvaez
Sponsored by: Adrian Narvaez