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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 SUPPLEMENTAL RESPONSE TO
CITY OF EL PASO'S FIFTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 5-1 THROUGH CEP 5-42

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CEP 5-9:

Refer to the Direct Testimony of EPE witness Doyle at Page 16, Lines 18-20. Please provide the information gathered from other utilities and analysis conducted by EPE or provided EPE by third parties that support EPE's contention that the right of way agreement with the Isleta Tribe was reasonable.

SUPPLEMENTAL RESPONSE:

This response assumes the City of El Paso is referencing the Direct Testimony of El Paso Electric Company ("EPE") witness Doyle in Docket 49148, at page 16, Lines 18-20.

Information gathered about other utilities was gathered through verbal conversations and was not documented, but EPE does have reference to that analysis conducted in 2015 in CEP 5-12, Attachment 4 – Confidential Voluminous at pages 837 to 838. In addition, please see CEP 5-12 Supplemental, Attachment 4 Confidential. Those discussions indicated that the costs to EPE were in the range of the other utilities' experience. The third-party information was consistent with the Wall Street Journal article referenced in R. Clay Doyle's direct testimony, page 24, line 23, and the analyses conducted by EPE are summarized in the presentation provided as Exhibit RCD-05.

Preparer: Darcy Welch

Title: Supervisor – T&D Financial Analysis &
Planning

Sponsor: R. Clay Doyle

Title: Vice President – Transmission and
Distribution

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CEP 5-12:

Refer to the Direct Testimony of EPE witness Doyle at Page 16, Lines 17-18. Please provide EPE's complete file regarding this transaction, including all backup information created and/or retained supporting the presentation provided in response to CEP 1-4 and 1-5.

SUPPLEMENTAL RESPONSE:

El Paso Electric Company ("EPE") assumes the reference to CEP 1-4 and CEP 1-5 refer to the discovery questions in Docket No. 49148. Please see EPE's response to CEP 5-1 through 5-11 in this docket. Please see also CEP 5-12, Attachment 1 Voluminous, Attachments 2 and 3, Attachment 4 Confidential Voluminous, and Attachment 5 Confidential.

Please see CEP 5-12-Supplemental, Attachment 4 Confidential, as an addition to CEP 5-12, Attachment 4 Confidential Voluminous.

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Sponsor: R. Clay Doyle

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EL PASO ELECTRIC COMPANY

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CEP 5-12 Supplemental Attachment 4 is a CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS and VOLUMINOUS attachment.