



## Filing Receipt

**Received - 2021-11-17 12:34:48 PM**

**Control Number - 52195**

**ItemNumber - 383**

**SOAH DOCKET NO. 473-21-2606  
PUC DOCKET NO. 52195**

<b>APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES</b>	<b>§ § §</b>	<b>BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS</b>
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**VINTON STEEL'S RESPONSE TO EL PASO ELECTRIC COMPANY'S  
FIRST REQUEST FOR INFORMATION TO VINTON STEEL**

Vinton Steel, LLC ("Vinton Steel") hereby files the following responses to the First Request for Information ("RFI") to Vinton Steel filed by El Paso Electric Company ("EPE"). The request was filed at the Commission and received by Vinton Steel on November 10, 2021. Pursuant to SOAH Order No. 2 issued in this case on June 29, 2021, Vinton Steel's responses are due within five working days of that date. Vinton Steel's response is therefore timely filed.

Vinton Steel's responses to specific questions are attached and incorporated by reference, in the order of the questions asked. Each response is stated on or attached to a separate page on which the request has been restated. Vinton Steel's responses are made in the spirit of cooperation without waiving Vinton Steel's right to contest the admissibility of any of these matters at hearing. Pursuant to 16 Tex. Admin. Code § 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. Pursuant to 16 T.A.C. § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully Submitted,

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By:   
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Miguel A. Huerta  
State Bar No. 00787733

**ATTORNEYS FOR VINTON STEEL LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of November, 2021 a true and correct copy of the above and foregoing document is being served via electronic mail, facsimile, U.S. mail and/or hand delivery to all parties of record.



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Miguel A. Huerta

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FIRST REQUEST FOR INFORMATION TO VINTON STEEL  
QUESTION EPE 1-1**

**EPE 1-1**

Refer to page 12 of the direct testimony of Vinton Steel witness Raymond J. Stanley. Please explain and support the basis for the base rate revenue increase cap to all classes of 1.5 times the jurisdictional average.

**RESPONSE:**

As stated in the direct testimony of Mr. Stanley, Vinton supports EPE’s attempt at reducing rate shock and adopting the principal of gradualism when setting class rates in a single rate proceeding. In this case, EPE has detailed prior efforts, through the testimony of Mr. James Schichtl, in setting limitations upon the amount of base rate changes that will be imposed on the various classes of customers. Also in this case, EPE proposes a cap for the Residential and Water Heating classes at 1.5 times the overall system average increase. Given that the recommended percentage increases for some classes are capped at 1.5 times the system average, it is reasonable that no other class should have to bear the burden of a percentage multiplier that is greater than 1.5 times.

Prepared by: Raymond J. Stanley  
Sponsored by: Raymond J. Stanley