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APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO	§	\mathbf{OF}
CHANGE RATES	§	ADMINISTRATIVE HEARINGS

THE UNIVERSITY OF TEXAS AT EL PASO'S RESPONSES TO EL PASO ELECTRIC COMPANY'S FIRST REQUEST FOR INFORMATION

The University of Texas at El Paso ("UTEP") serves its Responses to El Paso Electric Company's First Request for Information.

Respectfully submitted,

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Counsel for University of Texas at El Paso

CERTIFICATE OF SERVICE

I hereby certify that on this the 18th day of November, 2021, a true and correct copy of the foregoing document was served via email upon the parties of record.

/s/ Alton J. Hall, Jr.
Alton J. Hall, Jr.

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RFI 1-1

Refer to pages 25 through 29 of the direct testimony of UTEP witness Kit Pevoto. Please explain and support the basis for the UTEP rate moderation proposal to involve two steps; the rate class increase cap of 30%; and reducing the rate decreases at unity cost of several classes by 50%.

Response:

The two steps are first, as explained on Page 25, lines 9-19, of the Direct Testimony of Kit Pevoto, to reduce the cost increases for Residential customers, which would be covered by the cost decreases for Commercial and City/County customers, and then second, as explained on Page 25, lines 20-23, of Ms. Pevoto's testimony, to mitigate the cost increases for classes experiencing more than a 30% unity cost increase.

Regarding why the rate increase should be capped at 30%, please refer to Page 26, lines 7-13, of the Direct Testimony of Kit Pevoto. Further, Ms. Pevoto believes that the 50% reduction of rate decreases at unity cost for the Small General Service, General Service, and City/County Service rate classes represents a reasonable balance that allows these three rate classes to experience a moderate portion of the rate decreases they are entitled to and also provides a significant amount of cost decreases to mitigate the rate increases for the Residential rate class and its Water Heating rider.