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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

TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE TO EL PASO ELECTRIC COMPANY'S FIRST REQUEST FOR INFORMATION

Texas Industrial Energy Consumers ("TIEC") files the following responses to the First Request for Information ("RFI") to TIEC filed by El Paso Electric Company ("EPE"). The request was filed at the Commission and received by TIEC on November 10, 2021. TIEC's responses to specific questions are set for as follows, in the order of the questions asked. 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,

O'MELVENY & MYERS LLP

/s/ Benjamin B. Hallmark

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CERTIFICATE OF SERVICE

I, Christian E. Rice, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 18th day of November, 2021 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ Christian E. Rice

Christian E. Rice

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EPE 1-1. Please have TIEC witness Kevin C. Higgins provide the number of customers that would take service under Rate 25 and what current rate schedule they would transfer from if El Paso Electric Company were to accept his tariff language recommendation.

Response:

The tariff language change proposed by Mr. Higgins would be exercised at the customer's option. Mr. Higgins does not know which or how many customers would exercise that option.

Preparer: Kevin Higgins Sponsor: Kevin Higgins