



## Filing Receipt

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<b>APPLICATION OF EL PASO</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>ELECTRIC COMPANY TO CHANGE</b>	<b>§</b>	<b>OF</b>
<b>RATES</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**RATE 41 GROUP’S RESPONSE TO EL PASO ELECTRIC COMPANY’S FIRST  
REQUEST FOR INFORMATION**

Rate 41 Group (“Rate 41”) files this response to El Paso Electric Company’s (“EPE”) First Request for Information (“RFI”) to the Rate 41 Group. Rate 41 received EPE’s First RFI on November 10, 2021. Pursuant to Order No. 1, Rate 41’s response is due within five (5) working days. This response is therefore timely filed. All parties may treat these answers as if they were filed under oath.

Rate 41 reserves the right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,

By: /s/ Maria Faconti

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**ATTORNEYS FOR:**

**ANTHONY INDEPENDENT SCHOOL DISTRICT  
CANUTILLO INDEPENDENT SCHOOL DISTRICT  
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EL PASO COUNTY  
EL PASO COUNTY COMMUNITY COLLEGE  
DISTRICT  
EL PASO COUNTY HOUSING AUTHORITY  
EL PASO INDEPENDENT SCHOOL DISTRICT  
FABENS INDEPENDENT SCHOOL DISTRICT  
HOUSING AUTHORITY OF THE CITY OF EL PASO  
REGION 19 EDUCATION SERVICE CENTER  
SAN ELIZARIO INDEPENDENT SCHOOL  
DISTRICT  
SOCORRO INDEPENDENT SCHOOL DISTRICT  
TORNILLO INDEPENDENT SCHOOL DISTRICT  
YSLETA INDEPENDENT SCHOOL DISTRICT**

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all parties of record via electronic mail on the 18th day of November 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Maria Faconti

Maria Faconti

**RATE 41 GROUP'S RESPONSE TO EPE'S  
FIRST REQUEST FOR INFORMATION**

**EPE-RATE 41 GROUP 1-1:**

Refer to Table 1 of the direct testimony of Rate 41 witness James W. Daniel. Please explain and support the basis for the 20% Rate 41 discount (in specificity); the rate class decrease floor of 50%; and reducing the rate decreases at unity cost of several classes by 50%.

**Response:**

For the basis for the 20% Rate 41 discount, see the answer to the question "Please explain the basis for the 20% base rate discount for the Rate 41 customer class," which appears on page 11, line 17, through page 12, line 17, of the direct testimony of Rate 41 witness James Daniel. The rate class decrease floor of 50%, which also reduces the rate decrease at unity, is what was proposed by EPE. For the basis for the floor of 50%, refer to Section V of the direct testimony of EPE witness Manuel Carrasco.

Preparer: James W. Daniel

Sponsor: James W. Daniel