



Control Number: 52195



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

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APPLICATION OF EL PASO  
ELECTRIC COMPANY TO CHANGE  
RATES

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§  
§

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

OFFICE OF PUBLIC UTILITY COUNSEL'S  
FIRST REQUEST FOR INFORMATION TO  
EL PASO ELECTRIC COMPANY

Pursuant to 16 Texas Administrative Code ("TAC") § 22.144, the Office of Public Utility Counsel ("OPUC") submits this First Request for Information to El Paso Electric Company ("EPE"). OPUC requests that EPE provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that EPE provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. "EPE," the "Company," "Applicant," "You," and "Your" refer to El Paso Electric Company and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
2. "Document" and "documents" include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

**Claim of Privilege**

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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**General Questions**

- 1-1. Please provide copies of all testimony, exhibits, and workpapers in functioning electronic formats, with cell references and formulae intact, wherever available.
- 1-2. Please provide a functioning version of EPE's filed Jurisdiction Cost of Service Study with cell references and formulae intact.
- 1-3. Please provide a functioning version of EPE's filed Texas Retail Class Cost of Service Study with cell references and formulae intact.

**Pandemic Impact Questions**

- 1-4. Did EPE make any adjustments to test-year sales, revenues, or expenses to normalize the impacts of the COVID-19 pandemic on the economy, class usage levels, class usage patterns, and EPE's sales and revenues? If so, please identify where in EPE's filed testimony, attachments, schedules, or workpapers adjustments to normalize the impacts of the COVID-19 pandemic on EPE's sales revenues or expenses are identified or discussed. If no such adjustments were made, please provide a detailed justification for EPE's decision to not make adjustments to normalize the impacts of the COVID-19 pandemic.
- 1-5. Please provide the kilowatt-hours ("kWh"), coincident peak demands ("CP"), maximum class demands ("MCD") and non-coincident peak demands ("NCP") data by rate class both at meter and at source and by rate class by month for each jurisdiction for the period of 2010 through 2019. The information provided should be comparable to the information EPE provided in the Rate Filing Package ("RFP"), Schedule O-1.3 in Excel or other functioning electronic format.
- 1-6. Please provide the number of customers served by EPE by month and by rate class for the Texas retail jurisdiction, New Mexico retail jurisdiction, and the Federal Energy Regulatory Commission ("FERC") jurisdiction (i.e., Wholesale Power Service and transmission only service delivery points) for the period from the end of the test year through present. Please provide the information in Excel or other functioning electronic format.
- 1-7. Please provide the kWh, CP, MCD and NCP data by class and by month both at meter and at source for the Texas retail jurisdiction, New Mexico retail jurisdiction, and the FERC jurisdiction for the period from the end of the test year through present. The information provided should be comparable to the information EPE provided in the Schedule O-1.3 in Excel or other functioning electronic format.
- 1-8. Please provide the number of customers served by EPE by month and by rate class for the Texas retail jurisdiction, New Mexico retail jurisdiction, and the FERC jurisdiction (i.e., Wholesale Power Service and transmission only service delivery points) for the period of

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2010 through 2019. Please provide the information in Excel or other functioning electronic format.

- 1-9. Please provide the number of customers served by EPE by month and by rate class for the Texas retail jurisdiction, New Mexico retail jurisdiction, and the FERC jurisdiction for each month from the end of the test year through present. Please provide the information in Excel or other functioning electronic format.
- 1-10. Please provide the actual billing determinants, consistent with the type of data provided in Schedule Q-7 (e.g. billed customers, kWh, billed kilowatts ("kW"), etc.), by rate class and by month for the Texas retail jurisdiction, New Mexico retail jurisdiction, and the FERC jurisdiction for the period of 2010 through 2019. Please provide this information in Excel or other functioning electronic format.
- 1-11. Please provide the actual billing determinants, consistent with the type of data provided in Schedule Q-7 (e.g. billed customers, kWh, billed kW, etc.), by rate class and by month for the Texas retail jurisdiction, New Mexico retail jurisdiction, and the FERC jurisdiction (e.g., Wholesale Power Service and transmission only service delivery points) for the test year. Please provide this information in Excel or other functioning electronic format.
- 1-12. Please provide the actual billing determinants, consistent with the type of data provided in Schedule Q-7 (e.g. billed customers, kWh, billed kW, billed on-peak kW, etc.), by rate class and by month for the Texas retail jurisdiction, New Mexico retail jurisdiction, and the FERC jurisdiction for each month since December 2020. Please provide this information in Excel or other functioning electronic format.
- 1-13. Please provide the latest sales forecast for EPE, released for either internal or external use prior to March 1, 2020, that identified the forecasted annual kWh sales by jurisdiction and by retail customer class or group for 2020. If available, please provide this information in Excel or other functioning electronic format.
- 1-14. Please provide the latest sales forecast for EPE, released for either internal or external use, prior to March 1, 2020, that identifies the forecasted monthly kWh sales by jurisdiction and by retail customer class or group for 2020. If available, please provide this information in Excel or other functioning electronic format.
- 1-15. Please provide the latest sales forecast for EPE, released for either internal or external use, that identifies the forecasted annual kWh sales by jurisdiction and by retail customer class or group for 2022. If available, please provide this information in Excel or other functioning electronic format.
- 1-16. Please provide the latest sales forecast for EPE, released for either internal or external use, that identifies the forecasted monthly kWh sales by jurisdiction and by retail customer class

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or group for 2022. If available, please provide this information in Excel or other functioning electronic format.

- 1-17. Please provide copies of all monthly sales reports to EPE management that identifies EPE's budget or forecasted kWh sales, EPE's actual monthly kWh sales, and EPE's weather normalized kWh sales by jurisdiction and by retail customer class or group for the period of January 2017 through present. Please also provide any reports, analyses, or other documents that discuss the differences between actual and budgeted monthly kWh sales. Please provide in working Excel format any data that is available in that format and provide relevant information for all additional months as they become available.
- 1-18. Please provide copies of all sales reports to EPE management that identify EPE's budget or forecasted billing demand, EPE's actual monthly billing demand, and EPE's weather normalized billing demand. Please provide this information by jurisdiction and by retail customer class or group for the period of January 2017 through present. Please also provide any reports, analyses, or other documents that discuss the differences between actual and budgeted monthly billing demands. Please provide in working Excel format any data that is available in that format and provide all additional months as they become available.
- 1-19. Please provide any analyses or reports that compare monthly kWh, kW, or revenues by jurisdiction and by customer class or customer groups for each available month in 2021 compared to the same month in 2020. Please provide in working Excel format any data that is available in that format and provide all additional months as they become available.
- 1-20. Please provide all reports, presentations, analyses, or other documents prepared by or for EPE, Infrastructure Investment Fund, or J.P. Morgan that identifies, analyzes, or discusses the impacts of the COVID-19 pandemic on the economy, class usage levels, and patterns and EPE's 2020 sales and revenues, either in total, by jurisdiction or by customer groups or classes.
- 1-21. Please provide the following information for all Texas and New Mexico rate classes and all FERC jurisdictional classes for the test year and calendar years of 2016 through 2019, both at the meter and adjusted for losses:
  - a. Monthly system generation coincident peak demand;
  - b. Monthly transmission coincident peak demand;
  - c. Class non-coincident peak demand;
  - d. Customer non-coincident peak demand; and
  - e. kWh sales.
- 1-22. Please provide the hourly native system generation demands for every hour beginning with the first hour on January 1, 2020 through the twenty-fourth hour of December 31, 2020.
- 1-23. Have any significant changes (e.g., equal to or greater than 10%) occurred since September 30, 2016 in the composition of EPE's generation-related plant investment or the types of



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items included in EPE's generation-related plant investment? If so, please identify all changes and provide:

- a. A detailed description; and
- b. Approximate dollar values for each change to the types and composition of EPE's generation-related plant investment since September 30, 2016.

Please provide any tables, data, or worksheets in native, Excel format.

- 1-24. Have any significant changes (e.g., equal to or greater than 25%) occurred since September 30, 2016 in the types or composition of EPE's generation-related Operation and Maintenance ("O&M") expenses? If so, please identify all changes and provide:

- a. A detailed description; and
- b. Approximate dollar values for each change to the types and composition of EPE's generation-related O&M expenses since September 30, 2016.

Please provide any tables, data, or worksheets in native, Excel format.

- 1-25. Have any significant changes (e.g., equal to or greater than 25%) occurred since September 30, 2016 in the composition of EPE's transmission-related plant investment or the types of items included in EPE's transmission-related plant investment? If so, please identify all changes and provide:

- a. A detailed description; and
- b. Approximate dollar values for each change to the types and composition of EPE's transmission-related plant investment since September 30, 2016.

Please provide any tables, data, or worksheets in native, Excel format.

- 1-26. Have any significant changes (e.g., equal to or greater than 25%) occurred since September 30, 2016 in the types and composition of EPE's transmission-related O&M expenses? If so, please identify all changes and provide:

- a. A detailed description; and
- b. Approximate dollar values for each change to the types and composition of EPE's transmission-related O&M expenses since September 30, 2016.

Please provide any tables, data, or worksheets in native, Excel format.

- 1-27. Have any significant changes (e.g., equal to or greater than 25%) occurred since September 30, 2016 in the composition of EPE's distribution-related plant investment or the types of items included in EPE's distribution-related plant investment? If so, please identify all changes and provide:

- a. A detailed description; and

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- b. Approximate dollar values for each change to the types and composition of EPE's distribution-related plant investment since September 30, 2016.

Please provide any tables, data, or worksheets in native, Excel format.

- 1-28. Have any significant changes (e.g., equal to or greater than 25%) occurred since September 30, 2016 in the types and composition of EPE's distribution-related O&M expenses? If so, please identify all changes and provide:

- a. A detailed description; and
- b. Approximate dollar values for each change to the types and composition of EPE's distribution-related O&M expenses since September 30, 2016.

Please provide any tables, data, or worksheets in native, Excel format.

- 1-29. Have any significant changes (e.g., equal to or greater than 25%) occurred since September 30, 2016 in the composition of EPE's general- and intangible-related plant investment or the types of items included in that investment? If so, please identify all changes and provide:

- a. A detailed description; and
- b. Approximate dollar values for each change to the types and composition of EPE's generation and intangible-related plant investment since September 30, 2016.

Please provide any tables, data, or worksheets in native, Excel format.

- 1-30. Have any significant changes (e.g., equal to or greater than 25%) occurred since September 30, 2016 in the types and composition of EPE's Customer Accounts Expenses (FERC United System of Accounts ("USoA") Accounts 901 – 905), Customer Service and Information Expenses (FERC USoA Accounts 907 – 910), Customer Sales Expenses (FERC USoA Accounts 912 – 916), or Administrative and General Expenses (FERC USoA Accounts 920 – 935)? If so, please identify all changes and provide:

- a. A detailed description; and
- b. Approximate dollar values for each change to the types and composition of each of these groups of O&M expenses since September 30, 2016.

Please provide any tables, data, or worksheets in native, Excel format.

**Distribution Study**

- 1-31. Please provide all workpapers, supporting documents, and calculations used to develop the primary and secondary splits for distribution plant FERC USoA Accounts 360 – 368 in the Distribution Study found in Schedule P-11. In addition, please provide a detailed explanation of the basis for the primary and secondary splits for each account.

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**Transmission Customers use of Distribution Facilities**

- 1-32. For each wholesale load or delivery point served through EPE-owned distribution facilities, please provide:
- a. The annual charges under the currently approved Wholesale Distribution Service Charge or other approved charge for providing distribution service to wholesale delivery points or loads through EPE-owned distribution facilities;
  - b. The billing determinants; and
  - c. The associated tariff, rate, or contract.
- 1-33. Based on interval meter data or calculated loadings from a 2020 peak load flow, please provide the loadings by distribution substation at the time of the 2020 system peak for all EPE distribution substations.
- 1-34. Please provide the number of distribution line transformers included in FERC account number 368 by kilovolt-amperes rating by state as of December 31, 2020.
- 1-35. Please identify all retail or wholesale loads that receive service through EPE-owned distribution substations that are billed as transmission voltage service rather than distribution voltage service due to leasing or other contractual arrangements. Please provide the following information for each load:
- a. the retail or wholesale tariff(s) or contract rate under which the load is served;
  - b. the name and location of the substation through which the load is served;
  - c. total plant in service and net plant in service for the distribution facilities serving the load;
  - d. monthly demands for the load at the time of the monthly class peak or NCP demand; and
  - e. billing determinants.
- 1-36. Please provide a table separately identifying EPE's capital additions by year for the period of 2015 through 2020 for generation, transmission, distribution, general, and intangible.

**Other Cost Allocation Questions**

- 1-37. Please identify all radial sub-transmission or transmission lines rated at 69 kilovolts or higher that serve a single retail or FERC jurisdictional customers. Please provide the following information for each radial sub-transmission or transmission lines identified:
- a. name of the radial line;
  - b. voltage at which the line is operated;
  - c. current gross plant in service and net plant in service of radial line facilities;
  - d. county and state in which the radial line is located;
  - e. county and state in which the customer is located;
  - f. regulatory jurisdiction and rate class under which the customer is served;


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- g. test-year monthly EPE system coincident peak demands at meter and at generation for the customer;
- h. test-year monthly kWh at meter and at generation for the customer; and
- i. test-year monthly billing determinants for the customer.

July 1, 2021

Respectfully submitted,

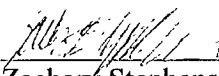
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ATTORNEYS FOR THE  
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**CERTIFICATE OF SERVICE**  
SOAH DOCKET NO. 473-21-2606  
PUC DOCKET NO. 52195

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 1st day of July 2021 by facsimile, electronic mail, and/or first class, U.S. Mail.

  
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Zachary Stephenson