



## Filing Receipt

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**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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**OFFICE OF PUBLIC UTILITY COUNSEL’S  
RESPONSE TO EL PASO ELECTRIC COMPANY’S  
SECOND REQUEST FOR INFORMATION**

The Office of Public Utility Counsel (“OPUC”) submits this response to El Paso Electric Company’s (“EPE”) Second Request for Information that was received on November 12, 2021. Pursuant to State Office of Administrative Hearings Order No. 2, OPUC’s response is timely filed within 5 working days of receipt of EPE’s discovery request. OPUC stipulates that all parties may treat this response as if it were filed under oath.

Dated: November 19, 2021

**SOAH Docket No. 473-21-2606**  
**PUC Docket No. 52195**  
**OPUC's Response to El Paso Electric Company's**  
**Second Request for Information**

**EPE 2-1:**

Will OPUC witness Mr. Evans' (sic) proposed base revenue increase distribution move all rate classes to cost? Please explain your answer.

**RESPONSE:**

No. Using Mr. Evans's proposed gradualism approach to the base revenue increase distribution was intended to move all rate classes toward EPE's fully allocated cost of service at a moderated level in order to avoid rate shock. Based on the wide range in the performance of rates for EPE's rate classes and the unusual conditions relative to the pandemic that prevailed during EPE's test-year, Mr. Evans does not believe it would be prudent to force all rate classes to their fully allocated cost of service in this rate case.

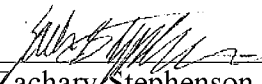
Prepared by: Evan D. Evans

Sponsored by: Evan D. Evans

November 19, 2021

Respectfully submitted,


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ATTORNEYS FOR THE  
OFFICE OF PUBLIC UTILITY COUNSEL

**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 19th day of November 2021 by facsimile, electronic mail, and/or first class, U.S. Mail.

  
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Zachary Stephenson