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SOAH DOCKET NO. 473-21-2606
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**APPLICATION OF EL PASO
ELECTRIC COMPANY TO
CHANGE RATES**

**§ BEFORE THE STATE OFFICE
§ OF
§ ADMINISTRATIVE HEARINGS**

**CITY OF EL PASO'S RESPONSES TO
TIEC's SECOND REQUEST FOR INFORMATION TO
CITY OF EL PASO TIEC 2-1—TIEC 2-3**

TIEC's Second Requests for Information were served on November 19, 2021. Pursuant to the scheduling Order, the 5th working day after November 19, 2021 is December 1, 2021.

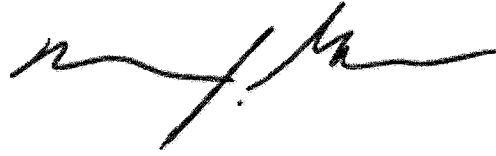
Dated: December 1, 2021.

Respectfully submitted,

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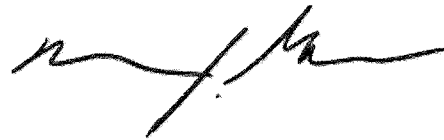
Attorneys for the City of El Paso



By: _____
Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on December 1, 2021.



Norman J. Gordon

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- TIEC 2-1.** Please refer to Mr. Johnson's workpaper, "3-CJ Confidential Workpaper EPE Regulatory Case Working Model - As Filed - Dkt 52195."
- a. Admit or deny that Mr. Johnson's model changes the allocation of fuel expenses among rate classes compared to EPE's Regulatory Case Working Model.
 - b. Admit or deny that Mr. Johnson's model does not change the fuel revenues from retail rates assigned to each rate class in EPE's Regulatory Case Working Model.
 - c. Admit or deny that the reconcilable fuel expenses allocated to each rate class in Mr. Johnson's model do not equal the fuel revenues assigned to each rate class.
 - d. Admit or deny that Mr. Johnson did not include interruptible energy in the E1FUEL/E2ENERGY allocators for Rate 15 or Rate 25. If denied, please explain why the allocation factor inputs for E1ENERGY and E1FUEL are the same for these respective rate classes.
 - e. Admit or deny that Mr. Johnson included interruptible energy in the E1FUEL/E2ENERGY allocators for Rate 24. If denied, please explain why the allocation factor inputs for E1ENERGY and E1FUEL are not the same for Rate 24.

RESPONSE:

- (a) Admitted.
- (b) Denied. Mr. Johnson used the Company regulatory model, and adjusted allocation factors and made other allocation modifications permitted in the model. The DEC Component Allocation sheet in the model identifies E1FUEL as the allocation applied to fuel revenues. For this reason, Mr. Johnson cannot agree with this statement.
- (c) Cannot admit or deny. Mr. Johnson has not performed a comparison that identifies reconcilable fuel expense amounts produced by the model in relation to the amounts of reconcilable fuel revenue allocated to Other Operating Revenues.

- (d) Admitted in part. The model which was included in confidential workpapers contained an error in the allocators for those two classes. The error was partially due to a cell reference to EPE Schedule P-7 prior to the Company's filing of Schedule P-7 Errata No. 2. Corrected schedules and workpapers will be prepared prior to hearing.
- (e) Admitted in part. The model which was included in confidential workpapers contained an error in the allocators for this class. The error was partially due to a cell reference to EPE Schedule P-7

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**CITY OF EL PASO'S RESPONSES TO
TIEC'S FIRST REQUEST FOR INFORMATION TO
CITY OF EL PASO TIEC 1-1—TIEC 1-6**

TIEC 2-2. Please provide the impact on each rate class's cost of service of Mr. Johnson's adjustments to external allocation factors to account for COVID-19, separately from Mr. Johnson's other cost allocation changes.

RESPONSE:

Mr. Johnson did not quantify the separate impacts of cost allocation adjustments related to COVID-19. For purposes of evaluating the class cost of service study as a benchmark for class revenue allocation, Mr. Johnson's opinion is that all appropriate adjustments should be included. However, in answer to 2-3, Mr. Johnson retrieved a copy of the Company's model which included only the external allocation factor adjustments.

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TIEC 2-3. Please provide the cost-of-service model that is the source for Mr. Johnson's COVID-19 adjustment impacts, separately from Mr. Johnson's other cost allocation changes.

RESPONSE:

Mr. Johnson did not quantify the separate impacts of cost allocation adjustments related to COVID-19. Mr. Johnson identified the version of the cost of service model which existed prior to incorporation of non-COVID-19 adjustments. This model does not provide the basis for Mr. Johnson's recommendations. This model does not take into account the Company's Errata No. 2. This model is confidential and provided pursuant to a protective order. This version is based on the Company's propose revenue requirement.

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Confidential Attachment TIEC 2-3 will be provided to parties who have executed the Protective Order and filed under the Commission's Confidential material directives.