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

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PUC DOCKET NO. 52195

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EL PASO ELECTRIC COMPANY'S RESPONSE TO
FREEPORT-MCMORAN, INC'S SIXTH REQUEST FOR INFORMATION
QUESTION NOS. FMI 6-1 THROUGH FMI 6-7

FMI 6-1:

Did the decision to retire Newman Units 1 and 2 in December 2022 have an impact on EPE's need for Newman Unit 6?

RESPONSE:

The retirement of Newman Units 1 and 2 was a factor that was considered in determining the need for Newman Unit 6. Newman Unit 6 was selected as part of a portfolio of resources that were sought due to load growth and potential unit retirements, which included Newman Units 1 and 2. Life extensions of these units were included as part of the economic evaluation of resource proposals, and the selection of the resources in the portfolio led to the decision to retire Newman Units 1 and 2.

Preparer: Victor Martinez

Title: Manager – Resource Planning, Resource
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Assurance

Sponsor: David C. Hawkins

Title: Vice President – Strategy & Sustainability

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FMI 6-2:

Regarding EPE's Settlement Agreement entered into between EPE, Chapparal Community Coalition and the Sierra Club on August 14, 2021, please confirm that EPE committed to file abandonment applications for Newman Unit 1 or 2 and Rio Grande Unit 7 no later than the start date of Newman Unit 6.

RESPONSE:

Confirmed.

As per SOAH Docket No. 473-21-2606; "No later than the start of commercial operations date of Newman Unit 6, EPE will file abandonment applications for Newman Unit 1 or Newman Unit 2 and Rio Grande Generation Station Unit 7 with the New Mexico Public Regulation Commission." In the filing for abandonment, EPE will propose a date for abandonment sometime in the future. Furthermore, the retirement options for the Units were considered in El Paso Electric Company's ("EPE") 2021 IRP modeling where the Unit extensions were introduced as resource options competing against other generic IRP resource options. Newman Unit 1 was selected by the 2021 IRP model for a retirement extension of 5 years from 2022. The Unit retirement extensions will be re-evaluated as part of the 2021 EPE RFP evaluations which can result in the retirement date extension of one or more of the Units modeled.

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FMI 6-3:

Please confirm that the composite remaining lives for Newman Units 1 and 2, and Rio Grande Unit 7 are 3 years, as of December 31, 2019.

RESPONSE:

The statement cannot be confirmed. Newman Units 1 and 2, and Rio Grande Unit 7 from an operational perspective may continue to provide value in inactive reserve state after December 31, 2022, or, as a result of their age, may prematurely end prior to December 2022 in the event of a significant contingency. Please refer El Paso Electric Company's response to FMI 6-2.

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FMI 6-4:

Assuming that EPE intends to keep Newman Units 1 and 2 and Rio Grande Unit 7 in an inactive status to provide contingency reserves, explain why the capacity of these units is not included in the Load and Resources Table presented on page 59 of EPE's Integrated Resource Plan filed on September 16, 2021, with New Mexico Public Regulation Commission.

RESPONSE:

Those units are not viewed as being maintained for dispatch at a moment's notice and hence not part of the resources counted on towards the planning reserve margin. The units will be placed in inactive reserve, which will give EPE the ability assess and/or bring them back into service to meet system conditions, if needed and economical. Please refer El Paso Electric Company's response to FMI 6-2.

Units selected for retirement extension were included in the 2021 L&R for the 5-year extensions.

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FMI 6-5:

The following Interrogatories pertain to the Rebuttal Testimony of Todd A. Horton.

Please provide the EUCG data for pressurized water reactors referenced and used by Mr. Horton as noted on Page 2, line 15 in “live” EXCEL format.

RESPONSE:

Please see FMI 6-5, Attachment 1-Highly Sensitive Protected Materials for EUCG data relied on in the direct testimony of Todd Horton page 34. As noted in the direct testimony of Todd Horton, the Water Reclamation Facility costs were excluded in this comparison.

This attached EUCG data includes all Pressurized Water Reactor nuclear power plants in the United States. Palo Verde O&M costs including the Water Reclamation Facility and excluding (highlighted in blue) are included.

The agreement with EUCG requires EPE to blind the presentation of any EUCG data.

Preparer: Nadia Powell

Title: Director – Enterprise Advanced Analytics

Sponsor: Todd Horton

Title: Sr. Vice President of Site Operations

EL PASO ELECTRIC COMPANY

SOAH Docket No. 473-21-2606

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FMI's 6th, Q. No. FMI 6-5

Attachment 1

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PUBLIC

FMI 6-5 Attachment 1 is a CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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FMI 6-6:

The following Interrogatories pertain to the Rebuttal Testimony of Todd A. Horton.

Using the EUCG data, please identify any and all the utilities in the United States that operate “independent, stand-alone pressurized water reactor” nuclear units, as that phrase is used on Page 3, lines 28-31.

RESPONSE:

Please see El paso Electric Company’s the response to FMI 6-5, Attachment 1, page 10 (Tab 2). The utilities in the United States that operate “independent, stand-alone pressurized water reactor” units are:

Luminant
American Electric Power
NRG Energy
Eversource
APS
Dominion
Pacific Gas and Electric
Ameren Missouri

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FMI 6-7:

The following Interrogatories pertain to the Rebuttal Testimony of Todd A. Horton.

Using the EUCG data provided in response to FMI 6-6, please identify any nuclear units that occupy a “large footprint” similar to the three Palo Verde units as referenced on Page 4, lines 10-14.

RESPONSE:

EPE is not aware of any nuclear units that occupy a similar footprint to Palo Verde. The footprint of all of the three-unit nuclear power plants in the United States is stated in the direct testimony of Todd Horton at page 7.

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CONFIDENTIALITY STATEMENT UNDER
SECTION 4 OF THE PROTECTIVE ORDER

The undersigned attorney for El Paso Electric Company (EPE) submits this statement under the section 4 of the Protective Order entered in this case. Materials provided in Attachment 1 to question FMI 6-5 in Freeport-McMoran, Inc.'s sixth set of discovery contain proprietary material owned by EUCG and is therefore exempt from public disclosure pursuant to sections 552.110 the Public Information Act (PIA). Counsel for EPE has reviewed the material and can state in good faith that the response contains documents that are subject to confidentiality provisions that require EPE to prevent the public release of the information contained therein, exempting it from public release under the PIA.

Respectfully submitted,

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**ATTORNEYS FOR EL PASO ELECTRIC
COMPANY**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by email on all parties of record on December 7, 2021.


Bret J. Slocum