



Filing Receipt

Received - 2021-12-08 01:43:55 PM

Control Number - 52195

ItemNumber - 463

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

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

**CITY OF EL PASO’S NINETEENTH REQUESTS FOR INFORMATION
TO EL PASO ELECTRIC COMPANY QUESTIONS CEP 19-1 THROUGH CEP 19-32**

The City of El Paso (the “City”) requests that the El Paso Electric Company (“EPE”) provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within twenty (20) calendar days. Please copy the question immediately above the answer to each question. The question(s) are continuing in nature, and if there is a relevant change in circumstances, such as that new or additional information or review reveals that an answer previously made is no longer complete or is inaccurate, that EPE submit an amended answer, under oath, as a supplement to your original answer within five days of the discovery of new or additional information. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

The City requests that EPE serve its respective responses to this Request on the following person via electronic mail and delivery of hard copies:

Norman J. Gordon
PO Box 8
El Paso, Texas, 79940
221 N. Kansas, Suite 700
El Paso, Texas, 79901
ngordon@ngordonlaw.com

Frances M. Maldonado Engelbaum
300 N. Campbell, Third Floor
El Paso, Texas, 79901
Engelbaumfm@elpasotexas.gov

DEFINITIONS AND INSTRUCTIONS

1. This Request is directed to El Paso Electric Company ("EPE"). Reference to EPE, "**you**" or "**your**" means all divisions, departments, bureaus, agencies, and all witnesses whose testimony EPE intends to present, and all persons acting or purporting to act for or on behalf of EPE, including its directors, officers, employees, and agents.

2. The terms "**document**" and "**documents**" are used in their broadest sense and shall mean and include all written, printed, electronic, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" or "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of personal conversations, minutes or summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultant reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

3. "**Person**" means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver syndicate, municipal corporation, government agency, any other form of legal entity, and other group or combination acting as a unit.

4. "**Relating to**" a subject means making a statement about, mentioning, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting or in any way pertaining, in whole or in part, to the subject.

5. "**Identify**" means:

- a. as to a "person," stating his, her or its:
 - (i) legal, full, and customarily used names;
 - (ii) present residential or business address;
 - (iii) job title; and
 - (iv) name of employer.
- b. as to a document, act, event, transaction or occurrence, stating:
 - (i) its date, authors or participants;
 - (ii) the place where it took place, was created or occurred;
 - (iii) its purpose and subject matter; and
 - (iv) a concise description of what transpired.

6. For each response, please state the Request for Information and identify the individual(s) responsible for preparing and sponsoring the response by name and title.

7. Pursuant to Rule 196.4, Texas Rules of Civil Procedure, any electronic or magnetic data included in the definition of document should be produced on a CD-ROM or similar media that is compatible with Microsoft Office software.

8. For each document produced that is generated by computer, please identify:

- a. the nature and source of the data constituting the input;
- b. the form of the input (e.g., tapes, punch cards);
- c. the recording system employed (e.g., program, flow charts); and
- d. the person(s) responsible for processing the input and/or performing the programming.

9. “**Each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**”.

10. “**Any**” shall be construed to include “**all**” and “**all**” shall be construed to include “**any**.”

11. The terms “**and**” and “**or**” shall be construed as either disjunctive or conjunctive as necessary to make this request inclusive rather than exclusive.

12. The term “**concerning**” includes the following meanings: relating to; pertaining to; regarding; discussion; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected to the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

13. The term “**including**” means and refers to “including but not limited to.”

14. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

15. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

Dated: December 8, 2021

Respectfully submitted,

Norman J. Gordon (ngordon@ngordonlaw.com)

State Bar No. 08203700

P.O. Box 8

El Paso, Texas, 79940

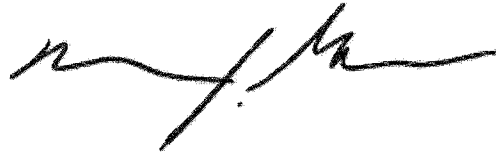
221 N. Kansas, Suite 700

El Paso, Texas, 79901

(915) 203 4883

Karla M. Nieman, City Attorney
State Bar No. 24048542
Frances M. Maldonado Engelbaum
State Bar No. 24094272
City of El Paso
300 N. Campbell, 2nd Floor
El Paso, Texas 79901
(915) 212-0033
(915) 212-0034 (fax)
Niemankm@elpasotexas.gov
Engelbaumfm@elpasotexas.gov

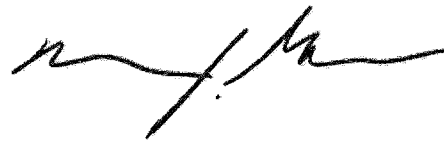
Attorneys for the City of El Paso



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 8, 2021.



Norman J. Gordon

PUC Docket No. 52195
City of El Paso's Nineteenth RFIs
Questions CEP 19-1---CEP 19-32

For CEP 19-1—19-4 Reference the Rebuttal testimony of J. Kyle Olson at page 7 lines 1-23

- CEP 19-1. Admit or Deny that EPE has not provided any cost benefit analysis for the purchase of the LMS100 booster and power turbine
- a. If Deny, please identify the discovery response in which the cost-benefit analysis was provided.
 - b. If the answer is Deny, please provide a copy of the cost benefit analysis prepared by EPE.
- CEP 19-2. With respect to the discussion on lines 12-23
- a. Please identify the date on which the decision was made to install the booster at Rio Grande 9 in the fall of 2022
 - b. Please provide all documents discussing and/or leading to that decision
 - c. Admit or deny that as of December 31, 2020, there was no plan to install that booster in a specific time frame on any of the units.
 - d. Provide all documents which address recent inspections in the blades across the blades of a particular vintage General Electric LMS 100 fleet.
 - e. As of December 31, 2020, was the Rio Grande Unit 9 booster scheduled to be refurbished in 2022?
 - i. If not, as of December 31, 2020 when was the booster scheduled to be refurbished?
 - ii. If not when was the decision made to refurbish the booster for Rio Grande Unit 9 in 2022?
 - f. As of June 1, 2021, what outages were planned for Rio Grande Unit 9 in 2022?
 - g. Provide all documents which relate to any changes in the schedule after June 1, 2022.
- CEP 19-3. Reference the word “critical” on line 23, please provide any and all studies and/or analysis of the consequences of not having the spare components Mr. Olson claims to be critical?
- CEP 19-4. Reference the word “critical” on line 23, identify the spare parts by description and costs that EPE has for its other generating units?
- CEP 19-5. Reference page 8, lines 1-6 of EPE witness Hawkins’ rebuttal testimony, please provide payroll dollars charged to FERC Account 566 for each year since 2015 and for the adjusted test year as requested in this case.

- CEP 19-6. Reference page 8, lines 1-6 of EPE witness Hawkins' rebuttal testimony, please provide total payroll dollars, along with payroll charged to transmission capital projects and payroll dollars charged to transmission O&M (separately provided) for each year since 2015 and for the adjusted test year as requested in this case.
- CEP 19-7. Reference page 8, lines 7-17 of EPE witness Hawkins' rebuttal testimony, please provide communication payroll dollars charged to FERC Accounts 920 and 566 (separately provided) for each year since 2015 and for the adjusted test year as requested in this case.
- CEP 19-8. Reference page 8, lines 12-15 of EPE witness Hawkins' rebuttal testimony, please provide the increase in payroll dollars charged to Account 566 in 2020 related to cybersecurity and communication systems personnel when compared to the average level payroll charged to Account 566 for these functions in 2016-2019.
- CEP 19-9. Please provide the O&M expense by FERC account for each EPE generating plant excluding Palo Verde for each year from 2010 to 2015.
- CEP 19-10. Please provide the total annual forced outage hours for each EPE generating plant excluding Palo Verde for each year from 2010 to 2015.
- CEP 19-11. Please provide the total annual planned outage hours for each EPE generating plant excluding Palo Verde for each year from 2010 to 2015.
- CEP 19-12. Please provide EPE's current planned outage schedule for each EPE generating plant excluding Palo Verde for 2021, 2022 and 2023 (if available).
- CEP 19-13. Please provide EPE's current O&M budget for each EPE generating plant excluding Palo Verde for 2021, 2022 and 2023 (if available).
- CEP 19-14. Please provide the total customer minutes interrupted due to forced outages of EPE generating plants for each year since 2010 along with a description of the events that caused each such customer interruption.
- CEP 19-15. Please provide budget variance reports for the Test Year period which describe the reasons for variances between budgeted and actual O&M expenses at each EPE plant excluding Palo Verde.
- CEP 19-16. Please provide any analysis conducted by EPE that demonstrates that the Test Year level of forced and planned outages was normal and likely to recur on an ongoing basis in the future.

- CEP 19-17. Please provide any analysis conducted by EPE that demonstrates that the Test Year level of non-fuel O&M expenses at EPE's plants (excluding Palo Verde) was normal and likely to recur on an ongoing basis in the future.
- CEP 19-18. Please provide the most recent analysis conducted by EPE that demonstrates that the increase in the Test Year level of non-fuel O&M expenses at EPE's plants (excluding Palo Verde) was due to plant aging impacts.
- CEP 19-19. Please provide the original schedule planned outage hours and actual scheduled planned outage hours for each EPE generating unit excluding Palo Verde units for each year since 2016, for the Test Year period, and for 2021 to date.
- CEP 19-20. Reference page 4, lines 1-5 of EPE witness Olson's rebuttal testimony, please provide a complete copy of the transcript of Mr. Norwood's cross examination in Docket 50277.
- CEP 19-21. Reference page 4, lines 9-16 of EPE witness Olson's rebuttal testimony, please provide O&M expense for each of EPE's local generating units supporting the budgeted and actual expense figures for 2021 presented in this testimony.
- CEP 19-22. Please provide total forced outage hours for each of EPE's local generating units for 2021 to date.
- CEP 19-23. Reference page 4, lines 9-16 of EPE witness Olson's rebuttal testimony, please provide budget and actual O&M expenses for each of EPE's local generating units for each month to date for 2021, along with variance reports that address the reasons for any variance from budgeted expense levels at each plant.
- CEP 19-24. Please provide O&M expenses for freeze protection for each of EPE's local generating plants for each of the last five years, the Test Year and for 2021 to date.
- CEP 19-25. Reference page 5, lines 6-9 of EPE witness Olson's rebuttal testimony, please provide the non-fuel O&M expenses and capacity factors for Newman Units 1 and 2 for each year since 2016, for the Test Year, and for 2021 to date.
- CEP 19-26. Reference page 6, lines 1-15 of EPE witness Olson's rebuttal testimony, please provide O&M expenses incurred for forced and planned outages for each of EPE's local generating plants for each of the last five years, the Test Year and for 2021 to date.

- CEP 19-27. Reference page 6, lines 1-15 of EPE witness Olson's rebuttal testimony, please provide capital expenditures incurred for forced and planned outages for each of EPE's local generating plants for each of the last five years, the Test Year and for 2021 to date.
- CEP 19-28. Reference page 7, lines 9-23 of EPE witness Olson's rebuttal testimony, please provide the date, duration and incremental O&M and replacement energy costs associated with each unplanned outage due to LMS 100 booster and power turbine failures at EPE's local generating plants for each of the last five years, the Test Year and for 2021 to date.
- CEP 19-29. Reference Exhibit RCD-3R of EPE witness Doyle's rebuttal testimony, please identify the specific passages of Exhibit RCD-3R or EPE's direct or rebuttal testimony that provide cost/benefit analyses to support EPE's claims that each of the six distribution capital projects addressed by Mr. Norwood's direct testimony were prudent.
- CEP 19-30. Reference Exhibit RCD-3R of EPE witness Doyle's rebuttal testimony, please identify the specific passages of Exhibit RCD-3R or EPE's direct or rebuttal testimony that provide the estimated reliability benefits to support EPE's claims that the six distribution capital projects addressed by Mr. Norwood's direct testimony were prudent.
- CEP 19-31. Reference Exhibit RCD-3R of EPE witness Doyle's rebuttal testimony, please identify the specific passages of Exhibit RCD-3R or EPE's direct or rebuttal testimony that provide the specific project cost variance analysis to support EPE's claims that the final cost of each of the six distribution capital projects addressed by Mr. Norwood's direct testimony were reasonable.
- CEP 19-32. Reference Exhibit RCD-3R of EPE witness Doyle's rebuttal testimony, please identify the specific passages of Exhibit RCD-3R or EPE's direct or rebuttal testimony that support EPE's claims that the each of the six distribution capital projects addressed by Mr. Norwood's direct testimony were necessary to provide reliable service to EPE customers.