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CEP 19-15_Attachment 01.xlsx
CEP 19-19_Attachment 01.xlsx
CEP 19-21_Attachment 1.xlsx
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SOAH DOCKET NO. 473-21-2606
PUC DOCKET NO. 52195

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEETH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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CEP 19-1:

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

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.

RESPONSE:

- a. Admit that there is no document(s) that EPE has provided that is a “cost benefit analysis”, but EPE considered and analyzed the costs and the benefits of the spare booster and power turbine prior to its decision to purchase same. Primary benefits of the LMS 100 booster and power turbine are discussed in El Paso Electric Company (“EPE”) witness J Kyle Olson’s testimony at page 12, line 11 through line 28. Additional information on the LMS100 booster and power turbine can be found in EPE witness J Kyle Olson’s rebuttal testimony at page 7, line 8 through line 24.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

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CEP 19-2:

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

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.

RESPONSE:

As previously discussed with counsel for City of El Paso, El Paso Electric Company witness J Kyle Olson misspoke in his rebuttal testimony when he stated that the spare booster was approved to be installed at Rio Grande Unit 9. Rather, it is the spare power turbine that will be installed, and the Rio Grande Unit 9 power turbine will serve as the spare in summer 2022 and will then be refurbished.

- a. October 25, 2021. Please see the response to question b. below for the documents showing the process that culminated in the October 25, 2021 decision.

- b. Please see CEP 19-2, Attachments 1-Confidential, 2-Confidential, and 3-Confidential.
- c. Admit.
- d. Please see CEP 19-2 Attachments 1-Confidential, 2-Confidential, and 3-Confidential.
- e. No refurbishment was scheduled as of December 21, 2020. The decision to refurbish the power turbine for Rio Grande Unit 9 was finalized on October 25, 2021.
- f. As of June 1, 2021, a hot section maintenance outage has been planned for Rio Grande Unit 9 during 2022.
- g. Documents related to any changes in the outage schedule for Rio Grande Unit 9 after June 1, 2022 can be found in CEP 19-2, Attachment 4-Highly Sensitive Protected Materials.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

EL PASO ELECTRIC COMPANY

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Attachments 1-4

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CEP 19-2 Attachments 1-4 are CONFIDENTIAL or HIGHLY SENSITIVE PROTECTED MATERIALS attachments.

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CEP 19-3:

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

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?

RESPONSE:

No studies and/or analysis were required as it is obvious that both the booster and power turbine are critical components. Upon a failure of either, the unit would be unavailable.

Preparer: J Kyle Olson

Title: Director – Power Generation Asset
Management

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

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CEP 19-4:

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

Reference the word “critical” on line 23, identify the spare parts by description and costs that EPE has for its other generating units?

RESPONSE:

Pursuant to agreement of counsel, this question is limited to spare parts with a value of \$100,000 or greater. El Paso Electric Company's local generating units' spare parts, identified by description and costs, can be found in CEP 19-4, Attachment 1.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

Line No.	Generating Unit	Description	Qty	Total Price
<u>Generating Plant Critical Spare Parts</u>				
1	Newman 4	Unbladed Compressor and Unbladed Turbine	1	\$ 5,560,000
2	Newman 4	Compressor Blade (Set) - Including Hardware	2	2,196,000
3	Newman 4	Turbine Blade R1	2	1,071,360
4	Newman 4	Turbine Blade R2	2	1,071,467
5	Newman 4	Turbine Blade R3	2	1,042,334
6	Newman 4	Turbine Blade R4	2	1,161,007
7	Newman 4	R1 Vane Segments	2	1,398,939
8	Newman 4	R2 Vane Segments	2	1,481,687
9	Newman 4	R3 Vane Segments	2	1,602,447
10	Newman 4	R4 Vane Segments	2	1,866,624
11	Newman 4	R1 Ring Segments	2	263,680
12	Newman 4	R2 Ring Segments	2	409,359
13	Newman 4	R3 Ring Segments	2	260,642
14	Newman 4	R4 Ring Segments	2	271,060
15	Newman 4	Baskets	2	517,316
16	Newman 4	Transition Cylinders (Clamshells)	2	473,925
17	Newman 4	Transitions	2	1,145,708
18	Newman 4	Transition Seals	2	158,414
19	Newman 4	Fuel Nozzle Assembly	2	573,650
20	Newman 4	Compr - Diaphragms	2	4,205,896
21	Newman 4	Turbine Blade Installation Hardware	2	783,588
22	Newman 4	Unit 4 New HP Circ Pump Bare Element	1	119,449
23	Newman 4	HRSRG 1 FW Pump Overhaul	1	150,171
24	Newman 5	U5 Spare Motor	1	130,285
25	Newman 5	U5 Boiler Feed Pump Overhaul	1	121,881
26	Newman 5	GT3 Torque Converter	1	115,277
27	RG8	Boiler Forced Draft Fan Motor. (Siemens)2500 HP, 4160V, 1187 RPM	1	175,000
28	RG9	Boiler Forced Draft Fan Motor. (GE)2250 HP, 4160V, 1187 RPM	1	150,000
29	RG8	Boiler Feed Pump Motor. (Reliance)2500 HP, 4160V, 3600 RPM	1	150,000
30	RG8	Boiler Feed Pump Barrel assembly (Byron Jackson)	1	450,000
31	MPS 1-4, RG9	LMS100 Supercore Model 7LMS100-PA-NGW (878-182)	1	11,800,000
32	MPS 1-4, RG9	Spare Power Turbine	1	5,667,987
33	MPS 1-4, RG9	Spare Booster	1	1,861,546
34	MPS 1-4, RG9	247Ths Valve Butterfly, Actuator, Vbv1	1	299,100
35	MPS 1-4, RG9	247Ths Valve, Butterfly, Actuator, Vbv2, Woodward	1	299,100
36	MPS 1-4, RG9	263Lfp Pump, Assembly, Liquid Fuel, Model Vsr2100 Mtr175 S484 With New Seal	2	279,000
37	MPS 1-4, RG9	241II Valve, Butterfly, Actuator, Vbv1, Ped, Woodward	1	163,100
38	MPS 1-4, RG9	241II Valve, Butterfly, Actuator, Vbv2, Ped, Woodward	1	163,100
39	MPS 1-4, RG9	Ehsv, Vsv Actr	1	143,376
40	MPS 1-4, RG9	833Gen Essential Maintenance Kit / Applies Gsns 923395 U2Mps, 925300, 922744 U1Mps & 925515	1	141,500
41	MPS 1-4, RG9	248Mlo Pump, Mineral Lube Oil Dc Supply Pump, 500Gpm, 240Vdc Motor, 2100Rpm, 40Hp, Nema, Csa Approved	1	119,600

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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.

RESPONSE:

See the table below for payroll dollars charged to FERC Account 566 related to EMS support and associated NERC CIP protections.

	Year Ended	Year Ended	Year Ended	Year Ended	Year Ended
Acct.	December 31, 2016	December 31, 2017	December 31, 2018	December 31, 2019	December 31, 2020
566000	337,016	786,773	1,194,949	1,177,274	1,082,025

Preparer: Tracy Van Slyke

Title: Sr. Director – Operational Technology

Sponsor: David C. Hawkins

Title: Vice President – Strategy & Sustainability

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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.

RESPONSE:

See the table below for total payroll dollars, payroll dollars charged to transmission capital projects and payroll dollars charged to transmission O&M related to EMS support and associated NERC CIP protections.

	Year Ended	Year Ended	Year Ended	Year Ended	Year Ended
	December 31, 2016	December 31, 2017	December 31, 2018	December 31, 2019	December 31, 2020
Transmission Capital Payroll	796,855	391,514	114,495	87,966	118,588
Transmission O&M Payroll	337,016	786,773	1,194,949	1,177,274	1,082,025
Total Transmission Payroll	1,133,872	1,178,287	1,309,443	1,265,240	1,200,613

Preparer: Tracy Van Slyke

Title: Sr. Director – Operational Technology

Sponsor: David C. Hawkins

Title: Vice President – Strategy & Sustainability

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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.

RESPONSE:

See Response to CEP 19-7.

Preparer: Tracy Van Slyke

Title: Sr. Dir – Operational Technology

Sponsor: David C. Hawkins

Title: Vice President – Strategy & Sustainability

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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.

RESPONSE:

El Paso Electric Company ("EPE") generating plant O&M expenses for calendar years 2010 through 2014 can be found in Public Utility Commission of Texas ("PUC") Docket No. 44941, EPE's response to CEP 3-15, Attachment 1. EPE generating plant O&M expenses for calendar year 2015 can be found in PUC Docket No. 46831, EPE's response to CEP 2-11, Attachment 1.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

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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.

RESPONSE:

Pursuant to agreement of counsel, this question is limited to the years 2012 to 2015. Please see CEP 19-10, Attachment 1, for annual forced outage hours by plant, excluding Palo Verde.

Preparer: Aaron A. Arzaga

Title: Sr. Data Scientist & Business Intelligence
Analyst

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

Plant	Year			
	2012	2013	2014	2015
Montana	0	0	0	442
Newman	2,792	1,714	5,106	3,551
Rio Grande	186	923	523	400

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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.

RESPONSE:

Pursuant to agreement of counsel, this question is limited to the years 2012 to 2015. Please see CEP 19-11, Attachment 1, for annual planned outage hours by plant, excluding Palo Verde.

Preparer: Aaron A. Arzaga

Title: Sr. Data Scientist & Business Intelligence Analyst

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering and Asset Management

EL PASO ELECTRIC COMPANY

SOAH Docket No. 473-21-2606

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CEP's 19th, Q. No. 19-11

Attachment 1

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Plant	Annual Planned Outage Hours			
	2012	2013	2014	2015
Montana				0
Newman	8,518	7,619	7,018	10,109
Rio Grande	2,208	2,340	1,784	2,453

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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).

RESPONSE:

Please see CEP 19-2, Attachment 4-Highly Sensitive Protected Materials, for El Paso Electric Company's ("EPE") current 10-Year planned outage schedule. Please see CEP 19-12, Attachment 1-Confidential, for EPE's current Summer Preparation outage schedule. Summer preparation outages are performed for each unit every year. However, they are not scheduled more than a year in advance.

Preparer: Aaron A. Arzaga

Title: Sr. Data Scientist & Business Intelligence Analyst

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering and Asset Management

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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).

RESPONSE:

El Paso Electric Company's ("EPE") current O&M budget for each EPE generating plant excluding Palo Verde for 2021 through 2026 can be found in CEP 19-13, Attachment 1.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

Line No.	Description	2021	2022 (a)	2023 (a)	2024 (a)	2025 (a)	2026 (a)
<u>Generating Plant O&M Budget</u>							
1	Newman	\$ 30,026,081	\$ 25,573,320	\$ 32,179,770	\$ 36,656,740	\$ 33,433,759	\$ 33,668,867
2	Rio Grande	15,139,870	12,992,706	10,246,755	10,472,055	11,584,046	10,601,465
3	Montana	7,653,224	7,431,496	7,613,617	7,776,483	8,022,405	8,352,074
4	Copper	606,586	481,099	968,589	896,251	1,704,065	1,412,042
5	Total Generating Plant O&M Budget	<u>\$ 53,425,761</u>	<u>\$ 46,478,621</u>	<u>\$ 51,008,731</u>	<u>\$ 55,801,529</u>	<u>\$ 54,744,275</u>	<u>\$ 54,034,448</u>

(a) Assumes 1% growth factor adjustment for costs budgeted in non-generation departments historically charging Generation O&M accounts. These are not allocated in the O&M budget from 2022 forward.

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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.

RESPONSE:

Since 2010, there was only one event where an interruption of generation directly caused customer interruptions. During February 2-4, 2011, the Southwest Region of the United States experienced unusually low temperatures that affected numerous electric utilities in Arizona, New Mexico, and Texas. The extremely low temperatures caused these utilities to experience outages, failures to start and/or derates of one or more of their generation units. EPE was directly affected by this event, and its customers sustained approximately 361 hours and 23 minutes of total interruption consisting of numerous managed rolling outages.

Preparer: Abel R. Bustillos

Title: Director – System Operations

Sponsor: J. Kyle Olson

Title: Director – Power Generation & Asset
Mgmt.

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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.

RESPONSE:

Budget variances and explanations for actual O&M expenses compared to O&M budgeted expenses for the test year can be found in CEP 19-15, Attachment 1.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
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Line No.	Description	2020	2020 Budget	Variance
<u>Generating Plant O&M</u>				
1	Newman	\$ 34,003,889	\$ 32,561,820	\$ 1,442,069 (a)
2	Montana	8,828,127	7,218,334	1,609,793 (b)
3	Rio Grande	11,107,731	9,670,016	1,437,715 (c)
4	Copper	1,302,036	1,868,603	(566,567) (d)
5	Total Generating Plant O&M	<u>\$ 55,241,783</u>	<u>\$ 51,318,773</u>	<u>\$ 3,923,010</u>
(a)	Primarily due to higher than anticipated summer preparation costs and increased water usage and higher water rates from the El Paso Water Utilities and increased unplanned outage costs at Newman Units 1 and 4. These increases were partially offset by decreased outage costs at Newman Unit 5.			
(b)	Primarily due to increased outage related expenses.			
(c)	Primarily due to higher than anticipated summer preparation costs at Rio Grande related to boiler repairs.			
(d)	Primarily due to outage costs delayed beyond 2020.			

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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.

RESPONSE:

Please see the planned outage schedules provided in El Paso Electric Company's ("EPE") response to CEP 19-2, Attachment 4- Highly Sensitive Protected Materials. Please see EPE's response to CEP 1-4 for forced outage information on historical trends. As the units continue to age, EPE expects the forced outage rate to increase, not decrease.

Preparer: J Kyle Olson

Title: Director – Power Generation Asset
Management

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

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

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Please see the 5-year O&M budget provided in El Paso Electric Company's ("EPE") response to CEP 19-13, Attachment 1, which shows expected non-fuel O&M expenses comparable to the test year, and the 10-year planned outage schedule provided in EPE's response to CEP 19-2, Attachment 4- Highly Sensitive Protected Materials, which shows outages over the course of the next ten years comparable to those of the test year.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

Pparate for filSOAH DOCKET NO. 473-21-2606
PUC DOCKET NO. 52195

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Please see the non-fuel O&M expense breakdown with explanations provided in El Paso Electric Company's ("EPE") response to CEP 6-12.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

Ing if requested. SOAH DOCKET NO. 473-21-2606
PUC DOCKET NO. 52195

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Please see CEP 19-19, Attachment 1, which includes original scheduled planned and maintenance outage hours and actual scheduled planned and maintenance outage hours for El Paso Electric Company's local generating units for each year since 2016, the Test Year period, and 2021 to date.

Preparer: Kara Randle

Title: Staff Data Scientist and Business
Intelligence Analyst

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Copper 1				1/21/2016	1/23/2016	55.6	Substation maintenance outage request.
Copper 1	4/2/2016	4/9/2016	168.0	4/2/2016	4/13/2016	264.0	Summer Prep
Copper 1				6/29/2016	6/29/2016	8.0	Exhaust gas leak repairs
Copper 1	11/25/2016	12/16/2016	504.0	11/26/2016	12/16/2016	484.3	Summer Prep
Copper 1	11/25/2017	12/8/2017	312.0	11/26/2017	12/1/2017	120.0	Oil Cooler Repairs
Copper 1				12/1/2017	12/9/2017	208.2	Lube oil cooler replacement
Copper 1				12/15/2017	12/16/2017	22.8	OneOk gas line repair
Copper 1				8/20/2018	8/20/2018	5.4	Substation to repair/replace parts on 3662B disconnect
Copper 1				9/13/2018	9/19/2018	149.5	Outside of Management Control (Oneok Outage)
Copper 1				10/31/2018	10/31/2018	9.0	Water Injection Pump Repairs
Copper 1	4/18/2020	5/1/2020	312.0	4/18/2020	5/1/2020	319.5	Summer Prep
Copper 1	2/16/2019	3/15/2019	648.0	2/16/2019	3/17/2019	713.6	Summer Prep
Copper 1				4/1/2021	4/30/2021	720.0	Major Inspection
Copper 1				5/1/2021	5/1/2021	10.0	Inlet Replacement Project
Copper 1				5/1/2021	5/1/2021	3.8	Tuning and testing
Copper 1				5/1/2021	5/3/2021	37.6	Conducting balancing activities
Copper 1				5/3/2021	5/3/2021	3.2	Conducting balancing activities
Copper 1				5/3/2021	5/4/2021	20.9	Conducting balancing activities
Copper 1				5/4/2021	5/5/2021	12.0	Conducting balancing activities
Copper 1				11/17/2021	11/18/2021	24.0	Outage to perform gas supply line pigging operations
Montana 1				8/27/2016	8/27/2016	7.0	Outage for gas line tie in Gas compressor "C"
Montana 1	1/7/2017	1/20/2017	312.0	1/7/2017	2/12/2017	857.0	Summer Prep
Montana 1				7/28/2017	7/28/2017	5.5	VSV Inspection
Montana 1	1/20/2018	2/2/2018	312.0	1/20/2018	2/7/2018	444.5	Summer Prep/Supercore replacement
Montana 1				5/2/2018	5/2/2018	2.0	Inspected SCR system and added logic and dual element TE
Montana 1				5/1/2018	5/1/2018	0.2	Perform software Build and download to correct SCR issue
Montana 1				5/25/2018	5/25/2018	2.0	Turbine support strut replacement
Montana 1				6/2/2018	6/2/2018	5.3	Turbine support leg bearing replacement
Montana 1				6/23/2018	6/23/2018	3.5	Replace suction valve internals CT 1 forwarding pump "B"
Montana 1				7/13/2018	7/13/2018	11.4	Borecope HPT Supercore
Montana 1				8/5/2018	8/18/2018	306.6	Replaced blades in 1st stage and 2nd stage hot section
Montana 1				10/1/2018	10/1/2018	1.3	Preventive maintenance natural gas supply valves Performed by Kinder Morgan

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Montana 1				10/23/2018	10/23/2018	2.3	Re-install anti-icing piping
Montana 1				11/2/2018	11/2/2018	2.5	Perform build and download black start project
Montana 1				11/3/2018	11/7/2018	100.5	Black start testing
Montana 1				11/18/2018	11/19/2018	28.4	Black start testing
Montana 1				1/8/2019	1/8/2019	10.7	Controls upgrade
Montana 1	1/7/2019	1/14/2019	168.0	1/8/2019	1/29/2019	386.8	Summer Prep
Montana 1	1/14/2019	1/25/2019	264.0	2/12/2019	2/14/2019	61.0	4160 electrical bus and breaker inspection
Montana 1				3/10/2019	3/12/2019	42.0	Generator vibration
Montana 1				3/25/2019	3/26/2019	2.5	Balance of plant build and download for upgraded control system
Montana 1				1/6/2020	1/7/2020	31.8	Blackstart Testing
Montana 1				2/24/2020	2/24/2020	9.4	water wash
Montana 1	2/3/2020	2/23/2020	480.0	2/25/2020	3/14/2020	445.1	Summer Prep
Montana 1				3/14/2020	3/15/2020	36.0	Summer Prep
Montana 1				4/25/2020	4/25/2020	6.2	Replaced synthetic lube oil scavenging pump
Montana 1				10/30/2020	10/30/2020	2.0	Turbine exhaust duct inspection
Montana 1				11/6/2020	11/6/2020	6.4	Intercooler tube leak repair
Montana 1				11/16/2020	11/19/2020	79.2	Black Start Testing
Montana 1				12/17/2020	12/20/2020	86.2	Main gas line section replaced
Montana 1				2/24/2021	2/24/2021	4.0	Synthetic lube oil system inspection
Montana 1				3/6/2021	3/7/2021	16.0	water wash
Montana 1				3/7/2021	3/25/2021	444.0	Summer prep
Montana 1				4/22/2021	4/22/2021	1.0	Opportunity outage from 0600-0700 MST to remove exhaust catalyst sample
Montana 1				11/23/2021	11/23/2021	5.5	Changing relay settings/breaker status verification
Montana 1				11/29/2021	11/30/2021	46.0	Black Start Testing
Montana 1				12/1/2021	12/3/2021	63.5	Black Start Testing
Montana 2				8/27/2016	8/27/2016	6.9	Outage for gas line tie in gas compressor "C"
Montana 2	1/16/2017	2/3/2017	432.0	1/14/2017	2/16/2017	785.0	Summer Prep
Montana 2	1/27/2018	2/9/2018	312.0	1/27/2018	2/10/2018	352.5	Summer Prep

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Montana 2				3/29/2018	3/29/2018	1.8	Changed ignitor
Montana 2				5/12/2018	5/12/2018	2.0	Repaired service water system leak
Montana 2				5/25/2018	5/25/2018	2.0	Build and download on DCS system
Montana 2				6/23/2018	6/23/2018	3.5	Replaced suction valve internals cooling tower 1 forwarding pump 'B'
Montana 2				8/22/2018	8/22/2018	0.8	Replaced hydraulic starter O-ring
Montana 2				8/23/2018	8/23/2018	0.8	Replaced Jacking oil pump expansion joint
Montana 2				10/1/2018	10/1/2018	1.3	PW Natural Gas Supply Valves from Gas Supplier (Kinder Morgan)
Montana 2				10/23/2018	10/23/2018	2.0	Re-install anti-icing piping
Montana 2				11/2/2018	11/2/2018	2.5	Perform build and download to incorporate black start logic
Montana 2				11/7/2018	11/7/2018	100.5	Black start testing
Montana 2				11/19/2018	11/19/2018	28.5	Black start Testing
Montana 2	1/7/2019	1/14/2019	168.0	1/9/2019	1/9/2019	7.2	Controls upgrade
Montana 2	1/19/2019	1/27/2019	192.0	1/18/2019	1/30/2019	281.0	Summer Prep
Montana 2				2/1/2019	2/14/2019	61.5	4160 bus inspection and repair
Montana 2				3/20/2019	3/20/2019	5.2	Replace acoustics detector
Montana 2				3/25/2019	3/26/2019	2.4	Balance of plant build and download for upgraded control system
Montana 2				2/22/2020	2/23/2020	20.9	Water Wash
Montana 2	2/15/2020	3/6/2020	480.0	3/7/2020	3/25/2020	438.7	Summer Prep
Montana 2				7/5/2020	7/5/2020	2.3	Replaced hydraulic starter pump
Montana 2				11/13/2020	11/13/2020	3.5	Replaced anti-ice valve
Montana 2				11/16/2020	11/19/2020	81.6	Black start testing
Montana 2				12/17/2020	12/20/2020	86.5	Main gas line section replaced
Montana 2				2/3/2021	2/3/2021	8.0	Replaced controller Tempering air fan
Montana 2				3/13/2021	3/14/2021	16.0	water wash
Montana 2				3/14/2021	3/31/2021	424.0	Summer prep
Montana 2				6/12/2021	6/12/2021	1.7	Replaced entire VSV turnbuckle assemble
Montana 2				8/18/2021	8/18/2021	3.0	Variable stator vane bracket replacement
Montana 2				11/23/2021	11/23/2021	5.5	Changing relay settings/breaker status verification
Montana 2				11/29/2021	11/30/2021	46.0	Black Start Testing
Montana 2				12/1/2021	12/3/2021	63.5	Black Start Testing
Montana 2						0.0	IPT Repair
Montana 2	10/25/2021	11/1/2021	188.0	8/27/2016	8/27/2016	7.0	Outage for gas line tie in gas compressor "C"
Montana 3	2/4/2017	2/17/2017	312.0	2/21/2017	3/1/2017	192.0	Summer Prep
Montana 3				9/18/2017	12/31/2017	2513.0	Generator Core Removal

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Montana 3				1/1/2018	1/5/2018	113.3	Turbine Balancing J3 J4 and Generator
Montana 3	2/1/2018	3/2/2018	312.0	2/1/2018	2/17/2018	151.7	Summer Prep
Montana 3				5/1/2018	5/12/2018	2.0	Repaired cooling water system leak
Montana 3				5/25/2018	5/25/2018	2.0	Build and download on DCS system
Montana 3				5/31/2018	5/31/2018	4.0	Power turbine inspection borescope
Montana 3				6/2/2018	6/2/2018	4.0	Replaced bearing on front west turbine leg
Montana 3				8/22/2018	8/22/2018	0.8	Replaced O-ring on engine starter supply line
Montana 3				10/1/2018	10/1/2018	1.3	Preventative maintenance on natural gas supply line (Kinder Morgan)
Montana 3				10/24/2018	10/24/2018	4.0	Re-install anti-icing piping
Montana 3				11/2/2018	11/2/2018	2.5	Perform build and download to incorporate black start logic
Montana 3				11/2/2018	11/21/2018	441.0	Replacement of generator coupling
Montana 3	1/7/2019	1/14/2019	168.0	1/8/2019	1/8/2019	3.0	Balance of plant build and download for upgraded control system
Montana 3				1/9/2019	1/9/2019	4.4	Balance of plant build and download for upgraded control system
Montana 3				1/10/2019	1/10/2019	8.5	Replaced thermal element generator drive end
Montana 3	2/4/2019	2/14/2019	240.0	2/4/2019	2/16/2019	295.4	Summer Prep
Montana 3				3/6/2019	3/7/2019	17.0	Generator vibration
Montana 3				3/25/2019	3/26/2019	2.5	Balance of plant build and download for upgraded control system
Montana 3				1/13/2020	1/13/2020	4.7	Balancing Generator
Montana 3				1/13/2020	1/13/2020	1.3	Balancing Generator
Montana 3				1/13/2020	1/13/2020	2.4	Balancing Generator
Montana 3				1/13/2020	1/13/2020	1.3	Balancing Generator
Montana 3				1/13/2020	1/14/2020	11.1	Balancing Generator
Montana 3				1/14/2020	1/14/2020	5.8	Balancing Generator
Montana 3				1/14/2020	1/15/2020	15.8	Balancing Generator
Montana 3				1/15/2020	1/15/2020	7.2	Balancing Generator
Montana 3				1/15/2020	1/16/2020	13.3	Balancing Generator
Montana 3				1/16/2020	1/16/2020	2.0	Balancing Generator
Montana 3				1/16/2020	1/16/2020	3.0	Balancing Generator
Montana 3				1/16/2020	1/17/2020	2.4	Balancing Generator
Montana 3				1/17/2020	1/17/2020	8.8	Balancing Generator
Montana 3				1/17/2020	1/17/2020	0.9	Balancing Generator
Montana 3				2/22/2020	2/22/2020	11.3	water wash
Montana 3				4/6/2020	4/16/2020	250.2	Summer Prep
Montana 3	3/6/2020	3/29/2020	480.0	4/16/2020	4/18/2020	49.4	Summer Prep
Montana 3				6/4/2020	6/4/2020	3.1	Replacing turbine leg strut bearing supercore west side
Montana 3				6/12/2020	6/12/2020	6.5	Replaced power turbine leg strut bearing west side
Montana 3				7/25/2020	7/25/2020	4.3	Balancing Gen drive end

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Montana 3				7/25/2020	7/25/2020	1.9	Balancing Gen drive end
Montana 3				7/26/2020	7/26/2020	3.3	Balancing Gen drive end
Montana 3				9/28/2020	1/1/2021	2280.0	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				1/1/2021	1/28/2021	657.7	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				1/28/2021	1/28/2021	4.4	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				1/28/2021	1/29/2021	13.7	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				1/29/2021	1/29/2021	5.2	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				1/29/2021	1/30/2021	19.1	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				1/30/2021	1/31/2021	28.8	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				2/1/2021	2/2/2021	39.9	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				2/1/2021	2/4/2021	69.7	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				2/4/2021	2/5/2021	10.9	Generator Rotor Refurbishment to reduce vibrations on J3 J4 and Generator
Montana 3				2/23/2021	2/23/2021	3.1	Verify Pre-stretch power turbine/generator couplin
Montana 3				4/5/2021	4/30/2021	616.0	Summer Prep
Montana 3				5/1/2021	5/1/2021	15.6	Summer Prep
Montana 3				5/1/2021	5/1/2021	5.4	Summer Prep
Montana 3				5/1/2021	5/2/2021	14.5	Summer Prep
Montana 3	10/20/2021	11/24/2021	840.0	10/21/2021	10/30/2021	561.1	PT Balancing
Montana 3				10/30/2021	10/31/2021	18.9	Power Turbine Balance
Montana 3				11/23/2021	11/23/2021	5.5	Changing relay settings/breaker status verification
Montana 3				11/29/2021	11/30/2021	46.0	Black Start Testing
Montana 3				12/1/2021	12/3/2021	59.9	Black Start Testing
Montana 3				12/3/2021	12/3/2021	3.3	Black Start Generator Test
Montana 4	2/11/2017	2/24/2017	312.0	1/23/2017	2/20/2017	665.0	Summer Prep
Montana 4	2/10/2018	2/23/2018	312.0	2/11/2018	2/23/2018	296.6	Summer Prep
Montana 4				5/1/2018	5/1/2018	2.0	Repaired cooling water system leak
Montana 4				5/25/2018	5/25/2018	2.0	Build and download software on DCS system
Montana 4				7/16/2018	7/16/2018	4.0	LP turbine support leg adjustment
Montana 4				10/1/2018	10/1/2018	1.3	PM Natural Gas Supply Valves from Gas Supplier (Kinder Morgan)
Montana 4				10/24/2018	10/24/2018	2.0	Re-install anti-ice piping
Montana 4				11/2/2018	11/2/2018	2.5	Perform build and download to incorporate black start logic
Montana 4				11/7/2018	11/7/2018	100.5	Black start testing
Montana 4				11/18/2018	11/19/2018	29.9	Black start testing
Montana 4	1/7/2019	1/14/2019	168.0	1/8/2019	1/8/2019	3.0	Balance of plant build and download for upgraded control system
Montana 4	1/7/2019	1/14/2019	168.0	1/10/2019	1/11/2019	25.1	Mark VI Control system upgrade
Montana 4	2/9/2019	2/17/2019	192.0	2/9/2019	2/20/2019	257.0	Summer Prep
Montana 4				3/8/2019	3/9/2019	17.0	Turbine balancing
Montana 4				3/25/2019	3/26/2019	2.5	Balance of plant build and download for upgraded control system
Montana 4				2/23/2020	2/23/2020	6.4	Water Wash
Montana 4	3/21/2020	4/10/2020	480.0	4/11/2020	4/24/2020	313.7	Summer Prep

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Montana 4				5/22/2020	5/22/2020	4.7	Replace supercore leg strut bearing west side
Montana 4				7/27/2020	7/27/2020	8.0	Replace supercore leg strut bearing west side Verified alignment on turbine and generator
Montana 4				8/28/2020	8/28/2020	2.6	Maintenance outage to repair VSV actuator
Montana 4				9/28/2020	10/4/2020	148.7	Performed an alignment of the Turbine and Generator
Montana 4				11/16/2020	11/19/2020	80.8	Black Start Testing
Montana 4				12/17/2020	12/20/2020	86.5	Main gas line section replaced
Montana 4				1/29/2021	1/29/2021	3.5	U4 Gen balancing
Montana 4				1/30/2021	1/30/2021	21.6	U4 Gen balancing
Montana 4				1/30/2021	1/31/2021	10.0	U4 Gen balancing
Montana 4				4/17/2021	4/30/2021	328.0	Summer prep
Montana 4				5/17/2021	5/8/2021	180.1	Summer prep
Montana 4				9/20/2021	9/27/2021	175.0	IPT Exchange
Montana 4				11/1/2021	11/1/2021	4.3	Generator Balancing
Montana 4				11/1/2021	11/1/2021	0.9	Trim Balance Generator
Montana 4				11/2/2021	11/2/2021	3.8	Trim Balance Generator
Montana 4				11/3/2021	11/3/2021	2.2	Outage for finishing trim balance and replacing guards/covers
Montana 4				11/20/2021	11/20/2021	7.3	Replace synthetic lube oil and replace VSV bracket bearing
Montana 4				11/23/2021	11/23/2021	5.5	Changing relay settings/breaker status verification
Montana 4				11/29/2021	11/30/2021	46.0	Black Start Testing
Montana 4				12/1/2021	12/3/2021	62.6	Black Start Testing
Montana 4						0.0	Intermediate Pressure Turbine Maintenance
Montana 4			480.0			0.0	IPT Exchange
Montana 4	10/1/2021	10/21/2021	480.0				
Montana 4	10/1/2021	10/21/2021	480.0				
Newman 1	1/21/2017	4/14/2017	1992.0	1/24/2017	5/24/2017	2890.2	Summer prep/Turbine overhaul
Newman 1				6/2/2017	6/3/2017	34.3	Repairs on U1 A BFP suction valve/U1 superheat attempt Main block valve
Newman 1				7/14/2017	7/15/2017	24.9	Adjustments to the governor linkages
Newman 1				8/25/2017	8/30/2017	105.7	Boiler tube leak repairs
Newman 1				9/7/2017	9/13/2017	137.2	Turbine latch inspection
Newman 1				9/14/2017	9/23/2017	230.0	Turbine latching mechanism/control valves
Newman 1				9/24/2017	9/24/2017	9.4	Turbine latch mechanism
Newman 1				10/21/2017	10/22/2017	15.3	Repair on governor
Newman 1				12/9/2017	12/9/2017	2.0	Inspect Main steam header line for steam leak-switched from MO to RS
Newman 1				12/16/2017	12/20/2017	104.1	Boiler inspection/repairs
Newman 1				2/27/2018	3/9/2018	232.6	Boiler Inspection/Repair Boiler Leaks 17 leaks at bottom of the boiler, 14 on the roof section, 1 water wall on 6th floor that needed asbestos abatement
Newman 1	2/24/2018	3/9/2018	312.0	3/12/2018	5/1/2018	1200.0	Summer Prep (moved up summer prep to coincide with generator seal repairs)
Newman 1				5/1/2018	5/11/2018	260.1	Oil Seal repairs on generator outboard bring
Newman 1				5/12/2018	5/15/2018	63.0	Testing of Newly Installed AVR / PSS Equipment
Newman 1				1/10/2019	2/3/2019	566.7	Boiler tube repair work / MO extended for circulating water line leak repair
Newman 1	1/4/2020	1/24/2020	480.0	1/3/2020	1/25/2020	528.9	Summer Prep
Newman 1				2/29/2020	3/9/2020	223.5	Boiler Roof Tube and Secondary Superheat Leaks
Newman 1				7/17/2020	7/27/2020	224.0	Loss of field in generator due to field fault, Generator H2 seal repair
Newman 1				10/18/2020	11/1/2020	318.8	Maintenance outage to repair boiler water wall tube leak
Newman 1	1/9/2021	3/10/2021	1440.0	1/9/2021	5/12/2021	2966.1	Valve Inspection/Summer Prep
Newman 1				8/1/2021	8/10/2021	237.7	Address boiler hot spot

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Newman 1	11/27/2021	12/17/2021	480.0	11/27/2021	In progress		Summer prep
Newman 2				3/1/2016	3/24/2016	304.0	Summer prep
Newman 2				8/1/2016	8/22/2016	106.6	Repair boiler tube leaks
Newman 2				10/26/2016	11/2/2016	173.6	Boiler leak repairs / circulating water line leak
Newman 2				1/19/2017	1/21/2017	67.8	T3 Transformer Prep Work
Newman 2	2/4/2017	2/17/2017	312.0	3/24/2017	4/7/2017	336.2	Summer Prep
Newman 2				4/2/2017	5/2/2017	141.5	Work on T-6 (Substation)
Newman 2				9/8/2017	9/16/2017	188.8	Repair superheat leak at the main steam stop valve
Newman 2				12/15/2017	12/15/2017	12.6	Forced Draft Fan controller/positioner replaced
Newman 2				12/26/2017	1/1/2018	138.0	Boiler inspection/repairs
Newman 2				1/1/2018	1/3/2018	66.2	Boiler Repairs Leak on the Roof and Super heat sections
Newman 2	2/3/2018	4/13/2018	1656.0	1/30/2018	4/13/2018	1763.3	Repairs made to both
Newman 2				4/14/2018	4/16/2018	26.6	Major inspection; boiler only
Newman 2				11/7/2018	11/13/2018	150.1	Balance shot on LP turbine
Newman 2				1/28/2019	1/28/2019	277.3	Turbine Vibration Testing- Balance Shot
Newman 2				3/9/2019	3/15/2019	155.9	Outage to address CO issues involving boiler and burner
Newman 2	3/2/2019	3/22/2019	480.0	3/15/2019	4/1/2019	385.0	HP steam leak at turbine
Newman 2	1/11/2020	1/31/2020	480.0	1/6/2020	2/2/2020	648.0	Summer Prep
Newman 2				1/23/2021	1/31/2021	212.5	Summer Prep
Newman 2				2/1/2021	2/17/2021	391.0	Summer Prep
Newman 3	1/9/2016	3/11/2016	1512	1/8/2016	3/7/2016	1393.8	Control valve repairs / Summer prep
Newman 3				4/1/2016	4/1/2016	5.6	Off line to repair DA make up line leak, returned to service after repair
Newman 3				5/12/2016	5/15/2016	72.0	Main Stop Valve Repairs
Newman 3	1/7/2017	5/8/2017	2904.0	1/7/2017	4/2/2017	2658.3	Summer Prep/turbine Overhaul
Newman 3				4/27/2017	5/2/2017	115.5	Balance Shot To Reduce Steam Turbine Vibrations
Newman 3				5/2/2017	5/2/2017	1.0	Boiler trip on low air flow, unit was in testing mode
Newman 3				5/2/2017	5/2/2017	0.8	Boiler trip on loss of Burner #1, unit was in testing mode
Newman 3				6/30/2017	7/1/2017	19.7	Condenser inspection/repairs
Newman 3				10/20/2017	10/21/2017	15.1	Repair of gas valve
Newman 3				4/13/2018	4/17/2018	75.6	Summer Prep
Newman 3	2/10/2018	2/23/2018	312.0	4/1/2018	4/30/2018	313.5	Summer Prep
Newman 3				7/27/2018	7/30/2018	77.9	Boiler leak repairs
Newman 3				10/5/2018	12/10/2018	1568.6	U3 in Planned Outage for DCS upgrade
Newman 3	3/16/2019	3/23/2019		1/28/2019	2/19/2019	531.8	Summer Prep
Newman 3	1/4/2020	2/7/2020	816.0	1/3/2020	2/16/2020	1056.0	Summer Prep
Newman 3				8/14/2020	8/18/2020	94.9	Unit removed from service to repair boiler tube leak
Newman 3				12/28/2020	1/1/2021	89.0	Boiler tube leak repairs
Newman 3				1/7/2021	1/2/2021	33.0	Boiler Tube Leak Repairs
Newman 3	2/20/2021	4/28/2021	1608.0	2/22/2021	5/6/2021	1760.3	Valve Inspection/Summer Prep
Newman 3				10/10/2021	10/14/2021	94.5	Boiler Tube Leak Repairs
Newman 3				10/25/2021	10/29/2021	95.7	Outage to inspect and repair air preheater
Newman 4GT-1				10/16/2015	3/1/2016	3524.4	Investigating cause of high vibrations
Newman 4GT-1	4/16/2016	4/30/2016	336.0	4/7/2016	4/20/2016	296.0	Summer Prep
Newman 4GT-1				6/2/2016	6/4/2016	67.0	Boiler repairs and seal air regulator replacement
Newman 4GT-1				8/29/2016	9/6/2016	197.2	Boiler inspection and checking HRSG for any damage during dry run mode
Newman 4GT-1				9/9/2016	9/11/2016	61.0	Intra gas tie in project
Newman 4GT-1				9/24/2016	9/26/2016	56.0	Cleaning U4 CT basin
Newman 4GT-1				10/21/2016	10/24/2016	66.9	Install balance shot for vibration issue and to repair oil leak

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Newman 4GT-1				12/19/2016	12/19/2016	17.7	BFP packing
Newman 4GT-1				1/9/2017	1/11/2017	41.1	Burner Work, Run back
Newman 4GT-1				1/24/2017	1/24/2017	5.2	Repair Feed Water Regulator HRSG1
Newman 4GT-1	2/25/2017	3/17/2017	480.0	3/3/2017	3/21/2017	421.3	Summer Prep
Newman 4GT-1				5/3/2017	5/5/2017	45.2	Exhaust leak
Newman 4GT-1				10/19/2017	10/25/2017	136.0	Aux cooling water system repairs
Newman 4GT-1	1/6/2018	1/26/2018	480.0	12/4/2017	12/24/2017	494.0	Summer Prep
Newman 4GT-1	10/30/2021	11/19/2021	480.0	10/30/2021	11/20/2021	501.5	Combustor Inspection
Newman 4GT1				1/15/2018	1/16/2018	28.2	Repack Pegging Steam Reg and replace DA make up reg
Newman 4-GT1				4/15/2018	5/9/2018	569.4	Repair exhaust end bearing oil leak
Newman 4-GT1				5/18/2018	5/21/2018	58.0	Inspection of exhaust bearing elements/ MO to FO on May 21, 2018 at 07:00
Newman 4-GT1				6/14/2018	6/15/2018	22.8	Installation of Insulation Blankets on GT Shell
Newman 4-GT1				12/3/2018	1/15/2019	1020.0	High Turbine Vibration
Newman 4-GT1	1/5/2019	3/29/2019	1992.0	1/15/2019	3/30/2019	1769.0	Major Inspection
Newman 4-GT1	3/7/2020	4/17/2020	984.0	3/7/2020	4/17/2020	984.0	Turbine Hot Gas and Summer Prep
Newman 4-GT1				5/14/2020	5/17/2020	72.0	Outage to repair oil leak on exciter/starting package
Newman 4-GT1				6/26/2020	6/27/2020	16.6	Maint Outage to install balance shot and cooling shroud on exciter
Newman 4-GT1				7/2/2020	7/2/2020	3.4	Planned outage to install balance shot
Newman 4-GT1				7/25/2020	7/25/2020	2.5	Removed from service to collect vibration data
Newman 4-GT1				10/2/2020	1/1/2021	2162.5	DCS Upgrade
Newman 4-GT1				1/7/2021	1/30/2021	696.0	DCS Upgrade
Newman 4-GT1				3/10/2021	3/14/2021	86.3	Change Water Injection Office
Newman 4-GT1				4/7/2021	4/13/2021	131.7	Boiler Feed Pump Repairs
Newman 4-GT1				11/23/2021	11/23/2021	6.5	Repairs on water injection
Newman 4GT-2	4/16/2016	4/30/2016	336.0	4/7/2016	4/28/2016	496.9	Summer Prep
Newman 4GT-2				9/6/2016	9/15/2016	221.5	Check HRSG for any damage during dry run mode
Newman 4GT-2				9/24/2016	9/28/2016	56.0	Cleaning U4 CF basin
Newman 4GT-2				10/21/2016	10/24/2016	80.0	Install balance shot for vibration issue and to repair oil leak
Newman 4GT-2				1/1/2017	1/17/2017	6.9	BFP Inboard Bearing Replacement
Newman 4GT-2	2/11/2017	4/7/2017	1320.0	2/10/2017	4/26/2017	1785.4	GT2 Planned Outage
Newman 4GT-2				5/19/2017	5/21/2017	35.2	Steam flow transmitter repair
Newman 4GT-2				7/7/2017	7/8/2017	23.9	Exhaust temp issues
Newman 4GT-2				8/24/2017	8/24/2017	7.8	GT2 GJV work
Newman 4GT-2				9/22/2017	9/22/2017	5.1	Aux water repair to H2 coolers/exciter cooler vent line
Newman 4GT-2				10/19/2017	10/25/2017	136.0	Aux cooling water system repairs
Newman 4GT-2	1/13/2018	1/26/2018	312.0	12/4/2017	12/24/2017	494.0	Summer Prep
Newman 4GT-2	10/30/2021	11/19/2021	480.0	10/31/2021	11/20/2021	480.0	Combustor Inspection
Newman 4-GT2				1/16/2018	1/17/2018	21.2	Replace Main BFP out board bearing
Newman 4-GT2				7/22/2018	7/22/2018	19.4	Main BFP replacement
Newman 4-GT2	1/13/2018	2/2/2018	480.0	2/16/2019	3/17/2019	705.3	Summer Prep
Newman 4-GT2				3/29/2019	4/1/2019	63.0	Transfer from FO to MO (Scheduled MO to replace the lead seal on condenser)
Newman 4-GT2	2/15/2020	4/17/2020	1488.0	2/18/2020	5/1/2020	1752.0	Turbine Major and Summer Prep
Newman 4-GT2				6/2/2020	6/29/2020	46.2	Maint outage to repair DA make up valve and nozzles
Newman 4-GT2				8/1/2020	8/1/2020	12.7	Unit removed from service to replace BF pump packing
Newman 4-GT2				8/5/2020	8/8/2020	84.5	Unit removed from service to repair oil leak in tear drop that is causing fires
Newman 4-GT2				10/2/2020	1/1/2021	2162.4	DCS Upgrade
Newman 4-GT2				1/17/2021	1/26/2021	607.7	DCS Upgrade

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Newman 4-GT2				2/2/2021	2/9/2021	163.2	Due to the GT1 and ST4 in Forced Outage
Newman 4-GT2				3/1/2021	3/1/2021	99.3	Exhaust Fan Repair
Newman 4-GT2				4/7/2021	4/13/2021	134.5	Exhaust Leak Repairs- per plant report
Newman 4-GT2				4/14/2021	4/14/2021	12.4	Balancing Activities
Newman 4-GT2				4/14/2021	4/15/2021	20.0	Balancing Activities
Newman 4-GT2				4/16/2021	4/16/2021	16.1	Balancing Activities
Newman 4-GT2				4/16/2021	4/17/2021	20.4	Balancing Activities
Newman 4-GT2				4/17/2021	4/28/2021	253.0	Balancing Activities, HRSG2 Tube Leaks, Manual Power Check Valve Failure
Newman 4-GT2				4/28/2021	4/29/2021	14.3	Balancing Activities
Newman 4-GT2				7/30/2021	7/31/2021	28.9	Repair HRSG2 HP Circulation Pump
Newman 4-GT2				11/22/2021	11/22/2021	14.4	GT2 Taken Offline for repairs
Newman 4-ST	4/16/2016	4/30/2016	336.0	4/7/2016	4/20/2016	296.3	Summer Prep
Newman 4-ST				10/24/2016	10/24/2016	11.2	Install balance shot for vibration issue and to repair oil leak
Newman 4-ST				11/28/2016	11/28/2016	11.5	Inverter work
Newman 4-ST	2/25/2017	3/17/2017	480.0	3/3/2017	3/22/2017	436.5	Summer Prep
Newman 4-ST				3/31/2017	4/2/2017	33.5	Replace Emer DC lube oil pump
Newman 4-ST				1/10/2018	1/10/2018	6.9	Post startup balance shot on U4 STM
Newman 4-ST				12/19/2018	12/20/2018	30.4	Gen Protective Relay Testing
Newman 4-ST	1/13/2018	1/26/2018	312.0	2/16/2019	3/18/2019	723.1	Summer Prep
Newman 4-ST				3/19/2019	4/1/2019	303.0	Transfer from FO to MO (Scheduled MO to replace the lead
Newman 4-ST	3/7/2020	4/17/2020	984.0	3/7/2020	4/7/2020	984.0	Summer Prep
Newman 4-ST				5/14/2020	5/17/2020	80.8	Outage to repair oil leak on exciter/starting package
Newman 4-ST				10/2/2020	1/1/2021	2162.8	DCS Upgrade and Valve Inspection
Newman 4-ST				3/10/2021	3/15/2021	109.7	S/JAE and Hogger design change
Newman 4-ST				4/7/2021	4/14/2021	152.3	Vacuum Leak Repairs
Newman 4-ST	10/30/2021	11/19/2021	480.0	10/31/2021	11/21/2021	504.0	Summer prep
Newman 5-GT3	10/3/2015	10/30/2015	672	10/23/2015	1/15/2016	2032.0	Gas Path Inspection and compressor blade repairs
Newman 5-GT3				1/15/2016	2/5/2016	500.9	High Vibrations #2 Turbine Bearing (extended planned outage)
Newman 5-GT3				3/22/2016	3/24/2016	56.5	Repairs on the wet compression and fogging system
Newman 5-GT3				4/7/2016	4/7/2016	3.2	Array in bell mouth Area Inspection
Newman 5-GT3				4/29/2016	4/30/2016	41.0	Inter gas tie in
Newman 5-GT3				7/17/2016	7/14/2016	64.4	Boiler tube leak repair
Newman 5-GT3				7/23/2016	7/23/2016	1.0	Hydraulic oil filter change and thermocouple 12 replace
Newman 5-GT3				8/13/2016	8/13/2016	10.1	Replace lube oil mist separator blower motor
Newman 5-GT3	11/28/2016	1/13/2017	1104.0	12/19/2016	1/14/2017	613.5	Summer Prep
Newman 5-GT3				4/10/2017	4/30/2017	474.2	Turbine Aux work/testing and commissioning U5 steam turbine
Newman 5-GT3				9/22/2017	9/26/2017	81.7	Remove blanking plate to return unit to combined cycle
Newman 5-GT3				9/30/2017	10/6/2017	127.6	Offline for lube oil flow inspection on bearings 2 and 4
Newman 5-GT3				11/19/2017	11/19/2017	12.0	Plate Swap
Newman 5-GT3				11/21/2017	11/28/2017	181.8	Block 5 Ongoing Testing
Newman 5-GT3				12/4/2017	12/4/2017	0.9	Controlled shutdown for tripped CCW pump on U5 STM (still in testing mode)
Newman 5-GT3	2/6/2021	3/10/2021	768.0	2/21/2021	3/27/2021	819.0	Hot Gas Path Inspection
Newman 5-GT3				1/26/2018	1/26/2018	11.5	Installation of bypass valves on HP drums
Newman 5-GT3	3/17/2018	3/30/2018	312.0	3/16/2018	4/2/2018	406.0	Summer Prep
Newman 5-GT3				6/2/2018	6/4/2018	33.0	HRSG leaks and HP bypass and HRH bypass valve stem repairs
Newman 5-GT3				7/21/2018	7/21/2018	16.8	Exhaust Leak Repairs on the HRSG side-convert to simple cycle mode
Newman 5-GT3				7/26/2018	7/26/2018	15.2	Converting from simple cycle to combined cycle
Newman 5-GT3				11/10/2018	11/16/2018	158.8	HRH Leak Repair

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Newman 5-GT3	3/16/2019	5/3/2019	1152.0	3/19/2019	4/1/2019	300.4	Summer Prep/DCS Upgrade
Newman 5-GT3	2/8/2020	2/28/2020	480.0	2/7/2020	2/29/2020	528.0	Summer Prep and Hot Gas Inspection
Newman 5-GT3				4/25/2020	4/27/2020	47.7	Maintenance Outage to repair attenuator and relief valves

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Newman 5-GT3				5/2/2020	5/5/2020	71.3	Maintenance outage to repair flange steam leak and
Newman 5-GT3				3/27/2021	3/27/2021	11.5	Summer Prep and Hot Gas Inspection
Newman 5-GT3				3/28/2021	3/29/2021	29.9	Summer Prep and Hot Gas Inspection
Newman 5-GT3				3/29/2021	3/30/2021	17.8	Summer Prep and Hot Gas Inspection
Newman 5-GT3				3/30/2021	3/31/2021	10.0	Summer Prep and Hot Gas Inspection
Newman 5-GT3				3/31/2021	3/31/2021	7.9	Summer Prep and Hot Gas Inspection
Newman 5-GT3				4/1/2021	4/5/2021	109.4	Summer Prep and Hot Gas Inspection
Newman 5-GT3				4/23/2021	4/30/2021	168.3	Exhaust leak repairs
Newman 5-GT3				5/1/2021	5/9/2021	200.2	Exhaust leak repairs
Newman 5-GT3				6/28/2021	6/29/2021	43.9	Replace 3-2 BFP
Newman 5-GT4				11/9/2016	1/29/2016	1943.5	Turbine repairs (compressor blade repairs)
Newman 5-GT4				1/29/2016	1/29/2016	2.1	Testing and tuning
Newman 5-GT4				4/29/2016	4/30/2016	41.0	Inter gas tie in
Newman 5-GT4				8/22/2016	8/23/2016	16.2	Exhaust Leak Repairs
Newman 5-GT4	11/28/2016	1/13/2017	1104.0	12/19/2016	1/14/2017	614.7	Summer Prep
Newman 5-GT4				2/25/2017	2/25/2017	4.5	Bleed valve actuator repair
Newman 5-GT4				4/10/2017	4/14/2017	111.0	Turbine Aux work/Gas Skid Filter
Newman 5-GT4				4/21/2017	4/30/2017	202.6	Combined cycle plate swap and U5 steam turbine startup and testing
Newman 5-GT4				8/3/2017	8/3/2017	10.7	Bore scope of turbine and combustor inspection
Newman 5-GT4				9/22/2017	9/26/2017	89.3	Remove blanking plate to return unit to combined cycle
Newman 5-GT4				9/30/2017	10/6/2017	139.2	Offline for lube oil flow inspection on bearings 2 and 5
Newman 5-GT4				11/19/2017	11/19/2017	12.0	Plate Swap
Newman 5-GT4				11/21/2017	11/28/2017	179.6	Block 5 Ongoing Testing
Newman 5-GT4				12/4/2017	12/4/2017	0.6	Controlled shutdown for tripped CCW pump on U5 STM (still in testing mode)
Newman 5-GT4	2/1/2020	2/28/2020	648.0	1/18/2020	1/18/2020	12.4	Repairs to Phosphate Line leaking at HP Drum
Newman 5-GT4				3/18/2021	4/1/2021	648.0	Summer Prep
Newman 5-GT4				4/1/2021	4/1/2021	325.5	Summer Prep, General Inspection
Newman 5-GT4				6/28/2021	6/30/2021	135.2	Summer Prep, General Inspection
Newman 5-GT4				11/9/2016	1/30/2016	53.4	Replace 3-2 BFP
Newman 5-GT4				2/16/2016	2/19/2016	1956.2	Unit off due to GT3 & GT4 off for inspection & compression repairs
Newman 5-GT4				4/29/2016	4/30/2016	81.4	Maintenance on hot reheat valves / Summer prep
Newman 5-GT4				9/27/2017	9/29/2017	41.0	Inter gas tie in
Newman 5-GT4				9/29/2017	11/8/2017	32.7	Steam turbine testing & tuning
Newman 5-GT4				12/1/2017	12/1/2017	954.9	Lube oil system inspection to inspect flow to bearings 3 and 4
Newman 5-GT4				12/1/2017	12/1/2017	0.4	Tripped on false drum level indication (Unit in testing mode, therefore not a FO)
Newman 5-GT4				12/4/2017	12/4/2017	1.1	Controlled shutdown for tripped CCW pump on U5 STM (still in testing mode)
Newman 5-GT4				3/16/2018	4/3/2018	422.2	Summer Prep
Newman 5-GT4				11/16/2018	11/16/2018	161.7	HRH Leak Repair
Newman 5-GT4	3/16/2019	5/3/2019	1152.0	3/19/2019	4/1/2019	290.4	Summer Prep/DCS Upgrade
Newman 5-GT4	2/18/2020	2/28/2020	480.0	2/17/2020	2/29/2020	528.0	Summer Prep
Newman 5-GT4				2/15/2021	3/28/2021	970.5	Summer Prep, HRSG Inspection
Newman 5-GT4				3/28/2021	3/28/2021	0.6	Summer Prep testing: Auto Sync issue
Newman 5-GT4				3/28/2021	3/31/2021	80.3	Summer Prep testing: Auto Sync issue
Newman 5-GT4				3/31/2021	3/31/2021	8.2	Summer Prep and GT3 Hot Gas Inspection
Newman 5-GT4				4/1/2021	4/6/2021	122.9	Unit Tripped

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Newman 5-ST				5/21/2021	5/23/2021	38.6	Substation crew to work on radiators due to extreme heat not circulating properly-mo to repair high GSU transformer
Newman 5-ST				6/28/2021	6/30/2021	50.0	Replace 3-2 BFP
Newman5-GT4				1/2/2018	1/2/2018	11.4	Installation of bypass valves on HP IP drums
Newman5-GT4	3/31/2018	4/13/2018	312.0	3/1/2018	4/2/2018	523.3	Summer Prep
Newman5-GT4				6/2/2018	6/4/2018	35.4	HRSG leaks and HP bypass and HRH bypass valve repairs
Newman5-GT4				11/10/2018	11/16/2018	157.5	HRH Leak Repair
Newman5-GT4	3/16/2019	5/3/2019	1152.0	3/19/2019	4/1/2019	288.3	Summer Prep/DCS Upgrade
Rio Grande 6				9/18/2017	9/19/2017	19.7	Repair attemperor sensing line
Rio Grande 6				10/4/2017	10/4/2017	7.5	Repair gas burner #2 linkage
Rio Grande 6	1/13/2018	1/26/2018	312.0	1/13/2018	2/2/2018	489.3	Partial summer prep outage
Rio Grande 6				8/20/2018	8/20/2018	7.5	To replace left side lead seal
Rio Grande 6				6/29/2021	7/1/2021	53.0	Condenser Cleaning
Rio Grande 6				7/27/2021	7/28/2021	31.5	Reason for outage is to repair AVR on unit 6
Rio Grande 7				2/1/2016	3/26/2016	1308.4	ST valve inspection outage
Rio Grande 7				5/1/2016	5/19/2016	52.0	Repair hotspot on boiler
Rio Grande 7				7/9/2016	7/9/2016	9.0	Repair condenser leak
Rio Grande 7				9/24/2016	9/25/2016	14.6	Repair lead seal on the condenser
Rio Grande 7				10/3/2016	10/7/2016	103.2	Repair boiler tube leaks
Rio Grande 7				11/8/2016	12/1/2016	536.8	Summer Prep
Rio Grande 7	1/14/2017	2/10/2017	648.0	1/13/2017	2/9/2017	652.1	Summer Prep
Rio Grande 7				4/7/2017	4/13/2017	133.0	Work on 1st PT Heater
Rio Grande 7				9/8/2017	9/12/2017	91.1	For Boiler Feed Pump discharge valve repair
Rio Grande 7				10/23/2017	10/23/2017	10.0	Boiler tube repair and preheater assessment
Rio Grande 7						9.0	Perform Hydro test boiler, preheater inspection and reheal vacuum test
Rio Grande 7	1/13/2018	2/2/2018	480.0	1/5/2018	1/5/2018	499.5	Summer Prep
Rio Grande 7				2/9/2018	2/10/2018	28.4	Repair view port on boiler and circ water system leak
Rio Grande 7				10/1/2018	10/4/2018	79.0	Address GPU relays, 2300v bus and 480v electrical system
Rio Grande 7				11/20/2018	11/21/2018	27.7	Repair Boiler Tube Leak in Economizer Section
Rio Grande 7	2/16/2019	3/1/2019	312.0	2/16/2019	3/4/2019	392.4	Summer Prep
Rio Grande 7				12/14/2020	12/18/2020	99.2	To work on Boiler Tube Leaks, DA Level Column Transmitter and Condenser
Rio Grande 7				1/4/2021	1/18/2021	343.7	Place T-5 and T-6 back to normal configuration
Rio Grande 7				2/6/2021	2/28/2021	544.0	Summer prep
Rio Grande 7				2/6/2021	2/28/2021	544.0	Summer prep
Rio Grande 7				3/1/2021	3/1/2021	13.5	Summer prep
Rio Grande 7				4/23/2021	4/26/2021	58.2	Address a minor tube leak on boiler
Rio Grande 7				6/25/2021	6/30/2021	121.7	Repair hot spot on boiler
Rio Grande 7				(A)			Summer Prep
Rio Grande 7	2/24/2020	3/15/2020	480.0	2/4/2020	2/5/2020	12.4	Repair main stream drain line
Rio Grande 8				4/15/2016	4/15/2016	6.9	Repair steam leak on boiler drain
Rio Grande 8				4/2/2016	4/28/2016	15.0	Repair leak on boiler blowdown
Rio Grande 8				8/1/2016	8/4/2016	65.7	Repair boiler leaks and preheater issues
Rio Grande 8	7/24/2016	8/3/2016	240.0	11/14/2016	11/19/2016	127.8	Preheater work
Rio Grande 8				12/30/2016	12/31/2016	24.2	Repair leak on circulating water line
Rio Grande 8	2/11/2017	2/24/2017	312.0	2/13/2017	3/20/2017	844.0	Summer Prep
Rio Grande 8	1/6/2018	3/30/2018	1992.0	1/6/2018	5/22/2018	3280.5	Planned Outage- LP Turbine Major
Rio Grande 8				10/5/2018	10/6/2018	34.0	Substation to repair GSU on ISO-Bus and for Rio Grande to repair Feedwater Leak

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Rio Grande 8	1/6/2018	3/30/2018	1992.0	1/5/2019	3/30/2019	2011.0	Summer Prep/DCS upgrade
Rio Grande 8	1/11/2020	2/14/2020	816.0	1/11/2020	2/19/2020	936.0	Boiler Cleaning and Summer Prep
Rio Grande 8				4/15/2020	4/17/2020	40.3	Repair Low Pressure Heater Issue
Rio Grande 8				5/15/2020	5/16/2020	18.4	Change out MOOG valve for the left side governor valve on
Rio Grande 8				8/22/2020	8/24/2020	57.4	Repair Boiler Hot Spots
Rio Grande 8				10/29/2020	11/8/2020	219.1	Perform Boiler Inspection by Babcock & Wilcox
Rio Grande 8				3/19/2021	3/31/2021	290.3	Summer prep
Rio Grande 8				4/1/2021	4/16/2021	381.1	Summer Prep
Rio Grande 8	11/13/2021	2/11/2022	2160.0	11/12/2021	In progress		Major Inspection - HP/IP/LP Turbine & Valve Inspection
Rio Grande 9	4/17/2016	4/29/2016	288.0	4/17/2016	5/2/2016	348.5	Summer Prep
Rio Grande 9				6/14/2016	6/16/2016	39.8	Testing
Rio Grande 9				6/17/2016	6/17/2016	2.3	Vibration issues
Rio Grande 9				6/30/2016	6/30/2016	4.1	Due to generator vibration issues
Rio Grande 9				6/30/2016	6/30/2016	6.8	Testing
Rio Grande 9				6/30/2016	7/2/2016	27.5	Due to generator vibration issues
Rio Grande 9				7/8/2016	7/8/2016	2.7	Testing
Rio Grande 9				7/9/2016	7/9/2016	2.1	Data collection on generator
Rio Grande 9				7/22/2016	10/6/2016	1817.0	Generator inspection, testing and cleaning
Rio Grande 9				10/7/2016	10/8/2016	26.2	Install covers on rotor coupling
Rio Grande 9				10/25/2016	10/25/2016	5.1	Repair evaporative water line
Rio Grande 9				12/9/2016	12/9/2016	3.0	Software upgrade
Rio Grande 9				3/11/2017	3/11/2017	7.0	MO for intercooler inspection
Rio Grande 9	3/4/2017	3/17/2017	312.0	3/25/2017	4/13/2017	449.3	Summer Prep
Rio Grande 9				4/28/2017	4/28/2017	5.0	Calibrate a Fire Detector LEL
Rio Grande 9				5/21/2017	5/30/2017	79.0	Repair Inter Cooler leaks and inspect HP compressor
Rio Grande 9				6/12/2017	6/12/2017	1.7	Addressing insulation issues
Rio Grande 9				6/26/2017	6/26/2017	1.3	Repair NOX water injection leak
Rio Grande 9				7/1/2017	7/1/2017	10.3	Perform water wash
Rio Grande 9				7/23/2017	7/23/2017	6.6	Check a casing leak
Rio Grande 9				8/18/2017	8/18/2017	8.0	Replace fuel nozzle
Rio Grande 9				9/26/2017	9/26/2017	2.7	Work on Fire Protection System
Rio Grande 9				11/21/2017	11/21/2017	0.5	GEMS software download
Rio Grande 9				12/11/2017	12/12/2017	32.2	Repair MLO pump 'A' bearing & U9 Water Wash
Rio Grande 9				1/19/2018	1/19/2018	1.6	Ammonia system switch inspection/replacement
							Needed to visually inspect a vibration probe assembly that was showing erratic readings
Rio Grande 9				2/7/2018	2/7/2018	8.6	Remove Kobelco Gas Compressor in prep for HPTC changeout
Rio Grande 9	3/31/2018	4/20/2018	480.0	3/29/2018	3/29/2018	7.5	Summer Prep/Hot Section Exchange
Rio Grande 9				4/22/2018	4/22/2018	2.8	Address oil leaks found in supercore
Rio Grande 9				5/4/2018	5/6/2018	59.5	Repair gas leak
Rio Grande 9				5/30/2018	5/30/2018	1.5	Charge Accumulators and inspect Pull Stations
Rio Grande 9				6/23/2018	6/23/2018	4.0	Inspect SCR and Catalyst
Rio Grande 9				7/12/2018	7/12/2018	7.3	Boroscope Insp/Vibration Probe Repl
Rio Grande 9				7/24/2018	7/24/2018	2.2	Perform hydraulic lift test requested by GE
Rio Grande 9				8/2/2018	8/2/2018	1.2	Replace SLO chip detectors
							Test Fire Protection System and troubleshoot the inadvertent release of CO2
Rio Grande 9				8/23/2018	8/23/2018	0.9	Change Transmitter on Lube Oil Cooling pumps, grease bearings on turbine enclosure fans and to perform the bi-weekly
Rio Grande 9				8/30/2018	8/30/2018	2.1	Change Temperature Air Fan and Inspection of VCA filter
Rio Grande 9				10/12/2018	10/12/2018	1.0	enclosures

UNIT NAME	SCHEDULED START DATE	SCHEDULED END DATE	SCHEDULED LENGTH OF OUTAGE (Hours)	ACTUAL START DATE	ACTUAL END DATE	ACTUAL LENGTH OF OUTAGE (Hours)	REASON FOR OUTAGE
Rio Grande 9				11/1/2018	11/1/2018	1.4	Check an orifice on the water wash system
Rio Grande 9				11/8/2018	11/8/2018	7.9	Install De-Icing hoses on Supercoore
Rio Grande 9				12/11/2018	12/11/2018	3.5	GE techs on site working on the Jacking Oil System
Rio Grande 9				1/4/2019	1/5/2019	26.4	Controls Upgrade
Rio Grande 9				3/11/2019	3/11/2019	4.8	Replace Ammonia Pump
Rio Grande 9				2/26/2020	2/27/2020	31.0	Replace Generator Filters
Rio Grande 9				3/25/2020	4/8/2020	336.0	Summer Prep
Rio Grande 9	4/11/2020	5/1/2020	480.0	4/17/2020	4/23/2020	149.2	Water Wash and Generator Testing
Rio Grande 9				5/19/2020	5/21/2020	36.6	Replace Fuel Nozzle
Rio Grande 9				5/22/2020	5/22/2020	1.6	Input water mapping and ammonia data
Rio Grande 9				6/15/2020	6/16/2020	14.3	Due to Kinder-Morgan requesting outage to allow for installation of new pipe
Rio Grande 9				7/19/2020	7/20/2020	10.7	Perform Borescope Inspections
Rio Grande 9				7/23/2020	7/24/2020	14.6	Rescheduled Borescope Inspection due to Vendor not available
Rio Grande 9				8/28/2020	8/31/2020	67.7	To troubleshoot loss of MW and Water Wash
Rio Grande 9				9/14/2020	1/1/2021	2609.0	To replace lifting hoses on the J3 oil lines
Rio Grande 9				1/1/2021	1/31/2021	744.0	Replace lifting oil hose
Rio Grande 9				2/1/2021	2/28/2021	672.0	Replace lifting oil hose
Rio Grande 9				3/1/2021	3/31/2021	744.0	Replace lifting oil hose
Rio Grande 9				4/1/2021	4/1/2021	5.4	Planned Outage
Rio Grande 9				4/28/2021	4/28/2021	5.6	Address gas flow meter
Rio Grande 9				5/10/2021	5/17/2021	174.0	2nd stage IPT cracked blade
Rio Grande 9				5/18/2021	5/19/2021	27.2	An enclosure seal test will
Rio Grande 9				10/1/2021	10/2/2021	32.3	Water Wash and Borescope Inspection
Rio Grande 9				10/13/2021	10/13/2021	2.2	Opportunity outage to troubleshoot intercooler Vfd
Rio Grande 9				12/7/2021	12/7/2021	3.2	Inspect and clean the Generator inlet air filters
Rio Grande 9				12/8/2021	12/8/2021	1.6	Inspect and perform PMs on the U9 turbine enclosure fans

Note:
Schedule reflects a combination of planned and maintenance outages.
(A) Rio Grande 7 Summer Prep outage was completed during the generator rewind forced outage
Rio Grande 6 went into inactive reserve 1/8/2019

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

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Please see CEP 19-20, Attachment 1.

Preparer: Curtis Hutcheson

Title: Manager – Regulatory Case Management

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

SOAH DOCKET 473-20-2278

PUC DOCKET 50277

APPLICATION OF EL PASO) BEFORE THE STATE OFFICE
ELECTRIC COMPANY TO AMEND)
ITS CERTIFICATE OF)
CONVENIENCE AND NECESSITY) OF
FOR AN ADDITIONAL)
GENERATING UNIT AT THE)
NEWMAN GENERATING STATION) ADMINISTRATIVE HEARINGS

HEARING ON THE MERITS

Tuesday, June 9, 2020

(Via Zoom Videoconference)

BE IT REMEMBERED THAT at 10:00 a.m., on
Tuesday, the 9th day of June 2020, the above-entitled
matter came on for hearing in Austin, Texas, before
ROBERT PEMBERTON and CHRISTIAAN SIANO, Administrative
Law Judges, and the following proceedings were reported
remotely by Lorrie A. Schnoor, Certified Shorthand
Reporter, Registered Diplomate Reporter and Certified
Realtime Reporter.

94 1 of Zoom. 2 JUDGE SIANO: Okay. So we'll take up -- 3 we'll take up the City's case next and then Staff and 4 then rebuttal. Does that sound like the plan? 5 MR. SLOCUM: I think that's -- 6 MR. BELL: Yes, Your Honor. 7 JUDGE SIANO: Okay. Very good. So 8 let's -- I want to have a short discussion with you all 9 off the record. 10 So, Ms. Schnoor, let's go ahead and go off 11 the record. 12 (Recess: 12:06 p.m. to 12:09 p.m.) 13 JUDGE SIANO: We can go back on the record 14 and go ahead and swear him in retroactively. 15 Let's see. Mr. -- Mr. Wayne Oliver? 16 THE WITNESS: Yes. 17 JUDGE SIANO: Okay. Please raise your 18 right hand. You do solemnly swear or affirm that the 19 testimony that you gave today -- that you gave today in 20 this proceeding is the truth, the whole truth, and 21 nothing but the truth? 22 THE WITNESS: Yes, I do. 23 JUDGE SIANO: All right. Thank you. 24 And with that, we'll go off the record 25 again.	96 1 A No, I don't. 2 MR. GORDON: So we tender Mr. Norwood for 3 cross-examination. 4 JUDGE PEMBERTON: All righty. I think 5 Applicants -- or Applicant? 6 MR. SLOCUM: Your Honor, we had filed 7 something saying we waived cross of Mr. Norwood but 8 reserved the right if other parties cross, and so we 9 have no cross for him now, but Mr. Bell may possibly 10 have recross depending on redirect. 11 JUDGE PEMBERTON: All righty. Well, I 12 think, then, Staff, anything? 13 MS. ASHER: Yes, Your Honor. Thank you. 14 CROSS-EXAMINATION 15 BY MS. ASHER: 16 Q Mr. Norwood, very brief. Good afternoon, 17 first. 18 A Good afternoon. 19 Q And I have very few questions, so just bear 20 with me. 21 So let's turn to your -- your direct 22 testimony. On Pages 4 to 5 of your direct testimony, 23 you summarize your conclusions regarding EPE's 24 application. Is that correct? 25 A Yes.
95 1 (Lunch recess: 12:09 p.m. to 1:15 p.m.) 2 AFTERNOON SESSION 3 TUESDAY, JUNE 9, 2020 4 (1:15 p.m.) 5 JUDGE PEMBERTON: Okay. We are on -- back 6 on the record in 473-20-2278, PUC Docket 50277, El Paso. 7 Mr. Gordon, I think we're to your direct 8 case. 9 MR. GORDON: We are. And we call Scott 10 Norwood. 11 JUDGE PEMBERTON: Okay. Mr. Norwood, will 12 you please raise your right hand and repeat after me. 13 (Witness sworn) 14 JUDGE PEMBERTON: All righty. You may 15 proceed, Mr. Gordon. 16 MR. GORDON: Your Honor, Mr. Norwood's 17 direct testimony and workpapers have been previously 18 admitted as CEP Exhibits 1 and 2. 19 PRESENTATION ON BEHALF OF CITY OF EL PASO 20 SCOTT NORWOOD, 21 having been first duly sworn, testified as follows: 22 DIRECT EXAMINATION 23 BY MR. GORDON: 24 Q Do you have any corrections to make, 25 Mr. Norwood?	97 1 Q And particularly, one of your main conclusions, 2 I think, on -- on -- it's No. 2 on Page 5, is that the 3 Company fails to account for the economic impacts of the 4 COVID-19 pandemic in assessing the need for Newman 6. 5 Is that correct? 6 A Yes. 7 Q And you go on to state -- let me see where it 8 is -- that -- well, let's see. On Page 17 of your 9 direct testimony, that EPE would have -- still have 10 sufficient generating capacity of -- I'm going to give 11 you the line number so it's easier for you. I 12 apologize. 13 A All right. 14 Q Lines 8 through 11. 15 A Okay. 16 Q And you go on to state that EPE would still 17 have sufficient generating capacity available on its 18 system until 20 -- at least 2026, simply by delaying 19 planned retirements of the Company's existing resources, 20 and supplementing those with short-term market -- 21 short-term market purchases. 22 A Yes. 23 Q And I assumed, I guess, from Table 3, which is 24 on Page 16 of your application -- and let me know if I 25 assumed incorrectly -- but that this would involve

98 1 delaying the retirements of Newman 1, Newman 2, Rio 2 Grande 7, and then taking Rio Grande 6 out of inactive 3 reserve. Is that correct? 4 A No, not necessarily. Actually, if you'll look 5 over on my Table 2, which is the page before on 14, 6 the -- this calculation shows what I'm suggesting. And 7 Rio Grande 6 has already been taken out of the capacity 8 shown on Row 1 up there, so they're not showing that as 9 a firm resource available to serve peak, although it is 10 available technically. That's why they're spending 11 money to keep it around. 12 So what I'm saying is, if you -- until we 13 know what's going on with COVID, if you could -- if they 14 could delay this decision to pull the trigger a year or 15 two by basically deferring retirements of Rio Grande 7 16 and Newman 1 and 2 and then picking up resource 17 purchases, which is a short-term purchase, at a very 18 modest level, much -- much lower than what they've done 19 already in the past, then they would have adequate 20 reserves at least through 2026. 21 I'm not suggesting necessarily that it has 22 to -- has to go that long, but, you know, I think this 23 is, you know, obviously a once-in-my-lifetime-type 24 thing, so it's -- I think it makes sense and will be 25 prudent to take a little extra time here.	100 1 2023 peak. 2 Q And then those -- those orange boxes, though, 3 include, I guess, Rio Grande 7 in those orange boxes in 4 Row 1.1 -- 5 A Yes. 6 Q -- from 2023 to 2028. Is that correct? 7 A Yes. 8 Q Okay. And -- and this was the information you 9 had available to you at the time you filed your 10 testimony, but it also includes the battery project 11 that -- I guess that's in line -- Row 1.7 that was 12 rejected by the New Mexico Commission. Is that correct? 13 A That's my understanding, yes. 14 Q Okay. And your testimony doesn't -- well, not 15 getting into any specifics, but there are operating and 16 maintenance costs associated with maintaining any -- any 17 gas-fired units, including Newman 6. Correct? 18 A Yes. 19 Q And as a general statement, older gas units 20 have greater O&M costs than newer ones. Would that be 21 correct? 22 A Well, I mean, that doesn't apply with Rio 23 Grande 6, because they're not -- they're not actually 24 operating the unit, per se, unless they need it. For 25 example, the data they've given us on Rio Grande 6 --
99 1 Q Mr. Norwood, actually you jumped right to -- to 2 where I wanted you to go anyway, so let's just start 3 talking about Table 2. 4 A Okay. 5 Q So in Table 2, you have, at least in my copy, 6 the one that was served to me, there is -- in Row 1.1 7 and Row 1.2, you have some orange highlighted boxes from 8 the year 2023 to 2028. 9 A Yes. 10 Q And that would include delaying the retirement 11 of Newman 1 and 2, just as you testified earlier. 12 That's at 736 megawatts in that line. Is that correct? 13 A That's correct. 14 Q And then, like you said, Rio Grande Unit 6 is 15 in inactive reserve, but it's already included in EPE's 16 forecast. Is that correct? 17 A It is actually not in their capacity forecast 18 here. So that line -- the Rio Grande Line 1.1, that 19 278 megawatts does not include Rio Grande 6, because 20 they're saying -- they don't -- they don't use that for 21 planning purposes as a long-term resource. They're 22 keeping it available to run in case they need it, just 23 as they do with the -- the Rio Grande 7 and Newman 1 and 24 2. Although they retire them in 2022, they plan to keep 25 them around in case they need them, you know, for that	101 1 and this is, I believe, in response to CEP 1-16 -- the 2 O&M numbers are -- are nil. The capital additions 3 they're showing for 2019 were actually negative. 4 So they're basically, you know -- they're 5 keeping all the systems checked out, and they do some 6 preparation on the turbine to keep it from corroding, 7 degrading. 8 The idea is do a minimal amount of 9 expenditure and work, but if need be, if in May or -- 10 you know, you have a coronavirus hit in April or May, if 11 you see a need for that unit or, you know, some other 12 event, like an outage on one of the Palo Verde units, 13 for example, it would be another 200 megawatts loss, you 14 would have the ability to bring that unit online over a 15 period of weeks, perhaps, to be available at -- at the 16 time of the peak, along with other things you could do. 17 You could go out and contract short-term. We heard 18 about that earlier with Mr. Hawkins. 19 So you have some flexibility to have 20 resources available as you need them. 21 Q Sure. And Rio Grande 6 is on inactive reserve, 22 but I asked you a general question. More generally, not 23 referring to Rio Grande 6, but in general, older 24 gas-fired units have greater operating and maintenance 25 costs than newer ones. Is that correct?

102 1 A Yeah, if you're -- if you're actually operating 2 them and not keeping them in inactive reserve, they can 3 have higher expenses. 4 Q Okay. And, Mr. Norwood, your testimony doesn't 5 provide any estimates on operating and maintenance costs 6 regarding Newman 1, Newman 2, and Rio Grande 7. Is that 7 correct? 8 A I did not -- no, did not include that. In 9 essence, I'm saying the Company should study this, 10 because it appears to me, from the data I did look at, 11 the operating cost and the capital cost for those units 12 are very low. And so to keep them around as an option 13 is -- is really kind of a gimme. It's a no -- 14 no-brainer if you have the kind of crisis we have now 15 that potentially could affect things, you know, in a 16 very big way going forward. 17 Q And -- I'm sorry. I also wanted to ask you a 18 little bit more about Table 2, which is on Page 14 -- 19 A Okay. 20 Q -- if you could flip to there. I apologize. 21 I'm jumping around here. 22 A No. Go ahead. 23 Q A couple of questions just as a point of 24 clarification. This was made with the 2019 load 25 forecast provided by EPE's application. Is that	104 1 A That's correct. 2 Q Okay. And earlier in our testimony and on our 3 dialogue today, you talked about delaying Newman 6 for 4 possibly one to two years. Is that correct? 5 A (Audio distortion) 6 THE REPORTER: I'm sorry. Was that -- 7 A Yes. 8 JUDGE PEMBERTON: Yeah, Mr. Norwood, you 9 broke up in that last sentence. If you could please 10 repeat that. 11 A Okay. Yeah, the -- what I am talking about 12 here are purchases in order to delay Newman 6, sort of 13 my recommendation a couple years to see what happens 14 with COVID. 15 Q (BY MS. ASHER) And not just purchases but 16 delaying of retirements. In general, you're talking 17 about delaying the Newman 6 project for another one to 18 two years, at least in our dialogue. Correct? 19 A Well, yeah. Let me -- I have not -- I think my 20 testimony makes this clear -- I've not -- 21 JUDGE PEMBERTON: And I'm sorry to 22 interrupt again. You -- back up a little bit, because 23 you broke up once again. 24 THE WITNESS: Okay. Okay. Is that 25 better?
103 1 correct? And that's information you had available at 2 the time. 3 A I don't recall if this was the 2018 or the 4 2020, but both of those forecasts were relatively close. 5 Q 2019 or 2020. Correct? 6 A Well, there was one they did with the 2018 RFP 7 that I think was what they made the selection on. 8 Q Just as a point of clarification, I guess, if 9 you go to system demand, that line, it's Line 4.0. Just 10 let me know when you're there. 11 A I'm there. 12 Q Okay. Sorry. Whichever load forecast you 13 used, those would -- those numbers in that line would 14 come from, you know, the 2019 load forecast or the 2020, 15 or if you don't remember 2018, that's fine, too. But 16 those numbers should -- 17 A Yeah, it's an earlier forecast. I think the -- 18 I seem to recall this being the 2018 or 2019 forecast, 19 but the forecast is essentially the same as the 2019 20 forecast. Very little difference. 21 Q Sure. And the last thing I wanted to highlight 22 here, in Row 2.6, those are the short-term market 23 purchases that you referred to in your testimony of -- 24 from years 2023 to 2026, 35 megawatts, and then the last 25 year, 60. Is that correct?	105 1 JUDGE PEMBERTON: Yeah. Yeah. 2 A Okay. Yeah, I'm not -- my testimony does not 3 sign off on Newman 6 as being the best resource. And, 4 you know, we've talked about several deficiencies in 5 their analysis that, you know, precludes us from this 6 time deciding whether that's really what they should do. 7 One being, again, you know, load forecast, which, you 8 know, no fault of their own, but, you know, COVID 9 hitting and you not having any idea what your future 10 load is going to be -- that's a big -- you know, that's 11 a big -- a big issue. 12 Two, this New Mexico renewable energy 13 regulation that essentially requires large reductions in 14 carbon emissions, and then ultimately zero carbon 15 emissions, is a goal by 2045, I believe. Those -- those 16 two things were not modeled. 17 As -- also, the Company did not model 18 short-term purchases and essentially moving the 19 retirement dates on the three gas units that they have 20 plugged in as -- you know, they plug them in as given 21 actions without really analyzing what a one- or two-year 22 delay in those units could do. 23 So I am saying they ought to wait a few 24 years before they pull the trigger on an investment that 25 would be right at \$200 million probably, when it's all

106 1 said and done, but also I think that would give them 2 time to refresh their modeling in order to evaluate 3 these big changes that, you know, will affect the 4 economics. I don't know if -- when it's all said and 5 done, when they refresh the modeling, if it will select 6 Newman 6 again, but certainly the economics will change 7 with these known changes that have now occurred. 8 And, you know, I feel like it's incumbent 9 upon them to look at that given -- given the level of 10 this investment -- very large investment. And once you 11 pull the trigger on that, that's a fixed -- you know, 12 that's a fixed investment. You can't -- you can't get 13 it back easily. 14 Q (BY MS. ASHER) Sure. So based on the line of 15 questions we're doing, I want to jump to your 16 conclusion. 17 A Okay. 18 Q And if you'll jump with me to Page 22 -- let me 19 find the line number for you. You basically 20 recommend -- you say -- it's Line 15 through 18 -- It 21 would be imprudent for the Company to proceed with 22 Newman 6 until it has a better understanding of the 23 impacts of the COVID-19 pandemic and the ETA on future 24 resource requirements. And you recommend that the 25 Commission deny EPE's request for approval.	108 1 A In other words, if you -- if you plug in the 2 assumption that you can only extend the life of these 3 older gas units by -- by spending a hundred million 4 dollars for five more years, which is essentially what 5 they did, you'll get one result. 6 But if you look at a more realistic 7 analysis that says what if we just -- you know, what if 8 we defer this a couple years, spend -- spend like we've 9 been doing on Rio Grande 6, per how we've been spending 10 on these units anyway over the last five or six years, 11 and then perhaps go back and look at -- now that we have 12 a renewable energy requirement that we know is more 13 aggressive, what if we, instead of doing Newman 6, 14 purchased a little more solar, because they had solar 15 options and wind options at very attractive prices. 16 Very attractive prices. They could have purchased more, 17 but they capped that in their modeling. 18 So what I'm saying is, they had some 19 ability to evaluate this thing differently and buy some 20 time. And I think the two of those things put together 21 might come out with a better answer anyway for 22 customers. And certainly it's -- it's a safer -- a 23 safer way of going at it. 24 Q Now, Mr. Norwood, if the Commission were to 25 reject this application. And we put this on hold for
107 1 A Yes. 2 Q Is that correct? 3 A Yes. 4 Q Okay. And we had a discussion just now, kind 5 of, of your testimony does not go on to say that Newman 6 6 is the best resource. Do you not believe it's the 7 most cost-effective resource? 8 A I don't think they've done that analysis yet, 9 so... 10 Q But they did do an -- they went through an RFP 11 analysis. Is that correct? 12 A Right. 13 Q An RFP process? 14 A Right. 15 Q They did go through -- well, have you reviewed 16 Mr. Gallegos' testimony and exhibits -- 17 A Yes. 18 Q -- in your testimony? 19 A Yes. 20 Q And they did go through, I believe, a program 21 called Strategus, which selects a best mix of resources. 22 Is that -- is that correct? 23 A Well, it selects best resources subject to what 24 you plug into the model. 25 Q Sure.	109 1 another couple of years, the Company would have to go 2 through another RFP process. Correct? 3 A Well, they might have to refresh. I don't know 4 that they would necessarily -- 5 Q Sure. 6 A -- go through -- 7 Q Refresh another -- 8 A Sure. 9 Q Possibly another contract negotiation. 10 A Sure. 11 Q Correct? 12 And possibly, depending on the resource 13 selected, another regulatory proceeding. Correct? 14 A Perhaps. 15 MS. ASHER: I have no other questions. 16 Thank you. Pass the witness. 17 JUDGE PEMBERTON: Okay. I think we're 18 back around to any redirect. 19 MR. GORDON: I'm sorry. Let me get on the 20 camera. No redirect, Your Honor. 21 JUDGE PEMBERTON: Okay. Well, then, I 22 guess are we done with this witness? 23 (No response) 24 JUDGE PEMBERTON: Okay. Very well, 25 Mr. Norwood. You can step down.

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

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Please see CEP 19-21, Attachment 1, for the budgeted and actual non-fuel O&M expense figures as of August 2021 for each of El Paso Electric Company's local generating units.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

EL PASO ELECTRIC COMPANY

Line No.	Description	2021 Year End					2021 Year End Variance
		August 2021 YTD Actuals	August 2021 YTD Budget	YTD Variance	Projected Actuals	Total 2021 Budget	
Newman							
1	Newman Common	10,613,693	7,429,698	3,183,995	14,166,729	10,835,261	\$ 3,331,468
2	Newman Unit 1	3,994,972	2,486,250	1,508,722	4,689,584	2,861,996	\$ 1,827,588
3	Newman Unit 2	1,359,517	1,056,416	303,101	1,555,669	1,302,359	\$ 253,310
4	Newman Unit 3	3,106,799	2,698,175	408,624	3,238,950	2,887,159	\$ 351,791
5	Newman Unit 4	2,140,655	2,752,320	(611,665)	4,954,519	4,761,005	\$ 193,514
6	Newman Unit 5	2,570,186	3,863,824	(1,293,638)	3,171,824	4,280,367	\$ (1,108,543)
7	Total Newman	\$ 23,785,822	\$ 20,286,682	\$ 3,499,140	\$ 31,777,275	\$ 26,928,147	\$ 4,849,128
Copper							
8	Copper						
9	Copper	\$ 735,286	\$ 484,220	\$ 251,066	\$ 849,754	\$ 606,586	\$ 243,168
Rio Grande							
10	Rio Grande Common	3,302,680	2,857,660	445,020	4,859,323	4,336,814	\$ 522,509
11	Rio Grande Unit 6	1,253,402	685,147	568,256	1,318,650	709,718	\$ 608,932
12	Rio Grande Unit 7	918,438	883,343	35,095	1,269,015	1,263,335	\$ 5,680
13	Rio Grande Unit 8	1,976,544	1,861,910	114,634	4,466,870	7,251,162	\$ (2,784,291)
14	Rio Grande Unit 9	1,055,775	1,054,625	1,150	1,590,879	1,578,841	\$ 12,038
15	Total Rio Grande	\$ 8,506,840	\$ 7,342,685	\$ 1,164,154	\$ 13,504,737	\$ 15,139,870	\$ (1,635,133)
Montana Power Station							
16	Montana Common	2,696,188	2,751,937	(55,749)	3,538,427	3,628,868	\$ (90,441)
17	Montana Joint U1 & U2	132,041	176,500	(44,459)	167,834	213,500	\$ (45,666)
18	Montana Joint U3 & U4	81,171	113,667	(32,496)	92,838	123,500	\$ (30,662)
19	Montana Unit 1	616,347	698,960	(82,612)	836,703	906,191	\$ (69,489)
20	Montana Unit 2	715,831	696,248	19,584	1,028,220	901,626	\$ 126,594
21	Montana Unit 3	676,524	682,123	(5,599)	859,211	870,927	\$ (11,716)
22	Montana Unit 4	656,492	822,236	(165,744)	991,823	1,008,612	\$ (16,789)
23	Total Montana	\$ 5,574,596	\$ 5,941,670	\$ (367,075)	\$ 7,515,056	\$ 7,653,224	\$ (138,169)
Generation Common							
24	Generation Common						
25	Generation Common	\$ 1,772,633	\$ 1,922,264	\$ (149,630)	\$ 2,855,916	\$ 3,097,934	\$ (242,018)
26	Total Generating Plant O&M	\$ 40,375,177	\$ 35,977,522	\$ 4,397,656	\$ 56,502,738	\$ 53,425,762	\$ 3,076,977

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

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

CEP 19-22:

Please provide total forced outage hours for each of EPE's local generating units for 2021 to date.

RESPONSE:

Please see CEP 19-22, Attachment 1, which includes the total forced outage hours for El Paso Electric Company's local generating units for 2021 to date.

Preparer: Kara Randle

Title: Staff Data Scientist and Business
Intelligence Analyst

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

Unit	Forced Outage Hours
Montana 1	8.59
Montana 2	63.15
Montana 3	28.05
Montana 4	89.82
Newman 1	234.37
Newman 2	161.86
Newman 3	285.53
Newman 4-GT1	334.88
Newman 4-GT2	245.47
Newman 4-ST	308.11
Newman 5-GT3	275.1
Newman 5-GT4	159.47
Newman 5-ST	285.4
Copper	2008.5
Rio Grande 6	28.97
Rio Grande 7	326.44
Rio Grande 8	3.2
Rio Grande 9	101.45

Note: Forced outage hours include dates January 1, 2021 to November 30, 2021
 Forced outage hours include outage hours that are considered to be outside of local plant management control

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

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Budgeted and actual non-fuel O&M expenses for each of El Paso Electric Company's ("EPE") local generating units for each month to date for 2021 can be found in CEP 19-23, Attachment 1. Reports for budget to actual variances through October 2021 at each plant can be found in CEP 19-23, Attachment 2. Numbers reported in CEP 19-23, Attachment 1, reflect expenses charged to generation functional accounts, while CEP 19-23, Attachment 2, only reflect results for Power Generation departments.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

Line No.	Description	January	February	March	April	May	June	July	August	September	October	November	Total YTD
<u>Newman</u>													
1	Newman Common	1,027,537	1,051,065	1,198,866	1,146,408	1,164,410	2,047,289	1,531,518	1,446,600	1,170,516	1,142,682	1,245,913	\$ 14,172,804
2	Newman Unit 1	138,864	402,297	1,953,685	526,171	198,779	327,780	121,123	328,273	422,490	115,255	53,677	\$ 4,586,395
3	Newman Unit 2	16,920	626,118	412,962	102,722	16,283	16,283	15,115	10,638	27,700	27,700	33,422	\$ 1,435,754
4	Newman Unit 3	103,270	30,033	603,345	1,427,305	371,806	85,926	259,046	259,046	(4,586)	59,980	(155,934)	\$ 3,006,259
5	Newman Unit 4	325,701	341,643	354,676	162,876	306,165	323,401	126,659	198,535	72,099	506,069	1,900,730	\$ 4,619,553
6	Newman Unit 5	73,657	378,419	883,069	338,173	334,970	223,797	154,955	183,146	179,230	225,390	32,544	\$ 3,007,349
7	Total Newman	\$ 1,686,948	\$ 2,829,575	\$ 5,406,593	\$ 3,703,654	\$ 2,395,900	\$ 3,024,476	\$ 2,314,437	\$ 2,424,237	\$ 1,854,864	\$ 2,077,076	\$ 3,110,352	\$ 30,828,114
<u>Copper</u>													
8	Copper	\$ 171,289	\$ 166,326	\$ 142,909	\$ 36,129	\$ 73,129	\$ 95,110	\$ (2,911)	\$ 53,305	\$ 19,817	\$ 38,841	\$ 154,865	\$ 948,809
<u>Montana Power Station</u>													
10	Montana Common	223,218	271,730	336,364	337,355	377,427	350,710	315,612	483,772	331,408	300,143	281,587	\$ 3,609,326
11	Montana Joint U1 & U2	5,739	13,706	33,099	25,242	6,604	6,359	29,782	11,510	8,666	17,247	18,727	\$ 176,684
12	Montana Joint U3 & U4	1,154	1,630	20,103	16,894	20,046	178	19,039	2,127	4,542	21,963	11,875	\$ 119,541
13	Montana Unit 1	24,570	29,639	165,232	83,867	52,994	133,633	34,465	91,947	52,948	39,618	64,967	\$ 773,880
14	Montana Unit 2	23,885	42,823	130,761	244,148	46,039	93,329	42,568	92,278	146,620	(149,982)	154,684	\$ 867,153
15	Montana Unit 3	(25,450)	65,558	84,725	231,149	73,377	116,445	60,134	70,586	30,602	34,056	70,015	\$ 811,197
16	Montana Unit 4	15,966	24,719	60,586	184,407	110,426	124,020	66,080	70,288	35,064	36,962	222,951	\$ 951,469
17	Total Montana	\$ 269,083	\$ 449,805	\$ 830,871	\$ 1,123,061	\$ 686,914	\$ 824,674	\$ 567,679	\$ 822,509	\$ 609,851	\$ 299,997	\$ 824,806	\$ 7,309,250
<u>Rio Grande</u>													
18	Rio Grande Common	346,817	328,724	492,043	368,756	453,717	408,739	447,908	455,977	501,215	445,612	553,142	\$ 4,802,649
19	Rio Grande Unit 6	11,115	105,780	310,975	69,183	111,716	464,063	117,650	72,921	49,320	28,626	56,576	\$ 1,387,925
20	Rio Grande Unit 7	126,437	179,695	158,102	93,067	52,500	132,560	100,245	75,833	67,609	108,526	121,952	\$ 1,216,525
21	Rio Grande Unit 8	121,611	95,272	246,953	943,371	120,442	152,034	91,151	205,711	103,046	108,210	1,221,549	\$ 3,409,349
22	Rio Grande Unit 9	130,640	214,159	241,810	82,126	87,201	157,645	62,975	79,219	186,731	89,778	174,479	\$ 1,506,763
23	Total Rio Grande	\$ 738,620	\$ 923,630	\$ 1,449,882	\$ 1,556,503	\$ 825,575	\$ 1,305,040	\$ 819,929	\$ 889,660	\$ 907,920	\$ 780,752	\$ 2,127,698	\$ 12,323,210
<u>24 Generation Common</u>													
25	Generation Common	\$ 190,177	\$ 192,467	\$ 140,785	\$ 245,523	\$ 272,947	\$ 283,544	\$ 261,971	\$ 185,219	\$ 264,784	\$ 257,570	\$ 255,983	\$ 2,551,971
26	Total Generating Plant O&M	\$ 3,054,117	\$ 4,561,804	\$ 7,971,041	\$ 6,664,871	\$ 4,254,465	\$ 5,532,845	\$ 3,961,106	\$ 4,374,930	\$ 3,657,237	\$ 3,454,237	\$ 6,474,704	\$ 53,961,355

Line No.	Description	January	February	March	April	May	June	July	August	September	October	November	Total YTD
<u>Newman</u>													
1	Newman Common	762,336	843,914	857,987	927,742	959,017	1,049,315	1,009,983	1,019,405	1,023,042	867,552	766,474	\$ 10,086,767
2	Newman Unit 1	313,542	800,042	832,041	133,125	104,125	103,125	103,125	97,125	103,625	93,375	90,125	\$ 2,773,374
3	Newman Unit 2	62,573	309,823	142,573	80,406	83,406	69,906	69,906	65,406	64,906	63,906	58,573	\$ 1,243,801
4	Newman Unit 3	43,247	499,947	514,147	735,647	716,947	72,747	61,247	54,247	52,247	50,247	44,247	\$ 2,844,915
5	Newman Unit 4	104,421	367,921	966,148	743,148	171,421	138,921	135,421	124,921	120,921	789,421	892,671	\$ 4,555,333
6	Newman Unit 5	136,135	1,420,008	1,434,008	164,635	141,635	229,135	223,135	115,135	109,135	105,135	101,135	\$ 4,179,228
7	Total Newman	\$ 1,422,253	\$ 4,174,154	\$ 4,914,153	\$ 2,846,869	\$ 2,176,550	\$ 1,673,648	\$ 1,602,816	\$ 1,476,238	\$ 1,473,876	\$ 1,969,636	\$ 1,953,225	\$ 25,683,419
<u>Copper</u>													
8	Copper	\$ 23,729	\$ 28,093	\$ 36,969	\$ 157,888	\$ 145,718	\$ 31,614	\$ 31,385	\$ 28,824	\$ 27,715	\$ 46,285	\$ 23,915	\$ 582,135
<u>Montana Power Station</u>													
10	Montana Common	184,707	228,671	351,038	482,713	455,344	377,510	362,640	309,314	241,032	231,056	200,077	\$ 3,424,103
11	Montana Joint U1 & U2	10,375	10,375	41,875	53,875	23,375	12,375	14,375	9,875	9,875	9,375	9,375	\$ 205,125
12	Montana Joint U3 & U4	3,708	3,708	32,708	44,708	14,708	4,708	6,708	2,708	2,708	2,708	2,708	\$ 121,792
13	Montana Unit 1	47,182	65,182	260,182	104,932	55,182	82,432	44,182	39,682	66,932	39,182	37,682	\$ 841,757
14	Montana Unit 2	38,468	54,468	259,718	109,468	66,968	82,218	44,468	40,468	66,718	38,968	35,468	\$ 836,403
15	Montana Unit 3	33,578	34,578	188,328	188,078	90,078	73,828	37,078	36,578	62,828	35,078	32,578	\$ 812,607
16	Montana Unit 4	32,967	38,967	187,217	222,467	189,467	78,717	36,467	35,967	62,217	34,467	31,967	\$ 950,887
17	Total Montana	\$ 350,986	\$ 435,950	\$ 1,321,067	\$ 1,206,242	\$ 895,123	\$ 711,789	\$ 545,920	\$ 474,593	\$ 510,311	\$ 390,836	\$ 349,856	\$ 7,192,673
<u>Rio Grande</u>													
18	Rio Grande Common	315,796	338,662	390,600	348,914	347,507	378,340	353,428	384,414	403,726	371,210	361,450	\$ 3,994,046
19	Rio Grande Unit 6	51,643	112,643	171,143	173,643	89,143	51,643	21,643	13,643	8,643	8,643	3,643	\$ 706,077
20	Rio Grande Unit 7	92,762	124,574	127,074	137,074	106,537	106,037	92,262	97,024	97,024	97,024	93,691	\$ 1,171,081
21	Rio Grande Unit 8	186,126	372,426	419,426	244,426	184,126	154,626	160,426	160,326	1,347,690	1,347,690	1,346,690	\$ 5,903,981
22	Rio Grande Unit 9	90,684	91,484	202,760	130,434	124,784	182,027	113,018	119,434	175,843	99,851	90,684	\$ 1,421,004
23	Total Rio Grande	\$ 737,012	\$ 1,039,789	\$ 1,311,003	\$ 1,034,491	\$ 852,098	\$ 872,673	\$ 730,777	\$ 764,841	\$ 2,032,927	\$ 1,924,418	\$ 1,896,159	\$ 13,196,189
<u>24 Generation Common</u>													
25	Generation Common	\$ 253,976	\$ 189,704	\$ 283,113	\$ 200,310	\$ 238,570	\$ 283,848	\$ 220,135	\$ 252,606	\$ 347,880	\$ 250,154	\$ 247,029	\$ 2,767,327
26	Total Generating Plant O&M	\$ 2,787,957	\$ 5,867,691	\$ 7,866,305	\$ 5,445,801	\$ 4,308,060	\$ 3,573,572	\$ 3,131,033	\$ 2,997,103	\$ 4,392,709	\$ 4,581,328	\$ 4,470,184	\$ 49,421,743

Line No.	Description	January	February	March	April	May	June	July	August	September	October	November	Total YTD
<u>Newman</u>													
1	Newman Common	265,201	207,152	340,879	218,666	205,393	997,975	521,535	427,195	147,473	275,130	479,438	\$ 4,086,037
2	Newman Unit 1	(174,678)	(397,745)	1,121,645	393,046	94,654	224,655	17,998	229,148	318,865	21,880	(36,448)	\$ 1,813,020
3	Newman Unit 2	(45,663)	383,795	103,129	(63,636)	(64,123)	(64,123)	84,207	(64,768)	(56,791)	(36,206)	(25,151)	\$ 191,953
4	Newman Unit 3	60,023	(469,914)	89,198	691,668	(345,140)	13,179	164,822	204,799	(56,833)	9,733	(200,181)	\$ 161,344
5	Newman Unit 4	222,280	(26,278)	(611,472)	(580,272)	134,745	184,481	(8,762)	73,614	(48,822)	(283,352)	1,008,059	\$ 64,220
6	Newman Unit 5	(62,477)	(1,041,589)	(550,938)	173,538	193,335	(5,338)	(68,179)	68,011	70,095	120,255	(68,591)	\$ (1,171,879)
7	Total Newman	\$ 264,695	\$ (1,344,579)	\$ 492,440	\$ 856,785	\$ 219,350	\$ 1,350,828	\$ 711,621	\$ 947,999	\$ 380,988	\$ 107,441	\$ 1,157,127	\$ 5,144,696
<u>Copper</u>													
8	Copper	\$ 147,560	\$ 138,233	\$ 105,940	\$ (121,759)	\$ (72,589)	\$ 63,496	\$ (34,296)	\$ 24,481	\$ (7,898)	\$ (7,443)	\$ 130,950	\$ 366,674
<u>Montana Power Station</u>													
10	Montana Common	38,512	43,059	(14,674)	(145,358)	(77,917)	(26,800)	(47,029)	174,458	90,376	69,086	81,510	\$ 185,223
11	Montana Joint U1 & U2	(4,636)	3,331	(8,776)	(28,633)	(16,771)	(6,016)	15,407	1,635	(1,207)	7,872	9,352	\$ (23,441)
12	Montana Joint U3 & U4	(2,554)	(2,078)	(12,606)	(27,814)	5,337	(4,530)	12,330	(581)	1,833	19,244	9,167	\$ (2,251)
13	Montana Unit 1	(22,612)	(35,544)	(94,950)	(21,066)	(2,188)	51,200	(9,718)	52,265	(12,985)	435	27,285	\$ (67,877)
14	Montana Unit 2	(14,583)	(11,645)	(128,957)	134,679	(20,929)	11,110	(1,901)	51,810	80,901	(188,951)	119,215	\$ 30,750
15	Montana Unit 3	(59,028)	30,980	(103,602)	43,072	(16,701)	42,617	23,056	34,008	(32,226)	(1,022)	37,437	\$ (1,410)
16	Montana Unit 4	(17,001)	(14,248)	(126,631)	(38,060)	(79,041)	45,303	29,613	34,321	(27,153)	2,495	190,984	\$ 582
17	Total Montana	\$ (81,903)	\$ 13,855	\$ (490,196)	\$ (83,181)	\$ (208,209)	\$ 112,885	\$ 21,760	\$ 347,915	\$ 99,540	\$ (90,839)	\$ 474,950	\$ 116,576
<u>Rio Grande</u>													
18	Rio Grande Common	31,021	(9,938)	101,443	19,842	106,210	30,398	94,480	71,563	97,489	74,403	191,692	\$ 808,603
19	Rio Grande Unit 6	(40,529)	(6,864)	139,831	(104,460)	22,572	402,419	96,007	59,278	40,676	19,983	52,933	\$ 681,848
20	Rio Grande Unit 7	33,675	55,121	31,028	(44,006)	(54,037)	26,523	7,983	(21,191)	(29,415)	11,502	28,261	\$ 45,443
21	Rio Grande Unit 8	(64,515)	(277,154)	(172,474)	698,944	(63,685)	(2,583)	(59,275)	55,384	(1,244,644)	(1,239,481)	(125,141)	\$ (2,494,632)
22	Rio Grande Unit 9	39,956	122,675	39,050	(48,308)	(37,583)	(24,361)	(50,043)	(40,216)	10,888	(10,073)	83,794	\$ 85,759
23	Total Rio Grande	\$ (392)	\$ (116,159)	\$ 138,879	\$ 522,011	\$ (26,523)	\$ 432,367	\$ 89,152	\$ 124,819	\$ (1,125,006)	\$ (1,143,666)	\$ 231,539	\$ (872,978)
<u>Generation Common</u>													
24	Generation Common	\$ (63,799)	\$ 2,763	\$ (142,328)	\$ 45,213	\$ 34,376	\$ (304)	\$ 41,836	\$ (67,387)	\$ (83,096)	\$ 7,416	\$ 9,954	\$ (215,356)
25	Generation Common	\$ 266,160	\$ (1,305,887)	\$ 104,735	\$ 1,219,069	\$ (53,594)	\$ 1,959,272	\$ 830,073	\$ 1,377,827	\$ (735,472)	\$ (1,127,092)	\$ 2,004,520	\$ 4,539,612

El Paso Electric Company
Controllable O&M - Local Power Generation (Guadarrama)
October 2021 Forecast
Expense Type by Department

DBFT Expense Category	Actuals												Forecast		Total Projected	Total Budget	Variance	Explanation
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb				
030 EMPLOYEE RELATED	18,695	13,412	13,590	7,872	95,988	54,480	121,874	51,429	27,872	55,900	27,431	53,359	454,883	285,312	168,371			
031 OFFICE SUPPLIES	3,710	2,071	1,703	12,199	3,062	5,648	1,706	4,426	6,637	1,593	4,540	3,379	50,672	60,200	-9,528			
035 DUES & SUBSCRIPTIONS	10,363	10,363	10,363	55,237	10,363	10,363	140,939	-119,691	25,379	10,967	11,131	10,881	186,459	206,578	-19,718			
060 MATERIALS PURCHASES	418,888	957,016	1,380,510	1,028,389	481,070	643,121	611,868	655,264	731,952	338,243	654,601	453,231	8,355,233	8,011,940	343,894			
065 REPAIRS & MAINT EXP	29,702	97,752	226,371	395,963	375,553	411,523	351,164	329,645	-131,147	463,633	670,813	92,272	2,829,979	4,217,624	-1,387,245			Offset with subcontractor charges below. Net decrease due to Rio Grande Unit 8 major outage rescheduled to be completed in 2022.
070 SUBCONTRACTOR CHARGES	566,012	1,431,196	4,072,440	2,877,210	956,813	1,379,030	1,032,151	1,052,215	979,549	479,300	2,162,549	1,456,031	18,395,664	16,017,569	2,377,925			Offset with repairs and maintenance charges above. Net decrease due to Rio Grande Unit 8 major outage rescheduled to be completed in 2022.
080 OUTSIDE SVCS-CONSULTING	32,375	-3,780	-124,715	7,101	6,501	189,016	-1,674	4,369	5,600	7,420	6,377	6,377	134,562	151,516	-16,554			
090 OUTSIDE SVCS-LEGAL	7,517	-7,517	1,117	4,801	-5,917	0	13,220	-3,723	8,352	6,595	0	0	0	0	0			
100 OUTSIDE SVCS-ENGINEERING	-54,744	22,880	17,262	57,160	39,245	9,514	93,949	73,059	80,046	57,409	32,917	26,025	115,760	423,000	-307,240			
140 RENTALS	48,428	197,122	94,237	93,857	38,904	173,002	468,425	468,425	468,425	296,425	171,722	185,000	944,016	242,610	691,406			
150 TRAVEL	3,710	3,710	3,710	28,615	4,426	4,426	4,426	4,426	4,426	4,426	4,426	4,426	3,858,426	4,426,426	-568,000			
154 OTHER CORPORATE EXPENSES	1,222	7,810	241	893	3,363	1,111	478	2,113	2,749	203	1,268	2,913	23,918	23,918	0			
158 FEES & PERMITS	100	445	5	5	5	95							645	2,900	-1,855			
235 FAC SERVICES- MISC REPAIR & MAINTENANCE	77				11,333	2,368	568	801	381	506			11,410	11,410	0			
285 FUEL	1,035	4,207	8,810	1,890	553	2,368							21,217	42,000	-20,783			
391 STRAIGHT TIME	1,400,558	1,235,796	1,474,214	1,218,773	1,383,488	1,339,859	1,381,323	1,554,162	1,374,509	1,268,470	1,393,673	1,389,673	16,165,388	16,748,077	-582,689			
395 OVERTIME	263,185	263,185	263,185	358,510	203,012	172,032	128,987	147,532	145,422	164,985	170,524	170,523	2,275,126	2,046,282	228,844			
399 FTO SELLBACKS	170,165	184,369	9,536	28,899	8,711	3,831	3,516	8,972	3,274	13,403	972	3,911	114,724	121,382	-6,658			
550 MASONRY ALLOWANCES	0	0	0	0	0	0	0	0	0	0	0	0	50,000	50,000	0			
620 WHEELING EXPENSE	550,779	666,881	555,617	550,658	718,972	850,562	655,015	925,997	600,059	630,796	607,553	607,553	7,920,182	7,893,415	26,767			Higher than expected transmission due to market conditions.
Total	9,524,234	4,958,411	8,156,629	7,039,749	4,732,164	5,674,748	4,683,919	4,897,332	4,310,461	3,827,762	5,516,010	4,263,089	62,044,508	60,038,497	1,956,011			

Summary by Power Plant	Actuals												Forecast		Total Projected	2021 Budget	Variance
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb			
Copper	180,466	169,728	154,716	65,502	75,943	80,069	-8,348	45,338	15,584	15,502	21,278	21,315	841,233	553,759	287,514		
Newman	1,619,731	2,624,176	5,206,954	3,165,426	2,674,880	2,411,015	2,746,115	2,776,785	1,959,887	1,940,664	2,676,622	843,657	26,670,892	25,829,368	3,841,589		
Rio Grande	640,580	835,469	1,394,156	1,465,585	707,565	1,270,918	796,210	786,622	820,540	686,940	1,769,841	1,829,386	12,837,627	14,893,177	-1,965,550		
Generation Management ¹	833,396	923,488	712,058	839,480	1,024,221	1,155,533	1,115,279	1,095,564	905,127	918,270	932,697	1,000,391	11,365,924	11,264,298	1,017,716		
Total	9,524,234	4,958,411	8,156,629	7,039,749	4,732,164	5,674,748	4,683,919	4,897,332	4,310,461	3,827,762	5,516,010	4,263,089	62,044,508	60,038,497	1,956,011		

¹ Includes 0130 Local Power Generation Management, 0134 Generation Engineering, 0135 Generation Outages & Projects, and 0136 Energy Trading departments. See supporting tabs for detail.

El Paso Electric Company
Controllable O&M - Power Generation Mgmt (Guaderrama)
October 2021 Reforecast
Expense Type by Department

DEPT Expense Category	Actuals												Forecast		Total Projected	Total Budget	Variance	Explanation
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec						
030 EMPLOYEE RELATED	75							308	408	33	161	54	230	1,268	2,355	-1,087		
031 OFFICE SUPPLIES						8					68	42	42	160	500	-340		
035 DUES & SUBSCRIPTIONS															550	-550		
060 MATERIALS-PURCHASES								473						473	150	323		
194 OTHER CORPORATE EXPENSES		7,825			3,211								200	11,236	965	10,271		
391 STRAIGHT TIME	35,780	41,117	38,536	44,939	45,702	44,014	45,457	45,504	43,996	45,438	39,465	39,465		509,412	473,581	35,831		
396 PTO SELLBACKS				291			291	1,856				794			3,232	3,177	55	
Total	35,855	48,942	38,536	45,231	48,912	44,022	46,056	48,241	44,029	45,667	39,561	40,731	525,781	481,278	44,503			
	*Costs associated with Generation Management Operating Segment												83,280					

*Costs associated with Generation Management Operating Segment

El Paso Electric Company
Controllable O&M - Power Plant Newman (Pruich)
October 2021 Reforecast
Outages

Outage Type	Unit	Actuals												Forecast				Total Projected	Total Budget	Variance	Explanation
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec								
Planned	Copper	136,999	133,346	84,418	7,341	4,378	73,829	-41,031	1,633	1,061	1,874			423,848				423,848	2020 Copper outage extended through May 2021 (not budgeted).		
	Newman Unit 1	7,984	22,863	984,423	151,181	188,835	185,916	81,864	-12,389	-10,878	0			1,599,798				611,500	988,298 increased repairs due to minor valve outage turned into major outage.		
	Newman Unit 2		22,559	22,500	84,704	0	0	143,769	639	0	0			274,171				274,171	274,171 Newman unit 2 thrust investigation.		
	Newman Unit 3	0	410	155,873	600,804	417,269	-14,144	126,633	0	5,866	0			1,292,712				1,668,800	-376,088 Newman unit 3 valve inspection lower than budgeted work scope performed during outage.		
	Newman Unit 4	174,140	6,608	-18,723	0	0	0	74,380	72,345	3,150	432,067	1,339,000	-300,000	1,782,967				1,878,000	-95,034 Part refurbishments GT2.		
	Newman Unit 5	0	0	77,738	13,091	484	-18,000	0	0	0	0			73,313				570,246	-496,933 lower than expected GT3 hot gas path inspection costs and capitalized turbine parts purchased through exchange agreement with Ethos Energy.		
Planned Total		339,123	185,787	1,306,229	857,121	610,966	227,601	385,614	62,227	-801	433,941	1,339,000	-300,000	5,446,809				4,728,546	718,263		
Unplanned	Newman Common	471			7,553									8,024				8,024			
	Newman Unit 1	5,630	-159	-35,596	5,972	2,060	-433	3,019	89,434	135,841	-56			205,711				205,711			
	Newman Unit 2			46,427	-2,335									44,091				44,091			
	Newman Unit 3	-703	693	-207	324	104,179	44,200	60,524	-28,125		526			181,411				181,411			
	Newman Unit 4	-1,518	29,781	49,398	1,232	0	0	0	293	-102	0			79,085				79,085			
	Newman Unit 5	109,337	-308,199	-392,762	135,589	-14,018	10,629	1,086	19,512	79,355			256,927				256,927				
Unplanned Total		3,409	140,124	-387,569	241,827	29,749	74,171	62,688	155,251	79,825			775,250				4,728,546	775,250			
Unplanned Total		342,532	325,911	1,682,003	469,552	852,793	257,350	459,786	124,915	154,450	513,766	1,339,000	-300,000	6,222,058				4,728,546	1,493,512		

El Paso Electric Company
Controllable O&M - Power Plant Newman (Purch)
October 2021 Reforecast
Non-Outages

O&M Type	Unit	Actuals												Forecast		Total Projected	Total Budget	Variances	Explanation
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Nov	Dec				
Routine	Copper	15,587	25,688	37,826	38,043	47,339	9,282	25,985	45,153	18,566	15,582	71,378	21,115	71,378	21,115	207,254	350,739	-143,485	Higher than expected O&M parts purchases, portable reverse comdis rentals, and increased training costs.
	Newman Common	885,865	854,181	965,853	995,613	1,011,166	1,469,175	1,414,950	1,853,285	1,264,900	965,240	718,316	704,851	718,316	704,851	12,458,369	10,901,733	1,556,635	
	Newman Unit 1	22,369	35,703	33,309	118,362	100,121	32,863	36,415	171,368	291,465	102,912	43,352	41,851	43,352	41,851	1,039,219	773,218	256,001	Lower than expected routine maintenance.
	Newman Unit 2	3,067	20,549	-16,436	18,429	17,121	10,381	9,884	9,568	14,653	23,318	56,311	56,299	56,311	56,299	233,146	880,218	-667,572	Lower than expected routine maintenance.
	Newman Unit 3	26,933	19,279	60,377	49,229	64,977	52,647	36,988	79,274	23,443	54,636	41,985	39,985	41,985	39,985	549,793	752,218	-202,425	Lower than expected routine maintenance.
	Newman Unit 4	176,658	149,987	128,888	151,002	302,973	237,613	60,139	127,666	66,950	83,437	103,913	96,917	103,913	96,917	1,686,141	1,671,957	14,184	HRSG2 Boiler Feedwater Pump replacement.
Routine Total	Newman Unit 5	66,426	166,101	329,548	123,297	171,750	240,006	150,482	181,579	156,921	142,526	98,496	98,504	98,496	98,504	1,925,635	1,636,957	288,678	HRSG3 Boiler Feedwater Pump replacement.
	Newman Unit 6	23,798	32,428	30,180	30,386	28,090	33,205	31,747	34,562	33,045	31,795			31,795		309,235	309,235	0	Capital straight-line associated with construction.
Summer Prep	Copper	1,226,230	1,301,428	1,573,255	1,526,343	1,743,478	2,025,272	1,765,271	1,910,455	1,869,543	1,417,525	1,083,750	1,059,722	1,083,750	1,059,722	18,502,292	16,477,542	2,024,750	
	Newman Common	7,480	10,684	31,472	19,178	24,226	-3,042	5,698	551	-42	-54			551		97,151	203,500	-106,349	
	Newman Unit 1	99,914	335,405	2,945	623	294	-74		76,106	-155	10,893					4,154	915,500	855,576	Higher than expected summer preparation costs, primarily driven by unit outage.
	Newman Unit 2	13,418	576,224	970,188	239,076	-94,363	107,818	325		5,614						1,751,076	394,500	586,246	Higher than expected summer preparation costs, primarily driven by unit outage.
	Newman Unit 3	77,504	15,404	387,639	779,883	-223,070	1,449	2,046	210,041	-27,076	1,879					1,232,298	439,000	796,298	Higher than expected summer preparation costs, primarily driven by unit outage.
	Newman Unit 4	21,170	124,661	159,627	7,249	5,617	83,466	3,946		9,078	6,028	275,250	107,250			863,321	1,192,954	-329,633	
Summer Prep Total	Newman Unit 5	5,948	1,02,878	167,941	390,077	27,983	12,421	0		0	2,799					974,049	2,041,500	-1,067,451	
	Newman Unit 6	2,148	1,170,868	2,653,333	1,160,073	-29,076	29,076	13,210	286,293	-13,076	29	276,260	107,260			8,176,631	3,174,000	5,002,631	Lower than expected summer preparation costs.
Total		1,437,646	2,471,993	3,659,846	3,161,458	1,486,030	2,233,794	1,777,491	2,197,203	1,856,022	1,441,402	1,359,000	1,166,972	1,359,000	1,166,972	24,526,087	21,644,498	2,881,589	

El Paso Electric Company
Controllable O&M - Montana Power Station (Montano)
October 2021 Reforecast
Non-Outages

Outage Type	Unit	Actuals												Forecast			Total Projected	Total Budget	Variance	Explanation
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec							
Planned	Montana Unit 2	0	0	0	0	0	-1,374	0	0	0	0	0	0	0	-1,374	0	-1,374			
Planned Total		0	0	0	0	0	-1,374	0	0	0	0	0	0	0	-1,374	0	-1,374			
Unplanned	Montana Common	0	0	0	0	0	0	0	-1	0	0	0	0	0	0	0	0			
Unplanned Total		0	0	0	0	0	0	0	-1	0	0	0	0	0	0	0	0			
Total		0	0	0	0	0	-1,374	0	-1	0	0	0	0	0	-1,375	0	-1,375			

El Paso Electric Company
Controllable O&M - Montana Power Station (Montana)
October 2021 Reforecast
Non-Outages

O&M Type	Unit	Actuals												Forecast			Total Projected	Total Budget	Variance	Explanation
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec							
Routine	Montana Common	211,639	255,900	320,855	325,716	357,320	341,113	305,167	451,603	302,348	265,968	196,436	210,870	3,544,935	3,670,598	-125,663	Less than expected summer prep costs.			
	Montana Joint U1 & U2	5,598	13,553	32,993	25,174	6,573	6,290	29,889	11,382	8,412	17,172	9,375	8,375	174,785	213,500	-38,715				
	Montana Joint U3 & U4	1,084	1,537	20,030	16,892	19,772	112	19,157	1,877	4,312	21,819	2,708	1,708	111,009	123,500	-12,491				
	Montana Unit 1	23,151	28,169	163,160	82,287	52,891	131,039	36,936	88,508	52,547	38,412	35,034	87,893	820,927	874,413	-53,487				
	Montana Unit 2	21,798	41,113	129,040	241,692	44,483	92,949	45,419	88,949	144,483	-150,993	34,034	89,893	822,862	884,413	-61,552				
Routine	Montana Unit 3	-27,395	63,094	83,421	228,463	72,139	114,475	61,078	69,877	28,646	32,586	32,136	83,994	842,516	865,631	-23,115				
	Montana Unit 4	14,196	23,226	59,273	182,471	108,546	121,689	69,028	70,828	33,574	37,984	205,747	83,605	1,010,166	1,005,964	4,202				
	Summer Prep	250,071	426,591	808,772	1,102,696	661,724	808,567	566,674	783,024	574,322	262,943	515,471	566,339	7,327,199	7,638,019	-310,820				
Summer Prep Total		0	0	0	0	0	0	0	0	0	2,937	0	0	2,937	0	2,937				
Total		250,071	426,591	808,772	1,102,696	661,724	808,567	566,674	783,024	574,322	265,885	515,471	566,339	7,330,136	7,638,019	-307,883				

El Paso Electric Company
Controllable O&M - Power Plant Rio Grande (Arranda)
October 2021 Reforecast
Outages

Outage Type	Unit	Actuals												Forecast				Total Projected	Total Budget	Variance	Explanation
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec								
Planned	Rio Grande Unit 7	0	0	-40,807	0	0	0	0	0	0	0	0	0	-40,807				-40,807		-40,807	
	Rio Grande Unit 8	0	0	0	-1,647	0	0	466	47,083	14,337	34,430	1,121,645	1,121,645	2,337,960				4,792,056		-2,454,096	Rio Grande Unit 8 major outage for turbine and valve inspection rescheduled to be completed in 2022.
Planned Total		0	0	-40,807	-1,647	0	0	466	47,083	14,337	34,430	1,121,645	1,121,645	2,297,153				4,792,056		-2,494,903	
Total		0	0	-40,807	-1,647	0	0	466	47,083	14,337	34,430	1,121,645	1,121,645	2,297,153				4,792,056		-2,494,903	

El Paso Electric Company
Controllable O&M - Power Plant Rio Grande (Arranda)
October 2021 Reforecast
Non-Outages

O&M Type	Unit	Actuals												Forecast				Total Projected	Total Budget	Variance	Explanation
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec								
Routine	Rio Grande Common	266,326	255,390	355,930	274,346	346,666	335,302	390,201	368,661	422,537	361,510	323,652	316,966	4,017,487	4,145,894	-128,407	Less than expected summer prep costs.				
	Rio Grande Unit 6	10,712	103,465	309,640	63,645	100,829	451,745	105,689	71,433	47,794	27,647	2,833	2,833	1,298,264	700,000	598,264	Higher than expected cooling tower structural repairs and reconditioning.				
	Rio Grande Unit 7	121,669	174,710	194,107	92,303	49,356	129,019	102,553	72,929	63,934	104,340	90,181	88,752	1,283,853	1,221,223	62,630					
	Rio Grande Unit 8	116,627	91,502	248,943	954,683	117,752	146,688	93,590	150,915	90,012	73,484	144,086	144,586	2,372,867	2,404,036	-31,168					
	Rio Grande Unit 9	125,248	210,401	236,337	78,938	84,909	154,165	64,902	75,620	181,976	85,350	87,444	154,604	1,539,845	1,539,968	-123					
Routine Total		640,580	885,469	1,344,956	1,463,914	699,512	1,216,920	756,936	739,558	806,203	652,330	648,196	707,742	10,512,316	10,011,121	501,195					
Summer Prep	Rio Grande Common					596	5,095	-959						4,732	4,732						
	Rio Grande Unit 6				4,318	7,288	-1,097	12,756	-20					23,245	23,245						
	Rio Grande Unit 8										180		180								
Summer Prep Total					4,318	7,883	3,998	11,797	-20		180		180	28,157	28,157						
Total		640,580	885,469	1,344,956	1,468,232	707,395	1,220,918	768,734	739,538	806,203	652,510	648,196	707,742	10,540,474	10,011,121	529,352					

El Paso Electric Company
Controllable O&M - Generation Engineering (Olson)
October 2021 Reforecast
Expense Type by Department

DEPT Expense Category	Actuals												Forecast		Total Projected	Total Budget	Variance	Explanation
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec						
030 EMPLOYEE RELATED	2,966	7,131	3,217	469	55,726	45,180	59,276	-78,699	10,234	10,988	500	500	117,488	24,414	93,074			
031 OFFICE SUPPLIES	236		594	99	370	661	405				167	667	3,199	4,000	-801			
035 DUES & SUBSCRIPTIONS											250		250	900	-650			
060 MATERIALS-PURCHASES	278			97	1,933	103							2,411	150	2,261			
194 OTHER CORPORATE EXPENSES	216			400			57		230			300	1,203	1,500	-297			
391 STRAIGHT TIME	28,987	43,425	42,612	26,390	34,163	48,040	37,806	38,031	36,791	23,834	65,069	65,069	490,216	804,827	-314,611			
392 OVERTIME	64	160	64	0	80	96			32				495		495			
396 PTO SELLBACKS			1,501	1,820								441	3,763	1,765	1,998			
Total	32,747	50,716	47,989	29,275	92,272	93,984	97,640	-40,668	47,287	34,822	65,985	66,976	619,026	887,556	-218,530			

El Paso Electric Company
El Paso Electric Company
Controllable O&M - Outage and Generation Projects (Kline)
October 2021 Reforecast
Expense Type by Department

DEPT Expense Category	Actuals												Forecast		Total Projected	Total Budget	Variance	Explanation
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec						
030 EMPLOYEE RELATED	553			30	1,325	15	10,274	823	82	158	684	1,186	13,805	27,329	-13,524			
031 OFFICE SUPPLIES	303						188		369		167	167	2,517	7,000	-4,483			
035 DUES & SUBSCRIPTIONS										86			86	200	-114			
060 MATERIALS-PURCHASES													0	150	-150			
065 REPAIRS & MAINT EXP	0	0	0	0	0	0	0	0	0	0	4,417	4,417	8,833	53,000	-44,167			
070 SUBCONTRACTOR CHARGES												300	300	1,050	-750			
194 OTHER CORPORATE EXPENSES						95							95		95			
391 STRAIGHT TIME	31,440	13,386	16,595	40,560	33,308	32,917	33,752	35,098	33,518	36,656	68,823	68,823	444,879	825,880	-381,002			
396 PTO SELLBACKS				10,130								6,547	16,677	26,188	-9,511			
Total	32,296	13,386	16,595	50,720	34,633	33,027	44,214	35,922	33,968	36,900	74,091	81,440	487,192	940,797	-453,605			

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

O&M expenses incurred for freeze protection for local generating plants is not specifically tracked by El Paso Electric Company.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

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PUC DOCKET NO. 52195

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
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EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Non-fuel O&M expenses for Newman Units 1 and 2 for the requested years can be found in CEP 19-25, Attachment 1. For capacity factors for Newman Units 1 and 2 for 2016 through the test year, please refer to El Paso Electric Company's responses to FMI 2-4 and CEP 5-41. Capacity factors for 2021 to date are 28.91 for Newman Unit 1 and 47.44 for Newman Unit 2.

Preparer: Kara Randle

Pedro Vega

Sponsor: J Kyle Olson

Title: Staff Data Scientist & Business Intelligence
Analyst

Senior Accountant – Power Generation

Title: Director – Power Generation Engineering
and Asset Management

Line No.	Description	Actuals					November 2021	
		2016	2017	2018	2019	2020	YTD	
<u>Newman</u>								
1	Newman Unit 1	\$ 402,806	\$ 4,797,213	\$ 2,096,729	\$ 885,005	\$ 2,580,437	\$ 4,586,395	
2	Newman Unit 2	600,611	846,233	5,851,133	689,625	664,113	1,435,754	
3	Total Newman Units 1 & 2	\$ 1,003,417	\$ 5,643,446	\$ 7,947,862	\$ 1,574,630	\$ 3,244,550	\$ 6,022,149	

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EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Please refer to CEP 19-26, Attachment 1, for forced and planned outage O&M expenses above \$500,000 (consistent with the Public Utility Commission of Texas' Rate Filing Package) incurred for each of EPE's local generating plants for the requested period.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

Line No.	Description	O&M Outages					November 2021 YTD
		2016	2017	2018	2019	2020	
<u>Newman</u>							
1	Newman Unit 1		3,883,591	1,226,029		1,111,102	2,462,387
2	Newman Unit 2			4,520,298			654,789
3	Newman Unit 3	635,815	3,030,166			1,473,755	1,306,367
4	Newman Unit 4	834,573	1,633,744	1,291,778	3,053,747	4,201,170	1,272,582
5	Newman Unit 5	567,454	1,748,077	203,006	553,864	904,346	
6	Total Newman	\$ 2,037,843	\$ 10,295,578	\$ 7,241,110	\$ 3,607,611	\$ 7,690,373	\$ 5,696,125
<u>Rio Grande</u>							
7	Rio Grande Unit 7	582,782				527,038	
8	Rio Grande Unit 8			3,333,408		742,663	1,899,032
9	Rio Grande Unit 9	523,385					
10	Total Rio Grande	\$ 1,106,167	\$ -	\$ 3,333,408	\$ -	\$ 1,269,701	\$ 1,899,032
<u>Montana Power Station</u>							
11	Montana Unit 3					1,314,834	
12	Total Montana	\$ -	\$ -	\$ -	\$ -	\$ 1,314,834	\$ -
13	<u>Copper</u>						
14	Copper					\$ 578,198	\$ 563,943
11	Total Generating Plant O&M Outages	\$ 3,144,010	\$ 10,295,578	\$ 10,574,518	\$ 3,607,611	\$ 10,853,106	\$ 8,159,100

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EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Capital expenditures incurred for forced and planned outages above \$500,000 (consistent with the Public Utility Commission of Texas' Rate Filing Package) for each of El Paso Electric Company's local generating plants for the dates requested can be found in CEP 19-27, Attachment 1.

Preparer: Pedro Vega

Title: Senior Accountant – Power Generation

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

EL PASO ELECTRIC COMPANY

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Line	Capital Outages						November 2021
No.	Description	2016	2017	2018	2019	2020	YTD
<u>Newman</u>							
1	Newman Unit 1	-	-	-	-	-	1,138,492
2	Newman Unit 2	-	-	597,326	-	-	-
3	Newman Unit 3	-	-	1,881,520	576,207	-	-
4	Newman Unit 4 (a)	6,209,316	-	-	5,592,573	26,591,000	-
5	Newman Unit 5 (b)	9,514,114	37,227,052	1,543,337	516,535	712,385	1,413,515
6	Total Newman	\$ 15,723,430	\$ 37,227,052	\$ 4,022,183	\$ 6,685,315	\$ 27,303,385	\$ 2,552,007
<u>Montana Power Station</u>							
(c)							
7	Montana Unit 1	11,857,508	-	5,670,500	1,418,918	-	-
8	Montana Unit 3	-	-	-	-	2,635,164	2,239,923
9	Montana Unit 4	-	-	-	2,239,923	-	2,780,000
10	Total Montana	\$ 11,857,508	\$ -	\$ 5,670,500	\$ 3,658,841	\$ 2,635,164	\$ 5,019,923
<u>Copper</u>							
11	Copper	-	-	-	1,591,287	9,161,279	8,118,997
<u>Rio Grande</u>							
13	Rio Grande Unit 7	-	-	-	-	1,103,840	-
14	Rio Grande Unit 8	-	-	825,626	-	574,119	786,243
15	Rio Grande Unit 9	-	-	1,909,584	-	-	2,613,695
16	Total Rio Grande	\$ -	\$ -	\$ 2,735,211	\$ -	\$ 1,677,958	\$ 3,399,937
17	Total Generating Plant Capital Outages	\$ 27,580,938	\$ 37,227,052	\$ 12,427,894	\$ 11,935,443	\$ 40,777,786	\$ 19,090,865

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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.

RESPONSE:

El Paso Electric Company ("EPE") has not had unplanned outages due to LMS 100 booster and power turbine failures at its local generation plants. As stated in EPE witness J Kyle Olson's rebuttal testimony, these parts were purchased based on the determination by EPE and GE that these parts are subject to long lead times of up to 24 months. Thus, these spare parts were purchased to avoid future extended forced outages on any of EPE's five LMS 100 units.

Preparer: Daniel Holguin

Title: Forward Marketer

Jesus Gonzalez

Manager – Day Ahead & Long-Term
Trading

Sponsor: J Kyle Olson

Title: Director – Power Generation Engineering
and Asset Management

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QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

The prudence of each of the six distribution capital projects addressed by Mr. Norwood's direct testimony, in terms of costs and benefits, is supported by Mr. Doyle's direct and rebuttal testimony as detailed below. For reliability projects like these, EPE does not prepare a document labeled "costs/benefit analysis" as the question seems to imply is needed to demonstrate prudence. Capital projects to restore, maintain, or improve operational capability and thereby reliability are, by definition, needed to provide reliable and continuous service to customers who request the service EPE provides. PURA's obligation to serve is not subject to a costs/benefit analysis. See PURA 37.151.

From an overall perspective, the benefit of any particular distribution capital project is to address the need that motivated the project and to avoid the negative consequences of not addressing the need. The specific passages that present the need for each of the six distribution capital projects addressed by Mr. Norwood's direct testimony is detailed below and in EPE's response to CEP 19-30. The need for each project is identified consistent with the application of EPE's distribution planning philosophy as presented in Mr. Doyle's rebuttal testimony as Exhibit RCD-6R. This document shows how numerous issues drive the distribution planning process including thermal constraints, voltage constraints, reliability, losses, aesthetics, contingency-based planning, peak utilization-based planning, other voltage considerations, capacity ratings, contingencies, 4kV distribution planning, cable replacement program, and load forecasting. As explained on the first page of the exhibit, capital projects for distribution planning are proposed for five main reasons: 1) to ensure feeders are not overloaded 2) to ensure that transformers are not overloaded 3) to

provide extra capacity for feeders and transformers which can be utilized during contingency switching scenarios 4) for safety considerations and 5) to improve reliability.

Also from an overall perspective, once a need is identified in the manner described above, the question becomes how to ensure the need is addressed in a cost-efficient manner. If there are alternative ways to address the need that provide comparable benefits, then the least-cost alternative is selected. As detailed below, the Company has considered project alternatives for each of the six distribution capital projects addressed by Mr. Norwood's direct testimony.

Once the project alternative is selected to address the identified need, the Company has in place processes and procedures for capital investments to manage the reasonableness of the costs associated with the projects, and these processes and procedures are detailed in Mr. Doyle's direct testimony from page 17, line 23 through page 19 line 2.

With regard to the specific benefits and costs of the six distribution capital projects addressed by Mr. Norwood's direct testimony, in Exhibit RCD-3R of EPE witness Doyle's rebuttal testimony, on page 2 of 10, Mr. Doyle re-presents Table CEP 8-3.1 from EPE's initial response to RFI CEP 8-3. Presented in this table are the total costs (less AFUDC and CE&S) for each of the top 24 distribution capital projects, including the six distribution capital projects addressed by Mr. Norwood's direct testimony. For convenience, Table CEP 8-3.1 is re-presented below with the costs for each of the six distribution capital projects addressed by Mr. Norwood's direct testimony highlighted.

Table CEP 8-3.1

*Top 20 DCRF Projects
(Docket Nos. 49148 and 49395)¹*

Project Number	Project Description	Project Total less AFUDC and CE&S	Page
DT359	NUWAY NEW DISTRIBUTION SUBSTATION	\$14,431,157	5
DT371	EXECUTIVE (CE-1) NEW SUBSTATION	\$11,021,964	6
DT229	SCOTSDALE TRANSFORMER & SWITCHGEAR REPLACEMENTS	\$8,159,325	7
DT220	SANTA FE SUBSTATION TRANSFORMER, SWITCHGEAR, AND EQUIPMENT UPGRADES	\$7,420,698	8
DT186	LEO SUBSTATION 115 KV CONVERSION & GETAWAY UPGRADE	\$6,899,698	9
DT365	SPARKS T2 TRANSFORMER, SWITCHGEAR, AND VOLTAGE REGULATORS	\$3,784,491	10
DT382	RIPLEY T2 TRANSFORMER, SWITCHGEAR, AND VOLTAGE REGULATOR ADDITIONS	\$3,397,392	11
DT379	PENDALE T2 TRANSFORMER, SWITCHGEAR, AND VOLTAGE REGULATOR ADDITIONS	\$3,351,288	12
DT389	SUNSET NORTH AUTO TRANSFORMER REPLACEMENT	\$3,223,211	13
DT291	GLOBAL REACH T2 AND SWITCHGEAR	\$3,009,279	14
DT194	SUNSET 69KV-4KV TRANSFORMER, REGULATORS, AND FEEDER REPLACEMENTS	\$1,947,525	15
DT383	PELLICANO T2 TRANSFORMER ADDITION	\$2,628,214	16
DT184	RIO BOSQUE CAPACITOR BANK ADDITION	\$2,139,566	17
DT218	SUNSET 14KV SWITCHGEAR AND NETWORK FEEDER REPLACEMENTS	\$2,382,644	18
DT353	STREET CAR (TROLLEY) - CITY OF EL PASO	\$1,706,470	19
DT300	FARMER 69KV 7.5 MVAR CAPACITOR BANK	\$1,659,158	20
DT361	SUBSTATION CIRCUIT BREAKER UPGRADES MPS	\$1,443,037	21
DT417	MONTWOOD T1 TRANSFORMER UPGRADE TO 50 MVA	\$1,484,196	22
DT392	SOL & VISTA DISTRIBUTION SUBSTATION UPGRADES	\$1,524,823	23
DT404	MONTWOOD SUBSTATION LAND & PRE-FAB WALL	\$1,642,242	24

In Exhibit RCD-3R of EPE witness Doyle's rebuttal testimony, on pages 5, 6, 7, 8, 9, and 10 of 10, Mr. Doyle re-presents the budget progression summary sheets for each of the six distribution capital projects addressed by Mr. Norwood's direct testimony. The format of the budget progression sheet is the same for all six projects and includes the cost of the project and a brief explanation of the purpose/benefit of each project.

DT359 - NUWAY SUBSTATION Scope Zero Budget estimated May 2013 Pre- Construction Budget estimated November 2018 In Service Date 12/17/2019							
Project Cost	COST INCLUDED IN RATE CASE REQUEST	SCOPE ZERO BUDGET	VARIANCE TO SCOPE ZERO BUDGET		PRE CONSTRUCTION START BUDGET	VARIANCE TO PRE CONSTRUCTION BUDGET	
	\$ 14,431,157	\$ 4,099,229	\$ 10,331,928	252%	\$ 12,168,853	\$ 2,262,304	19%
Project description, purpose & benefit	The project was necessary to improve system reliability and serve load growth in the west EPE service territory. Further project details can be found in the direct testimony of EPE witness Mr. Doyle in Docket No. 52915, page 40 line 25 through page 41, line 21.						
	The Scope Zero assumed the new substation would be located northwest of Interstate 10 ("I-10") and would include a six-position ring bus with two 30 MVA transformers, two switchgears, and four feeders. This initial location would have required routing a 115 kilovolt ("kV") transmission line across Interstate 10 and was a smaller lot. The decision was made to acquire property closer to existing transmission infrastructure and run distribution feeders across I-10 instead of the transmission line, which would help to expedite construction.						
Major causes of cost variance	This substation was also chosen to be EPE's first automated substation to include new technology to aid in faster recovery during transformer operations, reduce the number of hardwired alarms, and allow for remote monitoring of substation equipment.						
	Major equipment and scope changes that contributed to the increase from Scope Zero and from Pre-Construction Budget to actual costs in the project include: - Transformers changed from 30 MVA to 50 MVA. - The switchgear was upgraded from the standard configuration to one that supports a higher reliability, aids the automation processes, and provides flexibility to perform maintenance in critical substation equipment without taking any feeders out of service. The engineering and technician labor needed for the first implementation of these automated systems was more than had been initially estimated. - The substation site was larger than initially estimated and required additional grading and drainage work.						

Continuing, the first two distribution capital projects addressed by Mr. Norwood's direct testimony, Projects DT359 and DT186, were described separately with project cost in Mr. Doyle's direct testimony. Project DT359 can be found in Mr. Doyle's direct testimony, page 40 line 25 through page 41 line 21. Project DT186 can be found in Mr. Doyle's direct testimony, page 44 line 24 through page 45 line 26.

Continuing, in Exhibit RCD-4R of EPE witness Doyle's rebuttal testimony, on pages 1 and 2 of 2, Mr. Doyle re-presents Table CEP 1-13 attachment 3 from EPE's initial response to RFI CEP 1-13. The table presents the project cost and a brief description of the project benefit for all distribution capital project above \$2 million. The six distribution capital projects addressed by Mr. Norwood's direct testimony are included in table 1-13.

Continuing, in Exhibit RCD-5R of EPE witness Doyle's rebuttal testimony, on pages 3, 4, 5, and 6 of 6, Mr. Doyle re-presents Table FMI 2-3 from EPE's initial response to RFI FMI 2-3. The table presents the project cost and a brief description of the project benefit for all distribution capital project above \$2 million. The six distribution capital projects addressed by Mr. Norwood's direct testimony are included in table 1-13.

Finally, in response to this RFI (CEP 19-29), it is important to note that the cost/benefit question for any particular project, especially infrastructure projects, is distinctly different for a public utility with a defined and exclusive service territory. Whether it is El Paso Electric Company providing electric service, El Paso Water Utilities (CEP) providing water & waste-water service, or Texas Natural Gas providing gas service to the citizens of El Paso and the surrounding communities each public utility has the "obligation to serve" and each public utility has dictated national, state, and local service standards. To meet the continuing obligations and service standards, each public utility has a system (infrastructure) planning process and/or philosophy to guide decisions and infrastructure investments. An integral part of those service standards is service reliability and customer expectations.

It is typically impossible to assign a tangible value or benefit value for a public utility having met the obligation to serve, complying and adhering to service standards, and meeting customer expectations. In most cases the public utility has a limited number of infrastructure project options to satisfy its obligation to serve and adhere to established service standards. In each of the six distribution capital projects addressed by Mr. Norwood's direct testimony, there were other options to consider for EPE to meet its obligation to serve and comply with established service standards. In each case EPE chose, the least expensive option that resolved the current situation or risk to operational standards. The alternative options were discussed in Mr. Doyle's rebuttal testimony as follows:

DT382 (Ripley): page 28, line 1 through page 28, line 5.

DT379 (Pendale): page 29, line 26 through page 29, line 30.

DT291 (Global Reach): page 31, line 4 through page 31, line 9.

DT184 (Rio Bosque): page 31, line 24 through page 31, line 30.

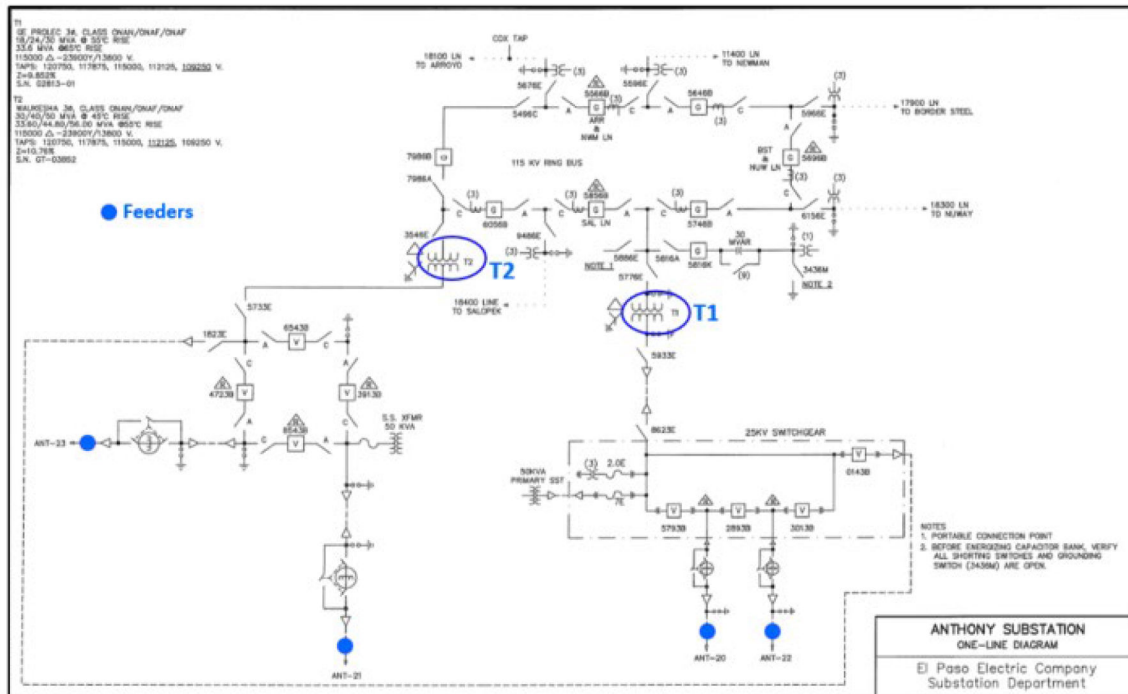
To the extent not previously made clear, the alternative solution to DT359 (Nuway) would have been to expand (add additional transformation) to both Montoya and Anthony substations and build new distribution feeders out of those existing substations.

This alternative solution was quickly ruled out for the following reasons:

1. Montoya substation is a three transformer, three transmission line and eight distribution feeder substation. Montoya substation also has very limited space to expand the 115 kV bus to add another transformer, and it would be difficult to get two new distribution feeders out and extended several miles to reach the area between Anthony substation and Montoya Substation. The structural configuration and an aerial view of Montoya Substation is presented below:

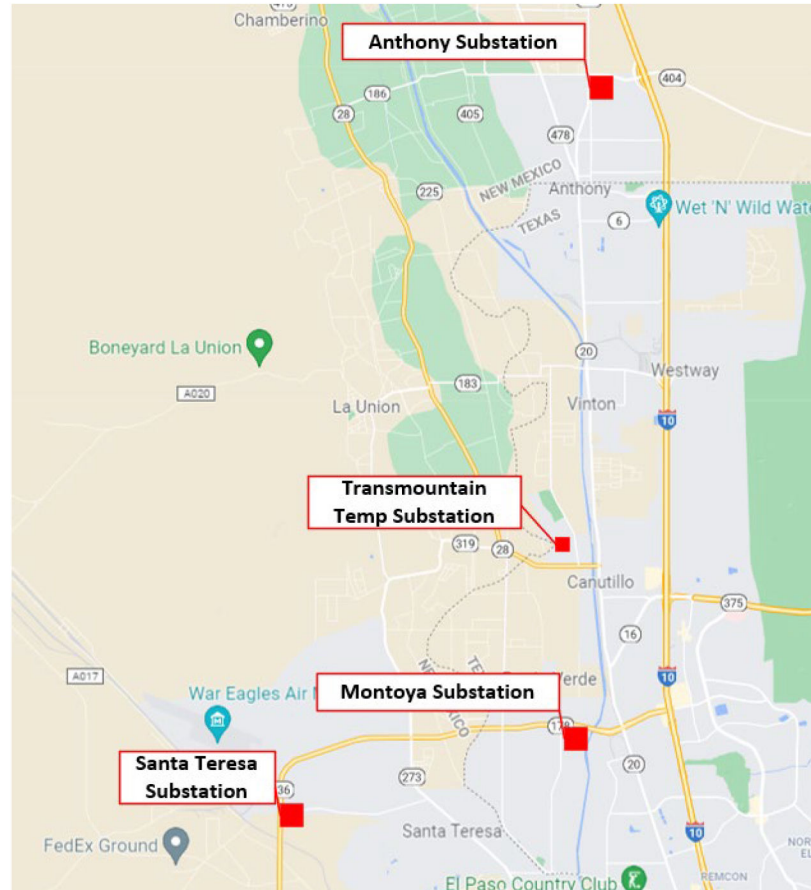


2. Anthony substation is a two transformer, five transmission line, four distribution feeder substation. Expanding the five transmission line, two transformer 115 kV bus to add another transformer would be difficult because it would require significant transmission work to re-position their connection to the substation 115 kV bus. And, like Montoya substation it would be difficult to get two new distribution feeders out of the substation and extended several miles to reach the area between Anthony substation and Montoya Substation. The structural configuration and an aerial view of Anthony Substation is presented below:



Again, the “expand Montoya and Anthony substations” option was ruled out for the reasons explained above. The only viable option was to build a new substation somewhere between Montoya Substation and Anthony Substation and, the initially selected location was to be somewhere in the Transmountain Rd./ I-10 area.

The load growth of the area exceeded EPE’s expectations and in early 2013 the peak loading on the area substations was becoming operationally unsustainable at peak. In response, a temporary, 115kV to 24kV, substation (Transmountain Temp Sub) was constructed and placed in service north of Transmountain Rd. and west of I-10 to help relieve the load on the area substations until the permanent substation could be constructed. The illustration below shows the relative location of Montoya, Anthony, Santa Teresa, and Transmountain Temp substations prior to the construction of Nuway Substation.



Additionally, to the extent not previously made clear, the necessity of project DT186 (Leo) was driven by the previous transmission line voltage conversion (from 69 kV to 115 kV) project, TL231 – MILAGRO – LEO 69 KV TO 115 KV UPGRADE. A detailed description of Project TL231, and the alternatives considered, is provided in Mr. Doyle’s direct testimony, page 33 line 10 through page 34 line 21.

In sum, the prudence of each of the six distribution capital projects addressed by Mr. Norwood's direct testimony, in terms of costs and benefits, is supported by Mr. Doyle's direct and rebuttal testimony as detailed above.

Preparer: Darcy Welch

Title: Supervisor – Financial Analysis and
Planning

Sponsor: R. Clay Doyle

Title: Vice President – Transmission and
Distribution

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

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S NINETEENTH REQUEST FOR INFORMATION
QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Beginning on page 23, line 23, and continuing through page 24, line 2, of Mr. Doyle's rebuttal testimony, Mr. Doyle provides a general description of El Paso Electric Company's ("EPE") distribution system planning philosophy and provides Exhibit RCD-6R, a non-confidential excerpt from the EPE Distribution System Expansion Plan.

Exhibit RCD-6R presents a seven-page written description of EPE's "Fundamental Planning Philosophy." Adherence to this distribution system planning philosophy guides EPE's distribution infrastructure expansion and improvement projects to ensure the operational integrity of its electric distribution system. Likewise, adherence to this distribution planning philosophy has delivered industry-leading reliability performance over the last 25 years.

Thus, the benefit of each of the six distribution capital projects addressed by Mr. Norwood's direct testimony is to address needs identified through application of the distribution planning principles and to avoid the negative consequences of not addressing the needs. As such, the need for and attendant benefits of each project were described in the following passages of Mr. Doyle's testimony:

Direct testimony:

DT359 (Nuway): page 41, line 10 through page 41, line 15.

DT186 (Leo): page 45, line 11 through page 45, line 20.

Rebuttal Testimony:

DT382 (Ripley): page 26, line 30 through page 27, line 30.

DT379 (Pendale): page 28, line 7 through page 28, line 15.

DT291 (Global Reach): page 30, line 1 through page 31, line 2.

DT184 (Rio Bosque): page 31, line 11 through page 31, line 22.

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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.

RESPONSE:

In Exhibit RCD-3R of El Paso Electric Company's ("EPE") witness R. Clay Doyle's rebuttal testimony, on pages 5, 6, 7, 8, 9, and 10 of 10, Mr. Doyle presents the budget progression summary sheets for each of the six distribution capital projects addressed by Mr. Norwood's direct testimony. The format of the budget progression sheet is the same for all six projects and includes a section that presents the major cost variance causes of each project.

The illustration below presents an annotated version of the budget progression summary sheet for project DT359 to help guide the reader to the specific portions of the budget progression summary sheet for the requested information.

DT359 - NUWAY SUBSTATION Scope Zero Budget estimated May 2013 Pre- Construction Budget estimated November 2018 In Service Date 12/17/2019							
Project Cost	COST INCLUDED IN RATE CASE REQUEST	SCOPE ZERO BUDGET	VARIANCE TO SCOPE ZERO BUDGET		PRE CONSTRUCTION START BUDGET	VARIANCE TO PRE CONSTRUCTION BUDGET	
	\$ 14,431,157	\$ 4,099,229	\$ 10,331,928	252%	\$ 12,168,853	\$ 2,262,304	19%
Project description, purpose & benefit	The project was necessary to improve system reliability and serve load growth in the west EPE service territory. Further project details can be found in the direct testimony of EPE witness Mr. Doyle in Docket No. 52915, page 40 line 25 through page 41, line 21.						
	The Scope Zero assumed the new substation would be located northwest of Interstate 10 ("I-10") and would include a six-position ring bus with two 30 MVA transformers, two switchgears, and four feeders. This initial location would have required routing a 115 kilovolt ("kV") transmission line across Interstate 10 and was a smaller lot. The decision was made to acquire property closer to existing transmission infrastructure and run distribution feeders across I-10 instead of the transmission line, which would help to expedite construction.						
Major causes of cost variance	This substation was also chosen to be EPE's first automated substation to include new technology to aid in faster recovery during transformer operations, reduce the number of hardwired alarms, and allow for remote monitoring of substation equipment.						
	Major equipment and scope changes that contributed to the increase from Scope Zero and from Pre-Construction Budget to actual costs in the project include: - Transformers changed from 30 MVA to 50 MVA. - The switchgear was upgraded from the standard configuration to one that supports a higher reliability, aids the automation processes, and provides flexibility to perform maintenance in critical substation equipment without taking any feeders out of service. The engineering and technician labor needed for the first implementation of these automated systems was more than had been initially estimated. - The substation site was larger than initially estimated and required additional grading and drainage work.						

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QUESTION NOS. CEP 19-1 THROUGH CEP 19-32

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.

RESPONSE:

Please refer to El Paso Electric Company's ("EPE") response to CEP 19-30.

All six of the distribution capital projects addressed by Mr. Norwood's direct testimony were system expansion projects to improve or re-gain operational integrity and, therefore, system reliability. In Mr. Doyle's rebuttal testimony, beginning on page 24, line 4, and continuing through page 31, line 30, Mr. Doyle presents additional detail on the following projects from Mr. Norwood's list:

- **DT382** - RIPLEY T2 TRANSFORMER, SWITCHGEAR, AND VOLTAGE REGULATOR ADDITIONS
- **DT379** - PENDALE T2 TRANSFORMER, SWITCHGEAR, AND VOLTAGE REGULATOR ADDITIONS
- **DT291** - GLOBAL REACH T2 AND SWITCHGEAR
- **DT184** - RIO BOSQUE CAPACITOR BANK ADDITION

In Mr. Doyle's direct testimony, beginning on page 40, line 25, through page 41, line 21, Mr. Doyle presents additional detail on Project DT359 - NUWAY NEW DISTRIBUTION SUBSTATION. Beginning on page 44, line 24, through page 45, line 26, of his direct testimony, Mr. Doyle presents additional detail on project DT186 - LEO SUBSTATION 115 KV CONVERSION & GETAWAY UPGRADE.

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Sponsor: R. Clay Doyle

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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
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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. Attachments 1, 2, 3 and 4 to question CEP 19-2 and Attachment 1 to question CEP 19-12 in City of El Paso's nineteenth set of requests for information provide sensitive commercial and financial information that is not otherwise readily available to the public and that if released could cause substantial competitive harm to EPE or the owner of the information. These attachments are 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 information included in Attachments 1, 2, 3 and 4 to CEP 19-2 and Attachment 1 to CEP 19-12 is exempt from public release under the PIA, and that these documents merit the Protected Materials and Highly Sensitive Protected Materials designations they have been given.

Respectfully submitted,

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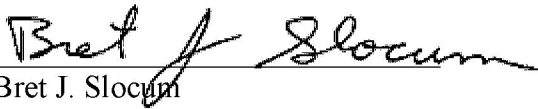


By: _____
Casey A. Bell

**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 15, 2021.


Bret J. Slocum