



Filing Receipt

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

**APPLICATION OF EL PASO
ELECTRIC COMPANY TO CHANGE
RATES**

§
§
§
§
§

**BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS**

**CITY OF EL PASO'S FIRST MONTHLY SUPPLEMENTAL RATE CASE EXPENSE
SUBMISSION**

The City of El Paso (the "City") submits its First Monthly Supplemental Rate Case Expense Submission in this proceeding, attached. This submission supplements Exhibit JZB-RCE-3, attached to the Direct Testimony of James Z. Brazell filed on October 22, 2021, in this matter, and is filed pursuant to the procedures proposed by the City for submission, consideration, and review of rate case expenses as the docket progresses in Mr. Brazell's October 22nd Testimony. The City requests that, after reasonable opportunity for objection, discovery, response, and a hearing, the information included in this filing be admitted into the evidentiary record in this case and be found by the Commission to support reimbursement of the City's rate case expenses incurred for participation in this proceeding.

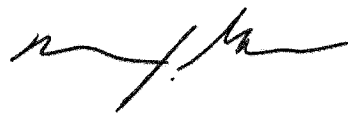
Dated: December 20, 2021

Respectfully submitted,

Norman J. Gordon
(ngordon@ngordonlaw.com)
State Bar No. 08203700
P.O. Box 8
El Paso, Texas 79940
221 N. Kansas, Suite 700
El Paso, Texas 79901
(915) 203-4883

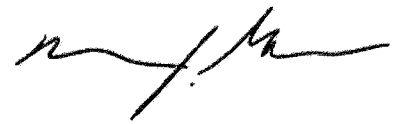
Karla M. Nieman, City Attorney
State Bar No. 24048542
Frances M. Maldonado Engelbaum
State Bar No. 24094272
City of El Paso
300 N. Campbell, 2nd Floor
El Paso, Texas 79901
(915) 212-0033
(915) 212-0034 (fax)
Niemankm@elpasotexas.gov
Engelbaumfm@elpasotexas.gov

Attorneys for the City of El Paso

By: 
Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on December 20, 2021.



Norman J. Gordon

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

APPLICATION OF EL PASO ELECTRIC COMPANY TO CHANGE RATES	§ § §	PUBLIC UTILITY COMMISSION OF TEXAS
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**CITY OF EL PASO’S FIRST MONTHLY SUPPLEMENTAL RATE CASE EXPENSE
SUBMISSION**

EXHIBIT JZB-RCE-3 SUPPLEMENTAL¹

**Summary of and Invoices and Source Documents
for
City of El Paso Rate Case Expenses for Participation in PUC Docket No. 52195
from
October 1, 2021, through November 30, 2021**

20 2021

¹ Supplements Exhibit JZB-RCE-3 attached to the October 22, 2021, Direct Rate Case Expense Testimony of James Z. Brazell.

(a) Attorney/Consultant	(b) Invoice Date	(c) Invoice No.	(d) Billing Period	(e) Fees	(f) Expenses	(g) Invoiced Amounts
Legal Fees and Expenses						
Norman J. Gordon	09/20/21	172	Mar-Aug 2021	\$39,095.00	\$0.00	\$39,095.00
	10/21/2021	176	Sep 2021	\$10,255.00	\$0.00	\$10,255.00
	11/23/21	179	Oct 2021	\$27,475.00	\$81.43	\$27,556.43
	12/15/21	180	Nov 2021	\$23,905.00	\$63.81	\$23,968.81
			Total			\$100,875.24
Molly Mayhall Vandervoort	None	NA	NA	NA	NA	NA
			Total			\$0.00
Snapper Carr, Curtis Seidlits	None	NA	NA	NA	NA	NA
			Total			\$0.00
Consultants and Experts Fees and Expenses						
ReSolved Energy (Karl Nalepa)						
	7/13/2021	4826	Jun 2021	\$2,214.00	\$0.00	\$2,214.00
	8/5/2021	4842	Jul 2021	\$2,871.00	\$0.00	\$2,871.00
	9/8/2021	4862	Aug 2021	\$2,115.00	\$0.00	\$2,115.00
	10/7/2021	4881	Sep 2021	\$1,782.00	\$0.00	\$1,782.00
	11/3/2021	4895	Oct 2021	\$12,456.00	\$0.00	\$12,456.00

	12/8/2021	4917	Nov 2021	\$2,970.00	\$0.00	\$2,970.00
			Total			\$24,408.00
CJ Energy (Clarence Johnson)	10/1/2021	1	Jul-Sep 2021	\$12,804.00	\$0.00	\$12,804.00
	11/2/2021	2	Oct 2021	\$11,022.00	\$0.00	\$11,022.00
	12/5/2021	3	Nov 2021	\$7,304.00	\$0.00	\$7,304.00
			Total			\$31,130.00
Dan Lawton	8/9/2021	NA	Jul 2021	\$24,275.00	\$0.00	\$24,275.00
	9/9/2021	992021	Aug 2021	\$15,325.00	\$0.00	\$15,325.00
	10/9/2021	1092021	Sep 2021	\$11,000.00	\$0.00	\$11,000.00
	11/12/2021	11122021	Oct 2021	\$9,875.00	\$0.00	\$9,875.00
	12/13/2021	12132021	Nov 2021	\$6,125.00	\$0.00	\$6,125.00
			Total			\$66,600.00
Garrett Group (Mark Garrett)	9/10/2021	NA	Aug 2021	\$25,435.00	\$1,017.40	\$26,452.40
	10/6/2021	NA	Sep 2021	\$7,005.00	\$280.20	\$7,285.20
	11/18/2021	NA	Oct 2021	27,950.00	\$0.00	27,950.00
	12/13/2021	NA	Nov 2021	\$11,230.00	(\$1,297.60)	\$9,932.40
			Total			\$71,620.00
Resolve Utility (David Garrett)	8/22/2021	000459	Jul 2021	\$2,750.00	\$0.00	\$2,750.00
	10/4/2021	000478	Aug	\$9,550.00	\$0.00	\$9,550.00

			2021			
	10/4/2021	000479	Sep 2021	\$3,200.00	\$0.00	\$3,200.00
	11/16/2021	000504	Oct 2021	\$10,800.00	\$0.00	\$10,800.00
	12/16/2021	000513	Nov 2021	\$3,550.00	\$0.00	\$3,550.00
			Total			\$27,100.00
Norwood Energy (Scott Norwood)						
	10/18/2021	EPE Rate Jun21	Jun 2021	\$5,720.00	\$0.00	\$5,720.00
	10/18/2021	Jul21	Jul 2021	\$7,920.00	\$0.00	\$7,920.00
	10/18/2021	Aug21	Aug 2021	\$8,360.00	\$0.00	\$8,360.00
	10/18/2021	Sep21	Sep 2021	\$8,800.00	\$0.00	\$8,800.00
	12/5/2021	EPERate OCT21	Oct 2021	\$15,620.00	\$0.00	\$15,620.00
	12/5/2021	EPERate NOV21	Nov 2021	\$7,370.00	\$0.00	\$7,370.00
			Total			\$53,790.00
Law Ofc of James Z Brazell (James Brazell)	10/20/2021	Inv21- 1760	Sep 2021	\$840.00	\$0.00	\$840.00
	12/15/2021	Inv21- 1763	Oct 2021	\$26,915.00	\$0.00	\$26,915.00
	12/15/2021	Inv21- 1767	Nov 2021	\$9,345.00	\$0.00	\$9,345.00
			Total			\$37,100.00
			Case Total			\$412,623.24

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

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

SECOND SUPPLEMENTAL DECLARATION OF NORMAN J. GORDON

THE STATE OF OHIO)
)
COUNTY OF CUYAHOGA)

1. My name is Norman J. Gordon. My business address is PO Box 8, El Paso, Texas, 79940. I am over eighteen years of age and I am not disqualified from making this Declaration. I declare under penalty of perjury that the information in this declaration provided under Chapter 132 Texas Civil Practice and Remedies Code is true and correct.

2. I am an attorney licensed in the States of Texas and Illinois, and numerous federal courts. I received my undergraduate degree and law degree from University of Illinois at Urbana-Champaign. I have been in private practice of law in El Paso since completing my military obligation with the Judge Advocate General's Corps of the United States Army in 1974. I am board certified in Civil Trial Law by the Texas Board of Legal Specialization and have been so certified since 1983. One of the areas of my practice is in the area of utility regulation. Since 1978, I have been lead counsel for parties in many major rate cases, rule making proceedings, and other administrative dockets before City Councils, the Railroad Commission of Texas, the Public Utility Commission of Texas, State District Courts, United States Bankruptcy Court, and Texas Appellate Courts, including the Supreme Court of Texas. I have filed testimony on rate case expense issues in cases before Railroad Commission of Texas. I have filed testimony and testified as an expert witness on rate case expenses in cases before the Public Utility Commission of Texas. I have also taught principles of regulation to members of the Public Utility Regulation Board of the City of El Paso, an advisory board on utility matters.

3. I became a sole practitioner in February 2019. Prior to February 2019, I was a shareholder in the El Paso firm of Mounce, Green Myers, Safi, Paxson & Galatzan, A Professional Corporation, from October 2003 until February 2019. Prior to that time my private practice was with the El Paso law firm of Diamond Rash Gordon & Jackson, P.C., for 29 years where I was a shareholder.

4. This declaration addresses fees and expenses for my work in Docket 52195 from October 1, 2021 through November 30, 2021. During those two months there was ongoing discovery, preparation of the City's direct and cross-rebuttal testimony, EPE rebuttal and discovery on EPE rebuttal. In addition, the services included assisting in getting the presentations ready for the City Council hearing in the case under its original jurisdiction.

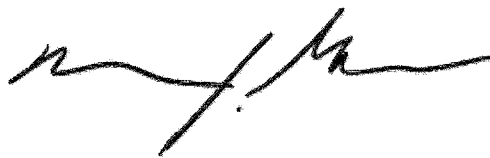
5. In connection with the Docket 52195, case, through for services through November 2021, I billed a total of which is an additional \$ 51,380.00 and \$145.24 in expenses to the \$49,350 in fees through September 30, 2021 for a total of \$100,875.24 in fees and expenses. The expenses are for printing parties direct, rebuttal and cross-rebuttal testimony. The description of services is provided in the attached invoices, by day and services performed. All services charged were for my time. The invoices and support are attached to the testimony of James Z. Brazell. There were no charges for first class travel or hotel expense. There will be no markup on the expenses.

6. There will be additional fees and potentially expenses through the completion of the case. I will update this Declaration prior to the close of the evidence. The services to be provided include the completion of discovery, testimony review and filing, review testimony of other intervenors, PUC staff, cross-rebuttal and rebuttal, discovery on other parties, participation at hearing before City Council, settlement negotiations preparation for the hearing, the hearing, post hearing briefing, including any necessary activities after the issuance of the Proposal for Decision. Based on my experience, I estimate an additional \$100,000 to \$130,000 in fees, plus expenses for copies and transcripts which may be an additional \$20,000. Since the hearing is currently identified to be conducted on Zoom®, I still expect that the travel will be minimal. These estimates do not include the estimates of the costs of an Appeal of any decision, should that be necessary.

8. All of the work done by me was necessary and reasonable with respect to both time and amount considering the nature, extent, and difficulty of the work, the originality of the issues presented including the nature of the issues raised and addressed by the City in this proceeding, and the amount of time spent by and charges by others for work of a similar nature in this and other proceedings.

Further Declarant Says Not.

Dated December 17, 2021

A handwritten signature in black ink, appearing to read 'N. J. Gordon', written over a horizontal line.

Norman J. Gordon

ATTACHMENT A
INVOICES October and November 2021 Services
RE: PUCT DOCKET 49395

Norman J. Gordon
Attorney at Law
PO Box 8
El Paso, Texas, 79940

City of El Paso
300 N. Campbell
Attn: Office of the City Attorney
PO Box 1890
El Paso TX 79950-1890
El Paso TX 79901

Attn: Karla M. Nieman

Page: 1
11/23/2021
Account No: 1M

Payments received after 11/23/2021 are not included on this statement.

Norman J Gordon
Attorney At Law

	Balance
1-30 EPE 2021 Rate Case Matter No. 21-1008-174	<u>\$27,556.43</u>

Please make checks payable to "Norman J. Gordon"

Norman J. Gordon
 Attorney at Law
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 El Paso, Texas, 79940

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 300 N. Campbell
 Attn: Office of the City Attorney
 PO Box 1890
 El Paso TX 79950-1890
 El Paso TX 79901

Attn: Karla M. Nieman

EPE 2021 Rate Case Matter No. 21-1008-174

Page: 1
 11/23/2021
 Account No: 1-30M
 Statement No: 179

Payments received after 11/23/2021 are not included on this statement.

<u>Fees</u>			Hours	
10/01/2021	NJG	Tel. D. Lawton re: New Mexico issues and New Mexico IRP locate and send documents to D Lawton re: Issues in New Mexico and jurisdictional allocation. Rate case summary sheet for City Attorney on issues and focus points in and raised by the case., Tel. M. Garrett, D. Lawton, Scott Norwood re: issues and timing of recommendations for discussion with Council.	3.20	1,120.00
10/03/2021	NJG	Receive and review EPE errata No. 2 and forward to consultants.	0.50	175.00
10/04/2021	NJG	Discussion on and forward information on COVID costs and DG charges to City Attorney office, Tel. D. Lawton re: NM allocation issues.	2.80	980.00
10/05/2021	NJG	Review responses to OPUC 7th RFI's E-mail to C. Johnson.	0.70	245.00
10/07/2021	NJG	Preparation of Memo re: history of and nature of charges and impacts on DG customers. Update to client Study of rate design issues/tariff proposals for residential, Review latest discovery responses from other parties. status of Brazell agreements.	3.50	1,225.00
10/08/2021	NJG	Work on Rate Design issues, issues related to rate structure, Tel. C. Johnson/ B Slocum re: rate design calculations	3.00	1,050.00
10/11/2021	NJG	Responsive E-mail to J. Brazell.	0.20	70.00
10/12/2021	NJG	Telephone w/ S. Norwood, M. Garrett and D. Garrett re: progress on their proposals. Update call on progress and status with CAO. Review discovery responses from 10-11 and 10-12, begin outline of presentation for City Council hearing.	2.40	840.00
	NJG	Review Staff 12th RFI's, Responses to UTEP 4, Supplement to TIEC 2nd, Tel. w/ City Attorney office re: progress and procedures for City hearing,	1.80	630.00

EPE 2021 Rate Case Matter No. 21-1008-174

			Hours	
10/13/2021	NJG	Preparation of Background materials on rate changes for City Attorney Office, Review depreciation adjustments and potential impacts on current plant balances. and E-mail sw/ S. Norwood re: RFI responses. Review AMended RFI responses, Responses to DOD/FEA 1st RFI's and OPUC 12th RFI's	2.90	1,015.00
10/14/2021	NJG	Work on Assembly of recommendations and issues for presentation to City Council. Summary memo to City Attorney, Tel. E. Cromley, K. Nalepa, D. Lawton, Scot Norwood, Compare to EPE request and impacts.	4.60	1,610.00
10/15/2021	NJG	E-m,ails re: confidential testimony portions (potential and Tel. B. Slocum), Review and Comment on draft presentation for City Council re: rate case discussions E-mails re: deprecation issues, E=mails to B. Slocum re: agenda for special meeting on 10-20-21, Receipt and initial review of draft testimony re: Cost allocation and rate design. updated memo to City Attorney re: potential recommendations in testimony to be filed.	5.00	1,750.00
10/17/2021	NJG	Review and edit draft testimony, D. Garrett, M. Garrett, D. Lawton, C. Johnson	4.50	1,575.00
10/18/2021	NJG	Edit draft testimonies, Tel. J. Brazell. D. Lawton, Prepare revisions to Memo to City Attorney re: recommendations.	6.50	2,275.00
10/19/2021	NJG	Tel. M. Garrett, K. Nalepa, City Attorney Office re: status and Council presentation, Additional edit suggestions for testimony, Second drafts, Tel. D. Lawton E-mails re: rate case expenses. Filing schedules for impacts in EPE request.	5.00	1,750.00
10/20/2021	NJG	Review revisions to testimony, Tel. w/ M. Arambula re: presentation to City Council and issues, Tel. B. Slocum E-mails re: meeting procedures Attend City Council meeting for Council action re: EPE application.	9.00	3,150.00
10/21/2021	NJG	Review and Edits of Nalepa and Norwood testimony, review Brazell final versions and revisions to declaration edits for final numbers and issues, Review Lawton achedules Tle. M. Garret re: status, Tel. James Brazell Prepare first group of final versions for filing.	6.50	2,275.00
10/22/2021	NJG	Finalize City of El Paso Testimony E-mails re: filing of confidential portions, service on parties, and initial receipt of testimony of other intervenors (DOD, TIEC, FMI, Vinton, Rate 41, OPUC, UTEP, IBEW) provision of confidential portions to EPE	4.40	1,540.00
10/24/2021	NJG	Identify testimony filed by other intervenors and start review.	1.30	455.00
10/25/2021	NJG	Review and prepare workpapers for filing E-mail w/ Consultants.	3.00	1,050.00
10/26/2021	NJG	Initial review of Intervenor testimony revenue requirements issues, Tel. M. Garrett re: potential amendment/errata on EDIT refund issue	2.00	700.00
10/27/2021	NJG	Review latest discovery responses filed by EPE	1.00	350.00

EPE 2021 Rate Case Matter No. 21-1008-174

			Hours	
10/29/2021	NJG	Receipt download and initial review of Staff testimony, E-mails with City and consultants.	2.70	945.00
10/31/2021	NJG	Review Higgins and Pollock testimony identify issues and impacts of recommendations.	2.00	700.00
		For Current Services Rendered	78.50	27,475.00

Timekeeper	Title	Recap	Hours	Rate	Total
Norman J Gordon			78.50	\$350.00	\$27,475.00

Expenses

10/25/2021	Printing charges Intervenor Testimony	60.63
10/29/2021	Printing charges Staff Testimony	20.80
	Total Expenses	81.43
	Total Current Work	27,556.43
	Balance Due	<u>\$27,556.43</u>

Fees	Expenses	Billing History Advances	Finance Charge	Payments
27,475.00	81.43	0.00	0.00	0.00

Please make checks payable to "Norman J. Gordon"

E PE 52/95

The UPS Store #6488
5120 Mayfield Rd
Lyndhurst, OH 44124-2406
440-421-9073

Terminal....: POS6488A Date.: 10/25/2021
Employee....: 128599 Time.: 01:52 PM
Cashier's Name Prit Patel

ITEM NAME	QTY	PRICE	TOTAL
8.5x11 Copies			\$48.12
	802 @	\$0.06	
Tax			\$3.85
3-Hole Punch			\$8.02
	401 @	\$0.02	
Tax			\$0.64
Subtotal			\$56.14
Shipping/Other Charges			\$0.00
Total tax			\$4.49
Total			\$60.63
Cards			\$60.63

Items Designated NR are NOT eligible
for Returns, Refunds or Exchanges.

US Postal Rates Are Subject to Surcharge.



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<https://www.theupsstore.com/privacy-policy>

VISA *****5161 06784D
10/25/2021 01:52 PM
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Purchase
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ENTRY METHOD CONTACTLESS CHIP
CVN
Invoice 0010007778
Clerk 12859
Response APPROVED
Auth Code 06784D

ENV DETAILS

MODE ISSUER
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Amount USD \$60.63 City of El Paso's 1st RCE Supplement
NO SIGNATURE REQUIRED 000014

PAINTING
SHASEE KISHOR
PUC DRS 2 195
Date: 10/28/202

Date.: 10/29/2021
Time.: 04:03 PM

Items Designated NR are NOT eligible
for Returns, Refunds or Exchanges.



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10/29/2021
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CONTACTLESS CHIP

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12859
APPROVED
006720

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TUR	0000000000
TAD	

City of El Paso's 1st RCE Supplement
000015

Norman J. Gordon
Attorney at Law
PO Box 8
El Paso, Texas, 79940

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12/15/2021
Account No: 1M

City of El Paso
300 N. Campbell
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El Paso TX 79901

Attn: Karla M. Nieman

Payments received after 12/15/2021 are not included on this statement.

Norman J Gordon
Attorney At Law

	Balance
1-30 EPE 2021 Rate Case Matter No. 21-1008-174	<u>\$23,968.81</u>

Please make checks payable to "Norman J. Gordon"

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EPE 2021 Rate Case Matter No. 21-1008-174

Page: 1
12/15/2021
Account No: 1-30M
Statement No: 180

Payments received after 12/15/2021 are not included on this statement.

<u>Fees</u>			Hours	
11/01/2021	NJG	Cost Allocation and Rate design. Background information re: cost allocation and rate design issues. Tel. C. Johnson on issues raised by staff and intervenors, review prior testimonies on relevant issues.	3.00	1,050.00
11/02/2021	NJG	Tel. S. Norwood re: Loss study issues raised by intervenors. Review of PUC staff recommendations and testimony. differences in issues.	2.40	840.00
11/03/2021	NJG	Second reading of Staff testimony, access to Staff CCOSS and Rate design models, Identify issues, and Issues raised by staff rate design witnesses, Begin charting of Intervenor/Staff issues, for discussion and presentation to client.	3.00	1,050.00
11/04/2021	NJG	New EPE RFI responses, Continue issue analysis of Issues raised by Intervenor, Tel. w/ Client re: staff proposals, Review EPE responses to CEP 16th RFI's	3.50	1,225.00
11/05/2021	NJG	Additional Review of Staff Models, Tel. C. Johnson, K. Nalepa, Prepare RFI's to EPE, Review of EPE RFI's to City and PUC staff, Review RFI's from Rate 41 group to City, E-mails to C. Johnson and D. Lawton	2.90	1,015.00
	NJG	Tel. K. Nieman re: relationship of FERC filing to rate case and issues that are affected, review impacts in EPE Form 1 re: FERC revenues and issues.	0.40	140.00
11/08/2021	NJG	Work on responses to RFI's from EPE Tel. D. Lawton re: RFI's and answers. Work on informal request regarding lawton schedules, Tel. B. Slocum, Tel. C. Johnson Re: potential sur rebuttal testimony, Prepare First RFI's to TIEC,	3.20	1,120.00
11/09/2021	NJG	Review Lawton response to informal request and errata, E-mail to B. Slocum	1.10	385.00

EPE 2021 Rate Case Matter No. 21-1008-174

			Hours	
11/10/2021	NJG	E-mails with consultants Review latest set of RFI's from EPE and from TIEC,	0.80	280.00
11/11/2021	NJG	Review RFI's from EPE to other parties filed 11/10 and RFI responses from EPE. Prepare additional potential RFI's to intervenors based on direct case. E-mail Identify critical dates from SOAH Order No. 7.	2.30	805.00
11/12/2021	NJG	Review and transmit additional RFI's from EPE, RFI's from and to other parties, Proposed response to EPE 3rd RFI's Tel. D. Lawton, K Nalepa and J. Brazell (Re: Cross rebuttal to Staff) Status meeting discussion with City Attorney office including settlement issues.	3.30	1,155.00
11/15/2021	NJG	Finalize and File responses to EPE First RFI's and Rate 41 Group RFI's	2.50	875.00
11/16/2021	NJG	Receipt and Review of first drafts of Norwood and Johnson Cross Rebuttal, Provide comments and potential edits to drafts, Status update with City Attorney Office.	5.40	1,890.00
11/17/2021	NJG	Finalize RFI responses to EPE 2 and TIEC 1, Research files on issues related to Norwood Cross=rebuttal and Johnson Cross-Rebuttal, Tel. J. Brazell re: Rate case expense issues.	2.60	910.00
11/18/2021	NJG	Edits Revisions to Cross-Rebuttal Testimony, Tel. J. Brazell, Tel. M. Garrett, prepare for filing. Stud implications of FERC filing on Texas rates. Status update to City Attorney Office	5.20	1,820.00
11/19/2021	NJG	Finalize Brazell cross rebuttal testimony and review for filing. Tel. K. Nalepa re: additional discovery, Tel. J. Brazell re: cross rebuttal. Initial Review of cross-rebuttal testimony of other parties. Receipt and Review of RFI's from TIEC relative to class cost allocation and rate design.	3.30	1,155.00
11/22/2021	NJG	Begin review of Cross Rebuttal and EPE rebuttal, Tel. J. Brazell re: workpapers, Tel. C. Johnson Discussion of deadlines. Provide copies toe consultants and City Attorney and management.	2.70	945.00
11/23/2021	NJG	Continued review of cross rebuttal, Discovery from TIEC to City, Tel. D. Lawton, Tel. w/ S. Spearman and F. Engelbaum,, review spreadsheets filed in FERC case for effect on Texas rate case.	3.60	1,260.00
11/24/2021	NJG	Review of cross-rebuttal and begin EPE Rebuttal review.	4.00	1,400.00
11/26/2021	NJG	EPE Rebuttal Review continued.	1.70	595.00
11/29/2021	NJG	Complete Review and notes of EPE Rebuttal. Identify issues for discovery.	5.20	1,820.00
11/30/2021	NJG	Prepare responses to TIEC and FMI discovery to City , Review EPE discovery responses, Draft Motion to strike Bazar (.6), Begin preparation of Additional RFI's to EPE, Conf w. City Management and City Attorney re: issues to discuss in settlement negotiations, Tel. D. Lawton re: Rate of return issues. Review EPE latest discovery responses to Staff, Identify nature of new increase proposal from EPE.	6.20	2,170.00

EPE 2021 Rate Case Matter No. 21-1008-174

		<u>Hours</u>	
For Current Services Rendered		68.30	23,905.00

Timekeeper	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Norman J Gordon		68.30	\$350.00	\$23,905.00

Expenses

11/22/2021	Printing Charges Rebuttal and Cross rebuttal	63.81
	Total Expenses	63.81

Total Current Work	23,968.81
--------------------	-----------

Balance Due	<u>\$23,968.81</u>
-------------	--------------------

	<u>Fees</u>	<u>Expenses</u>	<u>Billing History</u>	<u>Finance Charge</u>	<u>Payments</u>
	23,905.00	63.81	<u>Advances</u>	0.00	0.00
				0.00	0.00

Please make checks payable to "Norman J. Gordon"

The UPS Store #6488
5120 Mayfield Rd
Lyndhurst, OH 44124-2406
440-421-9073

DN 52195
BPS ROBOITAL
CROSS ROBOITAL

Terminal....: POS6488B Date.: 11/22/2021
Employee....: 187089 Time.: 09:45 AM
Cashier's Name Panna Patel

ITEM NAME	QTY	PRICE	TOTAL
8.5x11 Copies			\$50.64
	844 @	\$0.06	
Tax			\$4.05
3-Hole Punch			\$8.44
	422 @	\$0.02	
Tax			\$0.68
Subtotal			\$59.08
Shipping/Other Charges			\$0.00
Total tax			\$4.73
Total			\$63.81
Cards			\$63.81

Items Designated NR are NOT eligible
for Returns, Refunds or Exchanges.

US Postal Rates Are Subject to Surcharge.



1 2 1 1 1 2 2 6 4 8 8 B 0 1 5 7 6 1

View The UPS Store, Inc.'s privacy notice at
<https://www.theupsstore.com/privacy-policy>

VISA *****0990 06197D

11/22/2021

09:45 AM

TID

757201280002

Purchase

CHASE VISA

XXXXXXXXXXXX0990

ENTRY METHOD

CONTACTLESS CHIP

CUM

Invoice

0020013472

Clerk

18708

Response

APPROVED

Auth Code

06197D

EMV DETAILS

MODE

ISSUER

AID

A0000000031010

TVR

0000000000

IAD

06021203A00000

Amount

USD \$63.81

NO SIGNATURE REQUIRED

CARDHOLDER/VISA

CARDHOLDER/VISA

*** CUSTOMER COPY ***

City of El Paso's 1st RCE Supplement
000020

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

RATE CASE EXPENSE DECLARATION OF KARL J. NALEPA
PROVIDING ACTUAL EXPENSES FOR THE PERIOD
OCTOBER 1, 2021 THROUGH NOVEMBER 30, 2021

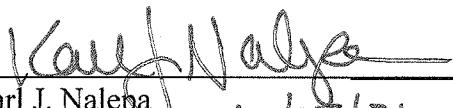
I, Karl J. Nalepa, declare under penalty of perjury that the following statement and facts are true and correct.

1. My name is Karl J. Nalepa. I am over eighteen years of age and am not disqualified from making this affidavit.
2. I am President of ReSolved Energy Consulting, LLC ("REC"), an independent utility consulting company. My business address is 11044 Research Boulevard, Suite A-420, Austin, Texas 78759.
3. REC was retained by the City of El Paso ("CEP" or City") to provide expert analysis and testimony in this base rate proceeding filed by El Paso Electric Company ("EPE" or "Company"), Docket No. 52195.
4. I am giving this affidavit to address the necessity for and reasonableness of REC's fee-related charges for the period October 1, 2021 through November 30, 2021.
5. REC's fees for the period October 1, 2021 through November 30, 2021, correspond to time spent reviewing and analyzing the Company's application and testimony, reviewing responses to discovery, compiling CEP consultant adjustments into the City's cost of service model, developing written testimony, reviewing intervenor testimony, reviewing rebuttal testimony, evaluating other parties' positions on case issues, and conferring with counsel. The hours charged by REC are summarized in the following table:

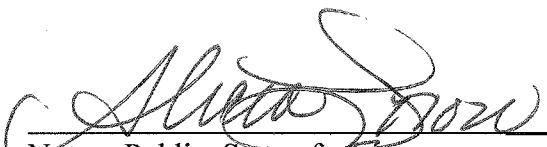
REC's EXPENSES			
OCTOBER 1, 2021 THROUGH NOVEMBER 30, 2021			
CONSULTANTS	HOURLY RATE	HOURS	ACTUAL TOTAL
Karl Nalepa	\$270	35.0	\$9,450.00
Erin Cromleigh	\$180	33.2	\$5,976.00
Total Actual		68.2	\$15,426.00

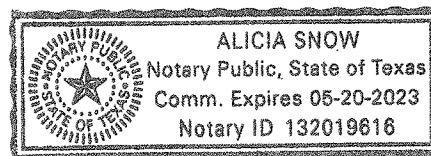
6. My billing rate is \$270 per hour. This is my normal billing rate that I charge to all clients for this type of work in rate proceedings. I am familiar with the hourly rates charged by other consultants to perform similar services before utility regulatory agencies in Texas. Given that I have more than 35 years of utility rate regulatory experience, my billing rate is reasonable.

7. Assisting me on this proceeding is Erin Cromleigh. Ms. Cromleigh is an energy consultant and has over 14 years of regulatory experience. Ms. Cromleigh works under my direction and supervision.
8. No REC personnel billed in excess of 12 hours on any given day to this case. No REC personnel incurred any airline, lodging, or meal expenses. No REC personnel charged for any luxury items. There are no instances of double billing for REC's services.
9. Based on my experience relating to analysis of rate proceeding matters and the reasonableness of rate case expenses before the Public Utility Commission of Texas, I conclude that: (1) REC's hourly rates are reasonable; and (2) the 68.2 actual hours during this period are both reasonable and necessary.
10. The statements made in this affidavit are true and correct.


Karl J. Nalepa 12/15/21

SUBSCRIBED AND SWORN to before me on this 15th of December, 2021.


Notary Public, State of Texas
My Commission Expires: 5/20/2023



ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420

Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
11/3/2021	4895

BILL TO

City of El Paso
Attn: Office of the City Attorney
PO Box 1890
El Paso, TX 79950-1890

PROJECT

NG EPE 21 RC 52195

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	24.2	270.00	6,534.00
Consulting (Cromleigh)	32.9	180.00	5,922.00
Total Labor			12,456.00
Work Completed thru - October 31, 2021	TOTAL DUE		\$12,456.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
October 5, 2021	Review responses to discovery.	0.50
October 6, 2021	Call with N. Gordon to discuss discovery and testimony issues.	0.30
October 11, 2021	Review responses to discovery.	0.50
October 12, 2021	Call with N. Gordon to discuss testimony issues.	0.30
October 14, 2021	Call with C. Johnson regarding cost allocation adjustments. Review adjustments and discuss with E. Cromleigh.	0.80
October 15, 2021	Work with E. Cromleigh to input depreciation rates into CEP cost of service model. Call with N. Gordon to discuss. Work on draft testimony. Call with J. Brazell regarding RCE testimony. Send	1.50
October 17, 2021	Work on draft testimony.	1.00
October 18, 2021	Complete draft testimony and send to N. Gordon for review. Work with E. Cromleigh to develop CEP cost of service model. Emails with N. Gordon regarding adjustments. Emails with J. Brazell regarding RCE testimony. Send additional invoices.	3.50
October 19, 2021	Call with N. Gordon to discuss testimony. Review consultant adjustments and work with E. Cromleigh to input into CEP COS model.	2.70
October 20, 2021	Revise testimony and send to N. Gordon for review. Compile and send testimony attachments to N. Gordon. Continue to review consultant adjustments and work with E. Cromleigh to develop CEP COS model. Prepare and send RCE estimate to J. Brazell for testimony.	3.00
October 21, 2021	Complete revisions to testimony. Prepare RCE testimony. Compile additional attachments. Work with E. Cromleigh to complete CEP COS model. Discuss issues with N. Gordon.	3.30
October 22, 2021	Review responses to discovery. Review and edit revised testimony. Work with N. Gordon to compile and file confidential testimony exhibits.	3.20
October 25, 2021	Review intervenor testimony and workpapers.	0.50
October 26, 2021	Review intervenor testimony and workpapers.	0.80
October 27, 2021	Review intervenor testimony.	1.30
October 28, 2021	Review responses to discovery.	0.70
October 29, 2021	Call with N. Gordon regarding Staff testimony.	0.30

24.20

Monthly Recap

Erin Cromleigh

Date	Task	Hours
October 14, 2021	Call with N. Gordon to discuss model; input CEP adjustments into model.	5.00
October 15, 2021	Input CEP adjustments into model.	4.50
October 18, 2021	Input CEP adjustments into model.	5.10
October 19, 2021	Input CEP adjustments into model.	5.50
October 20, 2021	Input CEP adjustments into model.	4.90
October 21, 2021	Input CEP adjustments into model. Revise model.	5.30
October 22, 2021	Create pdf attachments for testimony; upload model to shared drive.	2.10
October 25, 2021	Upload model to Dropbox and send link to N. Gordon.	0.50

32.90

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
12/8/2021	4917

BILL TO

City of El Paso
Attn: Office of the City Attorney
PO Box 1890
El Paso, TX 79950-1890

PROJECT

NG EPE 21 RC 52195

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	10.8	270.00	2,916.00
Consulting (Cromleigh)	0.3	180.00	54.00
Total Labor			2,970.00
Work Completed thru - November 30, 2021		TOTAL DUE	\$2,970.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
November 1, 2021	Call with N. Gordon to discuss Staff testimony.	0.20
November 3, 2021	Review allocations.	0.50
November 5, 2021	Review responses to discovery. Call with N. Gordon regarding Staff cost allocation recommendation.	0.80
November 8, 2021	Review intervenor testimony and compile revenue allocation proposals. Review discovery.	1.80
November 9, 2021	Continue to review testimony and compile allocation proposals.	1.20
November 10, 2021	Review testimony and revenue allocations.	1.30
November 12, 2021	Review class allocations. Call with N. Gordon to discuss solar jurisdictional allocations.	1.00
November 15, 2021	Review responses to discovery. Work on analysis.	1.20
November 17, 2021	Review CEP COS model. Work with E. Cromleigh to send COS model to intervenors.	0.50
November 19, 2021	Review responses to discovery.	0.30
November 28, 2021	Review rebuttal testimony.	0.50
November 29, 2021	Review rebuttal testimony.	0.70
November 30, 2021	Review rebuttal and cross rebuttal testimony.	0.80

10.80

Monthly Recap

Erin Cromleigh

Date	Task	Hours
November 17, 2021	Prepare and email model to DOD consultant.	0.30
		0.30

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

APPLICATION OF EL PASO	§	PUBLIC UTILITY COMMISSION
ELECTRIC COMPANY TO CHANGE	§	
RATES	§	OF TEXAS

AFFIDAVIT OF CLARENCE L. JOHNSON
SUPPORTING FIRST SUPPLEMENTAL RATE CASE EXPENSE FILING

STATE OF TEXAS

COUNTY OF TRAVIS

My name is Clarence L. Johnson. My address is 3707 Robinson Ave. Austin TX 78722. My business practice consists of expert witness consulting with respect to electric utility regulation. I filed testimony in PUC Docket No. 52195 on behalf of the City of El Paso. This affidavit supports my supplemental rate case expense filing for the months of October and November 2021 submitted in PUC Docket No. 52195. My billings for those periods are set out in Invoice 2 and Invoice 3 submitted to the City Attorney for the City of El Paso and submitted in this supplemental filing.

I swear and affirm the following regarding those billings:

1. The billings consist entirely of my professional services at the hourly rate of \$220 per hour.
2. The rate and charges are reasonable and necessary for the same reasons stated in my Direct Testimony dated Oct. 22, 2021.
3. The invoices submitted for October and November 2021 in the amount of \$18,326 are true and correct.
4. The billings are consistent with, and conform to, the statements set out in my rate case expense testimony at pages 64 – 67 of my Direct Testimony, dated Oct. 22, 2021.
5. The work done by me and submitted in these invoices was necessary and reasonable with respect to both time and amount considering the nature, extent, and difficulty of the work, the originality of the issues presented,

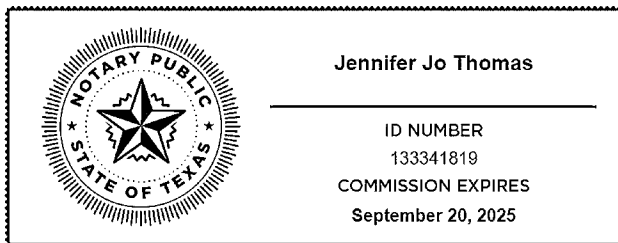
including the nature of the issues raised and addressed by the City in this proceeding, and the amount of time spent by and charges by others for work of a similar nature in this and other proceedings.

The declarations in this my affidavit are true and correct.

Clarence L Johnson
Clarence L. Johnson

State of Texas, County of Travis

SUBSCRIBED AND SWORN before me, the undersigned authority, on the
____15th____ Day of December, 2021, by Clarence L. Johnson.



Jennifer Jo Thomas
Notary Public, State of Texas
My commission expires: 09/20/2025.

Notarized online using audio-video communication

CLARENCE JOHNSON
CJ ENERGY CONSULTING
3707 ROBINSON AVENUE
AUSTIN, TX 78722
512-506-1896
NOVEMBER 2, 2021

INVOICE 2

RE: PUC DOCKET NO. 52195, EL PASO ELECTRIC CO.

TO: City of El Paso Attn: Office of the City Attorney

P.O. Box 1890 El Paso, TX 79950-1890

FROM: Clarence Johnson

Pursuant to our agreement in the above-referenced matter, I have enclosed a billing for services in October, 2021. The total billing is \$11,022. The hourly rate for expert services is \$220 per hour. Details for the billing are shown on the subsequent attached page. Thanks.

Vendor No. 1000058996

Enclosure

ATTACHMENT-Clarence Johnson Hours

Date	Activity (October)	Hours
3-Oct	Review RFI answers; write testimony	2.5
4-Oct	Telephone disc/w NG; revise adjustments to model.	2
6-Oct	Write testimony; spreadsheet analysis-rate design	4
7-Oct	Write testimony; spreadsheet analysis: P errata	3.5
8-Oct	Write testimony; spreadsheet analysis: Q7 workpaper	4.5
9-Oct	Write cost allocation testimony; prepare cust cost analysis	5.5
11-Oct	Write testimony regarding customer charge, energy rates	3.2
12-Oct	Write and revise draft direct testimony	5
13-Oct	Write testimony and develop schedules	4.2
14-Oct	Prepare model inputs for Nalepa; discuss with KN	2.5
15-Oct	Write testimony; transmit draft testimony to NG.	4
16-Oct	Write/prepare Appendix B	3.5
24-Oct	Prepare workpapers for direct testimony	4
29-Oct	Review Staff testimony	0.5
30-Oct	Review intervenor testimony	1.2
	Hours	50.1
	Times \$220 per hour	220
	Total	11,022

CLARENCE JOHNSON
CJ ENERGY CONSULTING
3707 ROBINSON AVENUE
AUSTIN, TX 78722
512-506-1896
DECEMBER 5, 2021

INVOICE 3

RE: PUC DOCKET NO. 52195, EL PASO ELECTRIC CO.

TO: City of El Paso Attn: Office of the City Attorney

P.O. Box 1890 El Paso, TX 79950-1890

FROM: Clarence Johnson

Pursuant to our agreement in the above-referenced matter, I have enclosed a billing for services in November, 2021. The total billing is \$7,304. The hourly rate for expert services is \$220 per hour. Details for the billing are shown on the subsequent attached page. Thanks.

Vendor No. 1000058996

Enclosure

ATTACHMENT-Clarence Johnson Hours

Date	Activity	Hours
5-Nov	Discuss Staff Test. w/NG; Prepare RFIs to Staff	1.3
6-Nov	Prepare RFI to TIEC; Prepare answers for EPE 1st RFI	2.5
7-Nov	Prepare answers to Rate 41 Group RFI	3
9-Nov	Research for cross rebuttal testimony	3.5
10-Nov	Prepare answers to TIEC RFI; review cross rebuttal issues	3
11-Nov	Prepare answers to EPE RFI 2; cross rebuttal T. preparation	4
12-Nov	Prepare answers to EPE RFI-3; cross rebuttal T. preparation	3
13-Nov	Write cross rebuttal testimony	2.3
14-Nov	Write cross rebuttal testimony	2
15-Nov	Write cross rebuttal testimony	3
16-Nov	Edit, revise cross rebuttal testimony	1
21-Nov	Prepare workpapers for cross rebuttal testimony	0.8
26-Nov	Review other parties' rebuttal testimony	1.3
29-Nov	Review issues pertaining to TIEC RFI 2	1.5
30-Nov	Prepare answer to TIEC RFI 2	1
Total Hours for Month		33.2
Times \$220 per hour		\$ 7,304

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

**APPLICATION OF EL PASO
ELECTRIC COMPANY TO CHANGE
RATES**

§ **PUBLIC UTILITY COMMISSION**
§
§ **OF TEXAS**

AFFIDAVIT OF DANIEL J. LAWTON
SUPPORTING CITY OF EL PASO'S FIRST SUPPLEMENTAL RATE CASE EXPENSE FILING
STATE OF TEXAS
COUNTY OF TRAVIS

I, Daniel J. Lawton, state the following facts upon my oath.

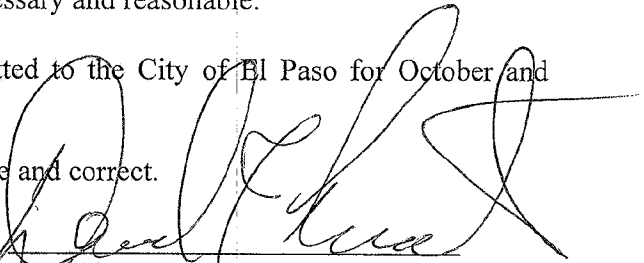
1. My name is Daniel J. Lawton. I am over eighteen years of age and am not disqualified from making this affidavit.
2. I am the owner of the Lawton Law Firm, P.C. My business address is 12600 Hill Country Blvd., Suite R-275, Austin Texas 78738. I have been retained by the City of El Paso to provide expert testimony and analyses on cost of capital and allocation issues in this rate proceeding filed by El Paso Electric Company ("EPE" or "Company"), Docket No. 52195.
3. I am giving this affidavit to address the necessity for and reasonableness of my actual fees related charges through November 30, 2021, and estimated expenses through completion of this case.
4. My billing rate for consulting services is \$250 per hour. This is my normal billing rate that I charge for rate case consulting services. This rate is reasonable for a consultant providing these types of services before utility regulatory agencies in Texas and around the country. I have more than 35 years of utility rate regulatory experience providing utility rate consulting.
5. I have included in the following table a summary of hours billed to date, actual charges to date, along with estimates to complete the case.

ACTUAL AND ESTIMATED RATE CASE EXPENSES FOR DANIEL LAWTON

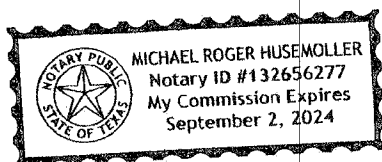
MONTH		HOURS	CHARGES
JULY 2021		97.1 Hrs	\$24,275.00
AUGUST 2021		61.3 Hrs	\$15,325.00
SEPTEMBER 2021		44.0 Hrs	\$11,000.00
OCTOBER 2021		39.5 Hrs	\$9,875.00
NOVEMBER 2021		24.5 Hrs	\$6,125.00
TOTAL ACTUAL TO DATE		272.4 Hrs	66,600.00
ESTIMATE COMPLETE	TO	60.00 Hrs	\$15,000.00

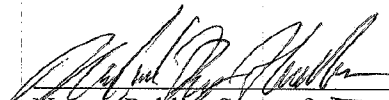
TOTAL ESTIMATE	ACTUAL &	332.4 Hrs	\$81,600.00
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6. As shown in the above table I have billed a total of 272.4 hours through November 30, 2021, in Docket No. 52195 for the time spent reviewing and analyzing the issues in this case and preparing testimony and analysis on the issues of cost of capital and jurisdictional allocation. An additional 60 hours are estimated to complete necessary tasks through the end of this proceeding. These estimated hours are for the time I estimate working on the case for review of Company rebuttal, and preparation for final hearings and testimony. Based on my experience this is a reasonable estimate.
7. I have reviewed the actual invoices and there have been no duplicate billings, no billings exceeding 12 hours per day, no out-of-pocket expenses have been billed and as such there are no billings for alcohol or extravagant items such as expensive meals, lodging, or transportation services.
8. The work done by me and submitted in these invoices was necessary and reasonable with respect to both time and amount considering the nature, extent, and difficulty of the work, the originality of the issues presented, including the nature of the issues raised and addressed by the City in this proceeding, and the amount of time spent by and charges by others for work of a similar nature in this and other proceedings.
9. Based on my experience relating to analysis of rate proceeding matters and the reasonableness of rate case expenses before the Public Utility Commission of Texas, I conclude that: (1) my hourly rate is very reasonable; and (2) the actual hours and estimate of additional hours in this case are both necessary and reasonable.
10. I have attached my actual invoices submitted to the City of El Paso for October and November, 2021.
11. The statements made in this affidavit are true and correct.


Daniel J. Lawton

SUBSCRIBED AND SWORN to before me, the undersigned authority, on the 16th day of December, 2021, by Daniel J. Lawton.




Notary Public, State of Texas
My Commission Expires: 09/02/2024

THE LAWTON LAW FIRM, P.C.

12600 Hill Country Blvd., Suite R-275 • Austin, Texas 78738 • 512/322-0019 • Fax: 512/329-2604

**Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso
Electric Company to Change Rates**

Daniel Lawton				
Total Fees		39.5 Hrs	\$250.00	\$9,875.00
EXPENSES:				\$9,875.00
Total Fees and Expenses				\$9,875.00

* Please see attachment {Attachment Letter}

THE LAWTON LAW FIRM, P.C.

Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso Electric Company to Change Rates

Daniel Lawton

10/4/21	4.5 Hrs	Update data and models for September month ending data
10/5/21	4.5 Hrs	Update data and models for September month ending data
10/7/21	3.5 Hrs	Update schedules and testimony edits for filing
10/8/21	3.0 Hrs	Update schedules and testimony edits for filing
10/14/21	3.0 Hrs	Update schedules and testimony edits for filing
10/15/21	3.5 Hrs	Update schedules and testimony edits for filing
10/16/21	2.5 Hrs	Update schedules and testimony edits for filing
10/19/21	3.5 Hrs	Update schedules and testimony edits for filing
10/25/21	4.0 Hrs	Review & summary parties' testimony & issues ROE and jurisdictional allocation
10/27/21	4.0 Hrs	Review & summary parties' testimony & issues ROE and jurisdictional allocation
10/28/21	3.5 Hrs	Review & summary parties' testimony & issues ROE and jurisdictional allocation
Total Hours	39.5 Hrs	

THE LAWTON LAW FIRM, P.C.

12600 Hill Country Blvd., Suite R-275 • Austin, Texas 78738 • 512/322-0019 • Fax: 512/329-2604

Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso Electric Company to Change Rates

Daniel Lawton	24.5 Hrs	\$250.00	\$6,125.00
Total Fees			\$6,125.00
EXPENSES:			
Total Fees and Expenses			\$6,125.00

* Please see attachment {Attachment Letter}

THE LAWTON LAW FIRM, P.C.

Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso Electric Company to Change Rates

Daniel Lawton

11/9/21	2.5 Hrs		Review schedules and prepare Errata related to Company questions on CAPM calculation on market risk premium
11/15/21	1.5 Hrs		Review and respond to EPE 2 nd request on Jurisdictional Allocation issues
11/20/21	4.8 Hrs		Review Company Rebuttal on cost of capital issues
11/22/21	5.0 Hrs		Review Company Rebuttal on cost of capital issues
11/23/21	3.5 Hrs		Review Company Rebuttal on cost of capital issues
11/26/21	3.5 Hrs		Review Company Rebuttal on cost of capital issues
11/29/21	2.5 Hrs		Review Company Rebuttal on Jurisdictional allocator
11/30/21	2.5 Hrs		Review Company Rebuttal & draft discovery
Total Hours	24.5 Hrs		

THE LAWTON LAW FIRM, P.C.

12600 Hill Country Blvd., Suite R-275 • Austin, Texas 78738 • 512/322-0019 • Fax: 512/329-2604

December 13, 2021

Sent Via email: EPCityAttorney-AccountsPayable@elpasotexas.gov,
EngelbaumFM@elpasotexas.gov,

VENDOR # 1000058818

INVOICE NO. 12132021

City of El Paso
Attn: Office of the City Attorney
P.O. Box 1890
El Paso, TX. 79950-1890

Re: Invoice for November 2021 Services -PUC Docket No. 52195; Application of El Paso Electric Company to Change Rates

To City of El Paso City Attorney and Accounts Payable Office:

Attached please find an invoice for services in the above-referenced matter for the month of November 2021. The services are related to the El Paso Electric Company ("EPE" or "Company") rate increase request in PUC Docket No. 52195 designated as Application of El Paso Electric Company to Change Rates. In this case the Company proposes a \$69.7 million annual Texas retail base rate (non-fuel) increase. The percentage impact of the proposed increase is about 13.5%. The resulting net increase after accounting for the \$27.9 million amount already being collected through the transmission ("TCRF") and distribution ("DCRF") interim rate mechanisms is about \$41.8 million or 7.79% increase.

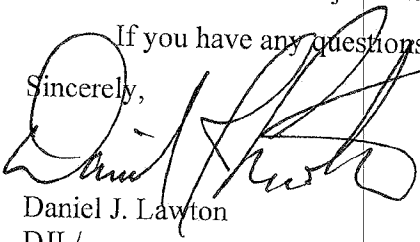
In this proceeding EPE seeks a Commission Order authorizing a 10.3% profit level and a 51% equity capitalization for the Company. Also, as part of this case the Company proposes to specifically assign certain generation facilities (solar) to New Mexico and Texas for purposes of identifying costs between the Texas and New Mexico jurisdictions.

Tasks in this matter for November 2021 entailed the review of the Company's rebuttal

testimony, responding to and developing discovery, and continued evaluation of case issues, of cost of capital issues and jurisdictional allocation.

If you have any questions, please call.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Lawton", written over the word "Sincerely,".

Daniel J. Lawton

DJL/

Enclosures

THE LAWTON LAW FIRM, P.C.

12600 Hill Country Blvd., Suite R-275 • Austin, Texas 78738 • 512/322-0019 • Fax: 512/329-2604

Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso Electric Company to Change Rates

Daniel Lawton	24.5 Hrs	\$250.00	\$6,125.00
Total Fees			\$6,125.00
EXPENSES:			
Total Fees and Expenses			\$6,125.00

* Please see attachment {Attachment Letter}

THE LAWTON LAW FIRM, P.C.					
<u>Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso Electric Company to Change Rates</u>					
Daniel Lawton					
11/9/21	2.5 Hrs		Review schedules and prepare Errata related to Company questions on CAPM calculation on market risk premium		
11/15/21	1.5 Hrs		Review and respond to EPE 2 nd request on Jurisdictional Allocation issues		
11/20/21	4.8 Hrs		Review Company Rebuttal on cost of capital issues		
11/22/21	5.0 Hrs		Review Company Rebuttal on cost of capital issues		
11/23/21	3.5 Hrs		Review Company Rebuttal on cost of capital issues		
11/26/21	3.5 Hrs		Review Company Rebuttal on cost of capital issues		
11/29/21	2.5 Hrs		Review Company Rebuttal on Jurisdictional allocator		
11/30/21	2.5 Hrs		Review Company Rebuttal & draft discovery		
Total Hours	24.5 Hrs				

THE LAWTON LAW FIRM, P.C.

12600 Hill Country Blvd., Suite R-275 • Austin, Texas 78738 • 512/322-0019 • Fax: 512/329-2604

November 12, 2021

Sent Via email: EPCityAttorney-AccountsPayable@elpasotexas.gov,
EngelbaumFM@elpasotexas.gov,

VENDOR # 1000058818

INVOICE NO. 11122021

City of El Paso
Attn: Office of the City Attorney
P.O. Box 1890
El Paso, TX. 79950-1890

Re: Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso Electric Company to Change Rates

To City of El Paso City Attorney and Accounts Payable Office:

Attached please find an invoice for services in the above-referenced matter for the month of October 2021. The services are related to the El Paso Electric Company ("EPE" or "Company") rate increase request in PUC Docket No. 52195 designated as Application of El Paso Electric Company to Change Rates. In this case the Company proposes a \$69.7 million annual Texas retail base rate (non-fuel) increase. The percentage impact of the proposed increase is about 13.5%. The resulting net increase after accounting for the \$27.9 million amount already being collected through the transmission ("TCRF") and distribution ("DCRF") interim rate mechanisms is about \$41.8 million or 7.79% increase.

In this proceeding EPE seeks a Commission Order authorizing a 10.3% profit level and a 51% equity capitalization for the Company. Also, as part of this case the Company proposes to specifically assign certain generation facilities (solar) to New Mexico and Texas for purposes of identifying costs between the Texas and New Mexico jurisdictions.

Tasks in this matter for October 2021 entailed the continued review of the Company's

Application and witness testimony, review discovery, continued evaluation of case issues, continued modeling and analysis of cost of capital issues, development of jurisdictional allocation issues, finalizing and updating testimony and schedules for the October 22, 2021 filing at the Public Utility Commission of Texas, and review of intervenor testimony on similar issues.

If you have any questions, please call.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Lawton", written over a circular stamp that is partially obscured by the signature.

Daniel J. Lawton

DJL/

Enclosures

THE LAWTON LAW FIRM, P.C.

12600 Hill Country Blvd., Suite R-275 • Austin, Texas 78738 • 512/322-0019 • Fax: 512/329-2604

Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso Electric Company to Change Rates

Daniel Lawton	39.5 Hrs	\$250.00	\$9,875.00
Total Fees			\$9,875.00
EXPENSES:			
Total Fees and Expenses			\$9,875.00

* Please see attachment {Attachment Letter}

THE LAWTON LAW FIRM, P.C.

**Invoice for October 2021 Services -PUC Docket No. 52195; Application of El Paso
Electric Company to Change Rates**

Daniel Lawton

10/4/21	4.5 Hrs		Update data and models for September month ending data
10/5/21	4.5 Hrs		Update data and models for September month ending data
10/7/21	3.5 Hrs		Update schedules and testimony edits for filing
10/8/21	3.0 Hrs		Update schedules and testimony edits for filing
10/14/21	3.0 Hrs		Update schedules and testimony edits for filing
10/15/21	3.5 Hrs		Update schedules and testimony edits for filing
10/16/21	2.5 Hrs		Update schedules and testimony edits for filing
10/19/21	3.5 Hrs		Update schedules and testimony edits for filing
10/25/21	4.0 Hrs		Update schedules and testimony edits for filing
10/27/21	4.0 Hrs		Review & summary parties' testimony & issues ROE and jurisdictional allocation
10/28/21	3.5 Hrs		Review & summary parties' testimony & issues ROE and jurisdictional allocation
Total Hours	39.5 Hrs		

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

APPLICATION OF EL PASO	§	PUBLIC UTILITY COMMISSION
ELECTRIC COMPANY TO	§	
CHANGE RATES	§	OF TEXAS

**AFFIDAVIT OF MARK E. GARRETT
SUPPORTING CITY OF EL PASO'S FIRST SUPPLEMENTAL RATE CASE EXPENSE
FILING**

STATE OF OKLAHOMA
COUNTY OF OKLAHOMA

I, Mark E. Garrett, state the following facts upon my oath:

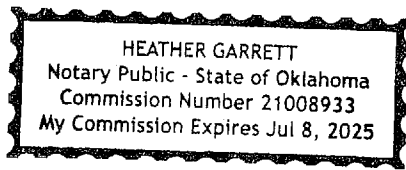
1. My name is Mark E. Garrett. I am over eighteen years of age and am not disqualified from making this affidavit.
2. I am the President of Garrett Group Consulting, Inc., ("GGCI"). My business address is 4028 Oakdale Farm Circle, Edmond, OK 73013. My firm has been retained by the City of El Paso to provide expert testimony and analyses on revenue requirement, ratemaking and accounting issues in this rate proceeding filed by El Paso Electric Company ("EPE" or "Company"), Docket No. 52195.
3. I am giving this affidavit to address the necessity for, and reasonableness of, actual fees and charges of my firm through November 30, 2021, and estimated charges through completion of this case.
4. My billing rate is \$270 per hour. The hourly rate is reasonable given my 35 years of experience and the complexity of the issues addressed. Consultants that assist GGCI in this proceeding have lower billing rates and perform services that promote efficient processing of regulatory proceedings of this type. The billing rates charged in this proceeding are reasonable for consultants providing these types of services before regulatory agencies in Texas and around the country.
5. I have included in the following table a summary of hours billed to date, actual charges to date, and estimates of time and billing to complete the case. As shown in the table below, GGCI has billed a total of 319.5 hours through November 30, 2021. The actual billings to date are for time spent reviewing and analyzing the issues in this case, preparing testimony, calculations and analysis, reviewing discovery, reviewing rebuttal and cross-rebuttal testimony and exhibits.

Month	Hours	Hourly Billing Amounts	Expense Charges	Invoice Totals
June-August 2021	116.0	\$25,435.00	\$1,017.40	\$26,452.40
September 2021	30.5	7,005.00	280.20	7,285.20
October 2021	127.0	27,950.00	0	27,950.00
November 2021	46.0	11,230.00	(1,297.60)	9,932.40
Total Actual to Date	319.5	\$71,620.00	\$0.00	\$71,620.00
Estimate to Complete	20.0	5,400.00	0.00	5,400.00
Total Actual and Estimate	339.5	\$77,020.00	\$0.00	\$77,020.00

6. I estimate an additional 20 hours of my time will be necessary to complete tasks through the end of this proceeding. The estimated additional hours are for time necessary to evaluate any proposed settlement and/or for my preparation for final hearings and testimony in the event settlement does not occur.
7. I have reviewed the actual invoices for this project and have determined that they reflect no duplicate billings nor individual billings exceeding 12 hours per day. The contractual expense charges for routine expenses (4%), which were billed pursuant to the terms of GGCI's contract with the City of El Paso have been removed and credited back to the City of El Paso (in the November 2021 invoice) per the recommendation of the PUCT Staff. As a result, GGCI has by agreement removed all charges for out-of-expenses in this proceeding.
8. The work done and submitted in these invoices was necessary and reasonable with respect to both time and amount considering the nature, extent, and difficulty of the work, the originality of the issues presented, including the nature of the issues raised and addressed by the City in this proceeding, and the amount of time spent by and charges by others for work of a similar nature in this and other proceedings.
9. Based on my experience relating to analysis of rate proceeding matters and the reasonableness of rate case expenses before the Public Utility Commission of Texas, I conclude that (1) the hourly rates charged and (2) the actual and estimated hours for work performed are both reasonable and necessary in this proceeding.
10. I have attached the actual invoices through November 30, 2021.
11. The statements made in this affidavit are true and correct.


 Mark E. Garrett

SUBSCRIBED AND SWORN before me, the undersigned authority, on the 16th day of
December, 2021 by Mark E. Garrett.



Heather Garrett
Notary Public, State of Oklahoma
My Commission Expires: July 8, 2025

GARRETT GROUP CONSULTING, INC.
4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013

TELEPHONE (405) 239-2226

E-MAIL: MGARRETT@GARRETTGROUPLLC.COM

November 18, 2021

City of El Paso
Attn: Office of the City Attorney
P.O. Box 1890
El Paso, TX 79950-1890

RE: *El Paso Electric Co., PUC Docket No. 52195*
Garrett Group Consulting, Inc. TIN: 83-2450199

Dear Manny:

Our invoice for professional services for October 2021 in connection with the above-referenced case follows:

I. Professional Services:

A.	Mark Garrett, JD, CPA — <i>(Details in Attachment A)</i>	55.0 hours at \$270.00 per hour	\$14,850.00
B.	Ed Farrar, CPA — <i>(Details in Attachment B)</i>	26.0 hours at \$150.00 per hour	\$3,900.00
C.	Heather Garrett, JD, CPA — <i>(Details in Attachment C)</i>	46.0 hours at \$200.00 per hour	\$9,200.00

II. Expenses:

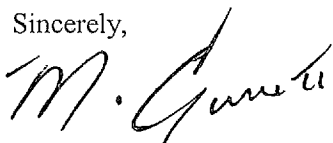
N/C

III. Total Invoice:

\$27,950.00

We appreciate the opportunity to work with you on this case. Please call me if you should have any questions.

Sincerely,



Mark E. Garrett
Attachments

Attachment A
Mark Garrett

Consulting Tasks for
El Paso PUC Docket No. 52195
Billing Period: October 2021

Dates	Tasks	Hours
October		
4	Issue analysis;	2.0
8	Issue analysis;	4.0
9	Work on testimony and exhibits	4.0
10	Work on testimony and exhibits	2.0
11	Work on testimony and exhibits	2.0
12	Work on testimony and exhibits	2.0
13	Work on testimony and exhibits	3.0
14	Work on testimony and exhibits	4.0
15	Work on testimony and exhibits	4.0
16	Work on testimony and exhibits	4.0
17	Work on testimony and exhibits	4.0
18	Work on testimony and exhibits	6.0
19	Work on testimony and exhibits	6.0
20	Work on testimony and exhibits	6.0
21	Work on testimony and exhibits	2.0
	Total	55.0

Attachment B

Ed Farrar

Consulting Tasks for
El Paso PUC Docket No. 52195
Billing Period: October 2021

Dates	Tasks	Hours
October		
1	Review discovery and exhibits	1.0
5	Review discovery and exhibits	1.0
8	Review payroll issues, draft discovery	1.0
9	Review testimony on depreciation issue	1.0
12	Review testimony, perform analysis	2.0
13	Review discovery, perform analysis	5.0
14	Review issues, workpapers and discovery, perform analysis	8.0
15	Review workpapers and discovery, perform analysis	1.0
18	Review workpapers, perform analysis	1.0
19	Review exhibits, perform analysis, draft testimony	5.0
	Totals	26.0

Attachment C
Heather Garrett

Consulting Tasks for
El Paso PUC Docket No. 52195
Billing Period: October 2021

Dates	Tasks	Hours
October		
1	Review discovery;	2.5
9	Review discovery;	2.0
13	Work on draft testimony;	8.0
14	Work on draft testimony;	5.5
15	Review discovery;	3.0
16	Work on draft testimony;	4.0
18	Work on testimony and schedules;	3.5
19	Revisions to testimony and exhibits;	7.0
20	Revisions to testimony and exhibits;	6.5
21	Revisions to testimony and exhibits;	4.0
	Totals	46.0

GARRETT GROUP CONSULTING, INC.
4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013

TELEPHONE (405) 239-2226

E-MAIL: MGARRETT@GARRETTGROUPLLC.COM

December 13, 2021

City of El Paso
Attn: Office of the City Attorney
P.O. Box 1890
El Paso, TX 79950-1890

RE: *El Paso Electric Co., PUC Docket No. 52195*
Garrett Group Consulting, Inc. TIN: 83-2450199

Dear Manny:

Our invoice for professional services for November 2021 in connection with the above-referenced case follows:

I. Professional Services:

A.	Mark Garrett, JD, CPA —	29.0 hours at \$270.00 per hour	\$7,830.00
	<i>(Details in Attachment A)</i>		
B.	Heather Garrett, JD, CPA —	17.0 hours at \$200.00 per hour	\$3,400.00
	<i>(Details in Attachment B)</i>		

II. Expenses:

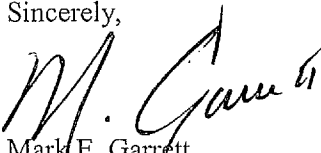
Credit to remove contractual expenses from prior invoices	<u>-\$1,297.60</u>
---	--------------------

III. Total Invoice:

\$9,932.40

We appreciate the opportunity to work with you on this case. Please call me if you should have any questions.

Sincerely,



Mark E. Garrett
Attachments

Attachment A

Mark Garrett

Consulting Tasks for
El Paso PUC Docket No. 52195
Billing Period: November 2021

Dates	Tasks	Hours
November		
2	Work on issues; review testimony and exhibits filed by other witnesses.	2.0
3	Work on issues; review testimony and exhibits filed by other witnesses.	2.0
5	Work on issues; review testimony and exhibits filed by other witnesses.	2.5
13	Work on issues; review testimony and exhibits filed by other witnesses.	2.0
17	Work on issues; review testimony and exhibits filed by other witnesses.	4.0
20	Review rebuttal testimony and exhibits filed by EPE; work on issues.	3.5
22	Review rebuttal testimony and exhibits filed by EPE; work on issues.	3.0
23	Review rebuttal testimony and exhibits filed by EPE; work on issues.	2.5
24	Review rebuttal testimony and exhibits filed by EPE; work on issues.	2.0
26	Review rebuttal testimony and exhibits filed by EPE; work on issues.	2.0
29	Review rebuttal testimony and exhibits filed by EPE; work on issues.	3.5
	Total	29.0

Attachment B
Heather Garrett

Consulting Tasks for
El Paso PUC Docket No. 52195
Billing Period: November 2021

Dates	Tasks	Hours
November		
2	Review PUCT Staff testimony and exhibits;	3.0
4	Review RFI discovery responses;	2.0
5	Review testimony and exhibits of other witnesses;	2.0
20	Review EPE rebuttal testimony and exhibits;	3.5
22	Review EPE rebuttal testimony and exhibits;	3.0
24	Review EPE rebuttal testimony and exhibits;	2.0
30	Review discovery responses;	1.5
	Totals	17.0

PUBLIC UTILITY COMMISSION OF TEXAS DOCKET NO. 52195

APPLICATION OF EL PASO ELECTRIC	§	BEFORE THE
COMPANY TO CHANGE RATES	§	PUBLIC UTILITY COMMISSION
	§	OF TEXAS

RATE CASE EXPENSE AFFIDAVIT OF SCOTT NORWOOD
PROVIDING ACTUAL EXPENSES THROUGH NOVEMBER 30, 2021, AND
ESTIMATED EXPENSES THROUGH COMPLETION OF THE PROCEEDING

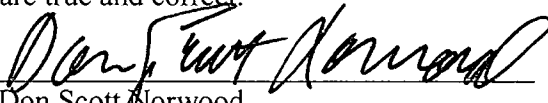
I, Don Scott Norwood, state the following facts upon my oath:

1. My name is Don Scott Norwood. I am over eighteen years of age and am not disqualified from making this affidavit.
2. I am the President of Norwood Energy Consulting, LLC ("NEC"). My business address is 5926 Lookout Mountain Drive, Austin, Texas 78751. My firm has been retained by the City of El Paso to provide expert testimony and analyses on revenue requirement issues in this rate proceeding filed by El Paso Electric Company ("EPE" or "Company"), PUC Docket No. 52195.
3. I am giving this affidavit to address the necessity for, and reasonableness of, actual fees and charges of my firm through November 30, 2021, and estimated charges through completion of this case.
4. My billing rate is \$220 per hour. This hourly rate is reasonable given my 35 years of regulatory consulting experience and the complexity of the issues addressed and is reasonable when compared to charges by other consultants providing these types of services before regulatory agencies in Texas and around the country.
5. I have included in the following table a summary of NEC's hours billed to date, actual charges to date, and estimates of time and charges to complete the case. As shown in the table below, NEC has billed a total of \$53,790 based on 244.5 man-hours expended on this case through November 30, 2021. The actual billings to date are for time spent reviewing and analyzing the issues in this case, preparing direct and cross-rebuttal testimony, calculations and analysis, reviewing discovery, and reviewing direct, rebuttal and cross-rebuttal testimony and exhibits.

NEC Actual and Forecasted Charges for PUC Docket No. 52195

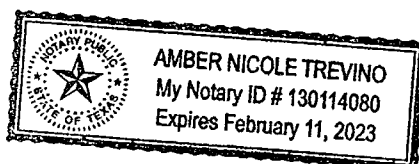
<u>Month</u>	<u>Hours</u>	<u>Fees @ \$220/Hr</u>	<u>Expenses</u>	<u>Total Charges</u>
June	26.0	\$5,720	\$0	\$5,720
July	36.0	\$7,920	\$0	\$7,920
August	38.0	\$8,360	\$0	\$8,360
September	40.0	\$8,800	\$0	\$8,800
October	71.0	\$15,620	\$0	\$15,620
November	<u>33.5</u>	<u>\$7,370</u>	<u>\$0</u>	<u>\$7,370</u>
Actual Total Through 11/30	244.5	\$53,790	\$0	\$53,790
Estimate to Complete	<u>24.0</u>	<u>\$5,280</u>	<u>\$0</u>	<u>\$5,280</u>
Total Actual and Estimated	268.5	\$59,070	\$0	\$59,070

6. I estimate that NEC will incur an additional 24 man-hours and \$5,280 in fees to complete remaining tasks through the end of this proceeding. The estimated additional hours are for time necessary to evaluate any proposed settlement offers and/or for my preparation for final hearings and testimony in the event a settlement does not occur.
7. I have reviewed the actual invoices for this project and have determined that they reflect no duplicate billings nor individual billings exceeding 12 hours per day. In accordance with NEC's normal practice, the firm's total charges for this project do not include charges for any non-labor, travel or administrative expenses incurred for this case.
8. Based on my experience relating to analysis of rate proceeding matters and the reasonableness of rate case expenses before the Public Utility Commission of Texas, I conclude that NEC's (1) hourly rate charged and (2) the actual and estimated hours for work performed on this case are both reasonable and necessary.
9. I have attached NEC's actual invoices through November 30, 2021.
10. The statements made in this affidavit are true and correct.


Don Scott Norwood

SUBSCRIBED AND SWORN before me, the undersigned authority, on the 15th of December, 2021 by Don Scott Norwood.





Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Manny Arambula
Senior Assistant City Attorney
Office of the City Attorney
300 N. Campbell, 2nd Floor
El Paso, TX 79901

Date: 12-5-21
Tax ID #: 26-2374359
Invoice#: EPERate NOV21

Re: EPE Base Rate Case Analysis - PUC Docket No. 52195

Statement for professional services rendered 11-1-21 through 11-30-21

11-02-21	Researched loss factor issues`	4.0 hrs
11-03-21	Reviewed TIEC testimony and past Orders on loss studies	5.0 hrs
11-04-21	Reviewed testimony; reviewed EPE's loss study`	4.0 hrs
11-06-21	Reviewed EPE's testimony; worked on adjustments`	3.5 hrs
11-15-21	Reviewed RFI responses`	5.5 hrs
11-16-21	Reviewed RFIs; worked on testimony outline	7.5 hrs
11-18-21	Reviewed intervenor direct testimony	<u>4.0 hrs</u>

Total hours: 33.5 hrs

Total due: 33.5 hours at \$220 per hour = \$7,370

Thank you for the opportunity to assist with this project.

Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Manny Arambula
Senior Assistant City Attorney
Office of the City Attorney
300 N. Campbell, 2nd Floor
El Paso, TX 79901

Date: 12-5-21
Tax ID #: 26-2374359
Invoice#: EPERate OCT21

Re: EPE Base Rate Case Analysis - PUC Docket No. 52195

Statement for professional services rendered 10-1-21 through 10-31-21

10-05-21	Reviewed EPE's RFI responses`	6.0 hrs
10-06-21	Reviewed EPE's direct testimony; drafted RFIs`	4.0 hrs
10-13-21	Reviewed EPE's RFI responses`	6.5 hrs
10-14-21	Reviewed EPE's testimony; worked on adjustments`	6.0 hrs
10-15-21	Reviewed RFI responses`	5.0 hrs
10-17-21	Reviewed RFIs; worked on testimony outline	4.0 hrs
10-18-21	Worked on first draft of testimony`	8.0 hrs
10-19-21	Reviewed RFIs; drafted direct testimony`	7.5 hrs
10-20-21	Worked on direct testimony and exhibits`	9.0 hrs
10-21-21	Worked on final draft of testimony; assembled exhibits	8.0 hrs
10-24-21	Reviewed direct testimony; assembled workpapers`	3.5 hrs
10-28-21	Reviewed intervenor direct testimony	<u>3.5 hrs</u>

Total hours: 71.0 hrs

Total due: 71.0 hours at \$220 per hour = \$15,620

Thank you for the opportunity to assist with this project.

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

APPLICATION OF EL PASO	§	PUBLIC UTILITY COMMISSION
ELECTRIC COMPANY TO CHANGE	§	
RATES	§	OF TEXAS

AFFIDAVIT OF DAVID J. GARRETT
SUPPORTING FIRST SUPPLEMENTAL RATE CASE EXPENSE FILING

STATE OF OKLAHOMA

COUNTY OF OKLAHOMA

My name is David J. Garrett. My address is 101 Park Ave., Ste. 1125, Oklahoma City, Oklahoma 73102. My business practice consists of expert witness consulting with respect to electric utility regulation. I filed testimony in PUC Docket No. 52195 on behalf of the City of El Paso. This affidavit supports my supplemental rate case expense filing for the months of October and November 2021 submitted in PUC Docket No. 52195. My billings for those periods are set out in invoices submitted to the City Attorney for the City of El Paso and submitted in this supplemental filing.

I swear and affirm the following regarding those billings:

1. The billings consist entirely of my professional services at the hourly rate of \$200 per hour.
2. The rate and charges are reasonable and necessary for the same reasons stated in my Direct Testimony dated Oct. 22, 2021.
3. Invoice number 504 submitted for October 2021 in the amount of \$10,800 and Invoice number 513 submitted for November 2021 in the amount of \$3,550 are true and correct.
4. The billings are consistent with, and conform to, the statements set out in my rate case expense testimony at pages 35-37 of my Direct Testimony, dated Oct. 22, 2021.
5. The work done by me and submitted in these invoices was necessary and reasonable with respect to both time and amount considering the nature, extent, and difficulty of the work, the originality of the issues presented, including the nature of the issues raised and addressed by the City in this proceeding, and the amount of time spent by and charges by others for work of a similar nature in this and other proceedings.

The declarations in this my affidavit are true and correct.



David J. Garrett

SUBSCRIBED AND SWORN before me, the undersigned authority, on the 16th day of December, 2021, by David J. Garrett





Notary Public, State of Oklahoma

My commission expires: 8-7-23

**Resolve Utility Consulting PLLC**

101 Park Avenue
Suite 1125
Oklahoma City, Oklahoma 73102
(405) 249-1050

INVOICE**Bill To****City of El Paso**

Attn: Office of the City Attorney
P.O. Box 1890
El Paso, Texas 79950-1890

Invoice#

INV-000504

Invoice Date

11/16/21

Project Name

El Paso Electric, PUC
Docket No. 52195,
Vendor #1000058684,
Tax ID #81-3933909

Task & Date	Hours	Rate	Amount
Conduct depreciation analyses and review testimony, workpapers and depreciation study 10/01/21	4.25	200.00	850.00
Conduct depreciation analyses and review testimony, workpapers and depreciation study 10/02/21	3.25	200.00	650.00
Conduct depreciation analyses and review testimony, workpapers and depreciation study 10/04/21	3.00	200.00	600.00
Conduct depreciation analyses and review testimony, workpapers and depreciation study 10/06/21	5.75	200.00	1,150.00
Conduct depreciation analyses and review testimony, workpapers and depreciation study 10/07/21	3.25	200.00	650.00
Conduct depreciation analyses and review testimony, workpapers and depreciation study 10/09/21	4.25	200.00	850.00

Task & Date	Hours	Rate	Amount
Draft testimony and build workpapers 10/12/21	6.25	200.00	1,250.00
Draft testimony and build workpapers 10/13/21	4.75	200.00	950.00
Draft testimony, build workpapers, and submit draft 10/14/21	6.75	200.00	1,350.00
Review and revise testimony 10/19/21	1.75	200.00	350.00
Review and revise testimony 10/20/21	3.50	200.00	700.00
Review and revise testimony, workpapers, and exhibits and prepare for filing 10/21/21	3.50	200.00	700.00
Review intervenor filed testimony and exhibits and review discovery 10/27/21	3.75	200.00	750.00
Total Hours 54.00		Total	\$10,800.00
		Balance Due	\$10,800.00

**Resolve Utility Consulting PLLC**

101 Park Avenue
Suite 1125
Oklahoma City, Oklahoma 73102
(405) 249-1050

INVOICE**Bill To****City of El Paso**

Attn: Office of the City Attorney
P.O. Box 1890
El Paso, Texas 79950-1890

Invoice#

INV-000513

Invoice Date

12/16/21

Project Name

El Paso Electric, PUC
Docket No. 52195,
Vendor #1000058684,
Tax ID #81-3933909

Task & Date	Hours	Rate	Amount
Review staff testimony and exhibits 11/02/21	3.50	200.00	700.00
Review staff testimony and exhibits 11/04/21	3.25	200.00	650.00
Review discovery, testimony, and exhibits 11/10/21	2.25	200.00	450.00
Review rebuttal testimony and exhibits 11/22/21	2.50	200.00	500.00
Review rebuttal testimony and exhibits 11/29/21	3.50	200.00	700.00
Review rebuttal testimony and exhibits 11/30/21	2.75	200.00	550.00
Total Hours 17.75		Total	\$3,550.00
		Balance Due	\$3,550.00

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

APPLICATION OF EL PASO	§	PUBLIC UTILITY COMMISSION
ELECTRIC COMPANY TO CHANGE	§	
RATES	§	OF TEXAS

AFFIDAVIT OF JAMES Z. BRAZELL
SUPPORTING CITY OF EL PASO'S FIRST SUPPLEMENTAL RATE CASE EXPENSE
FILING

STATE OF TEXAS

COUNTY OF WILLIAMSON

I, James Z. Brazell, state the following facts upon my oath.

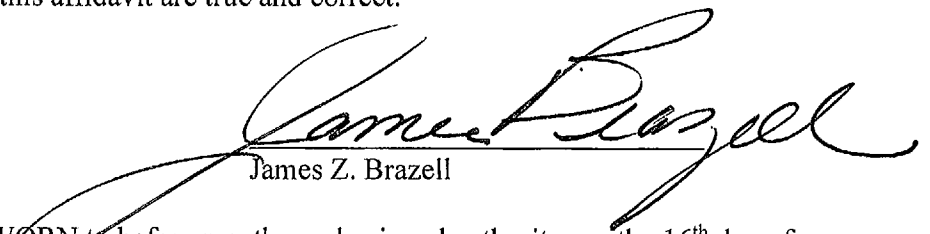
1. My name is James Z. Brazell. I am over eighteen years of age and am not disqualified from making this affidavit.
2. I am the owner of the Law Office of James Z. Brazell. My business address is PO Box 2, Taylor, Texas 76574. I have been retained by the City of El Paso to provide expert testimony and analyses on rate case expenses in this rate proceeding filed by El Paso Electric Company ("EPE" or "Company"), Docket No. 52195.
3. I am giving this affidavit to address the necessity for and reasonableness of my actual fees related charges from October 1, 2021, through November 30, 2021, and estimated expenses through completion of this case.
4. My billing rate for consulting services is \$350 per hour. This is my normal billing rate that I charge for legal and rate case consulting services. This rate is reasonable for a consultant providing these types of services before utility regulatory agencies in Texas and around the country. I have more than 30 years of utility rate regulatory experience providing utility legal and rate consulting.
5. I have included in the following table a summary of hours billed to date, actual charges to date, along with estimates to complete the case.

ACTUAL AND ESTIMATED RATE CASE EXPENSES FOR DANIEL LAWTON

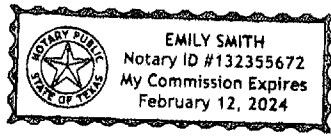
MONTH	HOURS	CHARGES
SEPTEMBER 2021	2.4 Hrs	\$840.00
OCTOBER 2021	77.8 Hrs	\$26,915.00
NOVEMBER 2021	26.7 Hrs	\$9,345.00


TOTAL ACTUAL TO DATE	106.9 Hrs	37,100.00
ESTIMATE TO COMPLETE	15.00 Hrs	5,250.00
TOTAL ACTUAL & ESTIMATE	121.9 Hrs	42,350.00

6. As shown in the above table I have billed a total of 106.9 hours through November 30, 2021, in Docket No. 52195 for the time spent reviewing and analyzing the issues in this case and preparing testimony and analysis on the issues of rate case expenses. An additional 15 hours are estimated to complete necessary tasks through the end of this proceeding. These estimated hours are for the time I estimate working on the case for review of parties' testimony, review of Company rebuttal, and preparation for final hearings and testimony. Based on my experience, this is a reasonable estimate.
7. I have reviewed the actual invoices and there have been no duplicate billings, no billings exceeding 12 hours per day, no out-of-pocket expenses have been billed and as such there are no billings for alcohol or extravagant items such as expensive meals, lodging, or transportation services.
8. The work done by me and submitted in these invoices was necessary and reasonable with respect to both time and amount considering the nature, extent, and difficulty of the work, the originality of the issues presented, including the nature of the issues raised and addressed by the City in this proceeding, and the amount of time spent by and charges by others for work of a similar nature in this and other proceedings.
9. Based on my experience relating to analysis of rate proceeding matters and the reasonableness of rate case expenses before the Public Utility Commission of Texas, I conclude that: (1) my hourly rate is very reasonable; and (2) the actual hours and estimate of additional hours in this case are both necessary and reasonable.
10. I have attached my actual invoices submitted to the City of El Paso for October and November, 2021.
11. The statements made in this affidavit are true and correct.


 James Z. Brazell

SUBSCRIBED AND SWORN to before me, the undersigned authority, on the 16th day of December, 2021, by James Z. Brazell.




Notary Public, State of TEXAS
My Commission Expires: 02-12-2024

**LAW OFFICE OF
JAMES Z. BRAZELL**

P.O. Box 2

TAYLOR, TEXAS 76574

jbrazell@brazelllaw.com 512-658-0830 512-233-0685 FAX

INVOICE

Date: December 15, 2021
Re: Inv21-1763; Consulting services in Oct 2021
From: Law Office of James Z. Brazell; EIN 51-0631337
City of El Paso Vendor No. 1000059002

To: City of El Paso, Texas
Office of the City Attorney
Office of the Comptroller
P.O. Box 1890
El Paso, TX 79950-1890

CityAttorney-AccountsPayable@elpasotexas.gov

Attn: Frances M. Engelbaum
Karla M. Nieman
Angela Riggs

Section 1: Legal Services Rendered

PUC Docket No. 52195, Application of El Paso Electric Company to Increase Rates, Rate Case Expenses Testimony

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charge</u>
10/1/2021	7:30 A to 7:48 A. Reviewed Insurer quote and payment page. Made payment to bind insurance policy for the City.	0.3	\$0.00	\$ -

10/1/2021	7:48 A to 8:12 A. Reviewed e-mails with N. Gordon regarding whether City will review El Paso Electric's rate case expenses. Reviewed Docket Interchange filings to find staff RFIs (RFIs 6 and 11) regarding El Paso Electric's rate case expenses. Drafted and sent email to N. Gordon advising that I had found Staff RFIs regarding El Paso Electric's rate case expenses.	0.4	\$	350.00	\$	140.00
10/1/2021	8:12 A to 8:36 A. Paid binder for insurance coverage. Drafted and sent e-mail to insurer confirming payment and binder. Drafted and send email to N. Gordon and M. Arambula advising that have secured coverage and completed City's requirements for engagement.	0.4	\$	-	\$	-
10/1/2021	1:00 P to 1:12 P. Tel call w insurer to change coverage amt and confirm that policy covers expert testimony. E-mails and tel conf w/ insurer to confirm coverage amt, coverage for E&O for expert witness/consulting. Signed and returned engagement letter to M. Arambula.	0.2	\$	-	\$	-
10/4/2021	2:36 P to 2:48 P. Reviewed rate case expense testimony from other recent dockets to list and confirm needed contents for City of El Paso's testimony.	0.2	\$	350.00	\$	70.00
10/5/2021	8:06 A to 8:18 A. Continued reviewing rate case expense testimony from other recent dockets.	0.2	\$	350.00	\$	70.00
10/6/2021	7:30 A to 11:00 A. Started and continued drafting City of El Paso's RCE testimony draft.	3.5	\$	350.00	\$	1,225.00
10/6/2021	12:00 P to 12:12 P. Drafted and sent an e-mail asking for names of City's attorneys, consultants, and experts to include in draft testimony.	0.2	\$	350.00	\$	70.00
10/6/2021	3:18 P to 6:12 P. Received and reviewed email from N. Gordon with list of City's consultants and attorneys and rates attached. Continued drafting City's draft testimony. Included consultants' and attorneys' names, issues, and rates in draft. Continued drafting testimony draft.	2.9	\$	350.00	\$	1,015.00
10/8/2021	6:24 A to 10:42 A. Continued drafting draft RCE testimony. Reviewed El Paso's rate filing package to evaluate difficulty, complexity, and novelty. Drafted and sent e-mail to N. Gordon and M. Arambula asking for more data, invoices, or other data to incorporate into draft testimony. Continued reviewing EPE's rate filing to determine difficulty, complexity, and novelty. Continued reviewing other recent rate case expense filings to determine current Commission requirements and standards and practices.	4.3	\$	350.00	\$	1,505.00
10/10/2021	7:42 A to 8:36 A. Continued drafting draft testimony text. Reviewed text of draft to include additional discussion needed.	0.9	\$	350.00	\$	315.00
10/11/2021	1:30 P to 2:48 P. Drafted draft affidavit for N. Gordon. Continued drafting draft testimony.	1.3	\$	350.00	\$	455.00
10/12/2021	8:06 A to 2:24 P. Reviewed N. Gordon e-mail with list of prior El Paso dockets with RCE to be recovered in this case. Reviewed filings supporting RCE in these additional dockets. Revised draft testimony to include these additional dockets, amounts, and basis of approval. Reviewed and drafted N. Gordon declaration/affidavit. Drafted and sent e-mail with questions.	6.3	\$	350.00	\$	2,205.00

10/13/2021	10:54 A to 11:36 A. Tel. conf. w/ N. Gordon ref responses to questions regarding invoices, non-duplication of attorneys' duties, seeking review of experts' work.	0.7	\$	350.00	\$	245.00
10/13/2021	4:48 P to 5:18 P. E-mails to/from City of El Paso ref additional invoices and locating attorneys' invoices. 6:18 P to 9:30 P. Continued reviewing data to determine compliance with RCE standards. Filled out protective order certificate and sent to N. Gordon. Sent N. Gordon e-mail ref seeking N. Gordon invoices at City. Revised text of draft RCE testimony to include tables for five dockets and totals.	0.5	\$	350.00	\$	175.00
10/14/2021	Reviewed collected and organized experts' RCE invoices. Noted issues in Pay vouchers. Drafted and sent e-mails to N. Gordon and M. Arambula ref information collected and reviewed and information needed and not yet received. Continued drafting draft testimony including tables for additional dockets to correctly reflect inclusion of additional dockets.	3.2	\$	350.00	\$	1,120.00
10/15/2021	7:30 A to 8:18 A. Created and collected exhibits for draft rate case expense testimony.	0.8	\$	350.00	\$	280.00
10/15/2021	9:48 A to 2:06 P. Continued reviewing data to determine compliance with RCE standards. Continued creating organizing and saving attachments for RCE testimony. Tel. confs/ w/ all witnesses to determine if have all invoices, any additional invoices, applying same standards as in past testimony. E-mails and tel conf/ w N. Gordon and M. Arambula ref obtaining copies of N. Gordon invoices and addressing issues in payment vouchers.	4.3	\$	350.00	\$	1,505.00
10/15/2021	3:34 P to 4:24 P. Continued reviewing data to determine compliance with RCE standards. Continued collecting and adding invoices to exhibits. Revised draft testimony schedules and tables to reflect information obtained.	0.8	\$	350.00	\$	280.00
10/16/2021	9:00 A to 3:24 P. Continued reviewing data to determine compliance with RCE standards. Continued preparing testimony, exhibits, and summary tables. Continued completing exhibits, filling out summary tables with data from invoices, and entering data in draft testimony.	6.4	\$	350.00	\$	2,240.00
10/16/2021	5:32 P to 6:36 P. Continued reviewing data to determine compliance with RCE standards. Continued preparing testimony, exhibits, and summary tables.	1.1	\$	350.00	\$	385.00
10/18/2021	9:00 A to 1:54 P. Collected and organized data into Excel sheets to total and tabulate amounts for lawyers, consultants for 52195 and five remaining dockets. Reviewed tabulated and totaled data from 52195 and five remaining dockets. Reviewed invoices from all dockets for inclusion in draft testimony tables. Responded to tel conf w/ F. Engelbaum ref revised invoices. Drafted and sent copies of invoices and summary. Tel. Conf. w/ K. Nalepa ref 41398 invoices.	4.9	\$	350.00	\$	1,715.00
10/18/2021	El Paso. Tel conf. w/ S. Norwood ref obtaining his invoices. Tel. conf. w/ N. Gordon ref anticipated completion of draft testimony, obtaining his invoices, and delivering draft for review.	0.6	\$	350.00	\$	210.00
10/18/2021	3.5 hrs. Rec'd and rev'd e-mail from S. Norwood and N. Gordon with invoices attached.	0.7	\$	350.00	\$	245.00

10/19/2021	7:00 A to 10:30 A. Continued adding summing and reviewing data from experts' invoices. Added missing invoices. Revised draft to reflect added data. Continued completing tabulations of RCE for totals to include in text.	3.5	\$	350.00	\$	1,225.00
10/19/2021	12:24 P to 3:00 P. Continued revising draft testimony, including attachments and invoices in attachments, and totaling and noting value of requests.	2.6	\$	350.00	\$	910.00
10/19/2021	5:30 P to 8:24 P. Continued making final revisions and corrections to draft testimony to submit draft to client tomorrow.	2.9	\$	350.00	\$	1,015.00
10/20/2021	7:24 A to 11:30 A. Continued revising draft RCE testimony. E-mailed consultants requesting estimate of charges to complete. Rec'd rev'd and respn'd to N. Gordon e-mail with Declaration attached. Continued revising summary tables and invoice compilations to add additional informing provided by consultants.	4.1	\$	350.00	\$	1,435.00
10/20/2021	12:00 P to 2:24 P. Continued revising and updating draft testimony.	2.4	\$	350.00	\$	840.00
10/20/2021	3:42 P to 7:18 P. Organized separated and consolidated .pdf of attachments and exhibits. Consolidated .pdf of testimony text and attachments and exhibits for delivery to N. Gordon.	3.6	\$	350.00	\$	1,260.00
10/21/2021	8:06 A to 10:36 A. Reviewed draft testimony checking math and tables. Corrected quantities & values in tables and sent e-mail to N. Gordon advising. Reviewed draft to find errors and make corrections.	2.5	\$	350.00	\$	875.00
10/21/2021	11:30 A to 1:24 P. E-mails to/from N. Gordon with revised Declaration and new figures. Ran new numbers and replaced outdated values in all slots in draft. Organized Exhibits 3 and 4.	1.9	\$	350.00	\$	665.00
10/21/2021	4:30 P to 6:06 P. Prepared final .pdfs of testimony filings. Cleared changes w/ N. Gordon. Revised .pdfs and saved changes. Sent to N. Gordon for review and approval.	1.6	\$	350.00	\$	560.00
10/22/2021	7:42 A to 9:18 A. Prepared single .pdf for filing. Added page borders and corrected page numbering. Added N. Gordon September invoice. E-mails and tel. conf w/ N. Gordon ref current versions, uploaded to Dropbox and determined whose office files.	1.6	\$	350.00	\$	560.00
10/22/2021	10:48 A to 11:30 A. Continued to complete revise and correct draft testimony to prepare for filing. Combined draft and exhibits into single .pdf for filing. Saved to Dropbox. Forwarded copies to N. Gordon. Continued to review draft to identify needed corrections.	0.7	\$	350.00	\$	245.00
10/22/2021	1:00 P to 1:48 P. Filed rate case expense testimony. Forwarded copies of PUC e-mail confirmations to N. Gordon. Reviewed filings.	0.8	\$	350.00	\$	280.00
10/24/2021	9:24 P to 10:00. Rec'd and rev'd e-mail from N. Gordon ref requirement to file workpapers on Monday. Reviewed workpaper filing requirements. Reviewed items needed to be included in workpapers.	0.6	\$	350.00	\$	210.00

10/25/2021	7:30 A to 10:54 A. Prepared J. Brazell RCE workpapers. Saved to single .pdf for filing. Filed workpapers. Saved to Dropbox to transmit to N. Gordon. Checked Interchange to determine workpapers filed without error in transmission.	3.4	\$	350.00	\$	1,190.00
10/29/2021	1:42 P. to 2:12 P. Rec'd and rev'd Staff witness A. Givens' testimony on rate case expenses. Reviewed cited pages of Brazell testimony. Drafted and sent e-mail to N. Gordon ref. responding in cross rebuttal.	0.5	\$	350.00	\$	175.00
Total		77.80			\$	26,915.00

Section 2: Out of Pocket Expenses & Reimbursable Charges

Date	Vendor / Services	Hours	Rate	Charge
10/1/2021	NA (No Expenses)	NA	NA	NA
Total Expenses & Reimbursable Charges				NA

Section 3: Summary of Charges

Outstanding Charges/Credits		
Date	Invoice/Payment	
10/19/2021	Inv21-1760; Legal services in Sep 2021	\$ 840.00
11/16/2021	Payment: Direct Deposit	\$ (840.00)
Outstanding Charges/Credits		\$ -
Current Charges		
12/15/2021	Inv21-1763; Consulting services in Oct 2021	\$ 26,915.00
	Expenses/Reimbursable charges (see above)	NA
Current charges		\$ 26,915.00
Outstanding charges/(credits) (from above)		\$ -
Total due		\$ 26,915.00

Please remit within 15 days of receipt to:

Law Office of James Z. Brazell
P.O. Box 2
Taylor, Texas 76574

Note(s):

Retainer Summary/Balance

	\$0.00	\$ -
Current retainer balance		\$ -

**LAW OFFICE OF
JAMES Z. BRAZELL**

P.O. Box 2

TAYLOR, TEXAS 76574

jlbrazell@brazelllaw.com 512-658-0830 512-233-0685 FAX

INVOICE

Date: December 15, 2021
Re: Inv21-1767; Consulting services in Nov 2021
From: Law Office of James Z. Brazell; EIN 51-0631337
City of El Paso Vendor No. 1000059002

To: City of El Paso, Texas
Office of the City Attorney
Office of the Comptroller
P.O. Box 1890
El Paso, TX 79950-1890

CityAttorney-AccountsPayable@elpasotexas.gov

Attn: Frances M. Engelbaum
Karla M. Nieman
Angela Riggs

Section 1: Legal Services Rendered

PUC Docket No. 52195, Application of El Paso Electric Company to Increase Rates, Rate Case Expenses Testimony

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charge</u>
11/8/2021	9:42 P to 10:18 P. El Paso. Rev'd A. Givens' (Staff) testimony. Identified issues for inclusion in cross rebuttal testimony. Reviewed procedural schedule and discovery on CEP testimony. Prepared e-mail to CEP witnesses and counsel to request supporting data for Staff adjustments.	0.9	\$350.00	\$ 315.00
11/9/2021	6:54 A to 8:12 A. El Paso. Reviewed A. Givens' testimony. Extracted relevant pages. Created attachment showing items that Staff claims that require support. Drafted and sent e-mail to M. Garrett, M. Arambula, N. Gordon, and F. Engelbaum ref seeking support to include in cross rebuttal.	1.3	\$ 350.00	\$ 455.00

11/9/2021	10:48 A to 11:12 A. El Paso. Tel. conf. vm w/ M Garrett and N Gordon ref follow up calls to discuss cross rebuttal and seeking additional support for RCE disallowed in A. Givens' testimony.	0.4	\$	350.00	\$	140.00
11/12/2021	11:48 A to 1:18 P. El Paso. Reviewed issues to prepare for call w/ N. Gordon ref cross rebuttal. Tel. conf. w/ N. Gordon ref issues in cross rebuttal. Started drafting cross rebuttal testimony.	1.5	\$	350.00	\$	525.00
11/15/2021	1:42 P to 2:48 P. El Paso. Continued drafting cross rebuttal testimony.	1.1	\$	350.00	\$	385.00
11/15/2021	5:00 P to 6:24 P. El Paso. Continued drafting cross rebuttal testimony.	1.4	\$	350.00	\$	490.00
11/16/2021	9:24 A to 2:42 P. El Paso. Continued drafting cross rebuttal testimony. Completed draft. Sent to N. Gordon for review. Tel. conf. w/ consultants to determine estimates for appeal. Added consultants' info into draft.	5.3	\$	350.00	\$	1,855.00
11/18/2021	12:18 P to 2:30 P. El Paso. Tel. conf. w/ N. Gordon. Rec'd N. Gordon's comments to draft cross rebuttal testimony. Made revisions consistent w/ comments. Rec'd rev'd resp'd to e-mails and tel. conf. ref supplemental invoice, declaration, and summary sheets for amounts requested for Docket No. 49395.	2.2	\$	350.00	\$	770.00
11/18/2021	4:12 P. to 8:54 P. El Paso. Rec'd N. Gordon supplemental invoice, declaration ref Docket No. 49395. Revised draft cross rebuttal to incorporate supplemental information throughout draft testimony. Sent revised draft back to N. Gordon for review.	4.7	\$	350.00	\$	1,645.00
11/19/2021	8:24 A to 1:48 P. El Paso. E-mails to from N Gordon ref any changes to draft testimony. Made revisions proposed in N. Gordon e-mails. Prepared draft for filing. Revised calculations to reflect adjustments. Filed draft, obtained proof of filing, and circulated draft to N. Gordon to be served.	5.4	\$	350.00	\$	1,890.00
11/22/2021	7:48 A to 10:00 A. El Paso. Prepared cross rebuttal workpapers. Saved workpapers and sent to N. Gordon w/ e-mail. Tel. conf. w/ N. Gordon ref workpapers and issues raised in other parties' cross rebuttal.	2.2	\$	350.00	\$	770.00
11/30/2021	.3 hr. El Paso. Drafted and sent e-mail to N. Gordon inquiring whether to seek to file invoice updates on December 1 (Wednesday) and recommendations regarding collection of data, documents, and invoices.	0.3	\$	350.00	\$	105.00
Total		26.70			\$	9,345.00

Section 2: Out of Pocket Expenses & Reimbursable Charges

Date	Vendor / Services	Hours	Rate	Charge
11/1/2021	NA (No Expenses)	NA	NA	NA
Total Expenses & Reimbursable Charges				NA

Section 3: Summary of Charges

		Outstanding Charges/Credits	
Date	Invoice/Payment		
10/19/2021	Inv21-1760; Consulting services in Sep 2021	\$	840.00
11/16/2021	Payment: Direct Deposit	\$	(840.00)
12/15/2021	Inv21-1763, Consulting services in Oct 2021	\$	26,915.00
NA	Payment: (Not due at time of issuance of this invoice - Oct & Nov invoices submitted same date)	\$	-
Outstanding Charges/Credits		\$	26,915.00

		Current Charges	
12/15/2021	Inv21-1767; Consulting services in Nov 2021	\$	9,345.00
	Expenses/Reimbursable charges (see above)		NA
Current charges		\$	9,345.00
Outstanding charges/(credits) (from above)		\$	26,915.00
Total due		\$	36,260.00

Please remit within 15 days of receipt to:

Law Office of James Z. Brazell
P.O. Box 2
Taylor, Texas 76574

Note(s):

Retainer Summary/Balance			
		\$0.00	\$ -
Current retainer balance			\$ -