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

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

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

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

The City of El Paso files this supplemental Response to TIEC RFI 2-1

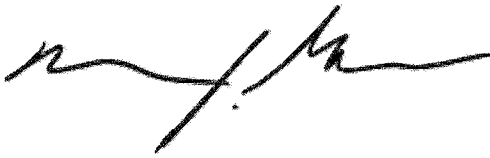
Dated: January 4, 2022.

Respectfully submitted,

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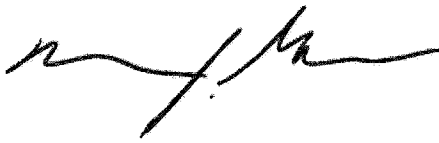
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Certificate of Service

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 January 4, 2022.



Norman J. Gordon

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

RESPONSE:

- (a) Admitted.

Supplemental Response: A corrected model has been prepared to support Errata Schedules CJ-3 and CJ-5. The corrected model does not change the allocation of fuel expenses in EPE's Regulatory Case Working Model.

- (b) Denied. Mr. Johnson used the Company regulatory model, and adjusted allocation factors and made other allocation modifications permitted in the model. The DEC Component

Allocation sheet in the model identifies E1FUEL as the allocation applied to fuel revenues. For this reason, Mr. Johnson cannot agree with this statement.

Supplemental Response: After additional review, the DEC Component Allocation sheet does not appear to modify the Rate Class Allocation sheet. Therefore, the model has been corrected as described in the supplement response to sub-part (a) above

(c) Cannot admit or deny. Mr. Johnson has not performed a comparison that identifies reconcilable fuel expense amounts produced by the model in relation to the amounts of reconcilable fuel revenue allocated to Other Operating Revenues.

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

Supplemental Response: Corrected schedules and workpapers have been prepared.

(e) Admitted in part. The model which was included in confidential workpapers contained an error in the allocators for this class. The error was partially due to a cell reference to EPE Schedule P-7

(f) Supplemental Response: Corrected schedules and workpapers have been prepared and filed.

Prepared and Sponsored By: Clarence Johnson