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

CITY OF EL PASO’S SUPPLEMENTAL STATEMENT OF POSITION

Pursuant to PUC Procedural Rule §22.124, the City of El Paso, Intervenor, (“City”) files this supplemental statement of position prior to the Hearing in the above styled and numbered docket.

The City’s basic position in the case is outlined in the direct testimony of its witnesses filed on October 22, 2021 and its cross-rebuttal testimony filed on November 19, 2021. However, since the time of the City’s direct case, an issue relevant to Preliminary Order Issues 41 and 43, transmission revenues and expenses (addressed in El Paso Electric’s (“EPE”) supplemental testimony filed on August 6, 2021 has arisen and changed. On October 29, 2021 El Paso Electric filed proposed revisions and increases to its Open Access Transmission Tariff docketed in FERC Docket No. ER-22-282-000 seeking an increase of \$16,647,129 in revenues based on a 2020 test year. On December 30, 2021, the FERC issued an order (177 FERC ¶61,228) which allowed EPE to start collecting those charges effective January 1, 2022. Since, the issue of the credits for those charges is an issue in the case, and the FERC tariff has changed, appropriate treatment and amounts for those credits is now an issue in this docket. Accordingly, the amount of the credit shown in EPE’s calculation of the revenue requirement (Other Revenues e.g. Schedule A, Schedule Q.07 line 384 and elsewhere should be adjusted to reflect the new/current OATT FERC revenues). This change is in addition to the issues and positions taken by the City in its pre-filed direct and cross-rebuttal testimony as corrected.

The City also reserves the right to address issues raised by other parties in the proceeding.

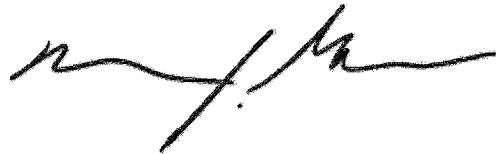
Dated: January 5, 2022

Respectfully submitted,

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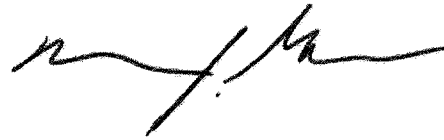
Attorneys for the City of El Paso



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 January 3, 2022.

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

Norman J. Gordon