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

VINTON STEEL, LLC’S
FIRST REQUESTS FOR INFORMATION
ON EL PASO ELECTRIC COMPANY

COMES NOW Vinton Steel, LLC (“Vinton Steel”) and requests that El Paso Electric Company (“EPE”) answer the following questions under oath. Please present your response in accordance with the requirements of P.U.C. PROC. R. 22.144(c)(2). State the name of the witness in this matter who will sponsor the answer to the question and can vouch for the truth of the answer. The answer should be filed under oath, or the responding party should stipulate in writing that the answer can be treated by all parties as if filed under oath. The response is requested within twenty (20) calendar days. EPE is under a continuing obligation to supplement or amend as needed in accordance with P.U.C. PROC. R. 24.144.

These RFIs are intended to not be duplicative of other discovery propounded by any other party, therefore to the extent any information requested herein is found in responses to other discovery, EPE’s response should so state rather than producing additional responses. If any information sought herein has already been filed in the Docket then reference to the location of that information is a sufficient response.

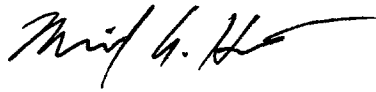
Provide your response to the undersigned counsel at the address and email listed below and submit an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, Suite 8-100, Austin, Texas 78701.

These requests are not intended to seek, and should be read as expressly excluding, privileged information or documents. Should any information be withheld from a response, please state in that response that you are withholding information or materials and the privilege(s) asserted.

Respectfully Submitted,

LAW OFFICE OF MIGUEL A. HUERTA, PLLC
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By:



Miguel A. Huerta
State Bar No. 00787733

ATTORNEYS FOR VINTON STEEL LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July, 2021 a true and correct copy of the above and foregoing document is being served via electronic mail, facsimile, U.S. mail and/or hand delivery to all parties of record.



Miguel A. Huerta

Definitions

“You” and “Your” refers to El Paso Electric Company (“EPE”), the Applicant in PUC Docket No. 52195.

“El Paso Electric Company” or “EPE” or “the Applicant” refers to its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of EPE.

“Vinton Steel, LLC” or “Vinton Steel” refers to its officers, employees, agents, representatives, attorneys, and all other natural persons, businesses or legal entities, presently or formerly, acting in concert with, under the direct or indirect control of, or on behalf of Vinton Steel.

The term **“Commission”** refers to the Public Utility Commission of Texas, an administrative agency of the State of Texas, and its Staff and Commissioners, natural persons employed by and working for the agency.

The term **“Staff”** as used herein refers to the natural persons employed by and working for the Public Utility Commission of Texas in any capacity.

"Document" and "Documents" are used herein in their broadest sense as set forth in Tex. R. Civ. P. 192.3(b), and specifically include electronic information or magnetic data as described in Rule 196.4. These words mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, both original and copies, and all attachments and appendices. Without limiting the foregoing, the terms "Document" and "Documents" shall include all agreements, contracts, Communications, correspondence, letters, opinion letters, telegrams, telexes, telefaxes, messages, memoranda, records, reports, books, summaries or other records of telephone conversations or interviews, summaries or other records of personal

conversations or interviews, minutes, summaries, or other records of meetings and conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants' and experts' reports, appraisals, bulletins, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs and data compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, magnetically-stored, optically-stored, or electronically stored matter and Electronic Information, however produced, prepared, reproduced, disseminated, made or stored in any data source. The words "Document" and "Documents" also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that do not contain any markings, additions, or deletions that are different from the original do not have to be separately produced.

The term "**Communication**" includes, without limitation of its generality, statements, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by any media such as intercoms, telephones, television, radio, or computer including electronic information.

The term **“Electronic Information”** includes, without limitation, the following: databases, data files, program files (e.g. DOC, XLS, WPD files), image files (e.g. JPEG, TIFF, PDF files), email messages and files, voice mail messages and files, instant messaging messages, text messages, temporary files, system-history files, deleted files or emails, back up files and archival files, website files, website information stored in textual, graphical or audio format, cache files, and cookies stored in any Data Sources in EPE’s possession or control.

The term **“Data Sources”** includes, without limitation, mainframe computers, network servers, internet (“web”) servers, computers (including desktop, laptop and handheld computers), hard drives (including portable or temporary hard drives), flash drives (including thumb drives, secure digital cards or other flash memory devices), email servers, handheld devices like personal digital assistants and cell phones or smart phones (e.g. iPhones, BlackBerrys).

The terms **"relate" or "relating"** to any given subject, when used to specify a document, communication, statement, or correspondence mean any document, communication, statement or correspondence that constitutes, contains, evidences, embodies, reflects, identifies, states, discusses, refers to, deals with, or is in any manner whatsoever pertinent to that subject.

The term **“identify,” when used in reference to a natural person** means to provide his or her (1) full name and (2) present or last known position or business affiliation, job title, employment address, and telephone number.

The terms **"identify" and "describe," when used in reference to facts, an event, or an allegation**, means to include: (a) a detailed description of the facts, events, or allegation at issue; (b) the date or dates on which the facts or event occurred, or the time period involved in the events giving rise or relating to the allegation; (c) the name, address, telephone number, and affiliation of all persons involved in the facts, event, or allegation; and (d) the date, author,

addressee or recipient, and type of document of any document relating to or concerning the event or allegation.

The term “**EPE Application**” means the Application of El Paso Electric Company to Change Rates, filed at the Public Utility Commission of Texas on June 1, 2021, PUC Docket No. 52195.

**VINTON STEEL, LLC'S FIRST REQUEST
FOR INFORMATION TO EL PASO ELECTRIC COMPANY**

- 1-1 Please refer to the testimony of James Schichtl, page 6, lines 16-18. How does the method to determine the revenue requirement in this case differ from the method adopted in prior cases? Also, if there are differences, please explain why they are proposed in this case?
- 1-2 Please refer to the testimony of James Schichtl, page 7, lines 26-27. What is EPE's plan for proposing a GCRR?
- 1-3 Please refer to the testimony of James Schichtl, page 17, lines 26-29. How will the \$21 million credit that will be paid over a 3-year period be allocated to the various retail classes of service?
- 1-4 Please provide the duration of each interruption that was ordered under the Noticed Interruptible Tariff from 2016 through 2020 (5 years), by year.
- 1-5 Please provide the amount of mW load that was curtailed through the Noticed Interruptible Tariff over the period of time from 2016 to 2020 for each interruption.
- 1-6 Has EPE investigated the level of price elasticity related to the increase in prices of all electric rates, including the Noticed Interruptible Tariff? If so, please explain, in detail.
- 1-7 Please refer to the testimony of James Schichtl, page 35, lines 18-24. Mr. Schichtl uses the phrase "the interruptible program is justified in the near-term." Please explain, in detail, whether Mr. Schichtl believes that the interruptible program is not or is also justified in the long-term and the reasons for his position.
- 1-8 Refer to the testimony of Mr. Schichtl, page 38, lines 24-26. Mr. Schichtl discusses rate shock and gradualism. Please explain whether his consideration of "gradualism" includes only base rate changes, or does he include the rate shock that includes fuel and base rate changes in his consideration?
- 1-9 Please provide the total changes to rates (by dollars and percentages), including fuel and other adjustment factors, over the past three years, by rate class.
- 1-10 In preparing EPE's demand growth projections, please describe how service to customers taking power under the noticed interruptible tariff is accounted for and provide all documents related to this response.
- 1-11 Please describe how the demands for power imposed by noticed interruptible customers are treated by EPE when making short and long-term demand projections.
- 1-12 Please identify the amount of noticed interruptible customer demands that are included in EPE's demand growth projections, by year.

- 1-13 Please refer to the testimony of Manuel Carrasco, page 62, lines 28-31, referring to the Interruptible Service Rate. Mr. Carrasco states, in part, that “the Company is proposing to reopen this rate schedule to additional customers as a means of securing additional resources for purposes of meeting the demands of EPE’s peak load...”. Please identify the amount of interruptible capacity EPE expects to acquire over the next three years.
- 1-14 Please refer to the testimony of Manuel Carrasco, page 62, lines 6-11. EPE proposes to increase the demand charges in Rate 38 while lowering the energy charges. What is the average load factor of existing Rate 38 customers? Please explain whether Rate 38 customers with lower monthly load factors will experience a smaller rate increase as compared to the overall average increase to the interruptible class of customers?
- 1-15 Please refer to the proposed DCRF and TCRF. Please identify the projected investments in distribution and transmission plant over the next ten years with the investments split into the Texas and New Mexico jurisdictions.
- 1-16 On page 62 of Mr. Carrasco’s testimony, line 28-31, he states that EPE is re-opening the Interruptible Service Rate to secure additional resources “until after the new resources...begin commercial operation.” If EPE plans to modify or eliminate Rate 38 after the new resources are operational, please explain in detail, including a time-line of expected dates and any related documents, EPE’s plans to modify or eliminate Rate 38.
- 1-17 Please refer to the proposed Rate 30. The tariff states that the on-peak period shall be from 12:00 PM through 6:00 PM, Monday through Friday. If legal holidays are considered off –peak, please provide a list of those holidays.
- 1-18 Please refer to the testimony of Manuel Carrasco, page 11, lines 20-26. EPE made a reduction in base revenues of \$1,212,341 due to non-compliance of provisions in the interruptible rate. From what rate class was that reduction made?
- 1-19 Please refer to Table MC-8 on page 16 of Mr. Carrasco’s testimony. Explain why some of the rate classes have a “Cap/Floor Revenue Increase” greater than 1.5 times the system average increase.
- 1-20 Refer to Exhibit MC-6, page 8 of 11. Please provide a detailed explanation, with any related documents, as to why every rate component in the proposed Rate 30-Electric Furnace tariff has a proposed base rate percentage increase significantly higher than 1.5 times the system average (with the exception of the customer charge).
- 1-21 Please refer to Mr. Carrasco’s direct testimony, page 56, lines 27-30. How was the on-peak hours of noon through 6:00 PM determined? Provide all calculations and statistics to support your answer.

- 1-22 Mr. Carrasco states that Rate 30 will not be eliminated in this proceeding in accordance with commitments made in Docket No. 49849. Does EPE have any plans to eliminate Rate 30 in future rate proceedings? Please explain your position in detail.
- 1-23 Please refer to Mr. Carrasco's direct testimony, page 57, line 28. How was the "incremental capacity cost" determined? Please provide all work papers, documents, and studies that show the calculation of the incremental capacity cost.
- 1-24 How many customers on the EPE system have expressed interest in taking power under Rate 38? How much load is expected to be served under Rate 38 by those interested customers?
- 1-25 Please refer to Mr. Carrasco's direct testimony, pages 61-62. Please describe the "rate moderation adjustments" that have been filed in both Texas and New Mexico.
- 1-26 Please refer to Mr. Carrasco's direct testimony, page 62 lines 16-23. Mr. Carrasco states that interruptible customers will not decide to leave the rate because the average charge under the proposed Rate 38 is lower than firm service. In estimating how customers may react to the proposed increases in Rate 38, has Mr. Carrasco taken into account the costs that individual end-use interruptible customers may bear due to the lower quality of service under Rate 38? Please explain your answer in detail.
- 1-27 Please refer to Exhibit B, page 1 of 1, of the rate filing package. Provide the "Present Revenue", by class of service, for each calendar year from 2016-2020, showing the fuel revenue that was collected during each of those years.
- 1-28 Please refer to the testimony of Adrian Hernandez, page 26, lines 14-18. Provide a comparison of the RATEBASE allocator, by class, used in this case to the D2PROD allocator.
- 1-29 Provide all of the studies, work papers, and any other documents that support the demand and energy charges proposed for Rate 38, Noticed Interruptible Power Service.