



## Filing Receipt

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**PUC DOCKET NO. 52195**  
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**APPLICATION OF EL PASO  
ELECTRIC COMPANY TO  
CHANGE RATES**

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**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

**THE UNIVERSITY OF TEXAS AT EL PASO'S FIRST  
REQUEST FOR INFORMATION TO EL PASO ELECTRIC COMPANY**

In connection with the Application filed by El Paso Electric Company ("EPE"), by and through its attorney of record, the University of Texas at El Paso ("UTEP") requests the following information within twenty (20) days of receipt of these requests. It is further requested that the answers to the requests for information be made under oath and that each item of information be made available as it is completed, rather than upon compilation of all information requested. Each answer should identify the person responsible for preparing that answer (other than the purely clerical aspects of its preparation) and the name of the witness in this proceeding who will sponsor the answer and who can vouch for its accuracy. These requests are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by you, such changed answer should be submitted immediately as supplement to your original answer.

**Definitions and Explanatory Notes**

1. When a request calls for identification of a "person or witness," the identification shall include a full name, business address and business telephone number. The identification should also include a job title and name of employer.
2. The terms "document" and "documents" are used in their broadest sense and shall mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" and "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of telephone conversations or interviews, summaries or other records of personal conversations, minutes or

summaries or other records of meetings and conferences, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time record, instructions, work assignments, forecasts, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultants' reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analysis, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiche, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained, and other printed, written, handwritten, type-written, recorded, stenographic, computer-generated, computer-stored, or electronically-stored matter, however, and by whomever produced, prepared, reproduced, disseminated, or made. The terms "non-privileged document" and "non-privileged documents" also include all copies of documents by whatever means made, except that where a document is identified or produced, identical copies thereof which do not contain any markings, additions, or deletions different from the original need not be separately produced.

3. If any of the information requests is available in machine-readable form (such as paper or magnetic tapes, drums, disks or other storage), state the form in which it is available and describe the type of computer or other machinery required to read the information.
4. When a request calls for identification of a "document," the identification should include the following:
  - a. the full name and address of the author(s) by whom the document was written, prepared, recorded or made;
  - b. the date of the document;
  - c. the title and/or 're' of the document;
  - d. the subject matter of the document;
  - e. the full name and address of the recipient and every person who received copies of the document;
  - f. the full name and address of the person who has possession, custody or control of the document, or who is in charge of maintaining the document; and
  - g. if the document has been lost, shredded or destroyed (whether intentionally or unintentionally) an explanation of the reasons for and causes of such loss, shredding or destruction.
5. The term "studies" includes any document, as defined herein, which reflects or was utilized in the collection, evaluation, analysis, summarization or characterization of information with the subjects referred to in this proceeding.

6. The term “El Paso Electric” and/or “EPE” includes El Paso Electric Company and all of its agents, employees, parent companies, subsidiaries, affiliates, predecessors, successors, or assigns.

Respectfully submitted,

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By: /s/ Alton J. Hall, Jr.

Alton J. Hall, Jr.

**ATTORNEYS FOR  
THE UNIVERSITY OF TEXAS AT EL PASO**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 23, 2021, a true and correct copy of the foregoing document was served via-email upon on all parties of record.

/s/ Alton J. Hall, Jr.

Alton J. Hall, Jr.

## **FIRST REQUEST FOR INFORMATION**

- 1-1. Please refer to page 9 of 45 of Mr. Adrian Hernandez's direct testimony and provide responses to the following:
  - a. Identify the non-peaking generation facilities that EPE proposes allocating their demand related costs among EPE's jurisdictions based on the 4CP-A&E methodology.
  - b. Explain how EPE determines that the generation facilities identified in (a) are non-peaking generation facilities.
  - c. Provide the reasons why EPE proposes allocating demand related costs for these non-peaking generation facilities among jurisdictions based on the 4CP-A&E methodology.
  
- 1-2. Please refer to page 10 of 45 of Mr. Adrian Hernandez's direct testimony and provide responses to the following:
  - a. Explain how EPE determines that the generation facilities listed on line 6 through line 8 are peaking generation facilities.
  - b. Provide the reasons why EPE proposes allocating demand related costs for these peaking generation facilities among jurisdictions based on the 4CP methodology.
  
- 1-3. Please refer to pages 10 and 11 of Mr. Adrian Hernandez's direct testimony and provide responses to the following:
  - a. Has PUCT approved a 4CP methodology to allocate demand related costs of any generation facilities in its previous Texas rate cases? If so, please identify the docket numbers of these rate cases.
  - b. Has PUCT approved using a 4CP methodology to allocate demand related costs of peaking generation facilities and a 4CP-A&E methodology to allocate demand related costs of non-peaking generation facilities in any Texas rate cases? If so, please identify the docket numbers of these rate cases.
  
- 1-4. Please refer to page 54 of 85 of Mr. Manuel Carrasco's direct testimony and provide responses to the following:
  - a. How many existing Rate 25 customers have installed Thermal Energy Storage system (TES) on their facilities and are charged based on the TES rider?
  - b. For each customer identified in (a), please explain how they were qualified to use the TES rider.
  - c. Do the customers identified in (a) own the TESs?

- d. Are the load for the TESs metered through the same meter as for the rest of the load for the customer?
  - e. How will new customers be qualified to use the TES rider?
- 1-5. Please refer to page 55 of 85 of Mr. Manuel Carrasco's direct testimony and provide responses to the following:
  - a. Provide a detailed explanation supporting EPE's proposed increases in monthly Customer Charges for Rate 25 customers.
  - b. Provide a detailed explanation supporting EPE's proposed increase in the price differential between Summer and non-Summer monthly Demand Charges for Rate 25 customers.
  - c. Provide a detailed explanation supporting EPE's proposed increase in the price differential between On-Peak Period and Off-Peak Summer Energy Charges for Rate 25 customers.
- 1-6. Please provide all of the information for all of the existing Energy Efficient Programs that are available for Rate 25 customers.
- 1-7. Please provide all of schedules and/or workpaper supporting EPE's responses to this RFI.