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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 SECOND
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 29, 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.

SECOND REQUEST FOR INFORMATION

- 2-1. Please provide the following information for University of Texas at El Paso ("UTEP") accounts by class for the test year:
 - a. Total number of customers;
 - b. Total energy usage;
 - c. Total demand usage;
 - d. Total base rate revenues;
 - e. Total fuel revenues;
 - f. Total revenues;
 - g. Average load factor; and
 - h. Average Power factor.
- 2-2. Please perform a detailed bill impact analysis for UTEP accounts, taking service under the Large Power Service and comparing the rates these accounts are currently paying to the proposed rates.
- 2-3. Please refer to page 6 of 11 of Exhibit MC-6 of Mr. Manuel Carrasco's direct testimony and explain the reasons why the summer on-peak energy charge for Large Power Service at transmission voltage level increases by about 44%, while those for Large Power Service at secondary voltage level and at primary voltage level experience a 0.12% decrease and a 5% increase, respectively.
- 2-4. Please refer to page 6 of 11 of Exhibit MC-6 of Mr. Manuel Carrasco's direct testimony and answer the following questions:
 - a. Explain in detail how the Summer on-peak energy charge and the Summer off-peak energy charge for Large Power Service at transmission voltage level were determined.
 - b. Explain in detail how the Summer on-peak energy charge and the Summer off-peak energy charge for Large Power Service at primary voltage level were determined.
 - c. Explain in detail how the Summer on-peak energy charge and the Summer off-peak energy charge for Large Power Service at second voltage level were determined.
- 2-5. Please refer to page 6 of 11 of Exhibit MC-6 of Mr. Manuel Carrasco's direct testimony and answer the following questions:
 - a. Explain in detail how the Summer demand charge and the non-Summer demand charge for Large Power Service at transmission voltage level were determined.
 - b. Explain in detail how the Summer demand charge and the non-Summer demand charge for Large Power Service at primary voltage level were determined.
 - c. Explain in detail how the Summer demand charge and the non-Summer demand charge for Large Power Service at second voltage level were determined.

- 2-6. Please refer to lines 27 and 28 on page 27 of Mr. Manuel Carrasco's direct testimony and answer the following questions:
- What is the percentage of EPE's incremental capacity cost that EPE uses to develop the TOD on-peak period energy price adder for the Large Power Service at transmission voltage? Explain in detail how the percentage was determined.
 - What is the percentage of EPE's incremental capacity cost that EPE uses to develop the TOD on-peak period energy price adder for the Large Power Service at primary voltage? Explain in detail how the percentage was determined.
 - What is the percentage of EPE's incremental capacity cost that EPE uses to develop the TOD on-peak period energy price adder for the Large Power Service at secondary voltage? Explain explain in detail how the percentage was determined.
- 2-7. Please refer to lines 17 through 28 on page 27 of Mr. Manuel Carrasco's direct testimony and answer the following questions:
- Does EPE have any combustion turbine other than the Rio Grande Unit 9?
 - If the response to (a) is yes, please identify all of EPE's other owned combustion turbines.
 - If the response to (a) is yes, please explain the reasons why EPE uses the Rio Grande Unit 9 to develop the incremental capacity cost, instead of any of EPE's other owned combustion turbines.
- 2-8. Please refer to lines 19 through 22 on page 81 of Mr. Manuel Carrasco's direct testimony and explain in detail how the \$830,360 excess ADIT refund was allocated to each rate class.
- 2-9. Please refer to lines 5 through 19 on page 83 of Mr. Manuel Carrasco's direct testimony and answer the following questions:
- Explain in detail how an allocation of \$2,196,060 COVID-19 related expenses to Texas jurisdiction was determined.
 - Explain in detail how the \$2,196,060 COVID-19 related expense was allocated among Texas Retail rate classes.