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

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

**COMMISSION STAFF’S FIFTH REQUEST FOR INFORMATION TO
EL PASO ELECTRIC COMPANY
QUESTION NOS. STAFF 5-1 THROUGH 5-8**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission’s Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that El Paso Electric Company (EPE) by and through its attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: August 9, 2021

Respectfully submitted,
**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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/s/ Robert Parish
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record on August 9, 2021 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Forrest Smith
Forrest Smith

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DEFINITIONS

- 1) "EPE," "Company," or "you" refers to El Paso Electric Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 5-1** Please provide a copy of all written internal guidelines and procedures for identifying and quantifying expenditures that are classified as COVID-19 expenses and recorded in the requested COVID-19 regulatory asset. If there are no written guidelines, provide a detailed explanation for how the COVID-19 expenses were identified. Please also explain how COVID-19 expenses were classified as such in cases where the same type of expense is also included in the requested revenue requirement.
- Staff 5-2** If individual expenditures were allocated between COVID-19 expenses and non-COVID-19 expenses, on what bases were such allocations made? For each such allocated expenditure, please provide the total expenditure amount, the amount allocated to the COVID-19 regulatory asset, and the amount allocated to non-COVID-19 costs.
- Staff 5-3** Did EPE's internal audit department review the amounts assigned to the requested COVID-19 regulatory asset? If so, provide a copy of the audit report and identify any adjustments made to the requested regulatory asset based on the audit.
- Staff 5-4** Provide a detailed explanation and justification for why expenditures on "accommodations" (beds, washers, dryers, freezers, TVs) were the result of COVID-19 and how these costs are reasonable and necessary costs of COVID-19. Your explanation should include, but not be limited to, information such as who was provided accommodations, for what purpose the accommodations were provided, what alternatives were considered, etc.
- Staff 5-5** Please refer to WP/A-3, Adjustment No. 7, Page 2 of 2. Please provide a detailed explanation and calculation of how the cost savings in column (h) were determined, including how the categories or items of cost savings were identified.
- Staff 5-6** Please refer to WP/A-3, Adjustment No. 7, page 2 of 2, Line 2, Column (b) Palo Verde Costs of \$1,546,840. Please provide a detailed itemization of this amount. What standards did APS use to identify expenses as COVID-19-related and what procedures did EPE follow to determine that the expenses were appropriately identified as related to COVID-19?
- Staff 5-7** Has EPE retired any generating units since the end of the test year in Docket No. 46831? If yes, please provide the name of the unit, the date retired, the gross plant and accumulated depreciation balances at the retirement date, and the journal

entries EPE recorded to reflect the retirements. Please also provide the balance included in rate base at the 12/31/2020 test year end for each retired unit.

Staff 5-8 Please provide a detailed reconciliation of the per book amounts, adjustments, and the adjusted amounts that were reported on WP B-1 Adjustment 3, Reg Assets and Liabilities with the amounts reported on Schedule B-01.01. Please identify each item on WP B-1, Adjustment 3 that is either a rate-case or other regulatory proceeding expense.