



## **Filing Receipt**

**Filing Date - 2023-11-30 02:25:57 PM**

**Control Number - 54614**

**Item Number - 37**

**SOAH DOCKET NO. 473-24-04312  
PUC DOCKET NO. 54614**

<b>APPLICATION OF EL PASO</b>	<b>§</b>	<b>BEFORE THE STATE OFFICE</b>
<b>ELECTRIC COMPANY FOR</b>	<b>§</b>	
<b>APPROVAL OF TEXAS ELECTRIC</b>	<b>§</b>	<b>OF</b>
<b>VEHICLE-READY PILOT</b>	<b>§</b>	
<b>PROGRAMS AND TARIFFS</b>	<b>§</b>	<b>ADMINISTRATIVE HEARINGS</b>

**OFFICE OF PUBLIC UTILITY COUNSEL’S  
FIRST REQUEST FOR INFORMATION TO  
EL PASO ELECTRIC COMPANY**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this First Request for Information to El Paso Electric Company (“EPE”). OPUC requests that EPE provide answers to the request for information under oath as required under 16 TAC § 22.144(c)(1) or within the timeframe specified in the procedural schedule in this proceeding whichever is shorter. OPUC further requests that EPE provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

**Definitions**

1. “EPE,” the “Company,” “Applicant,” “You,” and “Your” refer to El Paso Electric Company and its affiliates, subsidiaries, 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” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial

practice manuals, reports, summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other

than by providing clerical assistance, in the preparation of the answer to the question. If the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

**Claim of Privilege**

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

**SOAH DOCKET NO. 473-24-04312**  
**PUC Docket No. 54614**  
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**El Paso Electric Company**

- 1-1.** Please provide all estimated impacts on monthly and annual kilowatt-hour (“kWh”) sales and system coincident peak (“CP”) demands, Maximum Class Demands (“MCD”) and Non-Coincident Peak Demands (“NCP”) by year for the Texas jurisdiction and by Texas retail class that are expected to occur if the Electric Vehicle (“EV”) Smart Rewards Pilot Program is approved.
- 1-2.** Please provide all estimated impacts on monthly and annual kWh sales and system CP demands, MCD and NCP by year for the Texas jurisdiction and by Texas retail class that are expected to occur if the Whole House EV (“WHEV”) Pilot Incentive Credit Rider is approved.
- 1-3.** Please provide all estimated impacts on monthly and annual kWh sales and system CP demands, MCD and NCP demands by year for the Texas jurisdiction and by Texas retail class that are expected to occur if the PowerConnect Pilot Program is approved.
- 1-4.** Please provide all estimated impacts on monthly and annual kWh sales and system CP demands, MCD and NCP demands by year for the Texas jurisdiction and by Texas retail class that are expected to occur if the Take Charge TX Pilot Program is approved.
- 1-5.** Has EPE performed any studies of the potential impacts on loadings of distribution substations, distribution primary voltage feeders, distribution line transformers, or secondary voltage distribution lines that would result from the additional loads that would be expected to result if the proposed programs are approved? If so, please provide any associated studies or reports.
- 1-6.** Please refer to the Direct Testimony of George Novela, Table 1, page 16, lines 2 – 9. Will EPE maintain separate records of the actual program costs for each of the separate programs that will enable intervenors, the Staff of the Public Utility Commission of Texas (“Staff”), and the Public Utility Commission of Texas (“Commission”) to review the actual costs of each of these programs on an ongoing basis?

**SOAH DOCKET NO. 473-24-04312**  
**PUC Docket No. 54614**  
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- 1-7.** Please refer to the Direct Testimony of George Novela, Table 1, page 16, lines 2 – 9. Does EPE intend to recover the costs for each of these programs entirely from the participants in these programs, or does EPE intend for non-participants to bear some portion of these costs?
- 1-8.** If EPE intends for non-participants to bear a portion of any of the Pilot Program costs referred to in 1-7, please provide an estimate of the portion of the costs EPE expects will be borne by non-participants, and a detailed explanation of how that estimate was developed.
- 1-9.** Will EPE maintain separate accounting for all investment in EV infrastructure and equipment that is purchased, installed and operated by EPE, in whole or part, for customers participating in the proposed Take Charge TX Pilot Program? If so, please provide a detailed description of EPE's proposed accounting for that investment.
- 1-10.** Admit or deny: Under the Take Charge TX Pilot Program, EPE intends to protect non-participating customers from bearing any costs of EV infrastructure and equipment associated with customers who terminate service prior to the end of the contract term or otherwise abandon EV infrastructure and equipment prior to EPE fully recovering the associated costs. If admit, please provide a detailed explanation of all actions or steps EPE will take to protect non-participants from bearing any costs associated with abandoned EV infrastructure and equipment investment.
- 1-11.** Does EPE intend to record the costs for the EPE employees or representatives who consult with potential Take Charge TX Pilot Program customers in unique Federal Energy Regulatory Commission ("FERC") expense accounts and subaccounts, or otherwise maintain records of those costs? Please provide a detailed explanation for EPE's proposed treatment of the costs related to consulting with potential Take Charge TX Pilot Program customers.

Date: November 30, 2023

Respectfully submitted,

Courtney K. Hjältman  
Chief Executive & Public Counsel  
State Bar No. 24070294

*Renee Wiersema*

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ATTORNEYS FOR THE  
OFFICE OF PUBLIC UTILITY COUNSEL

**CERTIFICATE OF SERVICE**  
PUC DOCKET NO. 54659

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 30<sup>th</sup> day of November 2023 by facsimile, electronic mail, and/or first class, U.S. Mail.

*Renee Wiersema*

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Renee Wiersema