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APPLICATION OF EL PASO ELECTRIC COMPANY FOR APPROVAL OF TEXAS ELECTRIC VEHICLE-READY PILOT PROGRAMS AND TARIFFS

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S FIRST REQUEST FOR INFORMATION QUESTION NOS. OPUC 1-1 THROUGH OPUC 1-11

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OPUC 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.

RESPONSE:

EPE does not have estimates 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 its Texas jurisdiction or its Texas retail class that are expected to occur if the Electric Vehicle ("EV") Smart Rewards Pilot Program is approved. Specific estimates for energy and demand impacts have not been made as these values can vary greatly depending on customer enrollment in the program.

The approval and implementation of the pilot program will provide EPE with the information necessary to develop estimates of EV charging characteristics by customer class such as energy usage (kWh), typical charging time, charging duration, coincident peak demand, non-coincident peak demand, and maximum diversified demand.

Preparer:	Eric Galvan	Title:	Engineer – Staff
Sponsor:	George Novela	Title:	Director – Economic and Rate Research
	Angelina Rodriguez	Title:	Supervisor – Electrification

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OPUC 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.

RESPONSE:

Please see EPE's response to OPUC 1-1.

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	Angelina Rodriguez	Title:	Supervisor – Electrification

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OPUC 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.

RESPONSE:

Please see EPE's response to OPUC 1-1.

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OPUC 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.

RESPONSE:

Please see EPE's response to OPUC 1-1.

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OPUC 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.

RESPONSE:

No. EPE has not performed any distribution studies on the load impacts related to the proposed programs. All of the proposed programs are pilot initiatives that will help EPE collect the data that would be needed for such studies.

Preparer:	Edwin Martinez	Title:	Project Manager- Electrification
Sponsor:	Angelina Rodriguez	Title:	Supervisor- Electrification

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OPUC 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?

RESPONSE:

Yes.

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Sponsor: Angelina Rodriguez

Title: Supervisor-Electrification

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OPUC 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?

RESPONSE:

Please refer to the Direct Testimony of George Novela, page 17, lines 10-18.

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OPUC 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.

RESPONSE:

EPE has not quantified an estimate of the portion of the program costs, if any, that would be borne by non-participants. See also EPE's response to OPUC 1-7.

Preparer:	George Novela	Title:	Director – Economic and Rate Research
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OPUC 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.

RESPONSE:

Yes, EPE will use program specific workorder numbers and project codes to keep separate accounting for all investments in EV infrastructure and equipment to ensure that only customers who participate in the proposed Take-Charge TX Pilot Program are paying for those costs. EPE is currently working on the more detailed accounting structure for this program.

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OPUC 1-10:

Admit or deny: Under the Take Charge TX Pilot Program, EPE intends to protect nonparticipating 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.

RESPONSE:

Admit. EPE will use program specific workorder numbers and project codes to keep separate accounting for all investments in EV infrastructure and equipment to ensure that only customers who participate in the proposed Take-Charge TX Pilot Program are paying for those costs. Additionally, as discussed in the Direct Testimony of Angelina Rodriguez, in section VIII. Take Charge TX Pilot Program, customers that participate in the program must execute the program agreement (page 19, Q47) and will be charged a monthly fixed fee on their electric bill for the service to recover the full cost of the equipment and services provided to the customer and to avoid any financial impact to EPE's non-participating customers (page 22, Q59). Further, as indicated in section 5.2 of the customer agreement in the program tariff presented as Exhibit MC-1S to Mr. Carrasco's supplemental direct testimony, customers who terminate service prior to the end of the contract term or abandon EV infrastructure shall pay EPE all costs incurred by EPE to install the facilities equipment up to that point and shall also pay EPE a lump sum equal to the remaining unpaid fees calculated through the end of the contract term.

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Sponsor: Angelina Rodriguez

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OPUC 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.

RESPONSE:

EPE will maintain records for all costs incurred under the Take-Charge TX Pilot program using program specific workorder numbers and project codes. EPE is currently working on the more detailed accounting structure for this program.

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Sponsor:	Angelina Rodriguez	Title:	Supervisor- Electrification