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

STATEMENT OF INTENT AND	§	BEFORE THE STATE OFFICE
APPLICATION OF EL PASO	§	
ELECTRIC COMPANY FOR	§	OF
APPROVAL OF TEXAS ELECTRIC	§	
VEHICLE-READY PILOT PROGRAMS	§	ADMINISTRATIVE HEARINGS
AND TARIFFS	§	

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
EL PASO ELECTRIC COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that El Paso Electric Company by and through its representative of record, provide the following information and answer the following questions under oath. The questions 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 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. 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 Second Order Suspending Rules in Project No. 50664.

Dated: February 2, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

Andy Aus
Managing Attorney

/s/ Anthony Kanalas
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on February 2, 2024, in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ Anthony Kanalas
Anthony Kanalas

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DEFINITIONS

- 1) "EPE" 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) "EV" refers to electric vehicle.
- 3) "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 your 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 1-1** Please refer to page 22 of the Direct Testimony of Angelina Rodriguez. Please provide a detailed cost breakdown for each program summarized in Table 2: Proposed Two-Year Budget for Texas EV-Ready Pilot Programs.
- Staff 1-2** Please provide and explain in detail the costs for the EV-Ready pilot programs that EPE is proposing to recover in this proceeding.
- Staff 1-3** Please provide and explain in detail the costs for EV-Ready pilot programs that EPE is not seeking to recover in this proceeding.
- Staff 1-4** Please provide the estimated costs and a detailed breakdown of the estimated costs for the Whole House EV (WHEV) pilot program.
- Staff 1-5** Please refer to page 15 of the Direct Testimony of Angelina Rodriguez. Please provide the following for EPE's process to select a vendor to implement the EV Smart Rewards pilot program.
- a. The request for proposals (RFP) for software and/or services;
 - b. List of vendors to whom RFP was sent; and
 - c. Selected vendor;
- Staff 1-6** Please admit or deny that EPE will own the software and any related equipment used to implement the EV Smart Rewards pilot program.
- Staff 1-7** Please admit or deny that the software and any related equipment used to implement the EV Smart Rewards pilot program are vehicle-charging facilities or other transportation electrification and charging infrastructure.
- Staff 1-8** Please refer to page 16 of the Direct Testimony of Angelina Rodriguez. Please detail the estimated costs for "utility-side" upgrades necessary to implement the PowerConnect pilot program, if not separately identified and included in the response to Staff 1-1.