



## **Filing Receipt**

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SOAH DOCKET NO. 473-23-04312  
PUC DOCKET NO. 54614

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO  
OFFICE OF PUBLIC UTILITY COUNSEL'S  
SECOND REQUEST FOR INFORMATION  
QUESTION NOS. OPUC 2-1 THROUGH OPUC 2-7

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OPUC 2-1:

Please refer to the Rebuttal Testimony of George Novela (“Novela Rebuttal”) at page 5, lines 8 – 11. Does Mr. Novela believe it is appropriate to provide customers with incentives beyond the levels supported by costs and cost savings? If so, please provide a detailed explanation and full justification for this response.

RESPONSE:

[The referenced pages appear to be incorrect.] The question presumes the levels supported by costs and cost savings are known, which is not the case here since the Company has not yet conducted a managed charging program. When creating novel pilots or programs quantifying costs and cost savings may not be an option and the initial incentives may need to be based on industry best practices. Conducting the proposed pilot program will help the Company be able to identify the costs and cost savings that a full managed charging program may involve and be able to achieve.

Preparer: George Novela

Title: Director- Economic and Rate  
Research

Sponsor: George Novela

Title: Director- Economic and Rate  
Research

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OPUC 2-2:

Please refer to Novela Rebuttal at page 5, lines 8 – 11. Please identify where in EPE's filed direct testimony, exhibits and workpapers, or rebuttal testimony EPE provided data and analysis that proves EPE's proposed incentives for its EV Smart Rewards Pilot Program adequately reflect EPE's costs or cost savings to EPE's customers.

RESPONSE:

[Please see EPE's response to OPUC 2-1 for the page reference error.] The question presumes the levels supported by costs and cost savings are known, which is not the case since the Company has not yet conducted a managed charging program. Please refer to the direct testimony of EPE witness Rodriguez at 14:13-15:10 and the rebuttal testimony of EPE witness Rodriguez at 1:27-3:35 filed in this proceeding, which show EPE's proposed incentives for its EV Smart Rewards Pilot Program are reasonable.

Preparer: George Novela

Title: Director- Economic and Rate  
Research

Sponsor: George Novela

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OPUC 2-3:

Please refer to Novela Rebuttal at page 5, lines 8 – 11. Please identify where in EPE's filed direct testimony, exhibits and workpapers, or rebuttal testimony EPE provided data and analysis that proves EPE's proposed incentives for its WHEV Pilot Incentive Credit Rider adequately reflects EPE's costs or cost savings to EPE's customers.

RESPONSE:

Please refer to the direct testimony of EPE witness Carrasco at 9:10-18 filed in this proceeding, which shows EPE's proposed incentives for its WHEV Pilot Incentive Credit Rider adequately reflects EPE's costs or cost savings to EPE's customers.

Preparer: George Novela

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OPUC 2-4:

Please refer to Novela Rebuttal at page 6, line 30 through page 7, line 8. Is it Mr. Novela's testimony that EPE was not required to provide any analysis or other evidence that EPE's currently effective Off-Peak Water Heating Rider, Experiment Off-Peak Rate Rider, and the Thermal Energy Storage Rider was supported by EPE's costs or cost savings to EPE's customers? If so, please provide complete justification for Mr. Novela's position.

RESPONSE:

No. The purpose of Q13 of my Rebuttal Testimony was to provide examples of rate options and riders that have been previously approved by the Commission that offer a similar incentive basis as the EV Smart Rewards Pilot Program and the WHEV Pilot Incentive Credit Rider.

Preparer: George Novela

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Research

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Title: Director-Economic and Rate  
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OPUC 2-5:

Please refer to the Rebuttal Testimony of Angelina Rodriguez (“Rodriguez Rebuttal”) at page 1, line 27 through page 3, line 2 and Exhibit AR-R-1. Is it Ms. Rodriguez’s position that the costs, rates, and pricing structures of the utilities included in the Smart Electric Power Alliance “Managed Charging Incentive Design” guide and the utilities contained in Table 1 on page 2 of Rodriguez Rebuttal are the same or equivalent to EPE’s costs, rates and pricing structures? If so, please provide a detailed explanation of Ms. Rodriguez’s response and a complete justification for that response.

RESPONSE:

No but the proposed costs and pricing structures of the EV Smart Rewards Pilot Program referenced in my Rebuttal Testimony align with those of utilities included in the Smart Electric Power Alliance “Managed Charging Incentive Design” guide and the utilities found in Table 1 and provide a reasonable starting point for the Company’s pilot program through which actual costs and cost savings may be better identified.

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

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OPUC 2-6:

Please refer to Rodriguez Rebuttal at page 3, lines 10 – 19. Is it Ms. Rodriguez's position that the incentives contained in EPE's Energy Wise Savings Program were not supported by costs or cost savings to EPE's customers? If so, please provide a detailed explanation of Ms. Rodriguez's response and a complete justification for that response.

RESPONSE:

No; however, as indicated on page 6 of 6 of the Company's initial filing in Docket No. 46967, one of the objectives of that pilot project was to "Determine appropriate customer incentive levels." The purpose of Q8 of my Rebuttal Testimony was to provide an example of a program that has been approved by the Commission previously that offers a similar incentive basis as the EV Smart Rewards Pilot Program. As stated in my Rebuttal Testimony, EPE's Energy Wise Savings Program offers an enrollment incentive and an annual incentive. The program allows EPE to actively manage a participating residential customers smart thermostat to mitigate peak loads during time of need.

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



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OPUC 2-7:

Please refer to Rodriguez Rebuttal at page 3, line 10 through page 4, line 1. Is it Ms. Rodriguez's position that EPE's Smart Rewards Pilot Program was designed, developed and proposed as an energy efficiency program? If so, please provide all analysis that proves the proposed incentives contained in the Smart Rewards Pilot Program meets the cost-effectiveness standard for energy efficiency programs pursuant to 16 Texas Administrative Code § 25.181(d).

RESPONSE:

No, EPE's Smart Rewards Pilot Program was not designed, developed, and proposed as an energy efficiency program. Please see Q31 in my Direct Testimony for the objective of the EV Smart Rewards Pilot Program.

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