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**SOAH DOCKET NO. 473-24-04312
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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
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**CITY OF EL PASO'S
STATEMENT OF POSITION**

The City of El Paso, Intervenor, ("City") files this Statement of Position as required by 16 T.A.C. §22.124. The City takes the position that El Paso Electric Company ("EPE") has the burden of proof in this proceeding.

Since a rate is being set in this proceeding, this is a ratemaking proceeding and therefore the City should be allowed to be reimbursed its reasonable rate case expenses that are supported by the Declaration of Norman J. Gordon filed on February 20, 2024. The City's rate case expenses should either be found to be reasonable in this docket or deferred for consideration in EPE's next rate case.

The City is evaluating the issues raised by the parties, including but not limited to the issues of expanding Electric Vehicle infrastructure in the El Paso region and the potential risk of cost shifting to non-participating customers. The City reserves the right to take positions on all issues based on the evidence, to participate in the hearing on the merits and to take additional positions based on the evidence.

Respectfully submitted,

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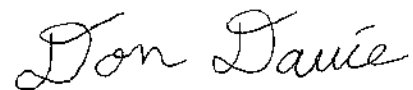
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Attorneys for the City of El Paso



By: _____
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Certificate of Service

I certify that a true and correct copy of the foregoing document was served on all parties of record in this proceeding on this 27th day of March 2024 by facsimile, electronic mail, and/or first class, U.S. Mail.

Don Davie

Donald C. Davie