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PUC DOCKET NO. 54929

APPLICATION OF EL PASO	§	
ELECTRIC COMPANY TO AMEND	§	PUBLIC UTILITY COMMISSION
ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	OF TEXAS
FOR A 150 MW SOLAR FACILITY	§	

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

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STAFF 1-1:

Refer to Direct Testimony of James Schichtl page 33, line 29-31.

- a. Please provide the "older gas-fired units (the retail portion)" being referred to on page 2, line 29-31.
- b. Please provide, in table format, the "older gas-fired units (the retail portion)" including nameplate capacity, unit capacity (owned by EPE), date of commercial operation and the planned retirement date.

RESPONSE:

- a. a. The "older gas-fired units" referenced on page 2, line 31 are Rio Grande Unit 6 and 7, and Newman Unit 1, 2, and 3. The "retail portion" refers to the 100 MW component of the proposed 150 MW solar PV system that is identified earlier in the referenced sentence (page 2, lines 29-31).
- b. Please refer to Staff 1-2, Attachment 1, Rows 2, 3, and 6-8.

Preparer: James Schichtl

Title: VP – Regulatory and Governmental
Affairs

Sponsor: James Schichtl

Title: VP – Regulatory and Governmental
Affairs

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STAFF 1-2:

Please provide, in table format, EPE's existing generation units, including primary fuel type, nameplate capacity, unit capacity (owned by EPE), date of commercial operation and the planned retirement date.

RESPONSE:

Please see El Paso Electric Company's response to STAFF 1-2, Attachment 1.

Preparer: Judith M. Parsons

Title: Regulatory & Resource Strategy Advisor

Sponsor: Victor Martinez

Title: Manager – Resource Planning, Resource
Management Regulatory and Quality
Assurance

El Paso Electric Company's Existing Generation Units

Generating Station	Unit Name	Nameplate Capacity (MW)	Unit Capacity (MW) ⁽⁵⁾	Primary Fuel Type	Secondary Fuel Type	Commercial Operation Date	Planned Retirement Date
Rio Grande Generating Station ^{(1), (4)}	Rio Grande Unit 6	50	45	Natural Gas	N/A	June 1957	October 2024
	Rio Grande Unit 7	50	44	Natural Gas	N/A	June 1958	December 2025
	Rio Grande Unit 8	166.5	139	Natural Gas	N/A	July 1972	December 2033
	Rio Grande Unit 9	131.8	88	Natural Gas	N/A	May 2013	December 2058
Newman Generating Station ⁽⁴⁾	Newman Unit 1	81.6	73	Natural Gas	N/A	May 1960	December 2025
	Newman Unit 2	81.6	73	Natural Gas	N/A	June 1963	December 2027
	Newman Unit 3	121.8	90	Natural Gas	N/A	March 1966	December 2031
	Newman 4 GT-1	85	67	Natural Gas	N/A	August 1975	December 2026
	Newman 4 GT-2	85	67	Natural Gas	N/A	August 1975	December 2026
	Newman 4 ST	120	86	Natural Gas	N/A	August 1975	December 2031
	Newman 5 GT-3	86.5	66	Natural Gas	N/A	May 2009	December 2061
	Newman 5 GT-4	86.5	66	Natural Gas	N/A	May 2009	December 2061
Copper Generating Station	Newman 5 ST	134	115	Natural Gas	N/A	April 2011	December 2061
	Copper Unit 1	86.9	63	Natural Gas	N/A	July 1980	December 2030
Montana Power Station	Montana Unit 1	131.8	88	Natural Gas	Fuel Oil	March 2015	December 2060
	Montana Unit 2	131.8	88	Natural Gas	Fuel Oil	March 2015	December 2060
	Montana Unit 3	131.8	88	Natural Gas	Fuel Oil	May 2016	December 2061
	Montana Unit 4	131.8	88	Natural Gas	Fuel Oil	September 2016	December 2061
Palo Verde Generating Station ^{(2), (3)}	Palo Verde Unit 1	221,704	622	Uranium	N/A	February 1986	June 2045
	Palo Verde Unit 2	221,704		Uranium	N/A	September 1986	April 2046
	Palo Verde Unit 3	221,704		Uranium	N/A	January 1988	November 2047
Newman Solar System	Newman Solar System 1	0.0756 (DC) 0.0643 (AC)	N/A N/A	Solar	N/A	December 2014	December 2044
Rio Grande Solar System	Rio Grande Solar System 1	0.0756 (DC) 0.0643 (AC)	N/A N/A	Solar	N/A	December 2009	December 2031
Wrangler Solar Facility	Wrangler Solar Facility	0.05292 (DC) 0.04760 (AC)	N/A N/A	Solar	N/A	October 2011	December 2033
Stanton Solar Installation	Stanton Solar Installation	0.03696 (DC) 0.03137 (AC)	N/A N/A	Solar	N/A	January 2012	December 2034
El Paso Community College Solar Installation	EPCC Solar Installation	0.01702 (DC) 0.01447 (AC)	N/A N/A	Solar	N/A	January 2012	December 2034
Van Horn Solar Installation	Van Horn Solar Installation	0.02000 (DC) 0.01540 (AC)	N/A N/A	Solar	N/A	August 2013	December 2035
Texas Community Solar 1	TX Community Solar 1	3.8800 (DC) 3.0000 (AC)	N/A N/A	Solar	N/A	May 2017	December 2047
Holloman Solar Facility	HAFB	6.5325 (DC) 5.0000 (AC)	N/A N/A	Solar	N/A	October 2018	December 2048

- (1) EPE filed for abandonment of Rio Grande Unit 6 in New Mexico, which is in inactive reserve, no longer in rates, and expected to retire in October 2024. It was operated in 2021 and 2022.
- (2) The 622 MW of Palo Verde is the total capacity owned by EPE, including approximately 40 MW from Palo Verde Unit 3 that are not serving either Texas or New Mexico.
- (3) El Paso Electric Company has a 15.8% ownership interest in Palo Verde Units 1, 2 and 3.
- (4) El Paso Electric Company will be filing for abandonment of Rio Grande Unit 7 and Newman Unit 1 in New Mexico during the third quarter of 2023.
- (5) Net peak unit capacity measured in Megawatts.

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

STAFF 1-3:

Please refer to the Direct Testimony of Victor Martinez page 81, line 9-16. Please provide, in table format, the capacity and contract expiration date of the energy mix EPE uses to serve load.

RESPONSE:

Please see STAFF 1-3 Attachment 1, attached, which shows the capacity and contract expiration date of the energy mix as of the time the RFP was issued in December 2021.

Preparer: Monica Garcia

Title: Principal Engineer – Resource Planning

Sponsor: Victor Martinez

Title: Manager – Resource Planning, Resource
Management Regulatory and Quality
Assurance

Natural Gas & Nuclear Generating Unit Name	Unit Capacity (MW) ^{(1), (2), (3)}	Retirement or Contract Expiration Date
Rio Grande 6	45	October 1, 2023 ⁽²⁾
Rio Grande 7	46	December 31, 2022
Rio Grande 8	144	December 31, 2033
Rio Grande 9	88	December 31, 2053
Newman 1	73	December 31, 2027
Newman 2	73	December 31, 2022
Newman 3	90	December 31, 2031
Newman 4 GT-1	69	December 31, 2031
Newman 4 GT-2	69	December 31, 2031
Newman 4 ST-1	89	December 31, 2031
Newman 5 GT-3	67	December 31, 2048
Newman 5 GT-4	67	December 31, 2048
Newman 5 ST-1	132	December 31, 2048
Copper 1	63	December 31, 2030
Montana 1	88	December 31, 2055
Montana 2	88	December 31, 2055
Montana 3	88	December 31, 2056
Montana 4	88	December 31, 2056
Palo Verde Units 1, 2 & 3 (nuclear)	622	June 1, 2045; April 1, 2046; November 25, 2047
Solar Facility Name EPE-owned	Unit Capacity (MW)	Retirement or Contract Expiration Date
Newman Solar System 1	0.0756 (DC); 0.0643 (AC)	December 31, 2029
Rio Grande Solar System 1	0.0756 (DC); 0.0643 (AC)	December 31, 2029
Wrangler Solar Facility	0.05292 (DC); 0.04760 (AC)	December 31, 2031
Stanton Solar Installation	0.03696 (DC); 0.03137 (AC)	December 31, 2032
EPCC Solar Installation	0.01702 (DC); 0.01447 (AC)	December 31, 2032
Van Horn Solar Installation	0.02000 (DC); 0.01540 (AC)	December 31, 2033
Texas Community Solar 1	3.8800 (DC); 3.0000 (AC)	December 31, 2037
Holloman Solar Facility	6.5325 (DC); 5.0000 (AC)	December 31, 2038
Solar & Biogas Facility Name PPA	Unit Capacity (MW) ⁽⁴⁾	Retirement or Contract Expiration Date
El Chaparral Solar (Chaparral)	10	December 31, 2031
The Centennial Solar (Las Cruces)	12	December 31, 2031
Hatch Solar (Hatch)	5	December 31, 2036
Roadrunner Solar (Santa Teresa)	20	December 31, 2031
Macho Springs Solar	50	December 31, 2034
juwi Solar (Newman)	10	December 31, 2044
Four Peaks (biogas)	3.2	December 31, 2028

Power Purchase Name	Unit Capacity (MWh) ⁽⁵⁾	Contract Expiration Date ⁽⁶⁾
AEPCO	See Note 5	See Note 6
BP	See Note 5	See Note 6
BROOK RENEW	See Note 5	See Note 6
BURBANK	See Note 5	See Note 6
CITI	See Note 5	See Note 6
CONOCO	See Note 5	See Note 6
DIRECT	See Note 5	See Note 6
DYNASTY	See Note 5	See Note 6
EDF	See Note 5	See Note 6
EVERGY	See Note 5	See Note 6
EXELON	See Note 5	See Note 6
GUZMAN	See Note 5	See Note 6
LADWP	See Note 5	See Note 6
MACQUARIE	See Note 5	See Note 6
MORGAN-STAN	See Note 5	See Note 6
PAC	See Note 5	See Note 6
PNM	See Note 5	See Note 6
POWEREX	See Note 5	See Note 6
PSCO	See Note 5	See Note 6
RAIN	See Note 5	See Note 6
SHELL	See Note 5	See Note 6
SRP	See Note 5	See Note 6
TENASKA	See Note 5	See Note 6
TEP	See Note 5	See Note 6
TRANSALTA	See Note 5	See Note 6
TRANSCAN	See Note 5	See Note 6
TRISTATE	See Note 5	See Note 6
UNS	See Note 5	See Note 6
SMSG	See Note 5	See Note 6
TX Customer DG	See Note 5	See Note 6
NM Customer DG	See Note 5	See Note 6

(1) Represents net dependable on-peak capacity for EPE's local fossil fueled units.
For steam turbine ("ST") components associated with combined-cycles ("CC"), i.e., Newman 4 ST-1 and Newman 5 ST-1, capacity includes duct firing capacity.
Includes capacity of Rio Grande Unit 6 which is in "inactive reserve", and which was utilized in 2021.
Rio Grande Unit 6 is scheduled to be abandoned on October 1, 2023.

(2) Represents EPE share, net capacity (total station and by unit), for the Palo Verde Generating Station units.

(3) Represents nameplate capacity for Renewable Energy Systems.

(4) Represents PPA contracted capacity ("AC") for Renewable Energy Systems.

(5) Reflects both non-renewable, firm and non-firm energy (MWh) market purchases.
The capacity amounts purchased from the market may change from hour-to-hour depending on agreed transaction terms.

(6) Market purchases represent short-term duration of one-year or less.

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STAFF 1-4:

Please provide Exhibit VM-2 in Excel format with formulas intact.

RESPONSE:

Please see El Paso Electric Company's response to STAFF 1-4, Attachment 1.

Preparer: Judith M. Parsons

Title: Regulatory & Resource Strategy Advisor

Sponsor: Victor Martinez

Title: Manager – Resource Planning, Resource
Management Regulatory & Quality
Assurance

El Paso Electric Company
TEXAS - Loads & Resources 2022 - 2041
October 12, 2021

Retirements		NM2, RG7		NM1		COP		NM3, NM4		RG8											
Resource Additions ¹⁷		80/40 Sol/Batt	182 NM6, 80 Sol																		
Texas		2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
1.0 GENERATION RESOURCES ¹																					
1.1 RIO GRANDE		195	162	162	162	162	162	162	162	162	162	162	162	59	59	59	59	59	59	59	59
1.2 NEWMAN ²		524	641	641	641	641	641	587	587	587	587	362	362	362	362	362	362	362	362	362	362
1.3 COPPER		52	52	52	52	52	52	52	52	52	0	0	0	0	0	0	0	0	0	0	0
1.4 MONTANA		265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265
1.5 PALO VERDE ²		468	468	468	468	468	468	468	468	468	468	468	468	468	468	468	468	468	468	468	468
1.6 RENEWABLES ³		2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
1.7 STORAGE		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1.8 POSSIBLE EMERGING TECHNOLOGY EXPANSION ⁴		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1.9 INTERRUPTIBLE ⁵		42	42	42	41	41	44	44	44	44	50	50	50	50	55	55	55	55	55	62	62
1.10 LINE LOSSES FROM OTHERS ⁶		6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
1.0 TOTAL GENERATION RESOURCES		1554	1637	1637	1637	1637	1640	1585	1585	1585	1539	1313	1313	1211	1216	1216	1216	1216	1216	1223	1223
2.0 RESOURCE PURCHASES																					
2.1 RENEWABLE PURCHASE ⁷		27	25	24	21	21	21	21	21	18	18	14	14	14	3	3	3	2	2	2	2
2.2 NEW RENEWABLE PURCHASE ⁸		0	40	39	34	34	33	33	33	29	29	23	23	23	22	22	22	20	20	20	20
2.3 NEW RENEWABLE/ BATTERY PURCHASE ⁸		43	40	39	34	33	33	33	33	29	29	23	23	22	22	22	22	20	20	20	20
2.4 NEW BATTERY PURCHASE ¹⁰		40	40	40	40	40	40	40	40	37	37	29	29	29	29	29	29	28	28	28	28
2.5 EDDY TIE PURCHASE ¹¹		28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28
2.6 MARKET RESOURCE PURCHASE ¹²		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2.0 TOTAL RESOURCE PURCHASES		139	172	171	156	156	155	155	154	141	140	116	116	116	104	104	104	99	99	98	98
3.0 FUTURE RESOURCES ¹³																					
3.1 RENEWABLE / SOLAR		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3.2 RENEWABLE / WIND		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3.3 BATTERY STORAGE		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3.4 GAS GENERATION		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3.0 TOTAL RESOURCE PURCHASES		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4.0 TOTAL NET RESOURCES (1.0 + 2.0 + 3.0)		1692	1810	1808	1793	1793	1795	1740	1739	1726	1679	1430	1430	1327	1321	1321	1320	1315	1315	1322	1322
5.0 SYSTEM DEMAND ¹⁴																					
5.1 NATIVE SYSTEM DEMAND		1717	1748	1770	1803	1833	1867	1897	1939	1978	2019	2056	2107	2158	2212	2267	2340	2417	2507	2608	2713
5.2 DISTRIBUTED GENERATION ¹⁵		(14)	(20)	(25)	(31)	(37)	(42)	(48)	(54)	(59)	(65)	(70)	(76)	(81)	(87)	(92)	(97)	(103)	(108)	(113)	(119)
5.3 ENERGY EFFICIENCY		(11)	(17)	(23)	(29)	(34)	(40)	(46)	(52)	(57)	(63)	(69)	(75)	(80)	(86)	(92)	(97)	(103)	(109)	(115)	(121)
6.0 TOTAL SYSTEM DEMAND (5.1 - (5.2+5.3))		1692	1711	1722	1743	1762	1785	1803	1833	1862	1892	1917	1957	1996	2040	2083	2145	2211	2290	2380	2474
7.0 MARGIN OVER TOTAL DEMAND (4.0 - 6.0)		1	99	86	50	31	10	(63)	(94)	(136)	(212)	(487)	(528)	(669)	(719)	(763)	(825)	(896)	(975)	(1058)	(1152)
8.0 PLANNING RESERVE 10.1% thru 2029 then 12.9%		172	175	176	179	182	185	187	191	248	252	256	262	268	274	281	289	299	309	322	334
9.0 MARGIN OVER RESERVE (7.0 - 8.0)		(172)	(76)	(90)	(129)	(151)	(175)	(250)	(284)	(384)	(465)	(743)	(790)	(937)	(993)	(1043)	(1115)	(1195)	(1284)	(1380)	(1487)

Effective Load Carrying Capability ("ELCC") ¹⁶
Planned Generation Additions
182 MW Newman 6 GT5 (92% ELCC) in 2023
80 MW Solar (27% - 54% ELCC) in 2022
40 MW Battery coupled with solar (71% - 100% ELCC) in 2022
80 MW Solar (27% - 54% ELCC) in 2023
Unit Retirements (86% - 94% ELCC)
Rio Grande 6 (36MW) (inactive reserve)
Rio Grande 7 (37MW) - December 2022
Rio Grande 8 (115MW) - December 2033
Newman 1 (58MW) - Extended to December 2027
Newman 2 (58MW) - December 2022
Newman 3 (72MW) - Extended to December 2031
Newman 4 CC (182MW) - Extended to December 2031
Copper (55MW) - December 2030
EPE Owned Renewables (27% - 54% ELCC)
Line 1.6 consists of Texas Community Solar, EPCC, Stanton, Wrangler, Rio Grande & Newman Carports and Van Horn
Resource Purchases
This purchase is supported by firm transmission through:
(i) Tucson / EPE Palo Verde Exchange Agreement,
(ii) Point to Point Transmission Kyrene-Coronado-Springerville,
(iii) Four Corners-West Mesa transmission retired
(iv) Freeport McMoRan (formerly Phelps Dodge),
Renewable Purchases from PPA (27% - 54% ELCC)
Line 2.1 includes Macho Springs, Juwi (Newsol) solar purchases
Line 2.2 and Line 2.3 includes Buena Vista and Hecate solar purchases (160 MW)

¹ Generation unit retirements are consistent with the 2021 IRP. Rio Grande 6 is classified as inactive reserve.

² Excludes 19.97% of New Mexico's portion for Newman Unit 6, and Palo Verde Unit 3, which were both denied by the New Mexico Public Regulatory Commission in the 2020 Rate Case and FPPCAC Continuation Case.

³ Existing EPE owned solar renewables (27% - 54% ELCC).

⁴ Emerging technologies may include customer or other distributed resources as well as additional community solar. None were used for the 2021 IRP.

⁵ Interruptible customer capacity shifted to the resource side of the L&R. Capacity MW contribution per 2021 Load Forecast.

⁶ Line losses from others shifted to resource side of the L&R and is the typical amount of repayment of transmission wheeling losses from transmission customers with in-kind energy during peak hours.

⁷ Existing renewable solar PPAs (27% - 54% ELCC).

⁸ New renewable solar PPAs (27% - 54% ELCC).

⁹ Reflects Texas' portion of 100 MW of new solar that is coupled with the 50 MW of battery storage PPA (27% - 54% ELCC).

¹⁰ Reflects Texas' portion of 50 MW of new battery that is coupled with the 100 MW solar PPA (71% - 100% ELCC).

¹¹ Reflects Texas' portion of the 50 MW reliability purchase through the Eddy tie (70% ELCC).

¹² Placeholder for market purchases which are excluded in this L&R.

¹³ Placeholder for Future New Resources which were excluded in this L&R.

¹⁴ System demand is based on the 2021 Long-Term Forecast dated April 2021 with "Native System Demand" adjusted for a fully-managed charging profile for EVs.

¹⁵ Distributed Generation is based on the 2021 Long-Term Forecast dated April 2021 which has an applied ELCC rate between 20% to 40%.

¹⁶ Effective Load Carrying Capability ("ELCC") is expressed as a percentage of the generators nameplate rating which is the contribution to reliably serve load and is listed here for the peak hour.

¹⁷ Resource capacity additions reflected are nameplate allocated to Texas.

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QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8

STAFF 1-5:

Please provide Exhibit VM-3 in Excel format with formulas intact.

RESPONSE:

Please refer to El Paso Electric Company's response to TIEC 1-16.

Preparer: Judith M. Parsons

Title: Regulatory & Resource Strategy Advisor

Sponsor: Victor Martinez

Title: Manager – Resource Planning, Resource
Management Regulatory and Quality
Assurance

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STAFF 1-6:

Please refer to the Direct Testimony of Victor Martinez page 86 (footnote 2). Please provide documentation and explain in detail the capacity met and the capacity market purchases by EPE.

RESPONSE:

El Paso Electric Company (EPE) issued a request for proposal (RFP) and purchased energy to supplement resources and meet EPE's capacity need during the 2022 peak summer periods that Mr. Martinez references in response to Q24 in his direct testimony. EPE entered in to three separate monthly energy transactions based on bids made into the RFP: (1) a 50 MW, Super peak (HE 1300 to 2000), Schedule C, firm energy deal with Citigroup for June 2022 priced at \$192.50/MWh and delivered at Palo Verde; (2) a 25 MW, Heavy Load Hours (HE 0700 to 2200), Schedule B, intertie contingent deal with Guzman Energy for July and August 2022 at an average price of approximately \$180/MWh and delivered at Four Corners; and (3) a 25 MW, Heavy Load Hours (HE 0700 to 2200), Schedule C, firm energy deal with Morgan Stanley for July and August 2022 at an average price of approximately \$245/MWh and delivered at Palo Verde. Please see STAFF 1-6, Attachments 1-3, attached. Please refer to STAFF 1-6 Attachment 4 for a copy of the RFP.

Preparer: Monica Garcia
Daniel Holguin

Title: Principal Engineer – Resource Planning
Principal Forward Marketer – Energy
Resources

Sponsor: Victor Martinez

Title: Manager – Resource Planning, Resource
Management Regulatory and Quality
Assurance



POWER CONFIRMATION

Date: May 11, 2022

To: El Paso Electric Company
Attn: El Paso Confirmations
Email: Fhill@epelectric.com
Tel: 1-915-543-2039
Fax: 1-915-521-4751

From: CITIGROUP ENERGY INC
Attn: Indu Gupta
Email - Signed confirms: ceiconfirms@citi.com
Email - Confirm queries: NAMCommoditiesConfirmations@citi.com
Tel: 1-713-693-6602
Fax: 1-646-291-3383

Re: Physical Power Transaction

Transaction Reference Number: 54473131

The purpose of this letter agreement is to confirm the terms and conditions of the Transaction entered into between us on the Trade Date referred to below. This letter constitutes a "Confirmation" as referred to in the WSPP Master specified below

U.S. Federal law requires Citi to obtain, verify and record customer identification information.

1. This Confirmation supplements, forms part of, and is subject to the most recent WSPP Master effective as of March 16, 2007 (the "Agreement"). All provisions contained in the Agreement govern this Confirmation except as expressly modified below in 3.

2. Terms used but not defined herein shall have the meaning ascribed to them in the Agreement.

3. The terms of the particular Transaction to which this Confirmation relates are as follows:

Trade Date: May 11, 2022

Buyer: El Paso Electric Company



Seller:

CITIGROUP ENERGY INC



Quantity: 50 MW per hour

Total Quantity: 10,400.00 MWH

Term: June 01, 2022 to and including June 30 , 2022

Delivery Period: All deliveries are made during the defined Peak hour periods, Hour Ending (HE) 1300 through (HE) 2000, (8 hours each day), Monday through Saturday, Exluding Sunday and NERC Holidays, Pacific Prevailing Time (PPT)

Contract Price: USD 192.50 per MWH

Delivery Point: Palo Verde

Service Type: Service Schedule C

Scheduling: All scheduling will be completed on or before the time specified by either rule or convention applicable to the market at the delivery point.

El Paso Electric Company hereby agrees to check this Confirmation carefully and immediately upon receipt so that errors or discrepancies can be promptly identified and rectified. If this Confirmation correctly sets forth the terms of our agreement, please confirm such agreement by executing this Confirmation in the space provided below and returning it to CITIGROUP ENERGY INC at 1-646-291-3383 . In the absence of the receipt by CITIGROUP ENERGY INC of an executed Confirmation or an objection to the terms hereof delivered to CITIGROUP ENERGY INC in accordance with the terms of the Agreement, the acceptance of the provisions of this Confirmation by El Paso Electric Company shall be governed by the applicable terms and conditions of the Agreement, which, for this particular purpose, shall be deemed to control over any conflicting terms in this Confirmation.

Accepted and confirmed as of the date first written:

El Paso Electric Company

CITIGROUP ENERGY INC

By: David Hawkins

By: _____



Name: David Hawkins
Title: Vice President

Imp
DHJg

Name: Amanda Wood
Title: Authorized Signatory





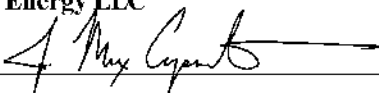
TRANSACTION CONFIRMATION

By executing this Transaction Confirmation (this "Confirmation"), effective as of March 16, 2022 ("Trade Date"), the undersigned parties agree to sell and purchase electric energy pursuant to the WSPP Agreement in effect as of the Trade Date, subject to the following terms and conditions:

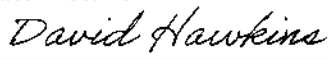

Seller:	Guzman Energy LLC
Purchaser:	El Paso Electric
Period of Delivery:	July 7, 2022 through August 31, 2022
Schedule (Days and hours)	On-Peak - 5x16, Monday-Friday Hours Ending 07:00-22:00 (MPT), Excluding NERC Holidays
Applicable Service Type:	Service Schedule B (Unit Commitment Service)* * Intertie Contingent (SPP Source)
Quantity:	25 Total MWs per hour
Delivery Point:	Four Corners (4C)
Contract Price:	July 7, 2022 through and including July 31, 2022: \$178 per MWh August 1, 2022 through and including August 31, 2022: \$182 per MWh
Transmission:	Purchaser shall arrange and pay for transmission at and from the Delivery Point.
Additional Credit Terms:	The Parental Guaranty issued to El Paso Electric by Leeward Renewable Energy, on behalf of Seller, in the amount of \$2.1 million shall be the Purchaser's sole source of credit assurance from Seller for the transaction under this Confirmation.

Each party recognizes that this Confirmation is a legally binding contract and acknowledges that it has had the opportunity to consult with legal counsel of choice. This Confirmation was prepared jointly by the parties, each party having had access to advice of its own counsel, and not by either party to the exclusion of the other party and shall not be construed against one party or the other as a result of the manner in which this Confirmation was prepared, negotiated or executed.

SELLER:
Guzman Energy LLC

By: 
 Name: J. Max Carpenter
 Title: Director, Trading & Market Operations

PURCHASER:
El Paso Electric

By:  
 Name: David Hawkins
 Title: Vice President

Morgan Stanley

AMENDED. THIS CONFIRMATION RESTATES AND SUPERSEDES ANY CONFIRMATION PREVIOUSLY
ISSUED BY US IN CONNECTION WITH THIS TRANSACTION.

Commodities

Morgan Stanley Capital Group Inc.

Attn: Commodities 1585

Broadway

New York, NY 10036-8293

Date: March 14, 2022
To: EL PASO ELECTRIC COMPANY
100 N. STANTON
EL PASO TX 79901

Attention: Judith Parsons
Phone No.: (915) 543-5777
Fax No.: (915) 521-4751
Email: judith.parsons@cpelectric.com

Contact: Commodity Confirms
Phone: 443-627-5650
Fax: 914-750-0445
Email: CommodConfNY@morganstanley.com

Reference No.: E9385840 v. 2
Trade Date: March 14, 2022

This electronic communication and any attachments hereto, are intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information, which is exempt from disclosure under applicable law. If you are not the intended recipient of this electronic communication, you are hereby notified that any examination, dissemination, disclosure, distribution, or copying of, or reliance on or use of this electronic communication, and any attachments hereto, is strictly prohibited. If you have received this electronic communication in error, please notify me immediately on the above telephone number and permanently destroy all copies of this electronic communication.

This document ("Confirmation Letter") made as of March 14, 2022 is to confirm the terms and conditions of the Transaction between Morgan Stanley Capital Group Inc. ("MSCGI") and EL PASO ELECTRIC COMPANY as of the Trade Date (the "Transaction"). MSCGI and EL PASO ELECTRIC COMPANY are each referred to as a "Party" and, collectively, as the "Parties."

This Confirmation Letter is being provided pursuant to and in accordance with the WSPP Agreement that is in full force and effect as of the Trade Date, including the Service Schedules and Exhibits thereto (as modified by the Master Confirmation Agreement to WSPP Agreement, dated as of June 15, 2009 between Buyer and Seller, the "Master Agreement"), including the Service Schedules and Exhibits thereto and constitutes part of and is subject to the terms and provisions of such Master Agreement; provided, however, that, to the extent there is a conflict between a provision of the Master Agreement and this Confirmation Letter, the terms of this Confirmation Letter shall control for the purposes of this Transaction.

Purchaser: EL PASO ELECTRIC COMPANY

Seller: MSCGI

Term One: July 1, 2022 to July 31, 2022
Term Two: August 1, 2022 to August 31, 2022

Delivery Hours:
 Monday-through Friday, excluding NERC holidays, 11:0700 through 2200
 (16 Hours) Pacific Prevailing Time (PPT)

Contract Quantity:
 Term One: 25 MWh of Firm energy per hour (Total 8,000.00 MWh)
 Term Two: 25 MWh of Firm energy per hour (Total 9,200.00 MWh)

Delivery Point: Palo Verde

Energy Price:
 Term One: 230 USD per MWh
 Term Two: 260 USD per MWh

Special Conditions: This purchase and sale of energy is Firm (LO), Service Schedule C. The parties agree to notify each other as soon as possible of any interruption or curtailment affecting this transaction.

West Firm Power: West Firm Power (WSPP Schedule C) means that such power may be sourced from any source in the WECC including the CATSO or wheeled through the CAISO. West Firm Power is defined as firm energy with LDs, for which the only excuse for failure to deliver or receive is due to an event of Uncontrollable Force.


Morgan Stanley Real-Time Communications and Scheduling

Option Exercise Line:	914-225-1501
Prescheduling:	914-225-1501
Real Time (24 hour):	914-225-1500

The parties agree that this transaction is a Forward Contract within the meaning of the U.S. Commodity Exchange Act, and in reliance upon such agreement, each party represents to the other that, as of the date the transaction is entered into:

- (a) It is a commercial market participant with respect to the specified commodity and is entering into the transaction in connection with its business; and
- (b) It intends to make or take physical delivery of the specified commodity.

If the recipient of the confirmation disagrees with any of the terms summarized herein, it shall promptly notify MSCGJ by telephone and facsimile transmission. Failure by the recipient to execute and return this confirmation or to notify MSCGJ of its disagreement within three (3) Business Days of receiving this confirmation constitutes the Counterparty's agreement to the terms set forth herein. Please confirm that terms stated herein accurately reflect the agreement reached between EL PASO ELECTRIC COMPANY and MSCGJ by returning an executed copy of this Confirmation Letter, (Fax: 914-750-0445)

Yours Sincerely,	<u>Confirmed</u> as of the date first written above:
	EL PASO ELECTRIC COMPANY
	By: Christianson Name: n, Jessica Title:
	Digitally signed by Christianson, Jessica Date: 2022.03.21 15:59:50-06'00'
Parker Corbin Authorized Signatory Morgan Stanley Capital Group Inc.	

*D#
r,ct*



February 23, 2022

El Paso Electric Company ("EPE") is seeking proposals for the summer period of 2022. EPE is soliciting proposals for 25 and 50 MW blocks of capacity and energy from, preferably, an existing generation facility located in Southern New Mexico and/or West Texas, however other points of delivery to be considered by EPE through this RFP can be found below.

EPE requests a "Notice of Intent to Bid" by Friday February 25, 2022, no later than 3:00 p.m. Mountain Daylight Time. The "Notice of Intent to Bid" is not binding, however, the "Notice of Intent to Bid" is required in order to submit a proposal.

Responses to the RFP should be provided with the attached Pricing Matrix and received no later than 3:00 p.m. Mountain Daylight Time on Friday, March 4, 2022. EPE shall notify the selected Bidder by 3:00 p.m. MDT on Friday, March 11, 2022.

Bidders must only submit proposals to provide capacity and energy on a firm basis – WSPP Schedule C or Unit Contingent – WSPP Schedule B.

EPE will consider proposals and associated information submitted by Bidders to be confidential. It is the Bidder's responsibility to clearly indicate in its proposal what information it deems to be confidential. Bidders may not mark an entire proposal as confidential, but instead must mark specific information on individual pages to be confidential in order to receive confidential treatment. Except as required by regulatory reviews, EPE will use reasonable efforts to avoid disclosure of information designated as confidential to persons other than those involved with the evaluation, selection, and any subsequent negotiations. To the extent that Bidders receive information from EPE, Bidders shall maintain the confidentiality of such information and such information shall not be available to any entity before, during, or after this RFP process unless required by law or regulatory order.

Bidders should be aware that information received in response to this RFP will be subject to the review of applicable local, state, and/or federal regulatory agencies, specifically including, but not limited to, the New Mexico Public Regulation Commission ("NMPRC") and the Public Utilities Commission of Texas ("PUCT"). All Bidders shall cooperate with EPE in making technological descriptions, pricing, and other contract terms available for review as part of any regulatory process as EPE deems necessary or appropriate. EPE will follow applicable orders and rules of the NMPRC, PUCT, and/or other applicable agency, including any protective orders issued, such as disclosure of price, terms, or other information as required; therefore, EPE cannot promise that information marked as confidential will not be publicly disclosed, and, as such, EPE cannot be held liable for any information that is ordered to be released or that is inadvertently released.

Moreover, information submitted in response to this RFP may become subject to federal or state laws pertaining to public access to information as a result of any reviews conducted by the aforementioned agencies. EPE shall not be liable for the release of any information subject to disclosure under any laws pertaining to public access to information.



EPE reserves the right, without qualification, in its sole discretion to (i) accept or reject in whole or in part any or all proposals received, (ii) change, supplement, or withdraw this RFP, (iii) modify or waive any of the criteria contained in this RFP, and (iv) waive any irregularity or technicality in proposals received. EPE has the right to reject any non-conforming offer. EPE also has the right to reject all offers. EPE also reserves the right, without qualification and in its sole discretion, to decline to enter into any agreement with any person or entity for any reason, including, but not limited to, change in regulations or regulatory requirements that impact EPE, the bankruptcy or insolvency of an interested seller, or any collusive bidding or other anticompetitive behavior or conduct on the part of an interested seller.

Neither this RFP nor any other communication from EPE, its directors, officers, employees, attorneys, or representatives (collectively, the "EPE Parties") shall be taken as legal, financial, or other advice or as establishing a contract or any contractual obligation. Respondents submitting proposals do so without legal recourse against the EPE Parties for (i) any modification or withdrawal of this RFP, (ii) EPE's rejection in whole or in part of any proposal, (iii) failure to enter into an agreement with EPE, or (iv) any other reason relating to or arising out of this RFP.

EPE makes no representations or warranties regarding the completeness of the information contained in this RFP and does not represent that this RFP contains all the information needed by interested sellers to determine whether to submit a proposal.

None of the materials received by EPE from Bidders in response to this RFP will be returned. All materials provided in the bid will become the property of EPE, subject to the confidentiality provision above.

This RFP is not an offer or commitment of EPE to enter into any transaction. The terms are subject to change and further review and approval, until execution of a definitive agreement containing all appropriate provisions.

The submission of a proposal shall constitute an agreement of the interested seller to each and all of the above terms and conditions. Thank you in advance for your proposal.



Request for Proposals:

Seller: Counterparty

Buyer: El Paso Electric Company (EPE)

Time Period: Period is July – August 2022

Quantity: 25 and 50 MW blocks

Delivery Points: Generation from an existing generation facility located in Southern New Mexico and/or West Texas such as:

Luna

Pyramid-Hidalgo

Afton

Additional delivery points to be considered include:

Palo Verde, Springerville, Four Corners, San Juan, Eddy County tie (EDDY), Amrad and other interfacce points

Product Firmness: WSPP Schedule C, WSPP Schedule B

Product 1: 5 X 16 Monday through Friday HE 0700 – HE 2200 PPT excluding NERC holidays.

Product 2: EPE will consider other proposals not described by Product 1 (including call-options).

Pre-scheduling: Pre-scheduling will be pursuant to the WECC ISAS daily pre-scheduling calendar and WECC Business Practices.

Pricing: EPE's preference is index pricing but will consider offers with fixed pricing. Bidders should complete a separate Pricing Matrix for each product offered.



Pricing Matrix for Request for Proposal

Counterparty Name (Seller): _____

Contact Name: _____

Phone number: _____

Product 1,2	Delivery Point	Delivery Months	Quantity (MW)	Option Description	Index Pricing Components	Fixed Pricing Energy Price (MWh)
		Jul – 2022				
		Aug – 2022				

Please email or fax your response to:

Daniel Holguin

Forward Marketer | Long Term Trading & Fuels

P.O. Box 982 | El Paso Texas, 79960

T: (915) 543-2009 | F: (915) 521-4656

daniel.holguin@epelectric.com

APPLICATION OF EL PASO	§	
ELECTRIC COMPANY TO AMEND	§	PUBLIC UTILITY COMMISSION
ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	OF TEXAS
FOR A 150 MW SOLAR FACILITY	§	

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

STAFF 1-7:

Please refer to the Direct Testimony of Victor Martinez page 86, line 19-22. Please explain in detail how EPE intends to fill the capacity need starting in 2023 if the Texas Solar One project is intended to help fill the capacity need starting in 2025.

RESPONSE:

El Paso Electric Company (EPE) will engage in short-term capacity purchases to fill the capacity need starting in 2023. EPE will evaluate these short-term capacity purchases on a year-by-year basis dependent on system conditions. Currently for 2023, EPE has not made any capacity purchases to serve Texas customers or system need. EPE has made short term energy purchases as needed to supplement resources and serve load.

Preparer: Victor Martinez

Title: Manager – Resource Planning, Resource
Management Regulatory & Quality
Assurance

Sponsor: Victor Martinez

Title: Manager – Resource Planning, Resource
Management Regulatory & Quality
Assurance

PUC DOCKET NO. 54929

APPLICATION OF EL PASO	§	
ELECTRIC COMPANY TO AMEND	§	PUBLIC UTILITY COMMISSION
ITS CERTIFICATE OF	§	
CONVENIENCE AND NECESSITY	§	OF TEXAS
FOR A 150 MW SOLAR FACILITY	§	

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

STAFF 1-8:

Refer to Exhibit GN-1 - 2022 Demand and Energy Forecast Summary. Please define upper bound and lower bound.

RESPONSE:

The upper and lower bounds represent a 95% confidence interval around the forecasted baseline values.

Preparer: Enedina Soto

Title: Manager – Load Research and Data
Analytics

Sponsor: George Novela

Title: Director – Economic and Rate Research

The following files are not convertible:

STAFF 01-02_Attachment 01.xlsx
STAFF 01-03_Attachment 1.xlsx
STAFF 01-04_VM-02 2021 L_R

Texas_FINAL.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.