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APPLICATION OF EL PASO ELECTRIC COMPANY TO UPDATE SCHEDULE NO. COVID-19 IN COMPLIANCE WITH DOCKET NO. 52195	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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UNOPPOSED MOTION FOR ABATEMENT OF OBLIGATION TO FILE AN UPDATE

El Paso Electric Company (EPE or the Company), files this motion requesting an interim order abating EPE’s obligation to file an annual update to its COVID Surcharge. EPE has conferred with the other parties to this proceeding, which are the City of El Paso, Texas Industrial Energy Consumers, the International Brotherhood of Electrical Workers, and the Public Utility Commission of Texas (Commission) Staff, and they have indicated that they do not oppose this motion.

I. Introduction

The Order in EPE’s last base rate proceeding directs EPE to file by March 31st of each year for “approval of a true-up of the previous year to account for any changes in the bad-debt amount and additional expenses related to COVID-19 that were incurred after the test year.”¹ This proceeding is EPE’s 2024 filing. Another filing is due by the end of this month. However, as reflected in EPE’s application, EPE has requested that the obligation for annual filings be terminated because EPE ceased accruing expenses in May 2023, when the Biden administration declared the public health emergency for COVID-19 to be over. Settlement discussions concerning this case are ongoing.

II. Request for Abatement

EPE submits that it would be inefficient and a potential waste of resources for it to file another proceeding while this proceeding is still pending, particularly because one of the elements of this case is EPE’s request for the termination of the obligation for an annual update. Therefore, an interim order abating EPE’s obligation to file an annual true-up filing by the end of March 2025 should be granted to avoid EPE having to file another update while termination of the obligation

¹ *Application of El Paso Electric Company to Change Rates*, Docket No. 52195, Sept. 15, 2022, Ordering Paragraph 7.

is a possible outcome of this proceeding. The interim order should also provide that in the event that the obligation for yearly updates is not terminated with the final resolution of this proceeding, the filing that would otherwise be due by the end of March 2025 should be due no earlier than 60 days after the order, unless ordered otherwise by subsequent order. EPE has conferred with the other parties to this proceeding, and they have indicated that they do not oppose EPE's request for abatement of the obligation to file a true-up by March 31, 2025.

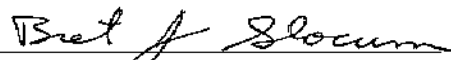
III. Conclusion

For the reasons discussed above, the parties request that the Administrative Law Judge issue an order abating EPE's obligation to file a true-up by March 31, 2025, of its COVID Surcharge rider, and for such other relief for which EPE has shown is justified.

Respectfully submitted,

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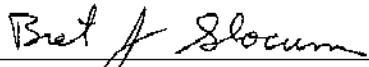
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**ATTORNEYS FOR THE APPLICANT
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CERTIFICATE OF SERVICE

I certify that notice of the filing of this document was provided to all parties of record via electronic mail on March 14, 2025, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Bret Slocum