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**SOAH DOCKET NO. 473-24-17664
PUC DOCKET NO. 56572**

APPLICATION OF EL PASO ELECTRIC COMPANY TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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CITY OF EL PASO FIRST REQUESTS FOR INFORMATION (CEP 1-1—CEP 1- 5)

TO EL PASO ELECTRIC COMPANY:

The City of El Paso (the “City”) requests that the El Paso Electric Company (“EPE”) provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within twenty (20) days. Please copy the question immediately above the answer to each question. The question(s) are continuing in nature, and if there is a relevant change in circumstances, such as that new or additional information or review reveals that an answer previously made is no longer complete or is inaccurate, that EPE submit an amended answer, under oath, as a supplement to your original answer within five days of the discovery of new or additional information. 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.

The City requests that EPE serve its respective responses to this Request on the following person via electronic mail and delivery of hard copies:

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(ddav@scotthulse.com)

DEFINITIONS AND INSTRUCTIONS

1. This Request is directed to El Paso Electric Company ("EPE"). Reference to EPE, **"you" or "your"** means all divisions, departments, bureaus, agencies, and all witnesses whose testimony EPE intends to present, and all persons acting or purporting to act for or on behalf of EPE, including its directors, officers, employees, and agents.

2. The terms **"document" and "documents"** are used in their broadest sense and shall mean and include all written, printed, electronic, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" or "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of personal conversations, minutes or summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultant reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

3. **"Person"** means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver syndicate, municipal corporation, government agency, any other form of legal entity, and other group or combination acting as a unit.

4. **"Relating to"** a subject means making a statement about, mentioning, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting or in any way pertaining, in whole or in part, to the subject.

5. **"Identify"** means:

- a. as to a "person," stating his, her or its:
 - (i) legal, full, and customarily used names;
 - (ii) present residential or business address;

- (iii) job title; and
 - (iv) name of employer.
 - b. as to a document, act, event, transaction or occurrence, stating:
 - (i) its date, authors or participants;
 - (ii) the place where it took place, was created or occurred;
 - (iii) its purpose and subject matter; and
 - (iv) a concise description of what transpired.
- 6. For each response, please state the Request for Information and identify the individual(s) responsible for preparing and sponsoring the response by name and title.
- 7. Pursuant to Rule 196.4, Texas Rules of Civil Procedure, any electronic or magnetic data included in the definition of document should be produced on a CD-ROM or similar media that is compatible with Microsoft Office software.
- 8. For each document produced that is generated by computer, please identify:
 - a. the nature and source of the data constituting the input;
 - b. the form of the input (e.g., tapes, punch cards);
 - c. the recording system employed (e.g., program, flow charts); and
 - d. the person(s) responsible for processing the input and/or performing the programming.
- 9. **"Each"** shall be construed to include the word **"every"** and **"every"** shall be construed to include the word **"each"**.
- 10. **"Any"** shall be construed to include **"all"** and **"all"** shall be construed to include **"any."**
- 11. The terms **"and"** and **"or"** shall be construed as either disjunctive or conjunctive as necessary to make this request inclusive rather than exclusive.
- 12. The term **"concerning"** includes the following meanings: relating to; pertaining to; regarding; discussion; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected to the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.
- 13. The term **"including"** means and refers to "including but not limited to."
- 14. 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.
- 15. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

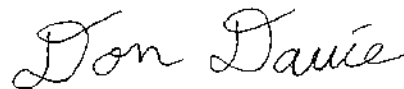
Dated: July 12, 2024

Respectfully submitted,

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Attorneys for the City of El Paso



By: _____
Donald C. Davie

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 12th day of July 2024 by facsimile, electronic mail, and/or first class, U.S. Mail.

Don Davie

Donald C. Davie

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CITY OF EL PASO FIRST REQUESTS FOR INFORMATION (CEP 1-1—CEP 1- 5)

- CEP 1-1** Refer to the Direct Testimony of Antonio Reyes at 18. Please described any attempts made by EPE to replace ARCA Recycling and restart the appliance recycling MTP.
- CEP 1-2** Refer to the Direct Testimony of Antonio Reyes at 19. Please explain why EPE proposes to combine the Large C&I Solutions MTP and Texas SCORE MTP, including any cost savings and improved benefits.
- CEP 1-3** Refer to the Direct Testimony of Antonio Reyes, Exhibit AR-01 at 11.
a. Please provide workpapers that support EPE’s calculation of claimed savings for AT&T’s participation in the Commercial Load management SOP.
b. Please provide documentation of Staff’s approval of EPE’s methodology.
- CEP 1-4** Refer to the Direct Testimony of Antonio Reyes, Exhibit AR-06E.
a. Please reconcile the \$17,334,821 in net benefits in step 2 with the \$17,312,562 net benefits in step 4.
b. Refer to step 2. Please explain why EPE includes the FutureWise MTP in its portfolio since the program’s benefit-cost ratio is less than 1 so is not cost effective.
c. Refer to step 2. Please explain why EPE includes the Residential Smart Thermostat Load Management program in its portfolio since the program’s benefit-cost ratio is less than 1 so is not cost effective.
- CEP 1-5** Reference the response to Staff RFI 2-3
a. Does the EPE travel policy have a limit on the amount of expenses for meals? Please provide
b. Does the EPE travel policy have a limit on the types of expenses that will be reimbursed? Please Provide
c. Reference Attachment 2, page 51 of 59 Is EPE seeking reimbursement for those highlighted expenses for which there are no receipts provided?