



## **Filing Receipt**

**Filing Date - 2024-08-01 11:26:22 AM**

**Control Number - 56572**

**Item Number - 33**

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

APPLICATION OF EL PASO ELECTRIC § BEFORE THE STATE OFFICE  
COMPANY TO ADJUST ITS ENERGY §  
EFFICIENCY COST RECOVERY § OF  
FACTOR §  
§ ADMINISTRATIVE HEARINGS

EL PASO ELECTRIC COMPANY'S RESPONSE TO  
CITY OF EL PASO'S FIRST REQUESTS FOR INFORMATION  
QUESTION NOS. CEP 1-1 THROUGH CEP 1-5

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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.

RESPONSE:

EPE met with PNM and Xcel Energy, who also had appliance recycling programs provided by ARCA Recycling, to discuss suddenly not having program implementation from ARCA Recycling and to strategize possible options. EPE also discussed our situation with one of our implementers, CLEAResult, and received a proposal from them to implement an appliance recycling program. However, at that time, EPE did not want to terminate the possibility of continuing the appliance recycling program with ARCA but wanted to wait to give ARCA time to reorganize.

Preparer: Desmond Machuca

Title: Senior Energy Efficiency Analyst

Sponsor: Antonio Reyes

Title: Senior Energy Efficiency Analyst

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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.

RESPONSE:

Combining the Large C&I Solutions MTP and the Texas SCORE MTP into a single Large Commercial Plus MTP results in the following program cost savings, process improvements and customer benefits:

- The consolidation results in a \$90,712.50 reduction in administrative costs.
- The administrative cost savings allow for a proportional increase in customer incentive budget.
- All large commercial projects are handled by one implementer team which streamlines invoicing, marketing, data processing and the customer application process.
- For the first half of the year, single projects in commercial programs are limited to 5% of the program incentive budget. This limitation is implemented to allow for a greater diversity of program participants and measures. With a larger consolidated incentive budget, larger projects can be authorized earlier in the year.

Preparer: Antonio Reyes

Title: Senior Energy Efficiency Program  
Analyst

Sponsor: Antonio Reyes

Title: Senior Energy Efficiency Program  
Analyst

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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.

RESPONSE:

- a. Please refer to Highly Sensitive Protected Material "CEP 01-03\_Attachment 01\_EPE\_Proposed\_Alternate\_Calculation\_for\_AT&T\_Curtailment\_Savings HSPM.xlsx" for calculations supporting EPE's claimed savings for AT&T's PY2023 participation in the Commercial Load Management SOP.
- b. Please refer to CEP 01-03, Attachment 02 "STAFF Approval - PY2023 Load Management meter data request - AT&T Meter Issue.msg" for confirmation from Tetratex, the Commission contracted state evaluator, that Commission Staff approved EPE's methodology.

Preparer: Antonio Reyes

Title: Senior Energy Efficiency Program  
Analyst

Sponsor: Antonio Reyes

Title: Senior Energy Efficiency Program  
Analyst

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CEP 1-3 Attachment 1 is CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachments.

**From:** [Reyes, Antonio](#)  
**To:** [Reyes, Antonio](#)  
**Subject:** STAFF Approval - PY2023 Load Management meter data request - AT&T Meter Issue  
**Date:** Wednesday, July 17, 2024 10:21:30 AM  
**Attachments:** [image001.png](#)  
[image002.jpg](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image003.jpg](#)

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**From:** Lee, Lark <[Lark.Lee@tetrattech.com](mailto:Lark.Lee@tetrattech.com)>  
**Sent:** Monday, November 20, 2023 12:31 PM  
**To:** Johnson, Don <[Don.Johnson@epelectric.com](mailto:Don.Johnson@epelectric.com)>; Jouini, Najoua <[Najoua.Jouini@tetrattech.com](mailto:Najoua.Jouini@tetrattech.com)>  
**Cc:** Yoder, Tina <[TINA.YODER@tetrattech.com](mailto:TINA.YODER@tetrattech.com)>; Reyes, Antonio <[Antonio.Reyes@epelectric.com](mailto:Antonio.Reyes@epelectric.com)>;  
Perea, Araceli G <[araceli.perea@epelectric.com](mailto:araceli.perea@epelectric.com)>  
**Subject:** RE: PY2023 Load Management meter data request - AT&T Meter Issue

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This email came from outside the organization, were you expecting it? **Think before you Click!**

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Hi Don-

Thanks so much for your patience and uploading the data. Najoua was able to review it and confirm she is able to verify the program's demand reductions. Commission Staff are also okay letting us do this, but they would like you to specifically discuss the situation in your 2023 EEPR filing and request a good cause exception for this customer and the use of the generator data. So in summary, good news on moving forward, but with increased documentation of what occurred and the need for a good cause exception.

Let me know if you have any other questions or if I can provide more information,  
Lark

**From:** Johnson, Don <[Don.Johnson@epelectric.com](mailto:Don.Johnson@epelectric.com)>  
**Sent:** Tuesday, November 7, 2023 7:37 PM  
**To:** Lee, Lark <[Lark.Lee@tetrattech.com](mailto:Lark.Lee@tetrattech.com)>; Jouini, Najoua <[Najoua.Jouini@tetrattech.com](mailto:Najoua.Jouini@tetrattech.com)>  
**Cc:** Yoder, Tina <[TINA.YODER@tetrattech.com](mailto:TINA.YODER@tetrattech.com)>; Reyes, Antonio <[Antonio.reyes@epelectric.com](mailto:Antonio.reyes@epelectric.com)>;  
Araceli.perea <[Araceli.perea@epelectric.com](mailto:Araceli.perea@epelectric.com)>  
**Subject:** RE: PY2023 Load Management meter data request - AT&T Meter Issue

Hi Lark and Najoua.

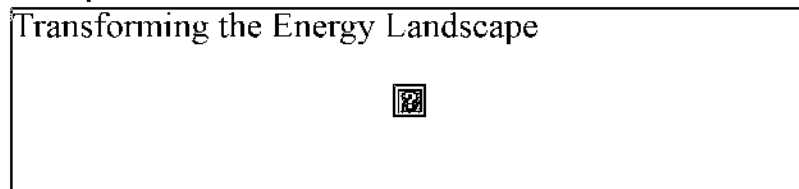
I wish to inform you that I have uploaded a spreadsheet to the Texas PUC EM&V share point with some information that I hope will support the consideration of allowing an alternate means for EPE to claim savings for our AT&T customer's participation in EPE's TX Commercial Load Management Program. I didn't see a folder created for 2023 in the share point, so I created one and put my spreadsheet in there.

I have provided estimates utilizing the actual 15-min interval metered demand that was curtailed. The data was measured by AT&T's generator during the days and times of our 3 events. I have also provided additional support for the estimate of savings. I do hope this will be helpful for PUCT Staff to allow our alternative means for EPE to claim the measured demand that was transferred from the grid to the participant's generator, in lieu of not being able to obtain utility metered interval data to determine high 5 of 10 days estimates.

Please contact me should there be any questions, additional information needed, or for other recommendations for the consideration of our request.

Thank you!  
Don

***\*Notice: Please make note that I will no longer be able to be reached at the 915-472-1604 work mobile number. Please be sure to utilize the contact information below for any future correspondence with me.***



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CEP 1-4:

Refer to the Direct Testimony of Antonio Reyes, Exhibit AR-06E.

- Please reconcile the \$17,334,821 in net benefits in step 2 with the \$17,312,562 net benefits in step 4.
- 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.
- 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.

RESPONSE:

- The net benefit results are different (equal to \$22,259) between the cost-effectiveness calculation (Step 2) and the performance bonus calculation (Step 4) due to the costs paid by a utility for an EECRF proceeding (Step 3, cell C25). Based on the energy efficiency rule, these EECRF proceeding costs are not included as a total program cost for the purpose of calculating the program cost-effectiveness. However, they are included as a total program cost for the purpose of calculating the performance bonus.

Specifically, the net benefits in Step 2 (\$17,334,821) represent the difference between the total avoided costs and total program costs to calculate cost-effectiveness (this includes the previous year's bonus and excludes the costs paid by a utility for an EECRF proceeding), as directed in the energy efficiency rule.

The net benefits in Step 4 are lower (\$17,312,562) because this represents the difference between the total avoided costs and total program costs to calculate the performance bonus (this includes the previous year's bonus and includes the costs paid by a utility for an EECRF proceeding (equal to \$22,259)), as directed by the energy efficiency rule.

- b. EPE planned to begin the FutureWise Program in the fall of 2022, but due to contracting and design delays there was not sufficient time to allow for the order and distribution of kits for the fall semester of 2022. EPE only began the distribution of kits for this program in the spring semester of 2023. As a new program with a UCT of 0.73, EPE projects that the program can achieve a significantly better cost effectiveness in subsequent years as participation increases, and therefore, EPE plans to retain the program as part of its portfolio.
- c. Step 2 shows that "Res Smart Thermostat Load Management" is a measure within the "Residential Load Management MTP". While the measure is just below the UCT threshold with a value of 0.91, the Program is cost effective with a benefit-cost ratio of 1.16. The Residential Load Management MTP is expected to continue to be cost effective in subsequent years.

Preparer: Desmond Machuca

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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?

RESPONSE:

- a. Employees are limited to a maximum of \$100 per day for meals. EPE expects employees to act with good judgement and expense an amount that is reasonable and appropriate.
- b. Yes. EPE's travel policy includes air travel, lodging, rental car, and meals/entertainment directly related to the active conduct of business.
- c. Yes. EPE is seeking reimbursement for the expenses incurred for the Hilton Garden Inn and the EPIA Parking. Despite an effort to locate the receipts, they were not found for these two items, and the employee who incurred this expense is no longer with the company. Nonetheless, the identified expenses were incurred in support of EPE's energy efficiency program.

Preparer: Desmond Machuca

Title: Senior Energy Efficiency Analyst

Sponsor: Antonio Reyes

Title: Senior Energy Efficiency Analyst