



## **Filing Receipt**

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

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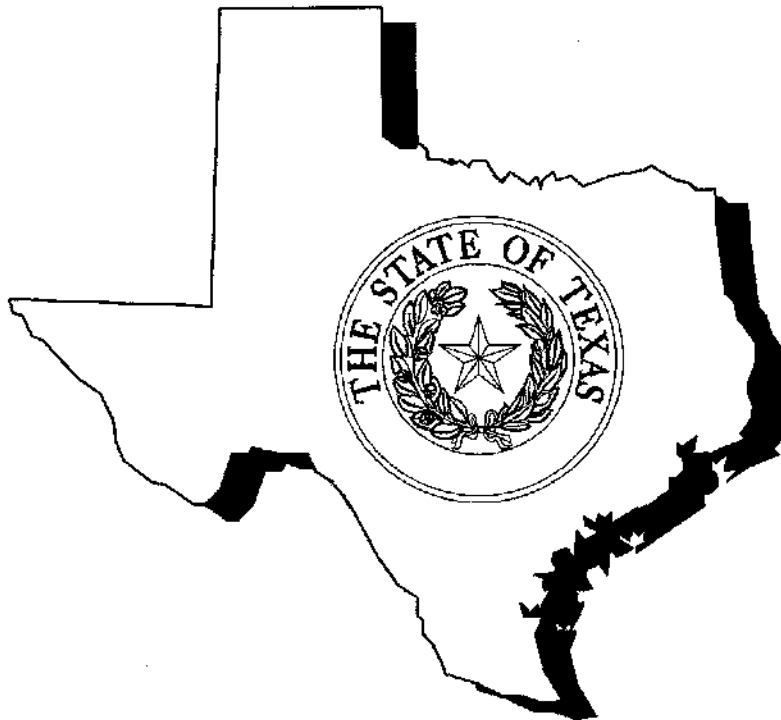
**APPLICATION OF EL PASO  
ELECTRIC COMPANY TO ADJUST  
ITS ENERGY EFFICIENCY COST  
RECOVERY FACTOR**

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**BEFORE THE STATE OFFICE**

**OF**

**ADMINISTRATIVE HEARINGS**



**TSUNGIRIRAI GOTORA**

**IN SUPPORT OF THE SETTLEMENT AGREEMENT**

**INFRASTRUCTURE DIVISION**

**PUBLIC UTILITY COMMISSION OF TEXAS**

**NOVEMBER 1, 2024**

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### ATTACHMENTS

Attachment TG-1 Educational and Professional Background

Attachment TG-2 List of Dockets

**I. STATEMENT OF QUALIFICATIONS**

**Q. Please state your name, occupation, and business address.**

A. My name is Tsungirirai Gatora. I am employed by the Public Utility Commission of Texas (Commission) as a Senior Infrastructure Analyst in the Infrastructure Division. My business address is 1701 N. Congress Avenue, Austin, TX.

**Q. Please describe your professional background.**

A. Attachment TG-1 details my educational and professional background.

**Q. Have you previously testified or provided other types of recommendations in regulatory proceedings?**

A. Yes. Please see Attachment TG-2 for a list of dockets which I have provided recommendations.

**II. PURPOSE OF TESTIMONY**

**Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to support the stipulation and settlement agreement (Agreement) that El Paso Electric Company (EPE), City of El Paso (City), and Commission Staff (collectively, Signatories) have reached in this proceeding.

1     **Q.     Does the Agreement provide for an acceptable resolution of EPE’s request in this**  
2           **proceeding?**

3           A.     Yes. The resolution of the issues in the Stipulation reflects an appropriate and  
4           reasonable balancing of the interests of EPE and its customers. The final terms  
5           constitute a negotiated compromise to which the Signatories agreed after discussions,  
6           and any changes to the Stipulation could undermine its purpose, result in the  
7           withdrawal from the Stipulation by Signatories negatively affected by the changes,  
8           and create additional litigation and costs.

9  
10    **Q.     Do any parties oppose the stipulation?**

11    A.     No.  
12

13    **III.    KEY PROVISIONS OF THE STIPULATION**

14    **Q.     Did the Signatories agree to a reduction in the requested 2025 program year**  
15           **expenditures?**

16    A.     Yes. The Signatories agreed to the following terms with respect to the requested  
17           program year 2025 EECRF expenditures.

- 18           a.    A reduction to EPE’s total EECRF requests for the 2025 program year to  
19                 \$5,631,947. This reflects an agreed reduction of \$72,417 without an agreement  
20                 to the basis of reduction to EPE’s 2023 expenses as reflected in the Settlement  
21                 Agreement.

1     **Q.     What is the effect on the requested EECRF amount?**

2     A.     The total amount to be collected through EPE's 2025 EECRF is \$5,631,947, which is  
3           reflected through the following components:

4           a.   EPE's estimated energy-efficiency costs in program year 2025 of \$5,161,212;

5           b.   projected evaluation, measurement, and verification (EM&V) expenses for the  
6               evaluation of program year 2024 in the amount of \$67,486;

7           c.   an adjustment of \$1,125,164, for EPE's net over-recovery, including interest, of  
8               program year 2023 energy-efficiency costs;

9           d.   an agreed reduction of EPE's 2023 expenses in the amount of \$72,417;

10          e.   rate case expense of \$44,876 (consisting of \$33,488 incurred by El Paso Electric  
11               and \$11,388 incurred by the City of El Paso) for Docket No. 54950, which was  
12               EPE's 2023 EECRF proceeding; and

13          f.   a performance bonus of \$1,555,954.

14

15     **Q.     Please summarize other key provisions of the Stipulation.**

16     A.     Besides the agreement to reduce the EPE's total EECRF request for the 2025 program  
17           year to \$5,631,947, the Signatories agreed to the following terms.

18           a.   EPE's demand goal for 2025 is 11.16 megawatts and EPE's energy goal is  
19               19,552 megawatt-hours.

20           b.   EPE will not recover any energy efficiency costs in base rates.

21           c.   The cost caps for program year 2025 are \$0.001626 per kWh for the residential  
22               class and \$0.001017 per kWh for the commercial classes based on 16 TAC  
23               § 25.182(d)(7)(C).

- 1 d. EPE's tariff will be adjusted to charge the rates for each customer class as  
2 described in Exhibit VHS-01E2 of the Stipulation.
- 3 e. EPE will provide receipts for travel expenses that may be requested in its  
4 next and subsequent EECRF filings.
- 5 f. EPE's administrative costs did not exceed 15% of its total program costs for  
6 program year 2021; EPE's research and development (R&D) costs did not  
7 exceed 10% of its total program costs for program year 2023; and EPE's  
8 cumulative cost of administration and R&D did not exceed 20% of its total  
9 program costs for program year 2023.
- 10 g. EPE's program year 2023 portfolio of programs produced a benefit-cost ratio  
11 of 1.0 or greater as required by 16 TAC § 25.181(d).
- 12 h. EPE's incentive payments did not exceed 100% of avoided cost for any  
13 customer class as required by 16 TAC § 25.181(f).
- 14 i. EPE's demand goal for the 2025 program year was adjusted for line loss as  
15 required by 16 TAC § 25.181(e)(3)(B).  
16

17 **Q. Are the terms of the Agreement fair and reasonable?**

18 A. Yes. Regulatory Accountant, Sandra Hale reviewed the accounting related aspects of  
19 the EECRF, and Rate Analyst, Ethan Blanchard reviewed the rate design-related  
20 aspects of the EECRF. Both Ms. Hale and Mr. Blanchard reviewed the Agreement,  
21 and both communicated that they found the Agreement reasonable. Based on their and  
22 my review of the EECRF, I believe that implementation of the various terms in the  
23 Agreement will result in a fair and reasonable outcome for affected stakeholders,

1            avoids the added cost of continued litigation, and is in the public interest. The  
2            Agreement provides certainty on the resolution of issues.

3

4    **Q.     Does this conclude your testimony?**

5    **A.     Yes.**



The following files are not convertible:

56572 - Tab 1 - Exhibit\_VHS-  
01E2\_2024\_EECRF\_Calculation\_w\_Workpapers\_FOR SETTLEMENT.xlsx

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

Contact [centralrecords@puc.texas.gov](mailto:centralrecords@puc.texas.gov) if you have any questions.

## **Attachment TG-1**

### **Statement of Qualifications**

#### **Tsungirirai Gotora**

I have a Bachelor of Arts Degree in Economics and a Masters of Arts Degree in Economics with a focus in Public Utility Policy and Regulation, both from New Mexico State University.

Prior to my employment at the Commission, I worked at Sharyland Utilities, LP (Sharyland) as a Regulatory Analyst for more than three years. As a Regulatory Analyst, I was responsible for Sharyland's compliance filings with the Commission and the U.S. Energy Information Administration.

After working for Sharyland, I served as a Research Analyst for the Connecticut Department of Energy and Environmental Protection, Bureau of Energy Technology Policy for three years. As a Research Analyst, I analyzed and reviewed natural gas rate case applications; and analyzed and reviewed compliance reports filed by local distribution companies.

My current role at the Commission includes analyzing and reviewing fuel factor applications; fuel reconciliation proceedings; generation certificate of convenience and necessity applications; advanced metering system deployment applications; and service area exceptions and boundary issues.

**Attachment TG-2**

Docket No. 56552

SOAH DOCKET NO. 473-24-17665

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF

Docket No. 56548

SOAH DOCKET NO. 473-24-17310

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR APPROVAL OF ITS TRANSMISSION AND DISTRIBUTION SYSTEM RESILIENCY PLAN

Docket No. 55849

SOAH 473-24-11573

SOUTHWESTERN PUBLIC SERVICE COMPANY'S APPLICATION FOR APPROVAL OF POWER PURCHASED AGREEMENTS PURSUANT TO PUBLIC UTILITY REGULATORY ACT § 36.205(E) AND FOR RELATED RELIEF

Docket No. 55255

SOAH 473-24-02691

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO CONSTRUCT GENERATION FACILITIES IN LAMB COUNTY, TEXAS AND LEA COUNTY, NEW MEXICO; FOR GOOD-CAUSE EXCEPTIONS; AND FOR RELATED RELIEF

Docket No. 54929

SOAH 473-23-24883

APPLICATION OF EL PASO ELECTRIC COMPANY TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR A 150 MW SOLAR FACILITY

Docket No. 54950

SOAH 473-23-18234

APPLICATION OF EL PASO ELECTRIC COMPANY TO REVISE ITS ENERGY EFFICIENCY COST RECOVERY FACTOR

Docket No. 54948

SOAH 473-23-18232

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF

Docket No. 54142

SOAH 473-23-03500

APPLICATION OF EL PASO ELECTRIC COMPANY FOR AUTHORITY TO RECONCILE FUEL COSTS

Docket No. 53679

SOAH 473-22-00990

APPLICATION OF AEP TEXAS INC. TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF

Docket No. 53551

SOAH 473-22-2610

APPLICATION OF EL PASO ELECTRIC COMPANY TO REVISE ITS ENERGY EFFICIENCY COST RECOVERY FACTOR AND ESTABLISH REVISED COST CAPS

Docket No. 53034

SOAH 473-22-1801

SOUTHWESTERN PUBLIC SERVICE COMPANY'S APPLICATION FOR AUTHORITY TO RECONCILE FUEL AND PURCHASED POWER COSTS FOR THE PERIOD JULY 2, 2018 THROUGH JUNE 30, 2021

Docket No. 53542

SOAH 473-22-2605

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR AND RELATED RELIEF

Docket No. 52451

SOAH 473-22-0816

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY FOR APPROVAL OF ADVANCED METERING SYSTEM (AMS) DEPLOYMENT PLAN, AMS SURCHARGE, AND NON-STANDARD METERING SERVICE FEES

Docket No. 52389

SOAH 473-22-0009

SOUTHWESTERN ELECTRIC POWER COMPANY'S REQUEST FOR APPROVAL OF ADVANCED METERING SYSTEM (AMS) DEPLOYMENT PLAN, AMS SURCHARGE AND NON-STANDARD METERING SERVICE FEES

Docket No. 52210

SOAH 473-21-2996

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO IMPLEMENT AN INTERIM NET SURCHARGE FOR UNDER-COLLECTED FUEL COSTS