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SOAH DOCKET NO. 473-24-25125
PUC DOCKET NO. 56954

APPLICATION OF TEXAS-NEW	§	BEFORE THE STATE OFFICE
MEXICO POWER COMPANY FOR	§	OF
APPROVAL OF A SYSTEM	§	
RESILIENCY PLAN	§	ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
TEXAS-NEW MEXICO POWER COMPANY
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-32

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that Texas New Mexico Power Company by and through its representative of record, provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. 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.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Second Order Suspending Rules in Project No. 50664.

Dated: September 4, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

Phillip Lehmann
Managing Attorney

/s/ Kelsey Daugherty
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CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on September 4, 2024, in accordance with the Second Order Suspending Rules, filed in Project No. 50664.

/s/ Kelsey Daugherty
Kelsey Daugherty

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
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DEFINITIONS

- 1) "TNMP" or "you" refers to Texas New Mexico Power Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond your control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. 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.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) 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.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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General

- Staff 1-1** What is the total estimated cost per month for the average residential customer if all of the proposed resiliency measures are approved? Show the calculation for this estimate. Provide the total increase in rates by customer class by year based on the rates tab and the revenue requirement summary. Please provide documentation supporting this response that shows how the rates support the entire expected cost recovery if the full resiliency plan were approved.
- Staff 1-2** Provide the estimated cost per month for the average residential customer separately for each measure proposed. Show the calculation for these estimates.
- Staff 1-3** Please describe any measures that have some portion that are not paid for by the rate payers. Contributions to the cost could come from private investment at customer sites, tax credits and federal grants.
- Staff 1-4** Please provide the company's current Storm Hardening Plan in its entirety as provided by 16 TAC § 25.95(d).
- Staff 1-5** Please provide company's current Vegetation Management Plan in its entirety as provided by 16 TAC § 25.96(e).
- Staff 1-6** Please prioritize the resiliency measures in this proceeding in order of most critical for implementation. Does the order of prioritization follow the BAC values? If not, please explain why not. Please provide all available documentation supporting your response.
- Staff 1-7** Were there any resiliency measures that the company decided not to pursue?

For each Specific Program

- Staff 1-8** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution System Resiliency, Distribution Circuit Hardening Rebuilds program.
- Staff 1-9** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution System Resiliency, Distribution Circuit Overhead Inspections Hardening program.
- Staff 1-10** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution System Resiliency, Strategic Undergrounding Pilot program.

- Staff 1-11** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution System Resiliency, Freeway Strategic Undergrounding program.
- Staff 1-12** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution System Protection Modernization, Mainline Automated Reclosing Deployment program.
- Staff 1-13** Please provide all calculations used to determine the Capital and O&M cost estimates for the Distribution System Protection Modernization, Lateral Reclosing Deployment program.
- Staff 1-14** Please provide all calculations used to determine the Capital and O&M cost estimates for the Vegetation Management, Proactive Vegetation Management (VM) program.
- Staff 1-15** Please provide all calculations used to determine the Capital and O&M cost estimates for the Vegetation Management, Enhanced Tree Risk Assessment and Mitigation program.
- Staff 1-16** Please provide all calculations used to determine the Capital and O&M cost estimates for the Vegetation Management, Remote Sensing program.
- Staff 1-17** Please provide all calculations used to determine the Capital and O&M cost estimates for the Vegetation Management, Risk-Based Data Management program.
- Staff 1-18** Please provide all calculations used to determine the Capital and O&M cost estimates for the Wildfire Mitigation, Asset Protection program.
- Staff 1-19** Please provide all calculations used to determine the Capital and O&M cost estimates for the Wildfire Mitigation, Situational Awareness program.
- Staff 1-20** Please provide all calculations used to determine the Capital and O&M cost estimates for the Wildfire Mitigation, Ignition Mitigation program.
- Staff 1-21** Please provide all calculations used to determine the Capital and O&M cost estimates for the Flood Mitigation, Substation Flood Mitigation program.
- Staff 1-22** Please provide all calculations used to determine the Capital and O&M cost estimates for the Enhanced Operations System Technology, Operations System Technology Strategy, Roadmap, and Governance program.
- Staff 1-23** Please provide all calculations used to determine the Capital and O&M cost estimates for the Enhanced Operations System Technology, Fully Enabled OMS program.
- Staff 1-24** Please provide all calculations used to determine the Capital and O&M cost estimates for the Enhanced Operations System Technology, Resilient, High-Capacity Field Area Network program.
- Staff 1-25** Please provide all calculations used to determine the Capital and O&M cost estimates for the Enhanced Operations System Technology, Project and Portfolio Management and Reporting program.

- Staff 1-26** Please provide all calculations used to determine the Capital and O&M cost estimates for the Cybersecurity, Integrated Security Operations Strategy, Roadmap, and Governance program.
- Staff 1-27** Please provide all calculations used to determine the Capital and O&M cost estimates for the Cybersecurity, OT Cybersecurity Perimeter Protections program.
- Staff 1-28** Please provide all calculations used to determine the Capital and O&M cost estimates for the Cybersecurity, OT Network Baseline and Monitoring program.
- Staff 1-29** Please provide all calculations used to determine the Capital and O&M cost estimates for the Cybersecurity, OT Cybersecurity Event Monitoring Protections program.
- Staff 1-30** Please provide all calculations used to determine the Capital and O&M cost estimates for the Cybersecurity, OT Cybersecurity Configuration Monitoring program.
- Staff 1-31** Please provide all calculations used to determine the Capital and O&M cost estimates for the Physical Security, Substation Security Fencing Hardening program.
- Staff 1-32** Please provide all calculations used to determine the Capital and O&M cost estimates for the Physical Security, Substation Security Technology and Response Upgrades program.