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Filing Date - 2024-11-15 02:45:21 PM

Control Number - 56954

Item Number - 141

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

APPLICATION OF TEXAS-NEW MEXICO POWER COMPANY FOR APPROVAL OF A SYSTEM RESILIENCY PLAN	§ § § §	PUBLIC UTILITY COMMISSION OF TEXAS
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**TEXAS-NEW MEXICO POWER COMPANY’S
RESPONSE TO ATM’S RFI 1-1**

TEXAS-NEW MEXICO POWER COMPANY (“TNMP”) files this response to ATM’s RFI 1-1 to Texas New-Mexico Power Company. Pursuant to SOAH Order No. 3 (the “Order”), TNMP’s response to this request for information shall be made within three days of entry of the Order, making the response due by November 15, 2024. This response is therefore timely. All parties may treat the answers as if they were filed under oath.

TNMP files this response without agreeing to the relevance of the information sought and without waiving its right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,

/s/ Stephanie C. Sparks

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**ATTORNEYS FOR TEXAS-NEW MEXICO
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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November 2024, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Stephanie C. Sparks

Stephanie C. Sparks

ATM RFI 1-1.

TNMP proposes to spend \$2,782 per customer under its system resiliency plan (SRP)¹. Other utilities and their respective SRP costs per customer are shown in the following table:

Docket No.	Utility	Cost (\$ million)	No. of Customers	\$ per Customer
56545	Oncor	\$3,412	4,000,000	853
56548	CenterPoint	\$2,278	2,800,000	814
56735	Entergy Texas	\$335	512,000	654
57057	AEP Texas	\$352	1,100,000	320

Please provide an explanation for TNMP's significantly higher proposed spending per customer compared to other utilities' proposed spending for similar resiliency program activities

Prepared by: Christopher Gerety

Sponsored by: Christopher Gerety

RESPONSE: TNMP is unable to provide a response to this RFI that is not rooted in speculation because the requested comparison is not possible. TNMP has not performed a comprehensive analysis of the measures, programs, and activities set forth in the SRPs filed by Oncor, Centerpoint, Entergy Texas, or AEP Texas (the "Utilities"). Nor is TNMP privy to the detailed, and in some instances confidential, information supporting the Utilities' SRPs.

Not only does this RFI require a fulsome and thorough review and comprehensive understanding of the measures, programs, and activities of the Utilities' SRPs, it also requires TNMP to have a complete understanding of the Utilities' operations and business model, including but not limited to variables such as the particular Utility's baseline and pre-existing infrastructure, policies and procedures, labor costs, and supply chain availability and concerns. Further, in making this comparison, TNMP would have to account for previous foundational investments. For example, for distribution operations technology, each of the Utilities may have different existing infrastructure and programs for D-Scada, distribution field area communications networks, or advanced distribution management or automation. However, part of the impossibility of providing a non-speculative response to this RFI is that

¹ \$751.1 million (Application at 12) / 270,000 customers (Application at 1) = \$2,782 per customer.

it is unknowable how TNMP's SRP compares against the Utilities in terms of how the Utilities' plans are supported by those past foundational investments.

Moreover, TNMP would also be required to have a complete understanding of the nature of the Utilities' service territories and their related geographic conditions, population density, environmental considerations, and weather-related risks. TNMP is uniquely situated in Texas with a diverse service territory and exposure to nearly all types and magnitudes of resiliency events, including but not limited to tropical cyclones, hurricanes, extreme thunderstorms, ice storms, and a significant amount of service territory of heightened fire risk areas.

Each of these variables, of which there are certainly more not specifically identified, would have the potential to impact the cost of a Utility's SRP.

Perhaps the cost-per-customer discrepancy, an arbitrary metric in and of itself with no basis in the rule, is explained by any one or more of these myriad factors. TNMP cannot say, because it does not possess and cannot obtain this information from the Utilities.

The impossibility of the analysis that is required to respond to this RFI is only underscored by the fact that ATM's own expert witness did not himself perform such an analysis.

In sum, the requested analysis is an impossibility, and accordingly, TNMP cannot provide a good-faith response that is not rooted in speculation.