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|                                       |          |                                |
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| <b>APPLICATION OF EL PASO</b>         | <b>§</b> | <b>BEFORE THE</b>              |
| <b>ELECTRIC COMPANY FOR AUTHORITY</b> | <b>§</b> | <b>STATE OFFICE OF</b>         |
| <b>TO RECONCILE FUEL COSTS</b>        | <b>§</b> | <b>ADMINISTRATIVE HEARINGS</b> |

**REDACTED**  
**DIRECT TESTIMONY OF**  
**SCOTT NORWOOD**  
**ON BEHALF OF**  
**THE CITY OF EL PASO**

**MARCH 25, 2025**

## TABLE OF CONTENTS

| <u>SECTION</u>  | <u>PAGE</u> |
|---|-------------|
| I. INTRODUCTION .....   | 1           |
| II. SUMMARY OF TESTIMONY .....  | 3           |
| III. DESCRIPTION OF EPE'S APPLICATION .....                                 | 4           |
| IV. RE-ALLOCATION OF BV PPA ENERGY COSTS (Preliminary Order Issue 28) ..... | 6           |
| V. IMPUTED CAPACITY CHARGE CREDITS (Preliminary Order Issue 29) .....       | 9           |
| VI. REALLOCATION OF NEWMAN 6 FUEL COSTS (Preliminary Order Issue 30) .....  | 12          |
| VII. CITY'S RATE CASE EXPENSE (Preliminary Order Issues 31 and 32) .....    | 14          |

### EXHIBITS

|      |  |
|------|--|
| SN-1 | Background and Experience of Scott Norwood                         |
| SN-2 | Excerpt Regarding Capacity Needs from EPE's 2021 IRP               |
| SN-3 | (CONFIDENTIAL) BV PPA Solar Facility Pricing Provisions            |
| SN-4 | Calculation of Imputed Capacity Adjustments                        |
| SN-5 | Summary of Norwood Energy Consulting Rate Case Expenses at 2/28/25 |
| SN-6 | Declaration of Norman J. Gordon on Rate Case Expense               |

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME, TITLE AND BUSINESS ADDRESS.**

A. My name is Scott Norwood. I am President of Norwood Energy Consulting, L.L.C. My business address is 5926 Lookout Mountain Drive, Austin, Texas 78731.

**Q. WHAT IS YOUR OCCUPATION?**

A. I am an energy consultant specializing in the areas of electric utility regulation, resource planning and energy procurement.

**Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.**

A. I have over 40 years of experience in the electric utility industry. Since January of 2004, I have served as President and sole proprietor of Norwood Energy Consulting, L.L.C. In this capacity, I have provided electric utility regulatory consulting services to electric consumers and governmental organizations. My consulting practice has been focused primarily on the areas of electric resource planning; power supply system dispatch and operations; transmission planning analyses; and evaluations of electric utility fuel supply and purchased power issues. Before founding Norwood Energy Consulting, I was employed for 18 years as a Principal and Director of the Deregulation Services Department of GDS Associates, Inc., an electric utility consulting firm. From 1984 to 1986, I was employed as Manager of Power Plant Engineering for the Staff of the Public Utility Commission of Texas, where I was responsible for analyzing and presenting testimony addressing resource planning, fuel, and purchased power cost issues arising from electric utility regulatory filings with the Commission. From 1980 to 1984, I was employed by Austin Energy as a Power Plant Engineer, in which capacity I directed electrical

1 maintenance and design projects at three gas-fired power plants. I received my Bachelor  
2 of Science degree in electrical engineering from the University of Texas in December of  
3 1980.<sup>1</sup>

4 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS CASE?**

5 A. I am testifying on behalf of the City of El Paso ("City" or "CEP").

6 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PUBLIC UTILITY**  
7 **COMMISSION OF TEXAS?**

8 A. Yes. I have filed testimony in numerous past proceedings before the Commission during  
9 my 38 years as a regulatory consultant and as a former member of the Commission's staff,  
10 including proceedings involving adjustments to base rates, new-plant certification  
11 proceedings, fuel-factor adjustments, and fuel-reconciliation applications. I have  
12 represented the City in the evaluation of numerous El Paso Electric Company ("EPE" or  
13 "Company") regulatory proceedings for more than 30 years, including PUCT Docket Nos.  
14 30143, 34695, 37690, 38361, 40094, 41852, 46308, 46025, 48973, 50058, and 54142  
15 (EPE's last fuel reconciliation case). Through my participation in these and other past EPE  
16 regulatory proceedings, I am quite familiar with the Company's system operations and  
17 generating resources and other issues raised by the Company's fuel reconciliation  
18 application in this case.

19 During my career I also have testified in over 200 regulatory proceedings involving  
20 base rate, fuel, and power plant certification matters before state regulatory commissions  
21 in 16 states, including Alaska, Arkansas, Florida, Georgia, Illinois, Iowa, Michigan,

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<sup>1</sup> See Exhibit SN-1 for a detailed summary of my background and project experience.

1 Missouri, New Jersey, Louisiana, Ohio, Oklahoma, Texas, Virginia, Washington and  
2 Wisconsin.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

4 A. The purpose of my testimony is to present my evaluation and recommendations regarding  
5 EPE's application for final reconciliation of fuel and purchased power expenses incurred  
6 over the 24-month period ending March 31, 2024 ("Reconciliation Period").

7 **Q. HAVE YOU PREPARED ANY EXHIBITS TO SUPPORT YOUR TESTIMONY?**

8 A. Yes. I have prepared 6 exhibits which are included with my testimony.

9 **II. SUMMARY OF TESTIMONY**

10 **Q. PLEASE SUMMARIZE YOUR TESTIMONY AND RECOMMENDATIONS.**

11 A. EPE is requesting authority to reconcile \$284.8 million of Texas retail fuel and purchased  
12 power expense and \$346.3 million of fuel factor revenue incurred during the Reconciliation  
13 Period ending March 31, 2024. My primary conclusions and recommendations regarding  
14 the EPE's request for final reconciliation of fuel and purchased power expenses and certain  
15 other related proposals are as follows:

16 1) I recommend that the Commission reject EPE's request to re-allocate a portion  
17 of the Texas jurisdiction's share of energy supplied from the BV PPA to its New Mexico  
18 jurisdiction in order to meet New Mexico RPS requirements. (Preliminary Order Issue 28)

19 2) I recommend that an imputed capacity credit of \$5.36/kW-month, which is the  
20 capacity charge for the 50 MW BVEC storage facility under the BV PPA, be applied for  
21 determining imputed capacity credits for the BVEC solar facility for the months of July  
22 2023 through March 2024. My recommendation results in a total imputed capacity credit

1 for the BVEC solar facility of \$4.82 million (Total Company) which reduces EPE's Texas  
2 retail fuel expense by approximately \$3.85 million. (Preliminary Order Issue 29)

3 3) I recommend that the approximate \$100/MWh energy price premium EPE paid  
4 for 2022 summer on-peak firm energy purchases to meet its system capacity reserves be  
5 treated as imputed capacity costs and removed from the Company's reconcilable expense  
6 balances. My recommendation results in a credit to reconcilable fuel expense of  
7 approximately \$5.25 million on a Total Company basis, which results in a reduction of  
8 \$4.19 million on a Texas retail basis.

9 4) I recommend that the Commission reject EPE's request to allocate 100% of  
10 Newman 6 energy and fuel expense incurred during the Reconciliation Period to the Texas  
11 jurisdiction, and that the Company be allowed to carry forward the estimated \$225,000  
12 impact of this proposal for final review in EPE's next fuel reconciliation case at which time  
13 a final determination of whether Newman 6 should be allocated 100% to the Texas  
14 jurisdiction is likely to have been decided. (Preliminary Order Issue 30)

15 5) I request that the Commission approve the City's request for reimbursement of  
16 rate case expenses in this case, which were reasonably incurred and meet all of the  
17 Commission's historical standards for recovery as explained further in my testimony.  
18 (Preliminary Order Issues 31 and 32)

### 19 **III. DESCRIPTION OF EPE'S APPLICATION**

20 **Q. PLEASE DESCRIBE EPE'S APPLICATION FOR AUTHORITY TO RECONCILE**  
21 **FUEL AND PURCHASED POWER COSTS.**

22 A. EPE's Application in this case requests authority to reconcile \$284.8 million of Texas retail  
23 fuel and purchased power expense and \$346.3 million of fuel factor revenue incurred

1 during the Reconciliation Period ending March 31, 2024.<sup>2</sup> The Company's Application  
2 indicates that after including the ending balance from the last reconciliation period, and  
3 making necessary reconciliation period adjustments, EPE is left with a net Reconciliation  
4 Period ending under-recovery balance of \$0.2 million, which the Company requests to  
5 carry forward as the starting balance for its next Reconciliation Period.<sup>3</sup>

6 **Q. WHAT SPECIFIC RELIEF IS EPE SEEKING IN THIS CASE?**

7 A. EPE's Application requests that the Commission approve the Company's request for final  
8 reconciliation of its fuel and purchased-power expenses and revenues during the  
9 Reconciliation Period. Specifically, EPE requests the following relief:

- 10 1. a prudence finding for the fuel-related contracts and arrangements under which  
11 fuel or power was taken or transported during the reconciliation period;
- 12 2. approval of EPE's execution of, and purchases of energy under, the Buena Vista  
13 Energy Center purchased-power agreement ("BV PPA");
- 14 3. approval of EPE's reallocation of the portion of the energy purchased under the  
15 BV PPA in February and March of 2024 that had previously been allocated to  
16 Texas customers to serve New Mexico customers;
- 17 4. approval of the reversal of a credit for an imputed capacity charge for the solar  
18 portion of the BV PPA for the period of July 2023 through March 2024 in the  
19 amount of \$2.7 million in the adjusted fuel reconciliation period balance; and

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<sup>2</sup> See Application, page 2.

<sup>3</sup> See Application, pages 2-3.



1           5. authorization to seek recovery in EPE's next base-rate case of the reasonable rate-  
2           case expenses that it and any intervening municipalities incur in this case.<sup>4</sup>

3   **Q.   WHAT IS THE STANDARD FOR DETERMINING WHETHER EPE'S**  
4       **APPLICATION FOR FINAL RECONCILIATION OF FUEL AND PURCHASED**  
5       **POWER EXPENSES SHOULD BE APPROVED?**

6   A.   16 Tex. Admin. Code § 25.236(d) provides that:

7           1)   In a proceeding to reconcile fuel factor revenues and expenses, an electric  
8           utility has the burden of showing that:

9           (A)   its eligible fuel expenses during the reconciliation period were reasonable  
10           and necessary expenses incurred to provide reliable electric service to retail  
11           customers;

12           (B)   if its eligible fuel expenses for the reconciliation period included an item or  
13           class of items supplied by an affiliate of the electric utility, the prices  
14           charged by the supplying affiliate to the electric utility were reasonable and  
15           necessary and no higher than the prices charged by the supplying affiliate  
16           to its other affiliates or divisions or to unaffiliated persons or corporations  
17           for the same item or class of items; and

18           (C)   it has properly accounted for fuel-related revenues collected pursuant to the  
19           fuel factor during the reconciliation period.

20   **IV. RE-ALLOCATION OF BV PPA ENERGY COSTS (Preliminary Order Issue 28<sup>5</sup>)**

21   **Q.   PLEASE DESCRIBE THE BV PPA.**

22   A.   In October 2019, EPE entered into a 20-year PPA with Buena Vista Energy Center, LLC  
23       ("Buena Vista") to purchase capacity and energy from the Buena Vista Energy Center

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<sup>4</sup> See Application, pages 4-5.

<sup>5</sup> 28. Should the Commission approve El Paso Electric's reallocation of the portion of the energy purchased under the BV PPA in February and March 2024 that had previously been allocated to Texas customers to serve New Mexico customers?

1 (“BVEC”) located in Otero County, New Mexico.<sup>6</sup> The BVEC consists of a 100 MW  
2 solar photovoltaic (“PV”) generating plant and a 50 MW battery energy storage facility.  
3 The BVEC entered commercial operations and began supplying capacity and energy to  
4 EPE under the BV PPA on July 11, 2023.<sup>7</sup>

5 **Q. IS THE BV PPA A “SYSTEM RESOURCE” THAT SERVES EPE’S TEXAS AND**  
6 **NEW MEXICO CUSTOMERS?**

7 A. Yes.<sup>8</sup>

8 **Q. HAS THE COMMISSION PREVIOUSLY ADDRESSED THE PRUDENCE OF**  
9 **THE BV PPA?**

10 A. No. EPE is requesting approval of the BV PPA for the first time in this case and in support  
11 of its request asserts that: 1) the contract price is reasonable with fixed charges from the  
12 BV solar facility at \$24.49/MWh and a charge of \$5.36/kW-month for capacity from the  
13 BV battery storage facility; 2) the transaction was chosen through EPE’s 2017 All-Source  
14 Request for Proposals (“2017 RFP”) process with oversight by an Independent Evaluator  
15 (“IE”); 3) the PPA was evaluated to be part of the lowest cost portfolio of resources to  
16 address EPE’s forecasted capacity and energy needs; and 4) the PPA provided low-cost  
17 energy to EPE’s system during the Reconciliation Period.

18 **Q. DO YOU HAVE ANY QUESTIONS OR CONCERNS REGARDING THE**  
19 **PRUDENCE OF EPE’S DECISION TO ENTER INTO THE BV PPA?**

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<sup>6</sup> See the Direct Testimony of EPE witness Victor Martinez, page 31.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

1 A. No. The BV PPA pricing does appear to be reasonable and EPE's resource plans indicate  
2 that the Company needed additional capacity to meet its planning reserve requirement even  
3 after the PPA was added.<sup>9</sup>

4 **Q. IS EPE PROPOSING ANY SPECIAL RATEMAKING ADJUSTMENTS**  
5 **RELATED TO THE BV PPA CHARGES INCURRED DURING THE**  
6 **RECONCILIATION PERIOD?**

7 A. Yes. EPE has proposed two adjustments to charges incurred for the BV PPA during the  
8 Reconciliation Period. The first adjustment proposed by EPE is to reflect the reallocation  
9 of a portion of Texas jurisdictional share of the BV PPA energy and charges to its New  
10 Mexico jurisdiction in order to meet the requirements of a New Mexico renewable energy  
11 portfolio law.<sup>10</sup> The second adjustment proposed by EPE is to reverse approximately  
12 \$2.7 million of credits for imputed capacity costs that the Company had originally included  
13 in as reconcilable fuel expense for energy delivered from the 100 MW Buena Vista solar  
14 facility.<sup>11</sup> I will address EPE's proposal to reverse these imputed capacity credits later in  
15 my testimony.

16 **Q. WHAT IS YOUR RECOMMENDATION ON EPE'S PROPOSAL TO RE-**  
17 **ALLOCATE A PORTION OF THE TEXAS JURISDICTIONAL SHARE OF BV**  
18 **PPA ENERGY TO THE NEW MEXICO JURISDICTION?**

19 A. I recommend that the Commission reject EPE's proposal to re-allocate a portion of the  
20 Texas jurisdiction's share of energy supplied from the BV PPA to its New Mexico  
21 jurisdiction in order to meet New Mexico RPS requirements. The BV PPA is a system

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<sup>9</sup> See Exhibit SN-2, excerpt from EPE's response to City 1-13, (EPE's 2021 New Mexico IRP).

<sup>10</sup> See the Direct Testimony of EPE witness George Novela, pages 11-12.

<sup>11</sup> See the Direct Testimony of EPE witness George Novela, pages 11.

1 asset, and it is not appropriate to divert a portion of Texas's load ratio share of the BV PPA  
2 to serve New Mexico customers just because EPE cannot meet its renewable energy  
3 obligations in that jurisdiction. EPE's Texas customers should retain their full entitlement  
4 to the benefits of the BV PPA.

5 **V. IMPUTED CAPACITY CHARGE CREDITS (Preliminary Order Issue 29)<sup>12</sup>**

6 **Q. WHAT IS EPE'S RATIONALE FOR REVERSING CREDITS FOR IMPUTED**  
7 **CAPACITY COSTS THAT THE COMPANY ORIGINALLY INCLUDED IN ITS**  
8 **RECONCILABLE FUEL EXPENSE BALANCE?**

9 A. EPE states that it originally applied a credit of \$2.4 million to Texas customers for imputed  
10 capacity charges related to the BV PPA solar facility for the period of July 2023 through  
11 February 2024.<sup>13</sup> The Company explains that, after further evaluation, it determined that  
12 the capacity charge for the BV PPA solar facility was already accounted for in the  
13 \$5.36/kW-month charge for the battery storage facility.<sup>14</sup> As a result, EPE has proposed  
14 an adjustment to reverse the imputed capacity charge credits it had originally applied for  
15 the period July 2023 through March of 2024.<sup>15</sup>

16 **Q. DO YOU AGREE WITH EPE'S CONCLUSION THAT THE PV PPA CAPACITY**  
17 **CHARGE FOR THE 100 MW SOLAR COMPONENT OF THE BVEC IS**  
18 **ACCOUNTED FOR IN THE \$5.36/KW-MONTH PPA CHARGE FOR THE 50 MW**  
19 **BATTERY STORAGE COMPONENT OF THE FACILITY?**

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<sup>12</sup> 29. Should the Commission approve El Paso Electric's reversal of a credit for an imputed capacity charge for the solar portion of the BV PPA for the period of July 2023 through March 2024?

<sup>13</sup> See the Direct Testimony of EPE witness Julissa Reza, page 23.

<sup>14</sup> Ibid.

<sup>15</sup> Ibid.

1 A. No. I see no basis for EPE's claim that the \$5.36/kW-month battery storage capacity  
2 charge accounts for the capacity charge for the 100 MW BVEC solar facility.<sup>16</sup> In fact,  
3 the BV PPA's pricing and delivery provisions contradict EPE's claim that the \$5.36/kW-  
4 month capacity charge applied to the battery storage component of the BV PPA is intended  
5 to represent the capacity charge for both the BVEC storage and solar facilities.

6 **Q. PLEASE EXPLAIN HOW THE BV PPA TERMS CONTRADICT EPE'S**  
7 **POSITION THAT THE BV SOLAR CAPACITY CHARGES ARE SUBSUMED IN**  
8 **THE BV STORAGE CHARGES.**

9 A. There are several provisions of the BV PPA contract that make clear that the \$5.36/kW-  
10 month capacity charge applies only to 50 MW BV battery storage capacity. For example,

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

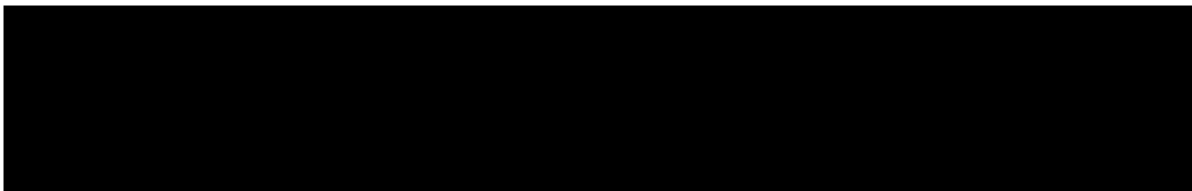
18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

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<sup>16</sup> See the Direct Testimony of EPE witness George Novela, pages 14-15.



Accordingly, based on the recognized separate capacity attributes, different capacity ratings, and separate pricing provisions of the BV solar and storage facilities, a separate imputed capacity charge credit should be applied to reflect the imputed cost of capacity supplied from the 100 MW BV Solar facility, which is not an eligible reconcilable expense.

**Q. WHAT IS YOUR RECOMMENDATION ON THIS ISSUE?**

A. I recommend that an imputed capacity credit of \$5.36/kW-month, which is the capacity charge for the 50 MW BVEC storage facility under the BV PPA, be applied as the basis for determining imputed capacity credits for the BVEC solar facility for the months of July 2023 through March 2024. My recommendation results in a total imputed capacity credit for the BVEC solar facility of \$4.82 million (Total Company) for the Reconciliation Period. This adjustment reduces EPE's Texas retail fuel expense by approximately \$3.85 million.<sup>21</sup>

**Q. DID EPE INCUR OTHER CAPACITY COSTS DURING THE RECONCILIATION PERIOD WHICH THE COMPANY HAS NOT REMOVED FROM ITS RECONCILABLE EXPENSE BALANCE?**

A. Yes. The Company acknowledges that it made certain other on-peak energy purchases during the months of June, July and August of 2022, in order to meet EPE's annual reserve margin and capacity planning targets.<sup>22</sup> The average cost of these energy purchases ranges

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<sup>21</sup> See Exhibit SN-4.

<sup>22</sup> See the Direct Testimony of EPE witness Victor Martinez, page 31.

1 from \$192/MWh in June to \$221/MWh in August of 2022. These costs were  
2 approximately \$100/MWh higher than the system average cost of firm energy purchases  
3 made by EPE during these same months. However, EPE has not proposed any adjustments  
4 to its reconcilable energy purchase expenses to account for the \$100/MWh premium it paid  
5 for these firm purchases for EPE's capacity reserves during the 2022 summer daily on-  
6 peak periods.

7 **Q. WHAT IS YOUR RECOMMENDATION REGARDING EPE'S SUMMER ON-**  
8 **PEAK PURCHASES DURING 2022?**

9 A. I recommend that the approximate \$100/MWh energy price premium EPE paid for these  
10 2022 summer peak firm energy purchases be treated as imputed capacity costs and removed  
11 from the Company's reconcilable expense balances. My recommendation results in a  
12 credit to reconcilable fuel expense of approximately \$5.25 million on a Total Company  
13 basis, which results in a reduction of \$4.19 million on a Texas retail basis.<sup>23</sup>

14 **VI. REALLOCATION OF NEWMAN 6 FUEL COSTS (Preliminary Order Issue 30<sup>24</sup>)**

15 **Q. WHAT IS EPE'S REQUEST REGARDING THE ALLOCATION OF NEWMAN 6**  
16 **FUEL COSTS INCURRED DURING THE RECONCILIATION PERIOD?**

17 A. EPE is requesting that it be allowed to allocate 100% of the Newman 6 fuel costs and  
18 energy production during the Reconciliation Period to the Texas jurisdiction due to the fact  
19 that the New Mexico PSC has denied EPE's application for approval of Newman 6.

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<sup>23</sup> See Exhibit SN-4.

<sup>24</sup> 30. Should the Commission approve El Paso Electric's request to reallocate its Newman Unit 6 fuel costs in this proceeding?

1 **Q. WHAT IS THE ESTIMATED IMPACT OF EPE'S PROPOSAL TO ALLOCATE**  
2 **100% OF NEWMAN 6 FUEL COSTS TO TEXAS?**

3 A. EPE estimates that its proposal to allocate 100% of Newman 6 to Texas would increase  
4 EPE's Texas reconcilable fuel expenses by approximately \$225,000.<sup>25</sup>

5 **Q. DO YOU HAVE ANY CONCERNS REGARDING EPE'S REQUEST TO**  
6 **ALLOCATE 100% OF NEWMAN 6 FUEL COSTS TO THE TEXAS**  
7 **JURISDICTION?**

8 A. Yes. As a general matter, I am concerned with the concept of allocating specific EPE  
9 supply-side resources that were originally justified as system resources entirely to a  
10 specific jurisdiction. I am also concerned that deciding whether EPE should allocate 100%  
11 of Newman 6 fuel costs to the Texas jurisdiction needs to be evaluated from a holistic view  
12 that considers all impacts on the system over a long-term period. This comprehensive  
13 analysis is necessary so that all capital and operating costs and benefits of Newman 6 and  
14 any potential operational impacts associated with dedicating the asset entirely to the Texas  
15 jurisdiction are understood before a decision is made to make such a transfer. The  
16 Company's current base rate case is a more appropriate forum to evaluate the total capital  
17 and ownership costs of Newman 6 and to determine whether allocating 100% of Newman  
18 6 to the Texas jurisdiction is in the public interest.

19 **Q. WHAT IS YOUR RECOMMENDATION ON THIS ISSUE?**

20 A. I recommend that the Commission reject EPE's request to allocate 100% of Newman 6  
21 energy and fuel expense incurred during the Reconciliation Period to the Texas jurisdiction,  
22 and that the Company be allowed to carry forward the estimated \$225,000 impact of this

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<sup>25</sup> See the Direct Testimony of EPE witness Julissa Reza, page 27, lines 17-31 and Exhibit JIR-3.



proposal for final review in EPE's next fuel reconciliation case at which time a final determination of whether Newman 6 should be allocated 100% to the Texas jurisdiction is likely to have been decided.

**VII. CITY'S RATE CASE EXPENSE (Preliminary Order Issues 31 and 32)**

**Q. WHAT SERVICES HAS NORWOOD ENERGY CONSULTING PROVIDED TO THE CITY OF EL PASO IN THIS CASE?**

A. The services provided by Norwood Energy Consulting to the City to date include: 1) review and analysis of EPE's direct testimony; 2) preparation of discovery; 3) analysis of EPE's discovery responses, 4) review of past testimony and orders addressing issues in this case, 5) identification and analysis of issues; and 6) preparation of direct testimony.

**Q. WHAT ARE THE TOTAL CHARGES INCURRED BY NORWOOD ENERGY CONSULTING FOR SERVICES PROVIDED TO THE CITY IN THIS CASE?**

A. Norwood Energy Consulting has incurred total charges of \$22,080 for services it has provided to the City through February 28, 2025.<sup>26</sup>

**Q. ARE THE HOURLY RATES CHARGED TO THE CITY BY NORWOOD ENERGY CONSULTING FOR THIS CASE REASONABLE AND CONSISTENT WITH THE FEES CHARGED BY OTHER FIRMS FOR SIMILAR CONSULTING SERVICES?**

A. Yes. My hourly rate of \$240 for services provided to the City compares reasonably to the hourly rates charged by other regulatory consultants with similar experience, based on my personal knowledge of rates charged in other proceedings. The hourly rate charged for this

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<sup>26</sup> See Exhibit SN-5.

1 project is equal to or less than the hourly rates charged by Norwood Energy Consulting to  
2 other clients for similar services provided during the period contemporaneous with this  
3 proceeding.

4 **Q. HAVE THE SERVICES PERFORMED BY NORWOOD ENERGY CONSULTING**  
5 **FOR THE CITY IN THIS PROCEEDING BEEN PROVIDED IN A**  
6 **PROFESSIONAL, TIMELY, AND EFFICIENT MANNER?**

7 A. Yes. The services provided to the City by Norwood Energy Consulting are detailed on  
8 monthly invoices, which include a detailed description of the services performed, and the  
9 number of hours charged in each day. The amounts charged for such service are  
10 reasonable, the calculation of the charges is correct, and there has been no double billing  
11 of any charges. All work performed was conducted in a timely and efficient manner and  
12 is relevant and necessary to address issues identified by Norwood Energy Consulting.

13 **Q. HAS NORWOOD ENERGY CONSULTING CHARGED 12 OR MORE HOURS IN**  
14 **ANY ONE DAY ON THIS PROJECT?**

15 A. No.

16 **Q. HAS NORWOOD ENERGY CONSULTING CHARGED ANY AMOUNTS FOR**  
17 **TRAVEL, LODGING, MEALS, OR OTHER EXPENSES INCURRED DIRECTLY**  
18 **FOR THIS PROJECT?**

19 A. No. Norwood Energy Consulting only charges for the actual services provided.

20 **Q. WHAT ARE THE ESTIMATED REMAINING CHARGES FOR NORWOOD**  
21 **ENERGY CONSULTING TO COMPLETE THIS CASE?**

22 A. I estimate that Norwood Energy Consulting will incur an additional \$16,800 for remaining  
23 services to be provided to the City after February 28, 2025 to complete this case, including:

1 1) final analysis of issues; 2) preparation of direct testimony; 3) responding to discovery  
2 responses from EPE; 4) reviewing and conducting discovery on EPE's rebuttal testimony;  
3 5) assisting with the City's settlement negotiations; 6) assisting with development of cross  
4 examination questions for EPE witnesses; 7) preparing for testimony and attending the  
5 hearing; 8) providing technical assistance in the preparation of briefs and any appeals.

6 **Q. HAS THE CITY INCURRED OTHER CHARGES FOR THIS CASE?**

7 A. Yes. Norman J. Gordon and Donald Davie have incurred charges totaling \$20,593.67  
8 through February 28, 2025 for Mr. Gordon and through March 18, 2025 for Mr. Davie.  
9 These charges are reasonable and meet the Commission's guidelines for recovery of rate  
10 case expenses as explained in Mr. Gordon's declaration, which is attached to my  
11 testimony.<sup>27</sup>

12 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

13 A. Yes.

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<sup>27</sup> See Exhibit SN-6.

**DON SCOTT NORWOOD**  
**Norwood Energy Consulting, L.L.C.**

P. O. Box 30197  
Austin, Texas 78755-3197  
scott@scottnorwood.com  
(512) 297-1889

**SUMMARY**

Scott Norwood is an energy consultant with over 40 years of utility industry experience in the areas of regulatory consulting, resource planning and energy procurement. His clients include government agencies, publicly-owned utilities, public service commissions, municipalities and various electric consumer interests. Over the last 15 years Mr. Norwood has presented expert testimony on electric utility ratemaking, resource planning, and electric utility restructuring issues in over 200 regulatory proceedings in Arkansas, Georgia, Iowa, Illinois, Michigan, Missouri, New Jersey, Oklahoma, South Dakota, Texas, Virginia, Washington and Wisconsin.

Prior to founding Norwood Energy Consulting in January of 2004, Mr. Norwood was employed for 18 years by GDS Associates, Inc., a Marietta, Georgia based energy consulting firm. Mr. Norwood was a Principal of GDS and directed the firm's Deregulated Services Department which provided a range of consulting services including merchant plant due diligence studies, deregulated market price forecasts, power supply planning and procurement projects, electric restructuring policy analyses, and studies of power plant dispatch and production costs.

Before joining GDS, Mr. Norwood was employed by the Public Utility Commission of Texas as Manager of Power Plant Engineering from 1984 through 1986. He began his career in 1980 as Staff Electrical Engineer with the City of Austin's Electric Utility Department where he was in charge of electrical maintenance and design projects at three gas-fired power plants.

Mr. Norwood is a graduate of the college of electrical engineering of the University of Texas.

**EXPERIENCE**

The following summaries are representative of the range of projects conducted by Mr. Norwood over his 30-year consulting career.

**Regulatory Consulting**

*Oklahoma Industrial Energy Consumers* - Assisted client with technical and economic analysis of proposed EPA regulations and compliance plans involving control of air emissions and potential conversion of coal-to-gas conversion options.

*Cities Served by Southwestern Electric Power Company* Analyzed and presented testimony regarding the prudence of a \$1.7 billion coal-fired power plant and related settlement agreements with Sierra Club.

*New York Public Service Commission* - Conducted inter-company statistical benchmarking analysis of Consolidated Edison Company to provide the New York Public Service Commission with guidance in determining areas that should be reviewed in detailed management audit of the company.

*Oklahoma Industrial Energy Consumers* - Analyzed and presented testimony on affiliate energy trading transactions by AEP in ERCOT.

*Virginia Attorney General* – Analyzed and presented testimony regarding distribution tap line undergrounding program proposed by Dominion Virginia Power Company.

*Cities Served by Southwestern Electric Power Company* Analyzed and presented testimony regarding the prudence of the utility's decision to retire the Welsh Unit 2 coal-fired generating unit in conjunction with a litigation settlement agreement with Sierra Club.

*Georgia Public Service Commission* - Presented testimony before the Georgia Public Service Commission in Docket 3840-U, providing recommendations on nuclear O&M levels for Hatch and Vogtle and recommending that a nuclear performance standard be implemented in the State of Georgia.

*Oklahoma Industrial Energy Consumers* - Analyzed and presented testimony addressing power production and coal plant dispatch issues in fuel prudence cases involving Oklahoma Gas and Electric Company.

*Georgia Public Service Commission* - Analyzed and provided recommendations regarding the reasonableness of nuclear O&M costs, fossil O&M costs and coal inventory levels reported in GPC's 1990 Surveillance Filing.

*City of Houston* - Analyzed and presented comments on various legislative proposals impacting retail electric and gas utility operations and rates in Texas.

*New York Public Service Commission* - Conducted inter-company statistical benchmarking analysis of Rochester Gas & Electric Company to provide the New York Public Service Commission with guidance in determining areas which should be reviewed in detailed management audit of the company.

*Virginia Attorney General* – Analyzed and presented testimony regarding an accelerated vegetation management program and rider proposed by Appalachian Power Company.

*Oklahoma Attorney General* – Analyzed and presented testimony regarding fuel and

purchased power, depreciation and other expense items in Oklahoma Gas & Electric Company's 2001 rate case before the Oklahoma Corporation Commission.

*City of Houston* - Analyzed and presented testimony regarding fossil plant O&M expense levels in Houston Lighting & Power Company's rate case before the Public Utility Commission of Texas.

*City of El Paso* - Analyzed and presented testimony regarding regulatory and technical issues related to the Central & Southwest/El Paso Electric Company merger and rate proceedings before the PUCT, including analysis of merger synergy studies, fossil O&M and purchased power margins.

*Residential Ratepayer Consortium* - Analyzed Fermi 2 replacement power and operating performance issues in fuel reconciliation proceedings for Detroit Edison Company before the Michigan Public Service Commission.

*Residential Ratepayer Consortium* - Analyzed and prepared testimony addressing coal plant outage rate projections in the Consumer's Power Company fuel proceeding before the Michigan Public Service Commission.

*City of El Paso* - Analyzed and developed testimony regarding Palo Verde operations and maintenance expenses in El Paso Electric Company's 1991 rate case before the Public Utility Commission of Texas.

*City of Houston* - Analyzed and developed testimony regarding the operations and maintenance expenses and performance standards for the South Texas Nuclear Project, and operations and maintenance expenses for the Limestone and Parish coal-fired power plants in HL&P's 1991 rate case before the PUCT.

*City of El Paso* - Analyzed and developed testimony regarding Palo Verde operations and maintenance expenses in El Paso Electric Company's 1990 rate case before the Public Utility Commission of Texas. Recommendations were adopted.

### **Energy Planning and Procurement Services**

*Virginia Attorney General* – Review and provide comments or testimony regarding annual integrated resource plan filings made by Dominion Virginia Power and Appalachian Power Company.

*Dell Computer Corporation* – Negotiated retail power supply agreement for Dell's Round Rock, Texas facilities producing annual savings in excess of \$2 million.

*Texas Association of School Boards Electric Aggregation Program* – Serve as TASB's consultant in the development, marketing and administration of a retail electric aggregation

program consisting of 2,500 Texas schools with a total load of over 300 MW. Program produced annual savings of more than \$30 million in its first year.

*Oklahoma Industrial Energy Consumers* - Analyzed and drafted comments addressing integrated resource plan filings by Public Service Company of Oklahoma and Oklahoma Gas and Electric Company.

*S.C. Johnson* - Analyzed and presented testimony addressing Wisconsin Electric Power Company's \$4.1 billion CPCN application to construct three coal-fired generating units in southeast Wisconsin.

*Oklahoma Industrial Energy Consumers* - Analyzed wind energy project ownership proposals by Oklahoma Gas and Electric Company and presented testimony addressing project economics and operational impacts.

*City of Chicago, Illinois Attorney General, Illinois Citizens' Utility Board* - Analyzed Commonwealth Edison's proposed divestiture of the Kincaid and State Line power plants to SEI and Dominion Resources.

*Georgia Public Service Commission* - Analyzed and presented testimony on Georgia Power Company's integrated resource plan in a certification proceeding for an eight unit, 640 MW combustion turbine facility.

*South Dakota Public Service Commission* - Evaluated integrated resource plan and power plant certification filing of Black Hills Power & Light Company.

*Shell Leasing Co.* - Evaluated market value of 540 MW western coal-fired power plant.

*Community Energy Electric Aggregation Program* – Served as Community Energy's consultant in the development, marketing and start-up of a retail electric aggregation program consisting of major charitable organizations and their donors in Texas.

*Austin Energy* – Conducted competitive solicitation for peaking capacity. Developed request for proposal, administered solicitation and evaluated bids.

*Austin Energy* - Provided technical assistance in the evaluation of the economic viability of the

City of Austin's ownership interest in the South Texas Project.

*Austin Energy* - Assisted with regional production cost modeling analysis to assess production cost savings associated with various public power merger and power pool alternatives.

*Sam Rayburn G&T Electric Cooperative* - Conducted competitive solicitation for peaking capacity. Developed request for proposal, administered solicitation and evaluated bids.

*Rio Grande Electric Cooperative, Inc.* - Directed preparation of power supply solicitation and conducted economic and technical analysis of offers.

*Virginia Attorney General* - Review and provide comments or testimony regarding annual demand-side management program programs and rider proposals made by Dominion Virginia Power and Appalachian Power Company.

*Austin Energy* – Conducted modeling to assess potential costs and benefits of a municipal power pool in Texas.

### **Electric Restructuring Analyses**

*Electric Power Research Institute* - Evaluated regional resource planning and power market dispatch impacts on rail transportation and coal supply procurement strategies and costs.

*Arkansas House of Representatives* – Critiqued proposed electric restructuring legislation and identified suggested amendments to provide increased protections for small consumers.

*Virginia Legislative Committee on Electric Utility Restructuring* – Presented report on status of stranded cost recovery for Virginia’s electric utilities.

*Georgia Public Service Commission* – Developed models and a modeling process for preparing initial estimates of stranded costs for major electric utilities serving the state of Georgia.

*City of Houston* – Evaluated and recommended adjustments to Reliant Energy’s stranded cost proposal before the Public Utility Commission of Texas.

*Oklahoma Attorney General* – Evaluated and advised the Attorney General on technical, economic and regulatory policy issues arising from various electric restructuring proposals considered by the Oklahoma Electric Restructuring Advisory Committee.

*State of Hawaii Department of Business, Economics and Tourism* – Evaluated electric restructuring proposals and developed models to assess the potential savings from deregulation of the Oahu power market.

*Virginia Attorney General* - Served as the Attorney General’s consultant and expert witness in the evaluation of electric restructuring legislation, restructuring rulemakings and utility proposals addressing retail pilot programs, stranded costs, rate unbundling, functional



separation plans, and competitive metering.

*Western Public Power Producers, Inc.* - Evaluated operational, cost and regional competitive impacts of the proposed merger of Southwestern Public Service Company and Public Service Company of Colorado.

*Iowa Department of Justice, Consumer Advocate Division* - Analyzed stranded investment and fuel recover issues resulting from a market-based pricing proposal submitted by MidAmerican Energy Company.

*Cullen Weston Pines & Bach/Citizens' Utility Board* - Evaluated estimated costs and benefits of the proposed merger of Wisconsin Energy Corporation and Northern States Power Company (Primergy).

*City of El Paso* - Evaluated merger synergies and plant valuation issues related to the proposed acquisition and merger of El Paso Electric Company and Central & Southwest Company.

*Rio Grande Electric Cooperative, Inc.* - Analyzed stranded generation investment issues for Central Power & Light Company.

## **Power Plant Management**

*City of Austin Electric Utility Department* - Analyzed the 1994 Operating Budget for the South Texas Nuclear Project (STNP) and assisted in the development of long-term performance and expense projections and divestiture strategies for Austin's ownership interest in the STNP.

*City of Austin Electric Utility Department* - Analyzed and provided recommendations regarding the 1991 capital and O&M budgets for the South Texas Nuclear Project.

*Sam Rayburn G&T Electric Cooperative* - Developed and conducted operational monitoring program relative to minority owner's interest in Nelson 6 Coal Station operated by Gulf States Utilities.

*KAMO Electric Cooperative, City of Brownsville and Oklahoma Municipal Power Agency* - Directed an operational audit of the Oklaunion coal-fired power plant.

*Sam Rayburn G&T Electric Cooperative* - Conducted a management/technical assessment of the Big Cajun II coal-fired power plant in conjunction with ownership feasibility studies for the project.

*Kamo Electric Power Cooperative* - Developed and conducted operational monitoring program for client's minority interest in GRDA Unit 2 Coal Fired Station.

*Northeast Texas Electric Cooperative* - Developed and conducted operational monitoring program concerning NTEC's interest in Pirkey Coal Station operated by Southwestern Electric Power Company and Dolet Hills Station operated by Central Louisiana Electric Company.

*Corn Belt Electric Cooperative/Central Iowa Power Cooperative* - Perform operational monitoring and budget analysis on behalf of co-owners of the Duane Arnold Energy Center.

## **PRESENTATIONS**

*Quantifying Impacts of Electric Restructuring: Dynamic Analysis of Power Markets*, 1997 NARUC Winter Meetings, Committee on Finance and Technology.

*Quantifying Costs and Benefits of Electric Utility Deregulation: Dynamic Analysis of Regional Power Markets*, International Association for Energy Economics, 1996 Annual North American Conference.

DOCKET NO. 57149

|                        |   |                           |
|------------------------|---|---------------------------|
| APPLICATION OF EL PASO | § | BEFORE THE PUBLIC UTILITY |
| ELECTRIC COMPANY TO    | § |                           |
| RECONCILE FUEL COSTS   | § | COMMISSION OF TEXAS       |

EL PASO ELECTRIC COMPANY'S RESPONSE TO  
CITY OF EL PASO'S FIRST REQUESTS FOR INFORMATION  
QUESTION NOS. CEP 1-1 THROUGH CEP 1-30

CEP 1-13:

Please provide the integrated resource plans that served as the basis for EPEL capacity planning decisions during the reconciliation period.

RESPONSE:

Please see CEP 1-13, Attachment 1.

|                             |  |
|-----------------------------|--|
| Preparer: Judith M. Parsons | Title: Regional Manager-Regulatory Resource Strategy |
| Sponsor: Victor Martinez    | Title: Director Energy Resources                     |

**Attachment SN-2**  
**To Testimony of Scott Norwood**  
**DN 57149**  
**Page 2 of 3**

PUC Docket No. 57149  
CEP's 1st, Q. No. CEP 1-13  
Attachment 1  
Page 1 of 380

300 Galisteo Street, Suite 206  
Santa Fe, New Mexico 87501  
(505) 982-7391



**EMAILED**

September 16, 2021

Ms. Melanie Sandoval  
Records Bureau  
New Mexico Public Regulation Commission  
P.O. Box 1269  
Santa Fe, NM 87504-1269

**Re: Compliance Filing Pursuant to IRP Rule, 17.7.3 NMAC**  
**El Paso Electric Company's Integrated Resource Plan**

Dear Ms. Sandoval:

Attached for filing please find El Paso Electric Company's ("EPE") Integrated Resource Plan ("IRP") for the period 2021-2040. This compliance filing is made pursuant to Section 9 of the Commission's IRP Rule, 17.7.3 NMAC which requires that certain electric utilities file an IRP, along with an action plan, every three years.

Distribution of the IRP, along with a copy of this letter, is being conducted through the following actions:

- EPE has posted an electronic copy of its IRP on EPE's website at [www.epelectric.com/company/regulatory/2020-2021-new-mexico-integrated-resource-plan-public-meetings](http://www.epelectric.com/company/regulatory/2020-2021-new-mexico-integrated-resource-plan-public-meetings).
- Copies are being served electronically to the NMPRC Chairman and Commissioners, General Counsel of the NMPRC, the New Mexico Attorney General and counsel of record and pro se parties in EPE's most recent general rate case, NMPRC Case No. 20-00104-UT, and all active participants in EPE's Public Advisory Group, including NMPRC Staff members who participated in the IRP Public Advisory Group.

Thank you for your assistance in this matter.

Very truly yours,

/s/Nancy B. Burns  
Nancy B. Burns  
Deputy-General Counsel  
El Paso Electric Company

Enclosures  
Service List



**Confidential Attachment SN-3  
To Testimony of Scott Norwood  
DN 57149  
Page 1 of 1**

**PUC DOCKET NO. 57149  
SOAH DOCKET NO. 473-25-05084**

|                                       |          |                                |
|---------------------------------------|----------|--------------------------------|
| <b>APPLICATION OF EL PASO</b>         | <b>§</b> | <b>BEFORE THE</b>              |
| <b>ELECTRIC COMPANY FOR AUTHORITY</b> | <b>§</b> | <b>STATE OFFICE OF</b>         |
| <b>TO RECONCILE FUEL COSTS</b>        | <b>§</b> | <b>ADMINISTRATIVE HEARINGS</b> |

**PUBLIC**

**Exhibit SN-3 is a CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.**

**CONFIDENTIAL PORTIONS OF THE DIRECT TESTIMONY OF SCOTT NORWOOD, ATTACHMENT SN-3 Bate Stamp 4-13.**

**Attachment SN-4**  
**To Testimony of Scott Norwood**  
**DN 57149**  
**Page 1 of 1**

**BV PPA Solar Facility and Block Energy Premium Imputed Capacity Adjustments**

| Line No.                                      | (a)<br>Month                | (b)                                       | (c)  | (d)   | (e)<br>Block Energy Premiums | (f)<br>Total | (g)<br>TX Allocator | (h)  | (i)<br>Texas Jurisdiction Imputed Capacity Adjustment |
|---|-----------------------------|---|--|---|------------------------------|--------------|---------------------|--|---|
|   |                             | Newman Solar Imputed Capacity Charge (\$) | Macho Springs Imputed Capacity Charge (\$) | Buena Vista Solar PPA Imputed Capacity Charges (\$) |                              |              |                     | Texas Jurisdiction Imputed Capacity Charge (e = f) |   |
| 1   | April 2022                  | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.7996612053        | \$112,592  |   |
| 2   | May                         | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.8125351884        | \$114,405  |   |
| 3   | June                        | \$23,300                                  | \$117,500                                  | \$0   | \$1,035,528                  | \$1,176,328  | 0.8040148854        | \$945,785  |   |
| 4   | July                        | \$23,300                                  | \$117,500                                  | \$0   | \$2,010,112                  | \$2,150,912  | 0.7987708875        | \$1,718,086  |   |
| 5   | August                      | \$23,300                                  | \$117,500                                  | \$0   | \$2,199,960                  | \$2,340,760  | 0.7949012376        | \$1,860,673  |   |
| 6   | September                   | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.7975486791        | \$112,295  |   |
| 7   | October                     | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.8024701192        | \$112,988  |   |
| 8   | November                    | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.7995042585        | \$112,570  |   |
| 9   | December                    | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.7848658044        | \$110,509  |   |
| 10  | January 2023                | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.7810848119        | \$109,977  |   |
| 11  | February                    | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.7792927774        | \$109,724  |   |
| 12  | March                       | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.7861726065        | \$110,693  |   |
| 13  | April                       | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.8066617059        | \$113,578  |   |
| 14  | May                         | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.8101927851        | \$114,075  |   |
| 15  | June                        | \$23,300                                  | \$117,500                                  | \$0   |                              | \$140,800    | 0.8116343061        | \$114,281  |   |
| 16  | July                        | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.8031526273        | \$543,574  |   |
| 17  | August                      | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.7940828276        | \$537,435  |   |
| 18  | September                   | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.7910911515        | \$535,410  |   |
| 19  | October                     | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.8092746351        | \$547,717  |   |
| 20  | November                    | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.8179257102        | \$553,572  |   |
| 21  | December                    | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.7845226942        | \$530,965  |   |
| 22  | January 2024                | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.7802073609        | \$528,044  |   |
| 23  | February                    | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.7965318502        | \$539,093  |   |
| 24  | March                       | \$23,300                                  | \$117,500                                  | \$536,000   |                              | \$676,800    | 0.7986765452        | \$540,544  |   |
| 25  | Total Reconciliation Period | \$559,200                                 | \$2,820,000                                | \$4,824,000   | \$5,245,600                  | \$13,448,800 |                     | \$10,728,587                                       |   |
| Proposed Reconciliation Period Adjustment (C) |                             |   |  |   |                              |              |                     |  |   |
| 26  |                             | \$0                                       | \$0  | \$0   |                              | \$0          |                     | \$0  |   |
| Adjusted Reconciliation Period                |                             |   |  |   |                              |              |                     |  |   |
| 27  | Total                       | \$559,200                                 | \$2,820,000                                | \$4,824,000   |                              | \$13,448,800 |                     | \$10,728,587                                       |   |
| EPE: Ech JIR-07                               |                             |   |  |   |                              |              |                     | \$2,695,587  |   |
| Recom Increase                                |                             |   |  |   |                              |              |                     | \$8,032,999  |   |

|                        |
|------------------------|
| Block Energy Premiums: |
| \$832,580              |
| \$1,605,619            |
| \$1,748,751            |
| \$4,186,950            |

|                       |
|-----------------------|
| BV Solar Imputed Cap: |
| \$430,490             |
| \$425,628             |
| \$424,025             |
| \$433,771             |
| \$438,408             |
| \$420,504             |
| \$418,191             |
| \$426,941             |
| \$428,091             |

**Attachment SN-5  
To Testimony of Scott Norwood  
DN 57149  
Page 1 of 1**

PUC Docket No. 57149  
Summary of Norwood Energy Consulting Rate Case Expense Through February 28, 2025

| <u>Month</u>         | <u>Man-hours</u> | <u>Fees, \$240/hr</u> |
|----------------------|------------------|-----------------------|
| Oct 24               | 18.5             | \$4,440               |
| Nov 24               | 19.0             | \$4,560               |
| Dec 24               | 20.0             | \$4,800               |
| Jan 25               | 7.5              | \$1,800               |
| Feb 25               | <u>27.0</u>      | <u>\$6,480</u>        |
| Total Through Feb 25 | 92.0             | \$22,080              |



PUC DOCKET NO. 57149  
SOAH DOCKET NO. 473-25-05084

|                                |   |                         |
|--------------------------------|---|-------------------------|
| APPLICATION OF EL PASO         | § | BEFORE THE              |
| ELECTRIC COMPANY FOR AUTHORITY | § | STATE OFFICE OF         |
| TO RECONCILE FUEL COSTS        | § | ADMINISTRATIVE HEARINGS |

**DECLARATION OF NORMAN J. GORDON**

THE STATE OF OHIO       )  
  )  
COUNTY OF CUYAHOGA )

1. My name is Norman J. Gordon. My business address is PO Box 8, El Paso, Texas, 79940. I am over eighteen years of age and I am not disqualified from making this Declaration. I declare under penalty of perjury that the information in this declaration provided under Chapter 132 Texas Civil Practice and Remedies Code is true and correct.

2. I am an attorney licensed in the States of Texas and Illinois, and numerous federal courts. I received my undergraduate degree and law degree from the University of Illinois at Urbana-Champaign. I have been in private practice of law in El Paso since completing my military obligation with the Judge Advocate General's Corps of the United States Army in 1974. I am board certified in Civil Trial Law by the Texas Board of Legal Specialization and have been so certified since 1983. One of the areas of my practice is in the area of utility regulation. Since 1978, I have been lead counsel for parties in many major rate cases, rulemaking proceedings, and other administrative dockets before City Councils, the Railroad Commission of Texas, the Public Utility Commission of Texas, State District Courts, United States Bankruptcy Court, and Texas Appellate Courts, including the Supreme Court of Texas. I have filed testimony on rate case expense issues in cases before Railroad Commission of Texas. I have filed testimony and testified as an expert witness on rate case expenses in cases before the Public Utility Commission of Texas. I have also taught principles of regulation to members of the Public Utility Regulation Board of the City of El Paso, an advisory board on utility matters.

3. I became a sole practitioner in February 2019. Prior to February 2019, I was a shareholder in the El Paso firm of Mounce, Green Myers, Safi, Paxson & Galatzan, A Professional Corporation, from October 2003 until February 2019. Prior to that time after my Army service my private practice was with the El Paso law firm of Diamond Rash Gordon & Jackson, P.C., for 29 years where I was a shareholder.

4. The City of El Paso ("City") engaged me to act as outside counsel for it in this case Application of El Paso Electric Company to reconcile Fuel Costs, PUC Docket No 57149, SOAH Docket No. 473-25-05804.

5. In connection with the case, the amount incurred through February 28, 2025, is \$5,640.00 in fees. I also charged expenses in the amount of for a total of \$54.17 for a total of \$5,694.17. The description of services is provided in the attached invoices, by day and services performed. The

invoices and support are attached to this Declaration as Attachment "A" and incorporated herein. The only expenses charged were for outside expense for copies of EPE's original filing. There were no charges for first class travel or hotel expense. There is no markup on the expenses. The expenses were reasonable.

6. This case is ongoing. I currently estimate that the additional fees through March 2025 will be \$7,500.00 in fees. If the case goes to hearing as scheduled in June 2025 I estimate the remaining work is the review and analysis of the testimony of other intervenors, the PUC, El Paso Electric rebuttal and possibly cross-rebuttal, discovery as necessary on other parties and El Paso Electric, the conduct of the hearing, including the preparation of exhibits, post hearing briefing, and as necessary Exceptions to the Proposal for Decision. Additional expenses will include copying and hearing transcripts, and potential travel to Austin for Open Meetings. Based on my experience I estimate that the additional fees will be approximately \$20,000 and expenses of \$2,500. I expect to supplement this declaration at a later time.

7. I am familiar with the hourly rates charged by others in Texas with similar or less experience for similar work, through the cases in which I have acted as counsel and through the cases in which I have filed testimony. The hourly rate charged by me of \$400.00 is reasonable.

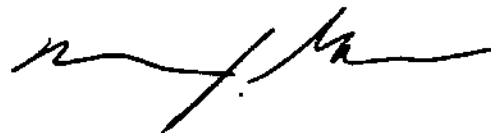
8. I have also reviewed the Declaration of Donald C. Davie which is attached to my declaration as Attachment B. Mr. Davie is an experienced attorney with particular experience and background training in the area of public utility regulation. He has worked with me on this matter. We have endeavored to not duplicate efforts, although given the complexities of the issues in this case, we both needed to work on many issues. In my opinion his hourly rate of \$385 is reasonable.

9. All of the work done by Mr. Davie and me was necessary and reasonable with respect to both time and amount considering the nature, extent, and difficulty of the work, the originality of the issues presented including the nature of the issues raised and addressed by the City in this proceeding, and the amount of time spent by and charges by others for work of a similar nature in this and other proceedings. The expenses incurred are all reasonable and necessary for the presentation and prosecution of the City's case.

10. The total fees and expenses invoiced so far for outside counsel to the City invoiced to date are \$20,593.67. The estimate to completion of the case is an additional \$60,000 for a total of \$80,593.67.

Further Declarant Says Not.

Dated March 25, 2025



---

Norman J. Gordon

Attachment SN-6  
To Testimony of Scott Norwood  
DN 57149  
Page 3 of 19

**SOAH DOCKET NO. 473-25-05084  
PUC DOCKET NO. 57149**

**APPLICATION OF EL PASO ELECTRIC §  
COMPANY TO RECONCILE §  
FUEL COSTS §**

**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

**ATTACHMENT A TO  
DECLARATION OF NORMAN J. GORDON**

**NORMAN J. GORDON-ATTORNEY STATEMENTS**

Norman J. Gordon  
Attorney at Law  
PO Box 8  
El Paso, Texas, 79940

City of El Paso  
300 N. Campbell  
Attn: Office of the City Attorney  
PO Box 1890  
El Paso TX 79950-1890  
El Paso TX 79901

03/03/2025  
Account No: 1.62

Attn: Karla M. Nieman

*Payments received after 03/03/2025 are not included on this statement.*

Norman J Gordon  
Attorney At Law

|  | Balance           |
|--|-------------------|
| 1-62 PUC Docket 57149 EPE Fuel Reconciliation 2024 | <u>\$5,694.17</u> |

Please make checks payable to "Norman J. Gordon"

Norman J. Gordon  
Attorney at Law  
PO Box 8  
El Paso, Texas, 79940

City of El Paso  
300 N. Campbell  
Attn: Office of the City Attorney  
PO Box 1890  
El Paso TX 79950-1890  
El Paso TX 79901

Page: 1  
03/03/2025  
Account No: 1-62M  
Statement No: 259

Attn: Karla M. Nieman

PUC Docket 57149 EPE Fuel Reconciliation 2024

***Payments received after 03/03/2025 are not included on this statement.***

Fees

|            |     |  | Hours |        |
|------------|-----|--|-------|--------|
| 09/30/2024 | NJG | Initial Review of Filing package, Tel. D. Davie re: spotted issues.  | 1.40  | 560.00 |
| 10/02/2024 | NJG | Start Detailed Review of Filing (Ex. Summary and prayer for relief   | 1.60  | 640.00 |
| 10/21/2024 | NJG | Review of First RFI's to EPE for potential editing   | 0.30  | 120.00 |
| 11/07/2024 | NJG | Review of Vinton Steel's First RFI's to EPE  | 0.20  | 80.00  |
| 11/25/2024 | NJG | Review of Preliminary order, EPE responses to CEP First RFI's SOAH Order No. 1, re: schedule, OPUC First RFI's to EPE, Staff First RFI's to EPE. | 2.40  | 960.00 |
| 11/29/2024 | NJG | Review of EPE responses to Vinton First RFI's  | 0.40  | 160.00 |
| 12/02/2024 | NJG | Review of final agreed schedule, and SOAH Order No. 3 canceling Prehearing Conference  | 0.30  | 120.00 |
| 12/11/2024 | NJG | Review of responses to OPUC 1st RFI responses and Staff 1st RFI's  | 1.30  | 520.00 |
| 12/13/2024 | NJG | Review of Vinton Second RFI's, OPUC Second RFI's   | 0.30  | 120.00 |
| 12/16/2024 | NJG | Review and edit CEP 3rd RFI's  | 0.30  | 120.00 |
| 01/03/2025 | NJG | Review of EPE response to VS 2nd and OPUC 2nd RFI's  | 0.60  | 240.00 |
| 01/07/2025 | NJG | Review Response to CEP 3rd RFI's   | 0.80  | 320.00 |
|            | NJG | Review of response to CEP 3rd RFI's  | 0.50  | 200.00 |
| 01/15/2025 | NJG | Review of additional Response to CEP 3rd RFI's   | 0.30  | 120.00 |
|            | NJG | Review of SOAH Order Amending Procedural schedule (Hearing dates)  | 0.10  | 40.00  |

Attachment SN-6  
To Testimony of Scott Norwood  
DN 57149  
Page 6 of 19

City of El Paso

Page: 2  
03/03/2025

Account No: 1-62M  
Statement No: 259

PUC Docket 57149 EPE Fuel Reconciliation 2024

|            |     |  | Hours |          |
|------------|-----|--|-------|----------|
| 01/29/2025 | NJG | Review of draft CEP 4th RFI's  | 0.30  | 120.00   |
| 02/04/2025 | NJG | Review of EPE responses to OPUC 3rd RFI's FMI 1st RFI's  | 0.70  | 280.00   |
| 02/06/2025 | NJG | Review of OPUC 4th RFI's   | 0.10  | 40.00    |
| 02/18/2025 | NJG | Review of responses to TIEC 2nd RFI's and objection to OPUC 4th RFI's  | 0.40  | 160.00   |
| 02/19/2025 | NJG | Review of response to Staff 2nd RFI's  | 0.10  | 40.00    |
| 02/21/2025 | NJG | Review responses to CEP 4th RFI's and TIEC 4th RFI questions   | 0.90  | 360.00   |
| 02/28/2025 | NJG | Review of Responses to CEP 4th (Additional), OPUC 4th RFI's , EPE amended response to Staff 2nd and responses to Staff 4th RFI's | 0.80  | 320.00   |
|            |     | For Current Services Rendered  | 14.10 | 5,640.00 |

| Timekeeper      | Title | Recap | Hours | Rate     | Total      |
|-----------------|-------|-------|-------|----------|------------|
| Norman J Gordon |       |       | 14.10 | \$400.00 | \$5,640.00 |

Expenses

|            |                                       |            |
|------------|---------------------------------------|------------|
| 09/30/2024 | Photocopy charges-Initial Filing Part | 54.17      |
|            | Total Expenses                        | 54.17      |
|            | Total Current Work                    | 5,694.17   |
|            | Balance Due                           | \$5,694.17 |

| Fees     | Expenses | Billing History<br>Advances | Finance Charge | Payments |
|----------|----------|-----------------------------|----------------|----------|
| 5,640.00 | 54.17    | 0.00                        | 0.00           | 0.00     |

Please make checks payable to "Norman J. Gordon"

The UPS Store #6488  
5120 Mayfield Rd  
Lyndhurst, OH 44124-2406  
440-421-9073

57149  
Laptop printer  
(Pony)

Terminal....: POS64888  
Employee....: 277165  
Cashier's Name

Date.: 9/30/2024  
Time.: 01:36 PM  
Poonan Patel

| ITEM NAME              | QTY   | PRICE  | TOTAL   |
|------------------------|-------|--------|---------|
| 0.5x11 Copies          | 418 3 | \$0.12 | \$50.16 |
| Tax                    |       |        | \$4.01  |
| Subtotal               |       |        | \$50.16 |
| Shipping/Other Charges |       |        | \$0.00  |
| Total Tax              |       |        | \$4.01  |
| Total                  |       |        | \$54.17 |
| Cards                  |       |        | \$54.17 |

Items Designated NH are NOT eligible  
for Returns, Refunds or Exchanges.

US Postal Rates Are Subject to Surcharges.



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Win a \$250 gift card  
Tell us how we're doing for your chance to win  
a \$250 Amazon.com Gift Card. Scan the  
QR code or go to the link to take the survey.



Attachment SN-6  
To Testimony of Scott Norwood  
DN 57149  
Page 8 of 19

SOAH DOCKET NO. 473-25-05084  
PUC DOCKET NO. 57149

APPLICATION OF EL PASO ELECTRIC §  
COMPANY TO RECONCILE §  
FUEL COSTS §

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**ATTACHMENT B TO**  
**DECLARATION OF NORMAN J. GORDON**

DONALD C. DAVIE DECLARATION  
AND  
SCOTTHULSE, PC STATEMENTS



SOAH DOCKET NO. 473-25-05084  
PUC DOCKET NO. 57149

APPLICATION OF EL PASO § BEFORE THE STATE OFFICE  
ELECTRIC COMPANY TO § OF  
RECONCILE FUEL COSTS § ADMINISTRATIVE HEARINGS

DECLARATION OF DONALD C. DAVIE

THE STATE OF TEXAS     )  
  )  
COUNTY OF EL PASO     )

1. My name is Donald C. Davie. My business address is 201 E. Main Dr., Ste 1100, El Paso, Texas 79901. I am over eighteen years of age, and I am not disqualified from making this Declaration. I declare under penalty of perjury that the information in this declaration provided under Chapter 132 Texas Civil Practice and Remedies Code is true and correct.

2. I am an attorney licensed in the States of Texas and New Mexico. I received my undergraduate degree in Finance from Texas Tech University and law degree from the University of Arizona James E. Rogers College of Law. I have been practicing law in El Paso since completing law school in 2015. One of the areas of my practice is in the area of utility regulation. Since 2021, I have been counsel for parties in major rate cases rulemaking proceedings, and other administrative dockets before City Councils, the Railroad Commission of Texas, and the Public Utility Commission of Texas.

3. I am a partner at the El Paso law firm of Scott Hulse PC. Prior to joining Scott Hulse PC, I was an Assistant City Attorney for the City of El Paso where I was the lead utility regulatory counsel for the City from January 2022. Prior to my employment with the City of El Paso I practiced in the area of business, tax, and commercial litigation with law firms in El Paso Texas.

4. The City of El Paso engaged me to act as outside counsel for it in this case Application of El Paso Electric Company to Reconcile Fuel Costs, PUC Docket No 57149, SOAH Docket No. 473-25-05084.

5. In connection with the case, the amount incurred through March 18, 2025 is \$14,899.50 in fees. The description of services is provided in the attached invoices, by day and services performed. The invoices and support are attached to this Declaration as Attachment "1" and incorporated herein. Our contract provides for a 4% additional amount of expenses. Although that was charged, the amounts have been reduced from the request for reimbursement. There were no charges for first class travel or hotel expense. There is no markup on the expenses. The expenses were reasonable.

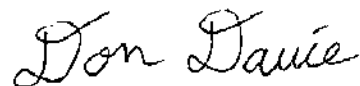
6. This case is ongoing. I currently estimate that the additional fees March 2025 will be \$2,500.00. If the case goes to hearing as scheduled in June 2025 I estimate the remaining work is the review and analysis of the testimony of other intervenors, the PUC, El Paso Electric rebuttal and possibly cross-rebuttal, discovery as necessary on other parties and El Paso Electric, the conduct of the hearing, including the preparation of exhibits, post hearing briefing, and as necessary Exceptions to the Proposal for Decision. Additional expenses will include copying and hearing transcripts, and potential travel to Austin for Open Meetings. Based on my experience I estimate that the additional fees will be approximately \$25,000.00 and possible expenses if travel to Austin for a final order meeting is necessary of \$2,500. I expect to supplement this declaration at a later time.

7. I am familiar with the hourly rates charged by others in Texas with similar or less experience for similar work, through the cases in which I have acted as counsel and through the cases in which I have filed testimony. The hourly rates charged by me of \$385.00 is reasonable.

8. All of the work done by me was necessary and reasonable with respect to both time and amount considering the nature, extent, and difficulty of the work, the originality of the issues presented including the nature of the issues raised and addressed by the City in this proceeding, and the amount of time spent by and charges by others for work of a similar nature in this and other proceedings. The expenses incurred are all reasonable and necessary for the presentation and prosecution of the City's case.

Further Declarant Says Not.

Dated March 25, 2025



---

DONALD C. DAVIE

Attachment SN-6  
To Testimony of Scott Norwood  
DN 57149  
Page 11 of 19

**ATTACHMENT 1 TO**  
**DECLARATION OF DONALD C. DAVIE**

**SCOTTHULSE, PC STATEMENTS**

Attachment SN-6  
To Testimony of Scott Norwood  
DN 57149  
Page 12 of 19

**ScottHulse** PC  
ATTORNEYS AT LAW

P.O. Box 99123  
El Paso, TX 79999-9123  
(915) 533-2493  
<https://www.scotthulse.com>  
Federal Tax I.D. No.: 74-2519777

City of El Paso  
P.O. Box 1890  
El Paso, TX 79950  
**Attention: Office of the City Attorney**

October 31, 2024  
Client: 008957  
Matter: 000016  
Invoice #: 305722  
Resp. Atty: DDAV  
Page: 1

RE: 57149 Application of El Paso Electric Company to Reconcile  
Fuel Costs in PUCT Docket No. 57149

For Professional Services Rendered Through September 30, 2024

|                        |                   |
|------------------------|-------------------|
| Total Services         | \$4,204.20        |
| Total Current Charges  | \$4,204.20        |
| <b>PAY THIS AMOUNT</b> | <b>\$4,204.20</b> |

Remittance Advice

This invoice is due and payable within thirty (30) days in El Paso, Texas.

Check Payable To:  
ScottHulse PC  
Attn.: Accounts Receivable  
P.O. Box 99123  
El Paso, TX 79999-9123

Wire Transfer:  
Receiving Bank: Sunflower Bank, N.A.  
8117 Preston Road Ste. 220  
Dallas, TX 75225  
SWISS Number: SNBAUS44 (International Wires Only)  
ABA Routing Number: 101100621  
Account Number: 1100069640  
Beneficiary: Scott Hulse Marshall Feuille Finger Thurmond PC  
1100 Chase Tower 201 E. Main Drive  
El Paso, TX 79901

Credit Card:  
Payments can be made by MasterCard & VISA. To make a secure payment online, please [click here](https://www.scotthulse.com/payments/), or type the following information  
into your browser: <https://www.scotthulse.com/payments/>

If paying by check, please return this remittance page with your payment. Thank you.

**ScottHulse** PC  
ATTORNEYS AT LAW

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El Paso, TX 79999-9123  
(915) 533-2493  
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Federal Tax I.D. No.: 74-2519777

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El Paso, TX 79950  
**Attention: Office of the City Attorney**

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Invoice #: 305722  
Resp. Atty: DDAV  
Page: 1

RE: 57149 Application of El Paso Electric Company to Reconcile  
Fuel Costs in PUCT Docket No. 57149

For Professional Services Rendered Through September 30, 2024

**SERVICES**

| Date                        | Person | Description of Services   | Hours |            |
|-----------------------------|--------|---|-------|------------|
| 09/27/2024                  | DDAV   | Preliminary review of fuel reconciliation filing and notes regarding the same.  | 2.50  |            |
| 09/28/2024                  | DDAV   | Continued review of fuel reconciliation filing and notes regarding the same; Review issues relating to newman 6 allocation and reallocation of BV; Review exhibits and work papers. | 4.60  |            |
| 09/30/2024                  | DDAV   | Continued review of filing and schedules; correspondence with counsel regarding the same; Work on memorandum to client regarding the same.  | 3.40  |            |
| 09/30/2024                  | DDAV   | 4% routine expense per paragraph five of engagement letter.   | 0.00  |            |
| Total Professional Services |        |   | 10.50 | \$4,204.20 |

**PERSON RECAP**

| Person |                 |                       | Hours | Rate     | Amount     |
|--------|-----------------|-----------------------|-------|----------|------------|
| DDAV   | Donald C. Davie | Shareholders          | 10.50 | \$385.00 | \$4,042.50 |
| DDAV   | Donald C. Davie | Shareholders          | 0.00  | \$0.00   | \$161.70   |
|        |                 | Total Services        |       |          | \$4,204.20 |
|        |                 | Total Current Charges |       |          | \$4,204.20 |
|        |                 | PAY THIS AMOUNT       |       |          | \$4,204.20 |

**ScottHulse** PC  
ATTORNEYS AT LAW

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<https://www.scotthulse.com>  
Federal Tax I.D. No.: 74-2519777

City of El Paso  
P.O. Box 1890  
El Paso, TX 79950  
**Attention: Office of the City Attorney**

December 16, 2024  
Client: 008957  
Matter: 000018  
Invoice #: 307114  
Resp. Atty: DDAV  
Page: 1

RE: 57149 Application of El Paso Electric Company to Reconcile  
Fuel Costs in PUCT Docket No. 57149

For Professional Services Rendered Through November 30, 2024

|                        |                    |
|------------------------|--------------------|
| Total Services         | \$5,845.84         |
| Total Current Charges  | \$5,845.84         |
| Previous Balance       | \$4,204.20         |
| <b>PAY THIS AMOUNT</b> | <b>\$10,050.04</b> |

**Remittance Advice**

This invoice is due and payable within thirty (30) days in El Paso, Texas.

Check Payable To:  
ScottHulse PC  
Attn.: Accounts Receivable  
P.O. Box 99123  
El Paso, TX 79999-9123

Wire Transfer:  
Receiving Bank: Sunflower Bank, N.A.  
8117 Preston Road Ste. 220  
Dallas, TX 75225  
SWISS Number: SNBAUS44 (International Wires Only)  
ABA Routing Number: 101100621  
Account Number: 1100069540  
Beneficiary: Scott Hulse Marshall Feuille Finger Thurmond PC  
1100 Chase Tower 201 E. Main Drive  
El Paso, TX 79901

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Payments can be made by MasterCard & VISA. To make a secure payment online, please [click here](https://www.scotthulse.com/payments/), or type the following information into your browser: <https://www.scotthulse.com/payments/>

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 El Paso, TX 79999-9123  
 (915) 533-2493  
<https://www.scotthulse.com>  
 Federal Tax I.D. No.: 74-2519777

City of El Paso  
 P.O. Box 1890  
 El Paso, TX 79950  
**Attention: Office of the City Attorney**

December 16, 2024  
 Client: 008957  
 Matter: 000016  
 Invoice #: 307114  
 Resp. Atty: DDAV  
 Page: 1

RE: 57149 Application of El Paso Electric Company to Reconcile  
 Fuel Costs in PUCT Docket No. 57149

For Professional Services Rendered Through November 30, 2024

**SERVICES**

| Date       | Person | Description of Services   | Hours |
|------------|--------|---|-------|
| 10/02/2024 | DDAV   | Review filings and compare previous fuel recon cases; worked on memorandum to client regarding case and issues. | 3.40  |
| 10/08/2024 | DDAV   | Prepare intervention and work on filing the same.   | 0.30  |
| 10/08/2024 | DDAV   | Worked on protective orders and filing of the same.   | 0.30  |
| 10/10/2024 | DDAV   | Worked on issues relating to filing including buena vista allocation issues; correspondence regarding the same. | 1.40  |
| 10/16/2024 | DDAV   | Review motion's to intervene.   | 0.10  |
| 10/21/2024 | DDAV   | Review motion's to intervene; Review proposed list of issues.   | 0.50  |
| 10/23/2024 | DDAV   | Worked on RFI's.  | 1.00  |
| 10/25/2024 | DDAV   | Review TIEC first request for information.  | 0.40  |
| 10/31/2024 | DDAV   | Review draft preliminary order.   | 0.50  |
| 10/31/2024 | DDAV   | Worked on second RFI and filings regarding the same.  | 0.60  |
| 11/07/2024 | DDAV   | Review PUCT agenda; Correspondence with client regarding preliminary order.                                     | 0.10  |
| 11/08/2024 | DDAV   | Review OPUC motion.   | 0.10  |
| 11/12/2024 | DDAV   | Review EPE response with City's first RFI's; Correspondence regarding the same.                                 | 1.80  |
| 11/12/2024 | DDAV   | Review order of referral and issues relating to the same.   | 0.20  |
| 11/14/2024 | DDAV   | Review EPE response to TIEC first RFI.  | 1.00  |
| 11/14/2024 | DDAV   | Review preliminary order and open meeting.  | 0.50  |
| 11/15/2024 | DDAV   | Review SOAH order No. 1.  | 0.20  |

**ScottHulse** PC  
ATTORNEYS AT LAW

December 16, 2024  
Client: 008957  
Matter: 000016  
Invoice #: 307114  
Resp. Atty: DDAV  
Page: 2

**SERVICES**

| Date                        | Person | Description of Services  | Hours |            |
|-----------------------------|--------|--|-------|------------|
| 11/20/2024                  | DDAV   | Review response to City's second RFI; Correspondence with counsel and expert regarding the same. | 0.70  |            |
| 11/22/2024                  | DDAV   | Review Staff's first RFI to EPE.   | 0.50  |            |
| 11/27/2024                  | DDAV   | Review EPE discovery answers; Work on discovery issues.  | 1.00  |            |
| 11/30/2024                  | DDAV   | 4% routine expense per paragraph 5 of engagement letter.   | 0.00  |            |
| Total Professional Services |        |  | 14.60 | \$5,845.84 |

**PERSON RECAP**

| Person                   |                 |              | Hours | Rate     | Amount             |
|--------------------------|-----------------|--------------|-------|----------|--------------------|
| DDAV                     | Donald C. Davie | Shareholders | 14.60 | \$385.00 | \$5,621.00         |
| DDAV                     | Donald C. Davie | Shareholders | 0.00  | \$0.00   | \$224.84           |
| Total Services           |                 |              |       |          | \$5,845.84         |
| Total Current Charges    |                 |              |       |          | \$5,845.84         |
| Previous Balance         |                 |              |       |          | \$4,204.20         |
| <b>PAY THIS AMOUNT :</b> |                 |              |       |          | <b>\$10,050.04</b> |



**Attachment SN-6**  
**To Testimony of Scott Norwood**  
**DN 57149**  
**Page 17 of 19**

**ScottHulse** PC  
ATTORNEYS AT LAW

P.O. Box 99123  
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(915) 533-2493  
<https://www.scotthulse.com>  
Federal Tax I.D. No.: 74-2519777

City of El Paso  
P.O. Box 1890  
El Paso, TX 79950

**Attention: Office of the City Attorney**

March 21, 2025

Client: 008957  
Matter: 000016  
Invoice #: 309159  
Resp. Atty: DDAV  
Page: 1

RE: 57149 Application of El Paso Electric Company to Reconcile  
Fuel Costs in PUCT Docket No. 57149

For Professional Services Rendered Through March 18, 2025

|                         |                   |
|-------------------------|-------------------|
| Total Services          | \$5,445.44        |
| Total Current Charges   | \$5,445.44        |
| Previous Balance        | \$10,050.04       |
| Less Payments           | (\$10,050.04)     |
| <b>PAY THIS AMOUNT:</b> | <b>\$5,445.44</b> |

**Remittance Advice**

This invoice is due and payable within thirty (30) days in El Paso, Texas.

Check Payable To:  
ScottHulse PC  
Attn.: Accounts Receivable  
P.O. Box 99123  
El Paso, TX 79999-9123

Wire Transfer:  
Receiving Bank: Sunflower Bank, N.A.  
8117 Preston Road Ste. 220  
Dallas, TX 75225  
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1100 Chase Tower 201 E. Main Drive  
El Paso, TX 79901

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Payments can be made by MasterCard & VISA. To make a secure payment online, please [click here](https://www.scotthulse.com/payments/), or type the following information into your browser: <https://www.scotthulse.com/payments/>

If paying by check, please return this remittance page with your payment. Thank you.

**ScottHulse** PC  
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<https://www.scotthulse.com>  
 Federal Tax I.D. No.: 74-2519777

City of El Paso  
 P.O. Box 1890  
 El Paso, TX 79950  
**Attention: Office of the City Attorney**

March 21, 2025  
 Client: 008957  
 Matter: 000016  
 Invoice #: 309159  
 Resp. Atty: DDAV  
 Page: 1

RE: 57149 Application of El Paso Electric Company to Reconcile  
 Fuel Costs in PUCT Docket No. 57149

For Professional Services Rendered Through March 18, 2025

**SERVICES**

| Date                        | Person | Description of Services   | Hours            |
|-----------------------------|--------|---|------------------|
| 12/02/2024                  | DDAV   | Correspondence regarding PHC and review of soah order.  | 0.50             |
| 01/02/2025                  | DDAV   | Worked on discovery matters including EPE responses to RFI's.   | 1.40             |
| 01/08/2025                  | DDAV   | Worked on discovery matters and review EPE responses to discovery.  | 1.80             |
| 01/22/2025                  | DDAV   | Review discovery responses; Worked on discovery matters.  | 1.00             |
| 02/03/2025                  | DDAV   | Review discovery including EPE's response to RFI's.   | 1.50             |
| 02/07/2025                  | DDAV   | Review discovery including OPUC Staff RFI, Staff's corrected RFI's.   | 0.60             |
| 02/27/2025                  | DDAV   | Continue review of discovery including EPE response to RFI's.   | 2.00             |
| 03/05/2025                  | DDAV   | Review EPE response to discovery.   | 0.80             |
| 03/07/2025                  | DDAV   | Prepare for and attend meeting with expert regarding direct testimony.                                      | 1.50             |
| 03/07/2025                  | DDAV   | Worked on discovery matters; Review Staff RFI.  | 0.50             |
| 03/11/2025                  | DDAV   | Review EPE Errata to direct testimony and schedules; Correspondence regarding the same.                     | 0.70             |
| 03/18/2025                  | DDAV   | Review additional discovery, application, and testimony for purposes of working on direct testimony issues. | 1.30             |
| 03/18/2025                  | DDAV   | 4% routine expense per paragraph five of engagement letter.   | 0.00             |
| Total Professional Services |        |   | 13.60 \$5,445.44 |

**ScottHulse** PC  
ATTORNEYS AT LAW

March 21, 2025  
Client: 008957  
Matter: 000016  
Invoice #: 309159  
Resp. Atty: DDAV  
Page: 2

**PERSON RECAP**

| Person                 |                 | Hours        | Rate  | Amount              |
|------------------------|-----------------|--------------|-------|---------------------|
| DDAV                   | Donald C. Davie | Shareholders | 13.60 | \$385.00 \$5,236.00 |
| DDAV                   | Donald C. Davie | Shareholders | 0.00  | \$0.00 \$209.44     |
| Total Services         |                 |              |       | \$5,445.44          |
| Total Current Charges  |                 |              |       | \$5,445.44          |
| Previous Balance       |                 |              |       | \$10,050.04         |
| Less Payments          |                 |              |       | (\$10,050.04)       |
| <b>PAY THIS AMOUNT</b> |                 |              |       | <b>\$5,445.44</b>   |

The following files are not convertible:

Workpapers.xlsx  
Norwood Native Files and

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.