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

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

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FEBRURY 20, 2025

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CEP 4-1:

Please provide the following information in an electronic spreadsheet format for each EPE generating unit and each purchased energy resource for each month of the Reconciliation Period:

a. MWh supplied by resource;

b. Variable cost of energy supplied ($/MWh) by resource;

c. MWh sales and associated energy cost ($/MWh) from resource that were assigned to off-system sales ("OSS"); and

d. Revenues and margin ($/MWh) received from OSS supplied by each resource.

RESPONSE:

a. Please see CEP 2-14 Attachment 1 CONFIDENTIAL, Part A.

b. Please see CEP 2-14 Attachment 1 CONFIDENTIAL, Part B.

c. Please see CEP 2-14 Attachment 1 CONFIDENTIAL, Part E for MWh from resources assigned to off-system sales. For the monthly average incremental energy costs assigned to off-system sales see CEP 4-1 Attachment 1 CONFIDENTIAL.

d. EPE does not assign revenues or margin received from off-system sales to individual generating units.

Preparer: Daniel Dominguez Title: Supervisor – Real Time Trading

Sponsor: Victor Martinez Title: Director – Energy Resources

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CEP 4-1 Attachment 1 is CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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CEP 4-2:

Reference EPE's response to CEP 1-3, please provide all other audits of purchased power or reconcilable fuel expense conducted by the Company for any portion of the Reconciliation Period.

RESPONSE:

Please refer to CEP 1-3 Attachment 1 CONFIDENTIAL and see CEP 4-2 Attachment 1 CONFIDENTIAL for additional audits of purchased power or reconcilable fuel expenses conducted by the Company for any portion of the Reconciliation Period.

Preparer: Peter Klopchic Title: Director – Internal Audit

Sponsor: Victor Martinez Title: Director – Energy Resources

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CEP 4-2 Attachment 1 is CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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CEP 4-3:

Please provide a detailed description of the method by which EPE calculated non-arbitrage off-system sales margins during the Reconciliation Period, including but not limited to what generating and purchased power resources were determined to supply such sales, how the cost of supplying sales was determined, and why certain resources such as solar PPAs were excluded from supplying off-system sales.

RESPONSE:

EPE calculates margins for off-system sales by subtracting the cost of generation from the revenue. For the methodology used to determine what generating or purchased power resource supplied such sales and the cost of supplying such sales, please see CEP 4-3 Attachment 1.

Please refer to EPE's response to CEP 3-12 for a description as to why solar PPAs are excluded from supplying off-system sales.

Preparer: Jaime Reyes Title: Manager – Energy Resources

Sponsor: Victor Martinez Title: Director – Energy Resources

El Paso Electric Company (EPEC) Dispatch Model

This document provides a description of the inputs and calculation steps used by the EPEC dispatch model to calculate the cost of producing electricity for one 24-hour period. The model also calculates the costs associated with wholesale sales. These are the functions that we expect users to be concerned about. The model also calculates quantities that, while not of interest to third parties, are useful for EPE's own operations. For the sake of brevity, we do not delve into those calculations in this document.

Spreadsheet Overview

The dispatch model is a Microsoft Excel spreadsheet composed of nine tabs. All user inputs are contained in a combination of these tabs. The function of each tab is described briefly in the table below.

Tab	Function
Dispatch	Inputs for plant operating costs and operating constraints. Inputs for off-system purchases with associated costs. Dispatches all units based on costs and operating constraints. Determines changes from least cost dispatch for regulation down requirements. Calculates dispatch and costs given the regulation down requirements.
Loads	Inputs for demand and wholesale sales. Determines local generation dispatch requirements. Determines changes in purchases to meet supply demand balance. Inputs for any Southwestern Reserve Sharing Group (SRSG) events on system.
Purchases	Detailed description of purchase transactions for the day.
TierCosts	Determines incremental costs associated with five tiers of wholesale sales.
SettleCore	CAISO software that supplies us with metered data for several data points on EPEC's system for the given day being processed.
data	Automatically arranges data from the SettleCore system into readable information used by the spreadsheet.
Gas Price Memo	Contains a copy of the natural gas prices used for the day in question as supplied by our gas trader on shift.
C.O.E.	Determines unit contribution to off-system sales.
SPRd_Check	An automated data reliability check that looks for irregularities in data entry.

Dispatch Tab

Input	Location	Description
Date	Dispatch B2	Numeric entry for labeling
Operating Cost Curve – Square	Dispatch B6:B28	Component of plant heat rate. Multiplied by the square of the plant MW output level
Operating Cost Curve – Slope	Dispatch C6:C28	Component of plant heat rate. Multiplied by the plant MW output level

Input	Location	Description
Operating Cost Curve – Intercept	Dispatch D6:D28	kWh/MMBTU. Component of plant heat rate. Added to the two prior cost components.
Operating Cost Curve – Min MW	Dispatch E6:E28	MW. Min output level for the unit if operating. Used to populate The Minimum MW table in Dispatch K6:AH28 if Operating Cost Curve – Operating? is TRUE.
Operating Cost Curve – Operating?	Dispatch F6:F28	TRUE or FALSE. Used to populate The Minimum MW table in Dispatch K6:AH28. Sets values in table to 0 if FALSE, otherwise uses values from Dispatch E6:E28.
Gas Prices	Dispatch F52:F55	$/MMBTU. Delivered Gas cost for fossil plants. Multiplied by operating cost heat rate to determine total cost, and multiplied by marginal cost heat rate to determine plant dispatch levels.
PV Purchase Price	Dispatch D92	$/MWh. Purchase prices for power from Palo Verde Generation.
Regulation Down	Dispatch C98	MW (enter as a negative number). MW required for regulation down.
ForceOut	Dispatch B101	$/MWh. Added to marginal cost of units for dispatch MW above their Operational Maximum MW. Essentially, pushes those units out of the dispatch stack.
ForceOut 2	Dispatch E101	$/MWh. Added to marginal cost of units for dispatch MW above their Unit Maximum MW. Added on top of ForceOut. Essentially, pushes those units further out of the dispatch stack. We use a two step process because in some cases, a unit may be required to operate beyond the user entered Operational Maximum MW.
ForceIn	Dispatch B102	$/MWh. The negative value is added to unit MW dispatch levels that "must run" as indicated by the Minimum MW table.
Minimum MW	Dispatch K6:AH28	MW. Minimum operating or purchase level for the unit. The manual inputs are for purchases. The other values in the table are filled in automatically based on inputs in the Operating Cost Curve section.
Operational Maximum MW	Dispatch K52:AH734	MW. Highest allowable dispatch level for the unit, under normal operating conditions. Note that the value cannot be lower than the Minimum MW. The cell shading will turn red if that condition is violated.
Unit Maximum MW	Dispatch K97:AH119	MW. Highest allowable dispatch level for unit. In some cases units may need to exceed the Operational Maximum, but should never exceed the Unit Maximum. Note that the value cannot be lower than the Operational Maximum. The cell shading will turn red if that condition is violated.

Input	Location	Description
Purchase Power	Dispatch K76:AH89	Off-system purchase power, up to 50MW blocks per cell, that will offset generation and affect cost.
Purchase Prices ($/MWh)	Dispatch K143:AH156	$/MWh. Cost to obtain import power above any prescheduled amounts.
SNMIC Limit	Dispatch K163:AH163	MW. Used by EPEC to determine reserve purchase levels but does not affect cost calculations.
SNM Slack	K208:AH208	Manual adjustment to SNM Slack Calculations that would force a purchase to register into system cost if it is not being fully captured.

Loads Tab

Input	Location	Description
Native Load	Loads B2:Y2	MW.
Other WSCC Load	Loads B8:Y8	MW.
RENEWABLE Purchase	Loads B11:Y11	MW. Solar output as measured by the EMS.
Battery Charge (+)/Discharge (-)	Loads B12:Y12	MW. Battery output and charge.
Remote Resources Metered Generation	Loads B18:Y22	MW. Generation outputs of both Palo Verde and Four Corners power plants.
Sales	Loads B24:Y34	MW. Divided into the five tiers (i.e. Long Term / Day Ahead / Real Time). There are multiple rows for each Tier for consistency with EPEC practices. The values are summed within the tier for calculation purposes. Subtracted from Net Remote Gen for Load Obligations. The TierCosts tab calculates the cost to meet these prescheduled sales.
Real Time Sales	Loads B36:Y38	MW. Subtracted from Net Remote Gen for Load Obligations
Total Local Generation	Loads B67:Y67	Sum of all hourly local generation as dispatched.
Required Spinning Res	Loads B105:Y105	MW. Used to determine reserve requirements. Does not affect cost calculations.
Required Contingent Res	Loads B106:Y106	MW. Used to determine reserve requirements. Does not affect cost calculations.

Purchases Tab

Input	Location	Description
Off-System Purchases	Purchases B21:AB62	Entry of off-system purchases for the day. Ties out to Dispatch Power and Dispatch Price on Dispatch tab.

TierCosts Tab

Input	Location	Description
Off-System Sales Incremental Cost Calculations by tier	TierCosts A1:Y290	Calculates the incremental cost of off-system sales by tiers.
Unit Contribution to Sales	TierCosts A297:Y324	Hourly description of unit generation dispatched to supply off-system sales
Tier Costs by tier results	TierCosts BH12:BQ35	Results of the incremental cost of generation to supply off system sales by tiers.

SettleCore Tab

Input	Location	Description
Metered data for units and solar	data dump into Tab.	Data dump of metered information from CAISO's SettleCore web-based software of EPEC's system on defined day.

data Tab

Input	Location	Description
Local generating units	data C3:Z17	Newman, Rio Grande, Montana and Copper units.
Combined Cycle units	data C21:Z30	Combined Cycle units.
Battery	data C34:Z34	Battery charge and discharge.
Renewables	data C38:Z47	Solar generation.
Palo Verde Generation	data C81:Z81	Palo Verde generation output from units 1, 2, 3.
Native Load	data C87:Z87	EPEC's local load consumption.

Gas Price Memo Tab

Input	Location	Description
Natural Gas	Gas Price Memo Q16:Q23	Entry of natural gas prices, both monthly and daily, for given day sourced from natural gas trader on shift memo.

C.O.E. Tab

Input	Location	Description

Unit Contribution to Sales	C.O.E B58:Z83	Hourly description of unit generation dispatched to supply off-system sales
Operating Costs By Unit	C.O.E. AD58:BB83	Hourly description of unit generation cost to supply off-system sales by unit.

SPRd_Check Tab

Input	Location	Description
Check Calculations	SPRd_Check A1:AF247	Costing Sheets calculations checks.

Model Calculation Steps

1. Determine the MW of generation that must be dispatched by local generation. The MW needed is referred to as the Additional Generation Required (Loads tab, Row 42). It is a combination of native load and prescheduled sales and purchase commitments, as well as some adjustments for real time transactions and adjustments for regulation down service.

MW Needed = Max (MustRun, (SLO – NetRemote)

Where

MustRun = Sum of minimum MW for local units (excludes SPS , FC, and PV)

SLO = System Load Obligations = SystemLd + Total Preschedule

SystemLd = NL + SNMSlack + MiscLd

NL = User Input for native load

SNMSlack = adjustment for regulation down service

MiscLd = Refers to user inputs for Station Service(Loads A4), Inadvertent (Loads A6), and other WSCC load (Load A8).

Total Preschedule = User input for FC, PV, Eddy, Lordsburg, Luna, West Mesa, San Juan, Coronado & Renewable purchases (purchases are negative).

NetRemote = Remote Generation – TierVolumes – RealTimeSales

Remote Generation = User input for FC and PV

TierVolumes = User input for wholesale sales in tiers 1-3

RealTimeSales = User input for real time sales to minimize swings and economy sales.

2. Determine the marginal cost to dispatch each unit at each output level.
The marginal cost is the change in cost incurred for operating the unit at an additional 1 MW output level for one hour. The marginal costs for fossil plants change as the MW output level of the unit increases. The marginal cost curve is described using a linear functional form:

$$\text{Marginal Cost} = (\text{Slope}_u * \text{OutputMW}_{u,h} + \text{Intercept}_u) * \text{GasCost}_u$$

Where

$\text{OutputMW}_{u,h}$ is the dispatch level (MW) for unit u in hour h.
Slope is the marginal cost curve input for unit u
Intercept is the marginal cost curve input for unit u
GasCost_u is the gas cost ($/MMBtu) for unit u.

The slope and intercept are derived as first derivatives from the unit's Operating Cost curve. The Operating Cost curve describes the cost to operate the unit at a certain output level, whereas the marginal cost curve describes the *change* in cost to increase output to that level. Purchased power for SPS, FC, and PV are modeled as constant costs equal to their respective entries in the Marginal Cost Curve input table.

Section B238:F2902 of the Dispatch Tab calculates the marginal cost to dispatch each local unit over all possible MW output levels. We refer to a unit at a certain MW dispatch level as a unit-dispatch combination.

3. Adjust marginal costs to reflect hourly operating constraints
In order to model the lowest cost feasible dispatch, the model needs to recognize the hourly constraints entered for each unit in the Minimum MW table, Operational Maximum MW table, and Unit Maximum MW table. The unit dispatch is based on taking the unit-dispatch combinations with the lowest marginal costs for each hour (basically sort all unit-dispatch combinations in ascending order and dispatch units until the generation requirement is met). Therefore, an easy way to incorporate unit dispatch constraints is to adjust the marginal costs as follows:

- Minimum MW: If unit output is less than or equal to the Minimum MW, then add a large negative value (ForceIn = -1000) to the marginal cost. This makes the

marginal cost to operate at that MW so low that it guarantees that the unit-dispatch combination will be at the bottom of the sorted stack and included in the dispatch. In the case of Palo Verde Purchases, those receive an additional -100 adjustment so that they are first in the dispatch order under the Minimum MW condition. This is Palo Verde adjustment is probably not needed, but has been included for consistency with past EPEC practices.

- Operational Maximum MW: If unit output is greater than the Operational Maximum MW for that unit in that hour, then add a large positive value (ForceOut = 500) to the marginal cost. This makes the marginal cost to operate at that MW so high that it should force that unit-dispatch combination out of the dispatch.
- Unit Maximum MW: If unit output is greater than the Unit Maximum MW for that unit in that hour, then add a large positive value (ForceOut2 = 500) to the marginal cost. This makes the marginal cost to operate at that MW even higher than under the Operational Maximum MW constraint to further force that unit-dispatch combination out of the dispatch.

The adjusted marginal costs for fossil units are in H238:AE2902. The adjusted purchase prices for SPS, FC, and PV are in H3869:AE4143 (indicated by the green cell shading).

** note that for the purpose of calculating units included in the dispatch, one needs to assure that no dispatch-unit combinations or purchase power alternatives would have the same value. If that were to occur, the ranking algorithms would not be able to resolve the tie, and the too many units could be dispatched. To prevent ties, all costs were rounded to seven decimal places, and then added a unique value in the eight through eleventh decimal places. (Excel only resolves to 15 significant digits). This will not affect the cost calculations, as those calculations do not use the marginal costs.*

4. Rank the unit-dispatch combinations based on marginal cost adjusted for hourly operating constraints.

Section AH240:BE41430 ranks all of the unit-dispatch combinations and pre-scheduled purchase power alternatives. The ranking is done separately for each hour, so each column will have ranks that range from 1 to 3902.

5. Calculate the SNM slack that is used to adjust the final dispatch level for each hour.

In some cases, the actual dispatch of local generation is lowered to reflect cases where must run generation levels are too high to allow for EPEC to provide normal regulation down service. In those cases, SNM slack is used to adjust the system load downward to reflect the regulation down resource scenario.

SNM slack is calculated in section I165 of the Dispatch Tab. Part of the calculation requires the calculation of local generation and incremental market purchases that would be required, assuming that SNM slack is zero (i.e.: no adjustment needed to accommodate regulation down). The dispatches are determined in section AL06:BI28 of the Dispatch tab. For the purchases (rows 176-189), the model counts the instances where the rank of the non local generation determined in step 4 above, is less than or equal to the *Additional Generation required w/o presales* in row 172. For the local generation, the model calculates the dispatch of all generation, less purchases and computes the value in row K193:AH193.

SNM Slack Conditions.

There are four tests in rows 201 through 204 that are used for determining SNM slack. The rationale and inputs for each test are represented in the flowchart shown in **Error! Reference source not found.**, and expressed in formulas below.

1. If Forced Sales > 0 then SNM Slack = regulation down MW.
   (if forced sales are required to hit demand-supply balance, then additional MW of supply need to be shed to provide room for regulation down service. SNM Slack forces the model to calculate the cost of meeting this lower supply level)

   Forced sales occur when Position > 0

   Position = Max (MustRun + NetRemote' – SLO', 0)

   MustRun = Sum of Min MW for on-line local units (excludes SPS , FC, and PV)

   NetRemote' = PreSchedPurch – TierVolumes – RealTimeSales

   PreSchedPurch = User input for FC and PV

   RealTimeSales = User input for real time sales for economy sales and to minimize swings.

   SLO' = NL + MiscLd

   NL = User input for native load

   MiscLd = User inputs for Station service, Inadvertent, and other WSCC load.

2. If StatMinReg <= LocalGen then SNM Slack = 0
   (Dispatched local generation exceeds the level needed to meet must run and regulation down requirements, so no SNM slack adjustment is needed for that hour)

   StatMinReg = Status minimum with regulation = MustRun – RegDown (note that since regulation down is a negative value, StatMinReg will be larger that MustRun)

LocalGen = Sum of local unit MW that would be dispatched to meet the generation requirement w/o presales.

Local unit MW excludes SPSFirm, SPSEmerg, FCPurch, and PVPurch.

Generation requirement w/o presales = Max(0, SLO'-NetRemote')

3. If SPS Firm Dispatch = 0 then SNM Slack = -(StatMinReg – LocalGen)
(If this test is needed, then dispatched LocalGen is too low to provide the needed headroom for regulation down service, i.e.: Test 2 is FALSE. SPS Firm can also provide regulation down service, but if SPS Firm Dispatch = 0 then SNM Slack is needed to adjust the dispatch down to make up for the lack of headroom in LocalGen.)

   SPS Firm Dispatch = MW of SPS Firm that would be dispatched to meet the generation requirement w/o presales.

4. If SPS Firm Dispatch > Absolute value of RegDown then SNM Slack = 0
(In this case, the SPS Firm dispatch is sufficient to provide all of the headroom needed for regulation down service. The SNM Slack adjustment is not needed.)

5. If conditions 1 through 4 are not met, then SNM Slack = -Min(0, -RegDown – SPS Firm Dispatch - Max(0,LocalGen – MustRun))
(At this point, SPS Firm Dispatch and Local Gen may provide some headroom for regulation down, but neither is sufficient on its own. SNM Slack is set to make up and shortfall after considering both SPS Firm Dispatch and Local Gen headrooms)

   Abs(RegDown) = absolute value of regulation down MW

   SPS Firm = MW of SPS Firm that would be dispatched to meet the generation requirement w/o presales.

6. Calculate dispatch for each unit

Incorporating the SNM Slack, the model determines the additional generation that needs to be dispatched or purchased for each hour (Loads B42:Y42). This is transferred to AL2:BI2 of the Dispatch tab. The Dispatch table BL6:CI46 determines the least cost dispatch for all units and purchases to meet the MW needed in row 2. The dispatch uses the ranks calculated in step 4 above.

This section of the model also calculates spinning reserves, but as those do not affect the cost calculation, we shall exclude their description herein.

7. Calculate Operating Costs

Using the dispatch table from step 6, we can now calculate the dispatch and purchase costs. For the fossil units, we use the following quadratic equation:

$$Cost = (Square_u * OutputMW_{u,h}^2 + Slope_u * OutputMW_{u,h} + Intercept_u) * GasCost_u$$

Where

OutputMW$_{u,h}$ is the dispatch level from Step 6 for unit u in hour h.
Square is the operating cost curve input for unit u
Slope is the operating cost curve input for unit u
Intercept is the operating cost curve input for unit u
GasCost$_u$ is the gas cost ($/MMBtu) for unit u.

For purchased power, the formula is: Cost = OutputMW$_u$ * PurchaseCost$_u$

Total Cost = Local Subtotal Cost (Row 47) + Cost of Remote Resources (Row 48)

where

Local Subtotal Costs (Row 47) = Sum of fossil unit costs and SPS (rows 6 through 29).

Cost or Remote Resources (Row 48) = Remote Generation Resources * purchase costs (D91 and D92) plus FC and PV purchased power (Rows 45 and 46).

Tier Costs

The TierCosts tab calculates the cost of the wholesale sales input in rows 24 through 34 of the Loads tab. The cost of providing a tier of wholesale sales is the total cost of production within and without the tier of wholesale sales. Specifically:

- Tier 5 cost = Total Cost (all tiers) less cost savings from forced sales less Total Cost (excluding Tier 5 sales)
- Tier 4 cost = Total Cost excluding tier 5) less Total Cost (excluding tiers 4 -5)
- Tier 3 cost = Total Cost excluding tiers 4-5) less Total Cost (excluding tiers 3 -5)
- Tier 2 cost = Total Cost (excluding tiers 3-5) less Total Cost (excluding tiers 2 and 5)
- Tier 1 cost = Total Cost (excluding tiers 2 - 5) less Total Cost (excluding tiers 1-5).

The operating costs for each tier scenario are calculated in the same manner described above for the full dispatch case.

The Tier 3 cost includes an adjustment for forced sales because the Total Cost (all tiers) does not calculate any cost reduction for forced sales from PV or FC. This is to remain consistent with EPEC past practices. Forced sales for the full dispatch case (including tiers 1-3) are shown in cells B115:Y115 of the Loads tab.

The Tier calculations, however, require that a cost be assigned to changes in forced sales. Without the adjustments, the cost reduction associated with the forced sales under the full dispatch case would appear as a cost reduction associated with Tier 3. For example, assume EPE had to dump 50MW of FC in the full dispatch case. If EPE had no Tier 3 sales, EPE would also have to dump 50MW in the Tier 3 case. The Tier 3 case estimates a cost reduction for 50MW no longer purchased from FC, the full dispatch case does not. When Tier 3 costs are compared against the full dispatch, this cost reduction shows up as a Tier 3 savings.

There are two choices to fix this 1) estimate a cost reduction for forced sales in the full dispatch case, or 2) calculate the cost reduction for forced sales in the full dispatch case, do NOT apply it to the full dispatch case costs, but include it as an adjustment to the tier 3 differential calculation. The second solution was implemented to remain consistent with past EPEC practices.

Organization of the TierCosts tab.

The TierCost tab contains five sets of tier calculations. The case with no tier sales is shown in rows 1 through 52 and uses burgundy headers. Rows 3-8 calculate the dispatch requirements, and rows 12-34 calculate the dispatch and costs for each unit. The dispatch calculations occur in the first table in columns A through Y, and are followed by the cost calculations in columns AA through AZ. The cost reduction excluding tier 1 sales, relative to the case where tier 2 - 5 sales are excluded is calculated in columns BA through BC.

Similar calculations are made for the case where tier 2 - 5 sales are excluded. This set begins in row 61 and uses blue headers.

Calculations for the case where tier 3 -5 sales are excluded begin in row 120 with dark orange headers. Calculations for the case where 4-5 sales are excluded begin in row 179 while final the calculation for the case where only tier 5 sales are excluded begin in row 238.

The results for each tier are presented in the Table in cells BF10:BQ39. Currently, EPE only uses tiers 1-3. Tiers 4 and 5 were created for any future use.

COSTING CHECKLIST

Dispatch Date: _____

ATTACHMENTS
- Fuel Price Memo (Fuels)
- Generation Status Report (Power Generation)
- Dispatch Sheet (DA email)
- Bottom of the Hour Report (RT report)
- EMS Documentation (Accounting)

DISPATCH TAB
- Dispatch Date
- Fuel Prices
- Unit Configuration Matches EMS
- Unit Minimum/Maximum Levels Adjusted as Needed
- NOX Adder Taken Out of Newman Gas Prices
- Purchase Totals Match webTrader Totals
- Additional Purchases Entered (Non-Arbitrage)
- Purchases Fully Dispatched
- Necessary Operational Notes

PURCHASES TAB
- Megawatts tie out for the day and Dispatch tab
- Total dollar values tie out for the day and Dispatch tab

LOADS TAB
- Native Load
- Station Service
- Inadvertent Schedule
- SRSG Schedule
- Four Corners Output
- Palo Verde Output
- Sales Totals Match webTrader Totals
- Additional Sales Entered (Non-Arbitrage)

TIER COSTS TAB
- Review Tier Costs

Reviewed By:

Prescheduler _____ Date _____
Manager _____ Date _____

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CEP 4-4:

Please provide EPE's cost/benefit analysis for Newman 6 and provide any regulatory orders that have addressed the prudence of Newman 6 and the appropriate method of allocation of Newman 6 capacity, energy and costs between jurisdictions served by EPE.

RESPONSE:

Please refer to OPUC 1-7 Attachment 2 - CONFIDENTIAL for the output report of EPE's capacity expansion model Plexos, used in EPE's 2021 TX RFP, which selected the remaining 20% of Newman Unit 6 as part of its least-cost portfolio of resources.

In October 2020, the Public Utility Commission of Texas (PUCT) granted EPE's application to amend its certificate of convenience and necessity ("CCN") to construct, own and operate Newman Unit 6. The New Mexico Public Regulation Commission (NMPRC) later rejected certification of Newman Unit 6, and as a result, that portion of Newman Unit 6 that would have otherwise served New Mexico retail load has been serving and will continue to serve the growing Texas load.

Newman Unit 6 is currently not in base rates. Rather, EPE's investment in Newman Unit 6 is being recovered via the Generation Cost Recovery Rider (GCRR) at approximately 80% of the invested capital costs of the facility, although it is exclusively being used to serve Texas load. EPE is requesting in its recently filed Texas base rate case, Docket No. 57568, that Newman Unit 6 be included in rate base. EPE is also seeking approval to recover 100% of its total capital investment in Newman Unit 6 given that the unit has been exclusively used to serve Texas customers.

The Final Order in Docket No. 50277 at page 13, Ordering Paragraph 2 supports the statement that the PUCT certificated the entire Newman Unit 6.

"The Commission amends El Paso Electric's certificate of convenience and necessity number 30050 to include the construction, ownership, and operation of Newman unit 6. an

approximately 228-MW natural-gas-fired power generation unit to be located at the existing Newman generating station in northeast El Paso."

The PUCT's preliminary order issued in Docket No. 54605 also supports the statement that PUCT certificated the entire Newman Unit 6. More specifically, Docket No. 54605, Preliminary Order at page 3, Section III, paragraph 1 states: "Therefore, the Commission concludes that it certificated the entire Newman unit 6 in Docket No. 50277. Jurisdictional allocation is a ratemaking issue to be addressed in a ratemaking proceeding."

Preparer:	Jaime Reyes George Novela	Title:	Manager – Energy Resources Senior Director – Regulatory Policy and Rates
Sponsor:	Victor Martinez George Novela	Title:	Director – Energy Resources Senior Director – Regulatory Policy and Rates

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CEP 4-5:

Please provide the forecasted non-fuel revenue requirement, MWh generation, fuel costs and net energy margins for Newman 6 for each year of the expected service life of the facility.

RESPONSE:

Please see CEP 4-5 Attachment 1 for the forecasted MWh generation and fuel costs for Newman Unit 6 by year for the expected service life of the facility. EPE does not forecast non-fuel revenue requirements or off-system energy margins by generation unit.

Preparer:	Daniel Holguin Manny Carrasco	Title:	Forward Marketer Manager – Econ & Rate Research
Sponsor:	Victor Martinez George Novela	Title:	Director – Energy Resources Senior Director – Regulatory Policy & Rates

EL PASO ELECTRIC COMPANY
Newman Unit 6
Forcasted MWh, and Fuel Costs

Year	Generation (MWh)	Fuel Costs ($)
2025	901,449	19,443.19
2026	958,897	24,169.21
2027	946,014	29,458.51
2028	952,430	28,619.60
2029	966,469	31,115.92
2030	963,290	31,673.41
2031	975,647	32,538.15
2032	973,178	31,817.11
2033	970,549	34,779.23
2034	968,905	34,419.72
2035	967,125	34,995.84
2036	971,700	34,333.32
2037	970,447	36,566.69
2038	973,292	37,504.30
2039	957,423	37,883.22
2040	907,023	35,830.22
2041	961,101	39,993.63
2042	946,706	40,169.92
2043	945,371	41,060.26
2044	959,049	40,531.61
2045	943,850	39,517.13
2046	943,850	40,297.23
2047	943,850	41,092.74
2048	943,850	41,903.95
2049	943,850	42,731.17
2050	943,850	43,574.72
2051	943,850	44,434.93
2052	943,850	45,312.11
2053	943,850	46,206.62
2054	943,850	47,118.78
2055	943,850	48,048.95
2056	943,850	48,997.48
2057	943,850	49,964.73
2058	943,850	50,951.08
2059	943,850	51,956.91
2060	943,850	52,982.58
2061	943,850	54,028.51
2062	943,850	55,095.08

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APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
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CEP 4-6:

Please explain why EPE believes it is appropriate for Newman 6 to be allocated entirely to the Texas jurisdiction and provide any cost/benefit analysis supporting this proposed treatment.

RESPONSE:

Please refer to EPE's response to OPUC 1-7 and the Direct Testimony of Victor Martinez at pages 24-25. EPE believes it is appropriate for Newman Unit 6 to be allocated entirely to the Texas jurisdiction because it has been certified in Texas and not New Mexico, and because it has been and continues to be used exclusively to serve Texas load because it has been shown to be part of the lowest-cost portfolio of resources to address EPE's capacity and energy needs in Texas. Please see OPUC 1-7 Attachment 2 for a cost/benefit analysis supporting this proposed treatment.

Preparer: Jaime Reyes Title: Manager – Energy Resources

Sponsor: Victor Martinez Title: Director – Energy Resources

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CEP 4-7:

Please provide EPE's cost/benefit analysis and 2017 RFP bid analysis and rankings supporting the prudence of the Company's selection of the Buena Vista ("BV") solar/BESS PPA.

RESPONSE:

Please see El Paso Electric Company's response to TIEC 2-3, Attachments 1 through 32 HIGHLY SENSITIVE PROTECTED MATERIALS.

Preparer:	Ronda R. Griffin	Title:	Principal Analyst - Market Development and Resource Strategy
Sponsor:	Victor Martinez	Title:	Director – Energy Resources

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CEP 4-8:

Please provide any regulatory orders that have addressed the prudence of the original BV PPA and the appropriate method of allocation of the BV PPA capacity, energy and costs between jurisdictions served by EPE.

RESPONSE:

The New Mexico Public Regulation Commission ("NMPRC") approved the BV 1 purchased power/energy storage agreement pursuant to Rule 17.9.551 [approval of long term purchased power agreement] as a system resource, including cost recovery. Specifically, BV1 energy charges were approved for recovery through EPE's fuel clause and recovery of approved capacity charges was deferred to EPE's next base rate case (which has not yet been filed). *See* NMPRC Case No. 19-000348-UT *Recommended Decision of the Hearing Examiner* (April 22, 2022) , Ordering Paragraphs C, E, G, adopted by NMPRC Case No. 19-00348-UT *Order Adopting Recommended Decision* (May 13, 2020) Ordering Paragraphs A, B. This approval is restated in NMPRC Case No. 19-00348-UT *Order Adopting Recommended Decision with Modifications* (May 17, 2023) at paragraph 24.

Upon appeal to the New Mexico Supreme Court, (*City of Las Cruces v. New Mexico Public Regulation Commission*, NO. S-1-SC-40048, Jan. 13, 2025, *Per Curiam*), the Court found that, "...the Commission acted pursuant to its statutory and regulatory authority under NMSA 1978, Section 62-6-4(B) (2003) to approve the amended Buena Vista-1 PPA under 17.9.551 NMAC...," and that, "[s]ubstantial evidence supports the Commission's findings that the amended Buena Vista-1 PPA met the 'lowest reasonable cost' standard of 17.9.551.8(D)(6) NMAC..."

Preparer:	George Novela	Title:	Senior Director- Regulatory Policy and Rates
Sponsor:	George Novela	Title:	Senior Director- Regulatory Policy and Rates

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PUC DOCKET NO. 57149

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
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QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-9:

Please provide a summary comparison of the original and amended capacity and energy pricing and delivery terms of the BV solar PPA.

RESPONSE:

El Paso Electric Company's ("EPE") Buena Vista Energy Center I ("BVI") Power Purchase Agreement ("BVI PPA") dated October 17, 2019, was based on a fixed rate of $20.99 per Megawatt-hour ("MWh") for the output of the solar facility and a capacity payment of $5.36/kilowatt-month for the energy storage over the 20-year term of the contract. The original commercial operation date for BVI was May 1, 2022.

The amendment to the BVI PPA dated July 13, 2022, changed the rate from $20.99 per MWh to $24.49 per MWh (an increase of $3.50 per MWh) for the solar facility. The capacity pricing for the energy storage facility remained the same. The BVI PPA amendment further modified the commercial operation date to June 1, 2023, and provided for automatic reductions in the energy pricing for the solar facility if NextEra failed to meet that date.

As a result of BVI not achieving commercial operation on June 1, 2023, EPE and NextEra entered into dispute resolution negotiations in accordance with the BVI PPA. Pursuant to the Dispute Resolution Letter Agreement included in WP/FR-7 Confidential, the commercial operation date for BVI was July 11, 2023, and the new rate for energy from the BVI solar facility is $24.24.

Preparer: Judith M. Parsons — Title: Regional Manager–Regulatory Resource Strategy

Sponsor: Victor Martinez — Title: Director–Energy Resources

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CEP 4-10:

Please provide EPE's cost/benefit analysis and 2017 RFP bid analysis and rankings supporting the prudence of the Company's selection of the amended Buena Vista ("BV") solar/BESS PPA.

RESPONSE:

Please refer to CEP 4-10 Attachment 1 CONFIDENTIAL. The 2017 RFP bid analyses and rankings pertain to the Company's selection of the original BV solar/BESS PPA. Refer to CEP 4-7.

Preparer: Ronda R. Griffin Title: Principal Analyst - Market Development and Resource Strategy

Sponsor: Victor Martinez Title: Director – Energy Resources

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CEP 4-10 Attachment 1 is CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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CEP 4-11:

Please provide any regulatory orders that have addressed the prudence of the amended BV PPA and the appropriate method of allocation of the BV PPA capacity, energy and costs between jurisdictions served by EPE.

RESPONSE:

The New Mexico Public Regulation Commission (NMPRC) approved amendments to the BV 1 PPA in Case No. 19-00348-UT, including the amended energy cost and recovery of amended energy costs through EPE's fuel clause. *See* NMPRC Case No. 19-00348-UT *Order Adopting Recommended Decision with Modifications* (May 17, 2023), Paragraphs 15, 24 and 25.

In Case No. 23-00086-UT, as part of EPE's Plan for compliance with the New Mexico Renewable Energy Act for Plan Year 2024, the NMPRC approved a modified BV 1 PPA Reallocation Proposal authorizing EPE to reallocate the Texas jurisdictional amounts of BV 1 energy to New Mexico customers to the extent required to meet the New Mexico 2024 renewable portfolio standard (RPS) obligations. *See* NMPRC Case No. 23-00086-UT *Order Adopting Recommended Decision s with Modifications* (May 17, 2023) paragraphs 17-19. 24, Ordering Paragraphs A, D.

In Case No. 24-00176-UT, involving EPE's Plan for compliance with New Mexico Renewable Energy Act requirements for Plan Year 2025, the NMPRC authorized EPE to continue the BV 1 PPA reassignment approved in Case No. 23-00086-UT to meet 2025 RPS obligations. *See* NMPRC Case No. *Final Order Adopting Recommended Decision with Modifications* (Oct. 17, 2024) paragraph 19, Ordering Paragraph A, adopting *Recommended Decision* (Sept. 20, 2024), Section 4.2, pp. 9-12, paragraph 7 and Ordering Paragraph B.

Preparer:	George Novela	Title:	Senior Director- Regulatory Policy and Rates
Sponsor:	George Novela	Title:	Senior Director- Regulatory Policy and Rates

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

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CEP 4-12:

Reference Schedule FR 4.3a and d, please explain the relatively high volume of energy purchases and relatively high average purchased energy price for purchases from Tenaska along with supporting monthly invoices.

RESPONSE:

Most, if not all, of the Tenaska purchases found in Schedule FR 4.3a and d are part of a long-term arbitrage transaction with Tenaska. For the past few years, EPE has entered into yearlong purchase and sale agreements (arbitrage transactions) with Tenaska where EPE sells up to 150 MW on an hourly basis for the entire year at Palo Verde and EPE purchases an equal amount from Tenaska at either Palo Verde or Four Corners. These arbitrage transactions with Tenaska generated approximately $9.6 million in off-system margins during the Reconciliation Period. Please refer to CEP 4-13 Attachments 1 and 2 for the amount of arbitrage purchases and off-system sales from Tenaska during the Reconciliation Period.

Please refer to CEP 4-12 Attachment 1 CONFIDENTIAL for Tenaska monthly netted invoices for each month of the Reconciliation Period. Per the WSPP agreement Section 28.1, "Parties shall net payments (associated with transactions under this Agreement and Confirmation(s)) in accordance with Exhibit A, if such Parties have executed the form attached as Exhibit A."

Preparer: Daniel Holguin — Title: Forward Marketer
Alejandra Guevara — Supervisor – Energy Accounting

Sponsor: Victor Martinez — Title: Director – Energy Resources

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CEP 4-12 Attachment 1 is CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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CEP 4-13:

Please provide the following information regarding EPE's arbitrage transactions for each month of the Reconciliation Period:

a. EPE monthly energy purchases (MWh) by month from each counterparty and associated monthly purchase costs ($ per month and $/MWh)

b. EPE monthly energy sales (MWh) by month to each counterparty and associated monthly energy sale revenues ($ per month and $/MWh)

c. EPE total company arbitrage sale margins by month from each counterparty

d. Calculations of the Texas retail jurisdiction allocation of arbitrage margins to customers for each month of the Reconciliation Period

e. Calculations of the Texas retail jurisdiction allocation of arbitrage margins retained by EPE for each month of the Reconciliation Period

RESPONSE:

a. Please see CEP 4-13 Attachment 1 for arbitrage energy purchases and purchase costs by counterparty by month.

b. Please see CEP 4-13 Attachment 2 for arbitrage energy sales (MWh), revenues ($), sales costs ($/MWh) and margins.

c. Please see EPE's response to part b above.

d. Please see CEP 4-13 Attachment 3 for the Texas retail jurisdiction allocation of arbitrage margins to customers for each month of the Reconciliation Period.

e. Please see CEP 4-13 Attachment 3 for the Texas retail jurisdiction allocation of arbitrage margins retained by EPE for each month of the Reconciliation Period.

Preparer:	Daniel Holguin Denise Perez	Title:	Forward Marketer Principal Accountant
Sponsor:	Victor Martinez Julissa I. Reza	Title:	Director – Energy Resources Manager – Regulatory Accounting

Year	Month	Counterparty	Purchase Energy (MWh)	Purchase Costs ($)	Purchase Costs ($/MWh)
2022	April	APS	(400)	-29,600	74.00
		FREEPORT	(76,922)	0	0.00
		TENASKA	(64,720)	-3,678,390	56.84
		RAIN	(1,600)	-121,400	75.88
		PAC	(2,400)	-146,400	61.00
		BROOK RENEW	(3,064)	-134,277	43.82
	May	FREEPORT	(93,000)	0	0.00
		TENASKA	(71,040)	-4,517,212	63.59
		PAC	(400)	-24,000	60.00
		BROOK RENEW	(10,552)	-644,357	61.06
	June	FREEPORT	(89,796)	0	0.00
		TENASKA	(90,000)	-6,787,910	75.42
		MACQUARIE	(400)	-24,000	60.00
		CITI	(200)	-14,000	70.00
		RAIN	(800)	-58,400	73.00
		GUZ PART	(800)	-46,332	57.92
		BROOK RENEW	(360)	-22,765	63.24
		DYNASTY	(7,656)	-756,423	98.80
	July	FREEPORT	(92,604)	0	0.00
		MORGAN	(400)	-27,600	69.00
		TENASKA	(93,000)	-8,062,130	86.69
		MACQUARIE	(400)	-29,800	74.50
		RAIN	(200)	-12,400	62.00
		GUZ PART	(560)	-30,940	55.25
		BROOK RENEW	(9,032)	-708,865	78.48
		DYNASTY	(1,057)	-96,442	91.24
	August	FREEPORT	(92,895)	0	0.00
		MORGAN	(800)	-85,600	107.00
		TENASKA	(93,000)	-9,892,220	106.37
		MACQUARIE	(2,200)	-185,500	84.32
		RAIN	(200)	-16,000	80.00
		BROOK RENEW	(18,576)	-2,031,863	109.38
		DYNASTY	(6,328)	-876,014	138.43
	September	FREEPORT	(89,436)	0	0.00
		TENASKA	(89,987)	-16,849,134	187.24
		BROOK RENEW	(11,456)	-1,258,683	109.87
		DYNASTY	(9,503)	-4,218,712	443.93

Year	Month	Counterparty	Purchase Energy (MWh)	Purchase Costs ($)	Purchase Costs ($/MWh)
	October	APS	(800)	-39,200	49.00
		FREEPORT	(62,968)	0	0.00
		MORGAN	(2,000)	-114,296	57.15
		TENASKA	(78,400)	-4,460,596	56.90
		SHELL	(800)	-46,400	58.00
		BROOK RENEW	(243)	-10,449	43.00
		MERCURIA	(15,320)	-876,885	57.24
	November	FREEPORT	(84,054)	0	0.00
		MORGAN	(1,200)	-66,932	55.78
		TENASKA	(80,975)	-5,628,856	69.51
		DYNASTY	(10,583)	-804,759	76.04
		MERCURIA	(14,800)	-1,023,509	69.16
	December	FREEPORT	(92,290)	0	0.00
		TENASKA	(93,000)	-21,506,754	231.26
		RAIN	(18,321)	-4,649,951	253.80
		DYNASTY	(26,444)	-6,076,395	229.78
		MERCURIA	(15,320)	-3,581,618	233.79
	January	FREEPORT	(91,012)	0	0.00
		TENASKA	(93,000)	-12,608,580	135.58
		RAIN	(5,785)	-681,895	117.87
		DYNASTY	(1,056)	-182,498	172.82
		MERCURIA	(15,160)	-2,078,780	137.12
	February	FREEPORT	(83,388)	0	0.00
		TENASKA	(84,000)	-5,621,854	66.93
		MERCURIA	(13,610)	-927,083	68.12
	March	FREEPORT	(92,734)	0	0.00
		TENASKA	(93,000)	-5,901,489	63.46
		MERCURIA	(15,480)	-973,291	62.87
	April	FREEPORT	(51,741)	0	0.00
		IID	(15)	-1,979	131.90
		TENASKA	(32,760)	-2,140,767	65.35
		CITI	(5,440)	-399,200	73.38
		MERCURIA	(10,000)	-633,672	63.37
	May	FREEPORT	(91,967)	0	0.00
		TENASKA	(48,360)	-1,212,458	25.07
		CITI	(14,960)	-359,680	24.04
		RAIN	(800)	-20,800	26.00
		MERCURIA	(10,400)	-291,352	28.01
	June	FREEPORT	(89,243)	0	0.00
		TENASKA	(87,120)	-2,839,446	32.59
		CITI	(1,040)	-40,800	39.23
		DYNASTY	(3,168)	-158,460	50.02

Year	Month	Counterparty	Purchase Energy (MWh)	Purchase Costs ($)	Purchase Costs ($/MWh)
2023		MERCURIA	(28,400)	-953,212	33.56
	July	FREEPORT	(92,889)	0	0.00
		MORGAN	(800)	-41,600	52.00
		TENASKA	(111,600)	-10,619,520	95.16
		MACQUARIE	(26,080)	-2,005,511	76.90
		RAIN	(160)	-4,800	30.00
		DYNASTY	(31,941)	-3,017,906	94.48
	August	FREEPORT	(92,775)	0	0.00
		TENASKA	(102,551)	-10,674,609	104.09
		MACQUARIE	(21,024)	-1,683,114	80.06
		PAC	(2,000)	-172,200	86.10
		LADWP	(75)	-71,250	950.00
		DYNASTY	(28,579)	-2,942,779	102.97
		MERCURIA	(25)	-1,302	52.09
	September	FREEPORT	(90,000)	0	0.00
		TENASKA	(108,000)	-4,487,652	41.55
	October	FREEPORT	(24,000)	0	0.00
		TENASKA	(48,360)	-2,681,104	55.44
		SHELL	(200)	-13,800	69.00
		CITI	(16,720)	-1,150,560	68.81
		RAIN	(1,200)	-60,000	50.00
	November	FREEPORT	(70,759)	0	0.00
		TENASKA	(70,715)	-3,666,832	51.85
		CITI	(4,400)	-256,680	58.34
		PNM	(70)	-4,200	60.00
	December	FREEPORT	(90,013)	0	0.00
		TENASKA	(111,600)	-4,422,170	39.63
		CITI	(240)	-12,640	52.67
		MAG	(32,296)	-1,270,925	39.35
2024	January	FREEPORT	(92,155)	0	0.00
		TENASKA	(111,600)	-7,859,627	70.43
		MAG	(44)	-1,071	24.35
	February	FREEPORT	(86,017)	0	0.00
		TENASKA	(97,200)	-3,298,518	33.94
		CITI	(400)	-11,200	28.00
		RAIN	(800)	-17,600	22.00
		PAC	(20)	-560	28.00
	March	FREEPORT	(93,000)	0	0.00
		TENASKA	(111,600)	-2,224,716	19.93

Year	Month	Counterparty	Sales Energy (MWh)	Sales Revenues ($)	Sales Revenues ($/MWh)	Sales Costs ($)	Sales Margins ($)
2022	April	FREEPORT	76,922	157,690	2.05	0	157,690
		TENASKA	58,320	3,593,850	61.62	3,345,990	247,860
		MACQUARIE	2,400	144,800	60.33	135,200	9,600
		RAIN	2,800	206,200	73.64	195,800	10,400
		TRANSALTA	400	19,600	49.00	16,800	2,800
		PAC	2,000	133,600	66.80	129,600	4,000
		PNM	800	45,600	57.00	44,000	1,600
		BROOK RENEW	3,064	137,341	44.82	134,277	3,064
		DYNASTY	1,600	66,400	41.50	63,600	2,800
		TENAUTHOR	800	48,000	60.00	44,800	3,200
	May	FREEPORT	93,000	190,650	2.05	0	190,650
		TENASKA	71,040	4,819,132	67.84	4,517,212	301,920
		MACQUARIE	200	12,864	64.32	12,000	864
		CITI	200	12,400	62.00	12,000	400
		BROOK RENEW	10,552	688,137	65.21	644,357	43,780
	June	FREEPORT	89,796	184,082	2.05	0	184,082
		IID	800	47,332	59.17	46,332	1,000
		TENASKA	90,240	7,189,221	79.67	6,801,590	387,631
		MACQUARIE	800	61,200	76.50	58,400	2,800
		CITI	200	15,000	75.00	14,000	1,000
		PSCO	400	28,800	72.00	24,000	4,800
		BROOK RENEW	120	9,265	77.21	9,085	180
		DYNASTY	7,656	810,015	105.80	756,423	53,592
	July	FREEPORT	92,604	189,838	2.05	0	189,838
		MORGAN	400	29,200	73.00	27,600	1,600
		TENASKA	93,480	8,486,720	90.79	8,088,650	398,070
		MACQUARIE	80	4,640	58.00	4,420	220
		PSCO	600	44,000	73.33	42,200	1,800
		BROOK RENEW	9,032	727,509	80.55	708,865	18,644
		DYNASTY	1,057	103,841	98.24	96,442	7,399
	August	FREEPORT	92,895	190,435	2.05	0	190,435
		MORGAN	600	70,800	118.00	68,000	2,800
		SRP	200	16,500	82.50	15,700	800
		TENASKA	93,320	10,316,210	110.55	9,917,820	398,390
		EDF	800	76,800	96.00	72,800	4,000
		PSCO	1,000	86,200	86.20	82,600	3,600
		BROOK RENEW	18,376	2,055,109	111.84	2,015,863	39,246
		DYNASTY	6,328	920,310	145.43	876,014	44,296
		CONSTELLATION	480	38,640	80.50	38,400	240

Year	Month	Counterparty	Sales Energy (MWh)	Sales Revenues ($)	Sales Revenues ($/MWh)	Sales Costs ($)	Sales Margins ($)
	September	FREEPORT	89,436	108,466	1.21	0	108,466
		TENASKA	89,987	17,233,378	191.51	16,849,134	384,244
		BROOK RENEW	11,456	1,277,715	111.53	1,258,683	19,032
		DYNASTY	9,503	4,285,233	450.93	4,218,712	66,521
	October	FREEPORT	62,968	0	0.00	0	0
		MORGAN	2,400	140,296	58.46	137,496	2,800
		TENASKA	78,000	4,768,896	61.14	4,437,396	331,500
		MACQUARIE	800	44,000	55.00	39,200	4,800
		SHELL	800	47,200	59.00	46,400	800
		MERCURIA	15,320	907,525	59.24	876,885	30,640
		DIRECT	243	11,239	46.25	10,449	790
	November	FREEPORT	84,054	0	0.00	0	0
		MORGAN	1,200	67,732	56.44	66,932	800
		TENASKA	80,975	5,973,000	73.76	5,628,856	344,144
		DYNASTY	10,583	860,320	81.29	804,759	55,561
		MERCURIA	14,800	1,053,109	71.16	1,023,509	29,600
	December	FREEPORT	92,290	0	0.00	0	0
		IID	713	216,925	304.24	208,685	8,240
		TENASKA	97,875	23,390,503	238.98	22,945,898	444,605
		CITI	2,785	762,231	273.69	737,568	24,664
		TRANSALTA	480	155,107	323.14	151,747	3,360
		PAC	1,520	455,541	299.70	440,501	15,040
		BROOK RENEW	7,948	1,745,563	219.62	1,672,306	73,258
		DYNASTY	26,444	6,215,226	235.03	6,076,395	138,831
		MERCURIA	15,320	3,612,258	235.79	3,581,618	30,640
	January	FREEPORT	91,012	186,575	2.05	0	186,575
		MORGAN	1,175	171,699	146.13	164,649	7,050
		TENASKA	93,120	13,069,708	140.35	12,626,340	443,368
		BROOK RENEW	4,290	503,998	117.48	469,885	34,113
		DYNASTY	1,056	188,042	178.07	182,498	5,544
		MERCURIA	15,160	2,114,401	139.47	2,078,780	35,621
		QUINTESS	200	30,000	150.00	29,600	400
	February	FREEPORT	83,388	170,945	2.05	0	170,945
		TENASKA	84,000	6,020,854	71.68	5,621,854	399,000
		MERCURIA	13,610	959,067	70.47	927,083	31,984
	March	FREEPORT	92,734	190,105	2.05	0	190,105
		TENASKA	93,000	6,343,239	68.21	5,901,489	441,750
		MERCURIA	15,480	1,009,669	65.22	973,291	36,378
	April	FREEPORT	51,741	106,069	2.05	0	106,069
		TENASKA	32,775	2,298,356	70.13	2,142,746	155,610
		CITI	5,440	410,960	75.54	399,200	11,760
		MERCURIA	10,000	660,172	66.02	633,672	26,500

Year	Month	Counterparty	Sales Energy (MWh)	Sales Revenues ($)	Sales Revenues ($/MWh)	Sales Costs ($)	Sales Margins ($)
2023	May	FREEPORT	91,967	188,532	2.05	0	188,532
		TENASKA	48,360	1,442,168	29.82	1,212,458	229,710
		CITI	15,760	402,256	25.52	380,480	21,776
		MERCURIA	10,400	318,912	30.66	291,352	27,560
	June	FREEPORT	89,243	182,948	2.05	0	182,948
		TENASKA	87,120	3,253,266	37.34	2,839,446	413,820
		CITI	1,040	42,360	40.73	40,800	1,560
		DYNASTY	3,168	180,636	57.02	158,460	22,176
		MERCURIA	28,400	1,128,412	39.73	953,212	175,200
	July	FREEPORT	92,889	190,422	2.05	0	190,422
		IID	1,520	79,249	52.14	75,065	4,184
		MORGAN	4,400	399,208	90.73	385,208	14,000
		TENASKA	113,000	11,321,348	100.19	10,722,348	599,000
		SHELL	400	25,400	63.50	24,428	972
		CITI	12,040	997,878	82.88	963,866	34,012
		TRANSALTA	400	25,400	63.50	24,428	972
		PAC	4,400	281,020	63.87	263,420	17,600
		AVANGRID	400	25,600	64.00	24,428	1,172
		BROOK RENEW	480	46,800	97.50	43,440	3,360
		CONOCO	1,600	149,600	93.50	144,800	4,800
		DYNASTY	31,941	3,241,493	101.48	3,017,906	223,587
	August	BP-ENERGY	2,400	397,388	165.58	381,088	16,300
		FREEPORT	92,775	190,189	2.05	0	190,189
		IID	1,000	49,780	49.78	47,990	1,790
		MORGAN	200	12,834	64.17	12,334	500
		TENASKA	105,186	11,442,628	108.78	10,891,787	550,841
		EDF	200	11,600	58.00	10,400	1,200
		CITI	6,224	398,472	64.02	383,754	14,718
		TRANSALTA	3,552	374,916	105.55	333,892	41,024
		PAC	800	50,400	63.00	50,096	304
		BROOK RENEW	576	176,675	306.73	175,023	1,652
		DYNASTY	28,779	3,156,548	109.68	2,956,045	200,503
		MERCURIA	2,400	194,400	81.00	175,200	19,200
		QUINTESS	2,912	132,966	45.66	126,342	6,624
		MAG	25	1,302	52.09	1,302	0
	September	FREEPORT	90,000	29,215	0.32	0	29,215
		TENASKA	108,000	5,063,652	46.89	4,487,652	576,000
	October	FREEPORT	24,000	0	0.00	0	0
		TENASKA	48,360	2,910,814	60.19	2,681,104	229,710
		SHELL	200	14,000	70.00	13,800	200
		CITI	16,720	1,179,800	70.56	1,150,560	29,240
		RAIN	1,200	63,600	53.00	60,000	3,600

Year	Month	Counterparty	Sales Energy (MWh)	Sales Revenues ($)	Sales Revenues ($/MWh)	Sales Costs ($)	Sales Margins ($)
	November	FREEPORT	70,759	0	0.00	0	0
		TENASKA	70,785	3,990,785	56.38	3,671,032	319,753
		CITI	4,400	264,960	60.22	256,680	8,280
	December	FREEPORT	90,013	0	0.00	0	0
		TENASKA	111,600	4,938,282	44.25	4,422,170	516,113
		CITI	240	12,320	51.33	12,640	-320
		MAG	32,296	1,440,479	44.60	1,270,925	169,554
2024	January	FREEPORT	92,155	188,918	2.05	0	188,918
		TENASKA	111,600	8,394,352	75.22	7,859,627	534,725
		MAG	44	1,302	29.60	1,071	231
	February	FREEPORT	86,017	176,335	2.05	0	176,335
		TENASKA	97,220	3,764,528	38.72	3,299,078	465,450
		CITI	400	12,600	31.50	11,200	1,400
		RAIN	800	20,000	25.00	17,600	2,400
	March	FREEPORT	93,000	190,650	2.05	0	190,650
		TENASKA	111,600	2,759,466	24.73	2,224,716	534,750

El Paso Electric Company
Arbitrage Margins
For the Period April 2022 through March 2024

Line #	(a) Month	(b) Arbitrage Margins	(c) EPE 40% Arbitrage Margins before allocation	(d) Customer Share = 60% Arbitrage Margins before allocation	(e) Texas Jurisdictional Allocator	(f) Texas Jurisdiction allocated amount retained by EPE (c)*(e)	(g) Texas Jurisdiction allocated amount to customers (d)*(e)
1	Apr-22	$ 438,180	$ 175,272	$ 262,908	0.7996612053	$ 140,158	$ 210,237
2	May-22	554,516	221,807	332,710	0.8125351884	180,226	270,338
3	Jun-22	635,085	254,034	381,051	0.8040148854	204,247	306,371
4	Jul-22	612,387	244,955	367,432	0.7987708875	195,663	293,494
5	Aug-22	663,895	265,558	398,337	0.7949012376	211,092	316,638
6	Sep-22	578,104	231,242	346,863	0.7975486791	184,427	276,640
7	Oct-22	370,540	148,216	222,324	0.8024701192	118,939	178,408
8	Nov-22	379,969	151,987	227,981	0.7995042585	121,514	182,272
9	Dec-22	738,956	295,582	443,373	0.7848658044	231,992	347,989
10	Jan-23	738,637	295,455	443,182	0.7810848119	230,775	346,163
11	Feb-23	490,925	196,370	294,555	0.779292774	153,030	229,544
12	Mar-23	595,889	238,356	357,533	0.7861726065	187,389	281,083
13	Apr-23	851,581	340,632	510,948	0.8066617059	274,775	412,163
14	May-23	299,939	119,976	179,963	0.8101927851	97,204	145,805
15	Jun-23	467,578	187,031	280,547	0.8116543061	151,805	227,707
16	Jul-23	795,704	318,282	477,422	0.8031526273	255,629	383,443
17	Aug-23	1,094,082	437,633	656,449	0.7940828276	347,517	521,275
18	Sep-23	1,044,845	417,938	626,907	0.7910911515	330,627	495,940
19	Oct-23	605,215	242,086	363,129	0.8092746351	195,914	293,871
20	Nov-23	262,750	105,100	157,650	0.8179257102	85,964	128,946
21	Dec-23	328,033	131,213	196,820	0.7845226942	102,940	154,409
22	Jan-24	685,347	274,139	411,208	0.7802073609	213,885	320,827
23	Feb-24	723,874	289,550	434,324	0.7965316502	230,636	345,953
24	Mar-24	645,585	258,234	387,351	0.7986765452	206,245	309,368

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-14:

Reference EPE's response to CEP 1-7, please explain the major factors contributing to the significant increase in off-system sales margins in 2022 and 2023 when compared to the level of margins earned in 2020 and 2021.

RESPONSE:

The total energy sales (MWh) in 2022 were in line with those of 2020 and 2021. However, in 2022 there were several months that had extremely strong market pricing. September, November, and December of 2022 exhibited unexpected market conditions. EPE was able to enter into sales transactions in the $200/MWh range during these periods to maximize margins for customers.

EPE experienced similar market conditions in 2023. The strong market pricing at the end of 2022 rolled into early 2023 and EPE was able to secure strong margins for customers in January, February, and March 2023. Once again, November and December of 2023 experienced a similar phenomenon as the previous year and EPE engaged in strong market pricing transactions to close out the year.

Preparer: Daniel Holguin Title: Forward Marketer

Sponsor: Victor Martinez Title: Director – Energy Resources

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

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
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QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-15:

Please provide average monthly variable energy production costs (variable fuel plus variable O&M) for each EPE generating resource for each month of the Reconciliation Period.

RESPONSE:

EPE does not track variable fuel plus variable O&M costs by unit.

Preparer: Kara Randle Title: Project Manager Nuclear Oversight

Sponsor: Victor Martinez Title: Director- Energy Resources

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

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
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EL PASO ELECTRIC COMPANY'S RESPONSE TO
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QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-16:

Reference EPE's response to CEP 2-14, please clarify whether off-system sales provided in this response include arbitrage sales. If so, provide the information originally requested in CEP 2-14 for arbitrage sales only, and for non-arbitrage sales only.

RESPONSE:

CEP 2-14 includes non-arbitrage sales only. Information requested within CEP 2-14 does not exist for arbitrage sales as those transactions are costed against a purchased power transaction executed in tandem with the sale. Non-arbitrage sale transactions are the only transactions costed against generating resources.

Preparer: Daniel Dominguez Title: Supervisor – Real Time Trading

Sponsor: Victor Martinez Title: Director – Energy Resources

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

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
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EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-17:

Reference EPE's response to CEP 2-14, please explain why Palo Verde energy is designated as the largest single source supplying EPE's off-system sales during most months of the Reconciliation Period.

RESPONSE:

Please refer to EPE's response to CEP 3-13.

Preparer: Daniel Dominguez Title: Supervisor – Real Time Trading

Sponsor: Victor Martinez Title: Director – Energy Resources

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-18:

Reference EPE's response to CEP 2-14, please explain why no energy from PPA resources is designated as the source for EPE's non-arbitrage off-system sales during most months of the Reconciliation Period.

RESPONSE:

Please reference EPE's response to CEP 3-12.

Preparer: Daniel Dominguez Title: Supervisor – Real Time Trading

Sponsor: Victor Martinez Title: Director – Energy Resources

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-19:

Reference EPE's response to CEP 2-14, please explain under what specific conditions EPE assigned Palo Verde energy as the source supplying EPE's off-system sales during hours of the Reconciliation Period when more costly EPE gas-fired energy and PPA resources were operating.

RESPONSE:

Please reference EPE's response to CEP 3-13.

Preparer: Daniel Dominguez Title: Supervisor – Real Time Trading

Sponsor: Victor Martinez Title: Director – Energy Resources

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-20:

Reference EPE's response to CEP 2-14, please provide the following information for the Company's non-arbitrage off-system sales for each month of the Reconciliation Period:

a. The volume (MWh) and cost ($ per month and average $/MWh) of Palo Verde energy assigned to non-arbitrage off-system sales;

b. The volume (MWh) and cost ($ per month and average $/MWh) of EPE gas-fired energy resources assigned to non-arbitrage off-system sales;

c. The volume (MWh) and cost ($ per month and average $/MWh) of EPE purchased energy resources assigned to non-arbitrage off-system sales;

d. The total volume (MWh) and cost ($ per month and average $/MWh) of all energy resources assigned to EPE's non-arbitrage off-system sales;

RESPONSE:

Please see CEP 2-14 Attachment 1 CONFIDENTIAL Part E, CEP 4-20 Attachment 1 CONFIDENTIAL, and CEP 4-1 Attachment 1 CONFIDENTIAL for total volume (MWh), cost ($ per month), and cost ($/MWh), respectively.

Preparer: Daniel Dominguez Title: Supervisor – Real Time Trading

Sponsor: Victor Martinez Title: Director – Energy Resources

PUBLIC

CEP 4-20 Attachment 1 is CONFIDENTIAL and/or HIGHLY SENSITIVE PROTECTED MATERIALS attachment.

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

APPLICATION OF EL PASO	§	BEFORE THE STATE OFFICE
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EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-21:

Please provide monthly invoices for each month of the Reconciliation Period including the volume (MWh) and charges ($ per month) for energy and/or capacity purchased by EPE from Tenaska and from each other counter-party whose average charge for the Reconciliation Period as reflected in Schedule FR04-3d was greater than $100/MWh

RESPONSE:

Counsel for the City of El Paso has agreed to an extension until February 28, 2025, for El Paso Electric Company to file a response to this request.

Preparer: Title:

Sponsor: Title:

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-22:

Please provide monthly invoices for each month of the Reconciliation Period including the volume and charges for energy and/or capacity sold by EPE to Tenaska and to each other counter-party whose average charge for the Reconciliation Period as reflected in Schedule FR04-4e was greater than $100/MWh.

RESPONSE:

Counsel for the City of El Paso has agreed to an extension until February 28, 2025, for El Paso Electric Company to file a response to this request.

Preparer: Title:

Sponsor: Title:

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

EL PASO ELECTRIC COMPANY'S RESPONSE TO
CITY OF EL PASO'S FOURTH REQUESTS FOR INFORMATION
QUESTION NOS. CEP 4-1 THROUGH CEP 4-23

CEP 4-23:

In PUC Docket 50277, the CCN application for Newman 6 EPE indicated the unit was needed and expected to be in service in June 2023.

a. Please indicate the sources of energy that were utilized in 2023 because of the delay in the Commercial Operation Date of Newman Unit 6 until December 27, 2023

b. Please identify the additional cost for fuel and/or purchased power during the reconciliation period in this docket that was incurred and requested for energy due to the delay in the commercial operation date of Newman Unit 6 until December 27, 2023.

RESPONSE:

a. The Company has not performed an analysis to determine the specific sources of energy utilized in 2023 in the absence of Newman Unit 6. Given that Newman Unit 6 did not reach commercial operation until December 27, 2023, energy used to serve EPE customers came from other generation online or purchased power.

b. The Company has not performed an analysis to determine the additional cost for fuel and/or purchased power incurred in the absence of Newman Unit 6.

Preparer: Jaime Reyes Title: Manager – Energy Resources

Sponsor: Victor Martinez Title: Director – Energy Resources

The following files are not convertible:

CEP 04-05 Attachment 01.xlsx
CEP 04-13 Attachment 01.xlsx
CEP 04-13 Attachment 02.xlsx
CEP 04-13 Attachment 03.xlsx

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

Contact centralrecords@puc.texas.gov if you have any questions.