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SOAH DOCKET NO. 473-20-3299 DOCKET NO. 50731

APPLICATION OF TEXAS-NEW MEXICO POWER COMPANY FOR A DISTRIBUTION COST

RECOVERY FACTOR

§ § BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

TEXAS-NEW MEXICO POWER COMPANY'S RESPONSES TO ALLIANCE FOR RETAIL MARKETS' FIRST REQUEST FOR INFORMATION TO TEXAS-NEW MEXICO POWER COMPANY

TEXAS-NEW MEXICO POWER COMPANY ("TNMP") files this response to Alliance for Retail Markets' ("ARM") First Request for Information. TNMP's responses to requests for information shall be made within ten working (10) working days, making the responses due by May 13, 2020. This response is therefore timely. All parties may treat the answers as if they were filed under oath.

TNMP files these responses without agreeing to the relevancy of the information sought and without waiving their right to object at the time of the hearing to the admissibility of information produced herein.

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Respectfully submitted,

/s/ Stephanie C. Sparks

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ATTORNEYS FOR TEXAS-NEW MEXICO POWER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2020, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with 16 Tex. Admin. Code § 22.74.

/s/ Stephanie C. Sparks Stephanie C. Sparks

Please refer to Rows 28 and 29 of Schedule III-B-5 Accumulated Depreciation included in the Settlement Agreement filed on November 2, 2018 in Commission Docket No. 48401. Confirm that \$14,983 in depreciation associated with the battery assets referenced therein was originally booked to FERC Account 363 (Storage Battery Equipment) and, as reflected in the settlement schedule, was reclassified as Station Equipment under FERC Account 362. If this is not the case, please explain.

Prepared by: Stacy Whitehurst Sponsored by: Stacy Whitehurst

Attachment: N/A

OBJECTION: Schedule III-B-5 Accumulated Depreciation is not associated with the DCRF filing.

AGREEMENT: ARM and TNMP have agreed that this RFI is withdrawn.

Please refer to Row 24 of WP Schd B-5 – Ret-Trans in Exhibit KTS-2 showing \$15,741 in Column D "2018 Retire/Other" and \$14,983 in Column E "2019 Retire/Other" for FERC Account A363. Explain what is included in the \$15,741 amount and why that amount differs from the \$14,983 included in TNMP's DCRF baselines.

Prepared by: Stacy Whitehurst Sponsored by: Stacy Whitehurst

Attachment: N/A

RESPONSE:

"WP Schd B-5 – Dep" shows the adjustment of \$758 "2018 depreciation expense" with FERC account 363. \$15,741 = \$14,983 + \$758.

Please refer to Row 8 of Schedule B-5 in Exhibit KTS-2, in which \$758 in depreciation expense is attributed to FERC Account A363 Storage Battery Equipment since Docket No. 48401. Explain when and for what this depreciation expense was incurred, why it was included in this proceeding, and confirm whether this amount was retired or adjusted.

Prepared by: Stacy Whitehurst Sponsored by: Stacy Whitehurst

Attachment: N/A

RESPONSE:

This depreciation expense was recorded during the 2018 year, prior to the final order in Docket No. 48401, which was approved on December 20, 2018. Please refer to Exhibit KTS-2 Schedule B-5 line 8 column 4.

Please confirm that TNMP is not requesting revenues in this proceeding related to any FERC Account 363 assets or expenses. If TNMP is requesting any such revenues or costs related to FERC Account 363, explain the amount and reason for inclusion.

Prepared by: Stacy Whitehurst Sponsored by: Stacy Whitehurst

Attachment: N/A

RESPONSE:

Although 16 TAC 25.243(b)(3) allows recovery of FERC Account A363, per Schedules II-B-1 and II-B-5, TNMP is not requesting revenues in those accounts in this docket.