



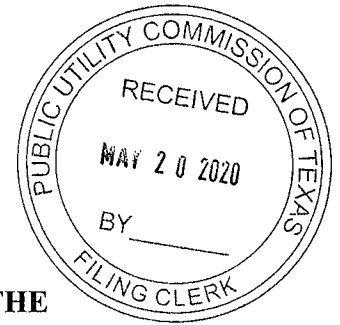
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DOCKET NO. 50277



APPLICATION OF EL PASO
ELECTRIC COMPANY TO AMEND
ITS CERTIFICATE OF
CONVENIENCE AND NECESSITY
FOR AN ADDITIONAL
GENERATING UNIT AT THE
NEWMAN GENERATING STATION

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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

**CITY OF EL PASO'S FIFTH REQUESTS FOR INFORMATION TO EL PASO
ELECTRIC COMPANY NOS CEP 5-1 THROUGH CEP 5-**

TO: EL PASO ELECTRIC COMPANY.

The City of El Paso (the "City") requests that El Paso Electric Company ("EPE"), provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within 4 working days. Please copy the question immediately above the answer to each question. The question(s) are continuing in nature, and if there is a relevant change in circumstances, such as that new or additional information or review reveals that an answer previously made is no longer complete or is inaccurate, that EPE submit an amended answer, under oath, as a supplement to your original answer within five days of the discovery of new or additional information. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

The City requests that EPE serve its respective responses to this Request on the following person via electronic mail and/or delivery of hard copies:

Norman J. Gordon
PO Box 8
El Paso, Texas, 79940
221 N. Kansas, Suite 700
El Paso, Texas, 79901
ngordon@ngordonlaw.com

Dated May 20, 2020

Respectfully submitted,

Norman J. Gordon (ngordon@ngordonlaw.com)
State Bar No. 08203700
PO Box 8
El Paso, Texas, 79940
221 N. Kansas, Suite 700
El Paso, Texas, 79901
Tel. 915 203 4883

Karla M. Nieman, City Attorney
State Bar No. 24048542
City of El Paso
300 N. Campbell, 2nd Floor
El Paso, Texas 79901
915 212-0033
Fax 915 212-0034

Attorneys for the City of El Paso

By: /s Norman J. Gordon
Norman J. Gordon

Certificate of Service

I certify that a true and correct copy of this document was served by e-mail and/or US mail on all parties of record in this proceeding on May 20, 2020.

/s Norman J. Gordon
Norman J. Gordon

DEFINITIONS AND INSTRUCTIONS

1. This Request is directed to Applicant El Paso Electric Company ("EPE") References to, **"you" or "your"** means all divisions, departments, bureaus, agencies, and all witnesses whose testimony EPE intends to present, and all persons acting or purporting to act for or on behalf of Applicant, including its directors, officers, employees, and agents.

2. The terms **"document" and "documents"** are used in their broadest sense and shall mean and include all written, printed, electronic, typed, recorded, or graphic matter of every kind and description, including drafts, originals and copies, and all attachments and appendices thereto. Without limiting the foregoing, the terms "document" or "documents" shall include all agreements, contracts, communications, correspondence, letters, telegrams, telexes, messages, memoranda, records, reports, books, summaries, tape recordings or other records of personal conversations, minutes or summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time books, time records, instructions, work assignments, financial statements, work sheets, workpapers, drafts, graphs, maps, charts, tables, accounts, analytical records, consultant reports, appraisals, bulletins, brochures, pamphlets, circulars, trade letters, press releases, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure, invoices, lists, journals, advertising, recommendations, printouts, compilations, tabulations, analyses, studies, surveys, transcripts of hearings, transcripts of testimony, affidavits, expense reports, microfilm, microfiches, articles, speeches, tape or disk recordings, sound recordings, video recordings, film, tape, photographs, punch cards, programs, data compilation from which information can be obtained (including matter used in data processing) and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer-stored, electronically-stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made.

3. **"Person"** means any natural person, firm, association, partnership, joint venture, corporation, estate, trust, receiver syndicate, municipal corporation, government agency, any other form of legal entity, and other group or combination acting as a unit.

4. **"Relating to"** a subject means making a statement about, mentioning, referring to, discussing, describing, reflecting, identifying, dealing with, consisting of, constituting or in any way pertaining, in whole or in part, to the subject.

5. **"Identify"** means:

- a. as to a "person," stating his, her or its:
 - (i) legal, full, and customarily used names;
 - (ii) present residential or business address;
 - (iii) job title; and
 - (iv) name of employer.

- b. as to a document, act, event, transaction or occurrence, stating:
 - (i) its date, authors or participants;
 - (ii) the place where it took place, was created or occurred;
 - (iii) its purpose and subject matter; and
 - (iv) a concise description of what transpired.
- 6. For each response, please state the Request for Information and identify the individual(s) responsible for preparing and sponsoring the response by name and title.
- 7. Pursuant to Rule 196.4, Texas Rules of Civil Procedure, any electronic or magnetic data included in the definition of document should be produced on a CD-ROM or similar media that is compatible with Microsoft Office software.
- 8. For each document produced that is generated by computer, please identify:
 - a. the nature and source of the data constituting the input;
 - b. the form of the input (e.g., tapes, punch cards);
 - c. the recording system employed (e.g., program, flow charts); and
 - d. the person(s) responsible for processing the input and/or performing the programming.
- 9. “**Each**” shall be construed to include the word “**every**” and “**every**” shall be construed to include the word “**each**”.
- 10. “**Any**” shall be construed to include “**all**”, and “**all**” shall be construed to include “**any**.”
- 11. The terms “**and**” and “**or**” shall be construed as either disjunctive or conjunctive as necessary to make this request inclusive rather than exclusive.
- 12. The term “**concerning**” includes the following meanings: relating to; pertaining to; regarding; discussion; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically, or factually connected to the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.
- 13. The term “**including**” means and refers to “including but not limited to.”
- 14. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 15. The present tense shall be construed to include the past tense, and the past tense shall

**CITY OF EL PASO'S FIFTH REQUESTS FOR INFORMATION TO EL PASO
ELECTRIC COMPANY NOS CEP 5-1 THROUGH CEP 5-23**

- CEP 5-1. Reference page 3 of EPE witness Novela's rebuttal testimony, provide City of El Paso or El Paso regional unemployment levels for each year presented in Table 1, and as reported for the last three calendar months including April 2020 and when available May 2020.
- CEP 5-2. Reference page 2 of EPE witness Schichtl's rebuttal testimony, identify any restrictions placed on the MW level of renewable energy resources, battery storage, short-term power purchases, interruptible capacity or demand-side resources that would be acquired by EPE through the 2017 RFP evaluation process, and explain the basis for such limitations.
- CEP 5-3. Reference page 2 of EPE witness Schichtl's rebuttal testimony, identify any portfolios that were evaluated that included higher MW levels of acquired renewable energy resources, battery storage, short-term power purchases, interruptible capacity or demand-side resources than included in the portfolio with Newman 6 selected by EPE, along with the ranking and cumulative NPV of production costs modeled for each such portfolio.
- CEP 5-4. Reference page 2 of EPE witness Schichtl's rebuttal testimony, identify the specific resource types, capacity levels and year of addition for each of the 50 highest ranked portfolios evaluated, along with the cumulative NPV of production costs modeled for each portfolio, and identify each of these portfolios that included Newman 6.
- CEP 5-5. Reference page 3 of EPE witness Schichtl's rebuttal testimony, identify the results of any portfolios that were analyzed that considered a delay of 1, 2 or more years in the in-service date of Newman 6.
- CEP 5-6. Reference page 5 of EPE witness Schichtl's rebuttal testimony, explain all reasons why EPE did not select more than 200 MW of solar generation resources and indicate whether the levelized cost of energy (LCOE) of such resources was lower than the LCOE of Newman 6.
- CEP 5-7. Reference page 5 of EPE witness Schichtl's rebuttal testimony, explain why EPE did not select more solar or wind resources through the 2017 RFP process as an alternative to Newman 6 in light of the fact that existing tax credits for these renewable resources may be significantly lower or eliminated in the near future.
- CEP 5-8. Describe actions taken by EPE to mitigate economic hardship caused by job loss and closure of businesses arising from impacts of COVID-19.
- CEP 5-9. Reference page 3 of EPE witness Gallegos' rebuttal testimony, identify any Strategize portfolios that evaluated one or two year delay of the addition of Newman 6 along with additional short-term purchases, and delayed retirements of the Rio

Grande and Newman units, and provide the rankings and cumulative NPV of production costs for each such portfolio.

- CEP 5-10. Reference page 3 of EPE witness Gallegos' rebuttal testimony, identify any Strategize portfolios that evaluated the addition of more solar resources as an alternative to the addition of Newman 6, and provide the rankings and cumulative NPV of production costs for each such portfolio, as well as the reasons they were not selected.
- CEP 5-11. Reference page 4 of EPE witness Gallegos' rebuttal testimony, provide the additional capital costs required to extend the retirement date of Rio Grande Unit 6 from 2007 to 2014.
- CEP 5-12. Reference page 4, lines 25-26 of EPE witness Gallegos' rebuttal testimony, identify the page and line numbers of Mr. Norwood's testimony in which he asserts that the impact of COVID-19 may eliminate the need for Newman 6.
- CEP 5-13. Reference page 6 of EPE witness Gallegos' rebuttal testimony, provide the nameplate rating (MW) of solar and wind resources as a percentage of total generating resource capacity for the EPE system and for the ERCOT region separately
- CEP 5-14. Reference page 8, lines 7-8 of EPE witness Gallegos' rebuttal testimony, identify the page and line numbers of Mr. Norwood's testimony in which he states that the New Mexico legislation was foreseeable in 2017 and 2018.
- CEP 5-15. Reference page 8, lines 25-26 of EPE witness Gallegos' rebuttal testimony, provide the referenced provisions of the New Mexico legislation that make allowances for consideration of reliability and costs.
- CEP 5-16. Reference Exhibits OG-1-R and OG-2-R of EPE witness Gallegos' rebuttal testimony, provide the underlying capacity and demand data for these two exhibits.
- CEP 5-17. Provide the date of EPE's most recent solicitation for acquisition of short-term (1 to 5 years) purchased power, along with the total capacity (MW) and proposed capacity charge (\$/KW-year) for each bid received.
- CEP 5-18. Provide the total capacity purchased (MW) and average cost of capacity (\$/kW-year) of EPE's actual short-term purchased power contracts (1-5 years) for each of the last 10 calendar years
- CEP 5-19. Reference page 3 of EPE witness Olivers' rebuttal testimony, did Mr. Oliver research the summer solar capacity values (i.e., % of nameplate capacity) used by utilities in New Mexico, Texas, or Oklahoma, or by the Southwest Power Pool for reliability planning purposes? If so, provide the results of that research. If not, explain why not.

- CEP 5-20. Reference page 1 of EPE witness Hawkins' rebuttal testimony, provide the scheduled retirement dates for Newman Units 1 and 2 and Rio Grande Unit 7 before they were changed to 2023, along with the total capital additions for each unit that were made to allow the retirement date extensions.
- CEP 5-21. Reference page 1 of EPE witness Hawkins' rebuttal testimony, provide the capital additions and non-fuel O&M costs Newman Units 1 and 2 and for Rio Grande Unit 7 (separately) for each year since 2014.
- CEP 5-22. Reference page 4 of EPE witness Hawkins' rebuttal testimony, provide any analysis that shows that addition of Newman 6 in 2023 was more reliable and cost-effective than the alternative of extending the scheduled retirement dates of Newman Units 1 and 2 and Rio Grande Unit 7 for one or two years.