

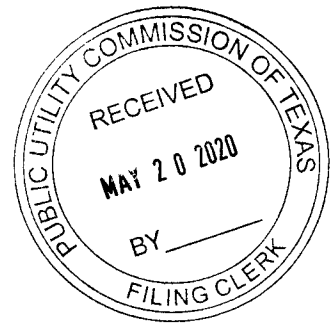


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Addendum StartPage: 0



**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 REQUESTS FOR INFORMATION TO EL PASO ELECTRIC  
COMPANY NOS CEP 6-1 THROUGH CEP 6-17**

**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:

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Dated May 20, 2020

Respectfully submitted,

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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 SIXTH REQUESTS FOR INFORMATION TO EL PASO  
ELECTRIC COMPANY NOS CEP 6-1 THROUGH CEP 6-17**

- CEP 6-1. Reference the Rebuttal testimony of James Schichtl at pages 5-6, are any of the contracts referenced on page 6 of 6 dedicated or expected to be dedicated to New Mexico?
- CEP 6-2. Reference the Rebuttal testimony of James Schichtl at pages 5-6, is it correct that the procurement of renewable resources dedicated to New Mexico Customers will result in a requested allocation factor adjustment for production plant such as proposed by EPE witness Rene Gonzalez in his direct testimony in Docket 46831, Exhibit RFG-1? If not, please explain why not.
- CEP 6-3. Reference the Rebuttal testimony of James Schichtl at page 2-3, is it the intention of El Paso Electric Company to deploy advanced metering as permitted by Texas Utilities Code Chapter 38? If so
- i. What is the current intended date for such deployment?
  - ii. What effect of advanced metering has been included in EPE's modeling of energy and demand in the future?
  - iii. Where is such inclusion reflected in the loads and resources study?
- CEP 6-4. If EPE is granted its requested relief in this case, and determines to delay the commercial operation of Newman 6, what protection to ratepayers does EPE offer from the continued capitalization of return as AFUDC during any delay?
- CEP 6-5. Reference the Rebuttal Testimony of George Novela at page 7,
- i. What was the day and time of the peak demand in April 2019?
  - ii. Was the day and time of the peak demand in April 2020?
  - iii. For the day of the peak demand in April 2020, was the weather described in Heating Degree Days or Cooling degree days?
  - iv. What was the peak demand for March 2020?
  - v. What was the peak demand for March 2019?
  - vi. What was the native system energy for March 2019?
  - vii. What was the native system energy for March 2020?
- CEP 6-6. Reference the Rebuttal Testimony of George Novela at page 2-3, zs soon as available please provide the native system energy for May 2020.
- CEP 6-7. Reference the Rebuttal Testimony of George Novela at page 3, please identify the number of days during the "Great Recession" of 2008 during which schools, shopping malls, office buildings, bars, restaurants, or other businesses and institutions were closed due to governmental order in the El Paso Electric Service Area?

- CEP 6-8. Reference the Rebuttal Testimony of George Novela at page 7 what was the unemployment rate at the end of April 2020 in, El Paso Texas and the El Paso Electric Service Area? What were the highest rates of unemployment in El Paso, Texas and the EPE service area during the “Great Recession” of 2008, and the “dot-com bubble” of 2001?
- CEP 6-9. Reference the Rebuttal Testimony of George Novela at page 4-5, what were the number of retail customers at the end of April 2020. Please provide the numbers for Residential, Commercial and Industrial-Small, Commercial and Industrial—Large, Public Authority and Total as provided on EPE’s website.
- CEP 6-10. Reference the Rebuttal Testimony of George Novela at page 6, line 28-30, please provide documentation for the statement that “EPE has concluded” on line 29, identifying who and when such conclusion was reached.
- CEP 6-11. Reference the Rebuttal Testimony of George Novela at page 6, line 28-page 7 line 2, please identify when EPE or Mr. Novela would expect to know the magnitude of a potential recession?
- CEP 6-12. Reference the Rebuttal Testimony of Omar Gallegos at page 9-11, is it correct that EPE and Mr. Gallegos were aware of the New Mexico increased restrictions on Carbon Emissions prior to filing the application in this case, PUC Docket No. 50277?
- CEP 6-13. Reference the Rebuttal testimony of David Hawkins at page 4, does the Economic Research department report to Mr. Hawkins?
- CEP 6-14. Reference page 1 of EPE witness Novela’s rebuttal testimony, provide the long-term sales and peak demand forecast used to support the cited 2017 All-Source RFP.
- CEP 6-15. Reference page 2 of EPE witness Novela’s rebuttal testimony, provide any new economic forecasts reviewed by EPE regarding unemployment, economic growth or other economic parameters for the region encompassing the City of El Paso, which reflect impacts of COVID-19 and explain whether the Company has updated its econometric models to reflect these new economic forecasts.
- CEP 6-16. Reference page 2 of EPE witness Novela’s rebuttal testimony, explain why EPE believes it is prudent to proceed with its proposal to construct Newman 6 when it has no meaningful long-term energy or demand forecasts that consider the potential impacts of COVID-19 pandemic.

CEP 6-17. Reference page 3 of EPE witness Novela's rebuttal testimony, are the historical sales and peak demand figures presented in Table 1 weather normalized? If not, provide weather normalized sales and peak demand results for each year presented in this table.