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August 6, 2026

Bureau Chief of Records Management
New Mexico Public Regulation Commission
P.O. Box 1269
Santa Fe, NM 87504-1269

Re: Case No. 25-00082-UT
El Paso Electric Company's Application for Revision of its Retail Electric Rates Pursuant to Advice Notice No. 317

Dear Ms. Sandoval,

Pursuant to the Sua Sponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application (issued July 16, 2026) ("Sua Sponte Order"), and the requirements of 17.1.210.11(B) and 17.9.530.9 NMAC, El Paso Electric Company ("EPE") hereby submits its amended request for an increase in retail electric rates. Accompanying this letter is EPE's Amended Application for Revision of its Retail Electric Rates, proposed tariffs , the matrix required by the Sua Sponte Order, Rule 530 Schedules, EPE's Direct Testimony and Exhibits, EPE's work papers, and a Certificate of Service. Each page of the filing is marked as "Amended Filing." This amended rate filing package supersedes and replaces the original Application (filed March 27, 2026).

Advice Notice No. 317 was filed separately on March 27, 2026.

EPE's amended filing uses a twelve-month Base Period ending September 30, 2025, and a twelve-month Historical Test Year Period as adjusted pursuant to Rule 530. EPE is seeking a rate increase to cover a non-fuel base rate deficiency in revenue of $70.7 million, which is offset by a $0.241 million reduction in miscellaneous service revenue, for a net revenue increase of $70.5 million.

EPE is serving an electronic copy of this amended filing on the Attorney General, and all counsel of record and pro se parties in this docket, pursuant to the requirements of the New Mexico Public Regulation Commission's interim working rules for PRCe360.

Thank you for your assistance in this matter.

SpencerFane®

Very truly yours,

/s/ Jeffrey J. Wechsler

Jeffrey J. Wechsler

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE APPLICATION OF EL PASO ELECTRIC COMPANY FOR REVISION OF ITS RETAIL ELECTRIC RATES PURSUANT TO ADVICE NOTICE NO. 317[1]

Case No. 25-00082-UT

EL PASO ELECTRIC COMPANY,
Applicant.

AMENDED APPLICATION FOR REVISION OF RETAIL ELECTRIC RATES

El Paso Electric Company ("EPE" or "Company") originally petitioned the New Mexico Public Regulation Commission ("NMPRC" or "Commission") for authority to adjust its retail electric rates in New Mexico ("2026 Rate Case") on March 27, 2026. This Amended Application for Revision of Retail Electric Rates ("Amended Application") is being filed pursuant to the Sua Sponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application (filed July 16, 2026) ("Sua Sponte Order"). The change in the Amended Application amounts to only ***0.04%*** of the originally filed revenue requirement. This amended 2026 Rate Case filing is made in accordance with the requirements of NMSA 1978, Section 62-8-7 of the Public Utility Act ("PUA") and NMPRC Rules 17.1.2.10 of the New Mexico Administrative Code ("NMAC"), and 17.9.530 NMAC ("Rule 530"), as modified by the Commission's Order Granting Variance (Dec. 18, 2025) and Order Granting Extension of Time (Feb. 19, 2026). This Amended Application supersedes and replaces the original Application and should be treated as a single integrated and comprehensive filing. Each page of the Amended Application and accompanying documents is labeled with the header "Amended Filing," and this

[1] On December 4, 2025, EPE filed a Notice Under Rule 17.9.530.11(A) and Verified Petition for Variance that commenced this proceeding. The caption for that Petition did not include the Advice Notice Number. As discussed below, EPE requests the caption be revised to include the correct Advice Notice No. 317.

Amended Application and accompanying documents are the sole operative versions of EPE's filing in this docket.

The term "Amended Application" is distinct from the original Application, and is used in this pleading to refer to the complete amended rate filing package, including this Amended Application and the notice to customers, testimony, exhibits, Rule 530 schedules, work papers, Rule 440 Amended Filings, and accompanying rate schedules, and other supporting documents listed below, all of which are made a part of this Amended Application by reference. EPE's Advice Notice No. 317 was filed on March 27, 2027 concurrently with the original Application and contains EPE's originally proposed rates supported by the original Application. The amended proposed rates and tariffs are part of this amended rate filing package.

I. EXECUTIVE SUMMARY

EPE's current base rates were approved by the Commission in Case No. 20-00104-UT based on a calendar-year 2019 historic Test Year Period ("2020 Rate Case").[2] Events and circumstances since the 2020 Rate Case have materially altered conditions that existed during the 2019 Test Year Period. EPE has made significant capital investments critical to the modernization and continued reliability of EPE's system to address complex challenges including load growth and electrification, transition to cleaner energy resources, grid modernization, reliability, resilience, and extreme weather. These investments, combined with inflationary pressures, are the primary drivers behind the increase in cost for EPE to dependably serve its customers.

These circumstances are the primary drivers for EPE's proposed base rate increase. The proposed New Mexico Jurisdictional base revenue requirement changed from $210,732,936 in the original Application to $$210,818,160 in the Amended Application, or by $85,224. EPE's cost of service demonstrates a $70.7 million non-fuel base rate revenue deficiency shown in the cost of service, reflecting a 50.5 percent non-fuel base rate increase. After deducting other operating revenues for miscellaneous services charges of $240,955, EPE is requesting a net revenue increase of 70.5 million. EPE is requesting a weighted average cost of capital of 8.35 percent. This non-fuel base rate increase is required to recover costs for EPE's investment of $2.4 billion on a total company basis and $408.44 million for New Mexico since EPE's 2020 Rate Case for new electric plant in service and used to serve EPE's customers. This includes approximately $197.34 million in distribution plant, $55.59 million in transmission plant, $28.86 million in

[2] EPE's current non-fuel base rates went into effect on January 1, 2024, pursuant to the Commission's Final Order on Remand in NMPRC Case No. 20-00104-UT (Nov. 30, 2023). These revised base rates replaced the initial base rates that went into effect on July 1, 2021, pursuant to the Commission's Order Adopting Recommended Decision with Modifications (June 23, 2021) ("Final Order") .

nuclear production plant, $66.8 million for local generating plants and $59.85 million in general plant.

EPE is also proposing to include in base rates its Commission-approved advanced metering system ("AMS") Program Costs pursuant to the Final Order in Case No. 21-00269-UT, and the annual capacity costs associated with Commission-approved agreements for three battery energy storage facilities ("BESS") pursuant to the Final Orders in Case Nos. 19-00099-UT, 19-00348-UT and 22-00093-UT.

In furtherance of EPE's merger commitments, pursuant to the Final Order in Case No. 19-00234-UT, EPE has exceeded $1.2 million per year in charitable donations since its last general rate case (#11), and EPE has requested no amount of charitable donations in base rates. EPE's proposed base rates additionally include $4.75 million in costs related to its apprenticeship programs for technical and professional positions for students in local high schools and colleges (#14); $138.5 million in costs related to supplier diversity (#15); and less than $100,000 in costs related to entry-level training programs (#13).

EPE recognizes the significance of a $70.7 million base rate deficiency, representing a 50.5 percent increase in base rate revenues. To moderate the rate impact on certain customer classes, under a proposal to move all rate classes to full cost of service rates, EPE is voluntarily proposing to phase in recovery through a two-part implementation of base rates for Rate Nos. 01 (Residential), 05 (Irrigation), 10B (Military), 12 (Private Lighting), 25 (Outdoor Lighting), and 26 (State University). The first phase, expected to take effect on January 1, 2027, represents a system average increase of 26.8 percent for these rate classes; and the second phase, proposed to take effect on October 1, 2027, reflects an additional 18.7 percent increase relative to phase 1. EPE does not intend to seek recovery of the amount of revenue foregone between the two phases, estimated at $27 million.

II. SUMMARY OF AMENDED APPLICATION

The Sua Sponte Order was entered on July 16, 2026 in this docket. That Order required EPE to "file an Amended Application for Revision of Retail Electric Rates and a complete replacement filing package." Sua Sponte Order at Ordering Paragraph E. This Amended Application complies with the Sua Sponte Order as follows:

1. The Amended Application represents the single operative and authoritative version of EPE's filing in this case. It is complete, coherent, internally consistent, and usable. EPE has not incorporated any previous versions of affected documents by general reference. *See* Sua Sponte Order at Ordering Paragraphs E, E(1), E(2), and G(2).

2. The Amended Application package includes this Amended Application, along with a complete set of all testimony, exhibits, schedules, workpapers, cost-of-service studies, applicable models, proposed tariffs, rate calculations, and all other supporting documents upon which EPE relies. *See id*. at Ordering Paragraphs E(2) and G(1).

3. EPE has conducted a comprehensive review to ensure, to the extent it can, that the Amended Application does not rely upon future rebuttal testimony, future errata, future replacement exhibits, future workpapers, or anticipated discovery supplementation to establish any foundational component of EPE's affirmative case. All identified corrections have been carried through to affected materials. *See id*. at Ordering Paragraphs E(3), G(4).

4. The Amended Application does not contain any unresolved ambiguities as to which testimony, exhibit, schedule, workpaper, model, tariff, calculation, or discovery response is operative. *See id*. at Ordering Paragraphs E(3).

5. Attached as **Amended Application Exhibit A** is a comprehensive correction and reconciliation matrix ("Matrix"). The Matrix identifies every error, omission, correction, replacement, or supplementation included in this amended rate filing package. *See id*. at Ordering Paragraphs E(4), G(3).

6. Attached as **Amended Application Exhibit B** is a verification of Mr. James Schichtl. Mr. Schichtl is an authorized officer of the Company. In his executive verification, Mr. Schichtl confirms that EPE has undertaken a comprehensive review of the Amended Application and supporting materials, and that, to the best of his knowledge, after reasonable inquiry, the Amended Application package is complete, accurate, internally consistent, and not known to require further correction or supplementation. *See id*. at Ordering Paragraphs E(5), G(6).

7. Accompanying the testimony of each EPE witness is a verification confirming that he or she has reviewed the amended testimony, exhibits, schedules, and workpapers sponsored by him or her, and that those materials are complete, accurate, internally consistent, and consistent with the Amended Application. *See id.* at Ordering Paragraph E(6).

8. In connection with the filing of the Amended Application, EPE has provided all executable, native-format workpapers and models without technical limitations. Those materials will allow Staff and intervenors to reproduce EPE's calculations. *See id*. at Ordering Paragraphs E(7), G(5), G(7).

9. Concurrently with the filing of this Amended Application, EPE has supplemented all discovery responses that were impacted by the changes identified on the Matrix. Tab B of the Matrix includes a complete listing of all 1,288 discrete questions that EPE has received in discovery. For each discrete question, EPE indicates whether supplementation was required by the Amended Application, or not. For those discovery responses that were not supplemented, EPE

confirms that its prior responses are currently complete, accurate, and consistent with the Amended Application. *See id*. at Ordering Paragraph E(8).

10. The Amended Application includes all materials required by the applicable statutes and rules. No additional foundational corrections or supplementation are necessary before Staff and intervenors can fairly prepare testimony. *See id*. at Ordering Paragraph G(10).

11. The changes required by the Sua Sponte Order resulted in very modest adjustments as compared to the original Application. For example, the requested net revenue increase changed from $70.4 million in the original Application to $70.5 million in the Amended Application. For perspective, the proposed New Mexico Jurisdictional base revenue requirement changed from $210,732,936 in the original Application to $210,818,160 in the Amended Application, or by $85,224. This amounts to ***0.04%*** of the original revenue requirement.

II. DISCUSSION

In further support of its Application EPE states:

1. EPE is a public utility that provides retail electric service in New Mexico subject to the jurisdiction of the Commission.

2. EPE's current rates for electric service were authorized by the Commission in the 2020 Rate Case.[3]

3. Pursuant to 17.1.2.10.B NMAC, EPE is submitting the following documents as part of this Amended Application:

a. The form of Notice authorized by the Hearing Examiner (**Amended Application Exhibit C**);

[3] *See* Note 2 above.

b. Direct Testimonies and Exhibits of EPE witnesses James A. Schichtl, George Novela, Cynthia S. Prieto, Richard S. Gonzalez, Steven A. Sierra, Jennifer E. Nelson, Joseph S. Weiss, Julissa I, Reza, Lori A. Glander, John J. Spanos, Tamera L. Henderson, Victor Martinez, Jeffrey M. Hughes, Omar Gallegos, Enedina O. Soto, Adrian Hernandez, Rene F. Gonzalez, and Manuel Carrasco

c. Rule 530 Schedules A through Q along with accompanying work papers and the letter of transmittal required by 17.9.530.9 NMAC; and

d. EPE's Rule 440 Amended Filings pursuant to 17.5.440.8.D(1)(b) NMAC.[4]

4. As explained more fully in the accompanying testimony and schedules, EPE intends to demonstrate that:

a. EPE's currently authorized rates are no longer just and reasonable, will not adequately attract and encourage the investment of capital if left unchanged, and do not allow for a reasonable return on investment in public utility plant and property;

b. EPE's rates and authorized revenues as presently allocated do not adequately reflect the cost of service for the respective classes of electric customers; and

[4] Paragraph 33 of the Sua Sponte Order provides that the "effect of the Amended Application upon the applicable statutory period, including its proposed effective date and whether a revised advice notice is required, is reserved pending the Amended Application and an opportunity for the parties to state their positions." Consistent with that provision, EPE has not refiled Advice Notice 317. Advice Notice 317 can be found in Commission Docket No. 26-0000062.

c. The rates proposed by EPE are just and reasonable and should be approved.

5. EPE's filing is based on a twelve-month Base Period ending September 30, 2025, as adjusted pursuant to Rule 530 for the Test Year Period consistent with the provisions of NMSA 1978, Section 62-6-14(D). The Test Year Period shows a non-fuel base rate revenue requirement of $70.7 million. After deducting other operating revenues for miscellaneous service charges of $240,955, EPE is requesting a net revenue increase of $70.5 million.

6. In accordance with the requirements of NMPRC Rule 530, EPE is providing information consisting of: (i) the Base Period, which is EPE's actual experience as reflected on its book balance of accounts for the twelve-month period ended September 30, 2025; and (ii) a Test Year Period for the twelve-month period ended September 30, 2025, as adjusted for annualizations, normalizations, estimates, and adjustments for known and measurable changes. The Test Year Period best reflects the expected conditions during the period when the proposed new rates take effect, consistent with NMSA 1978, Section 62-6-14(D). EPE is also providing a fully allocated cost of service study pursuant to NMPRC Rule 530. The cost of service study is based on cost data from EPE's Base Period and Historical Test Year Period.

7. EPE previously filed Advice Notice 317. On April 24, 2026, the Commission suspended Advice Notice 317. The Sua Sponte Order provides that the "effect of the Amended Application upon the applicable statutory period, including its proposed effective date and whether a revised advice notice is required, is reserved pending the Amended Application and an opportunity for the parties to state their positions." Sua Sponte Order at ¶ 33. Although EPE

seeks to implement new rates as soon as possible, EPE requests that its new rates go into effect no later than January 1, 2027.

8. In compliance with 17.1.210.11(C) NMAC, EPE filed Advice Notice 317 on March 27, 2026. EPE shall file an updated advice notice if ordered to do so by the Hearing Examiner. *See* Sua Sponte Order ¶ 33.

9. EPE also is proposing a phased in implementation of new base rates for Rate Nos. 01 (Residential), 05 (Irrigation), 10B (Military), 12 (Private Lighting), 25 (Outdoor Lighting), and 26 (State University).

10. EPE is proposing several rate design changes to: (i) align recovery of demand, energy and customer costs with how those costs are incurred, thereby minimizing intra-class subsidization, (ii) provide customers with accurate price signals that convey cost differences between seasonal and non-seasonal time periods to encourage energy conservation and potentially reduce customer contribution to EPE's system peak, (iii) promote stability, and (iv) allow EPE the opportunity to recover the costs of providing safe and reliable service.

11. EPE does not recommend adopting an opt-out time of day ("TOD") rate design at this time to avoid interference with its ongoing Time Varying Rate Pilot Program ("TVRPP"), intended to inform the creation of permanent time-varying rates. If, contrary to EPE's recommendation, the Commission orders adoption of mandatory opt-out TOD rates, EPE presents its *opt-in* TOD rates as the *opt-out* TOD rates, pending implementation of time-varying rates informed by the TVRPP. EPE also requests authorization for an accounting order to defer and track any differences between approved revenues and actual collections under mandatory, opt-out TOD rates for consideration of recovery in a future proceeding.

12. Other notable customer rate options include: (i) a new Low-Income Rider for qualified customers in the Residential Service Rate; (ii) experimental off-peak and TOD demand rates designed to further incentivize shifting load from peak hours; (iii) opening Rate No. 29 Noticed Interruptible Service to new customers; (iv) two new Large Load tariff schedules designed to prevent subsidizing costs associated with serving large load customers; and (v) a new two-year Peak Time Rebate Pilot Program intended to incentivize customers to shift to off-peak usage times by providing pilot participants the opportunity to receive a bill credit for reducing energy consumption during peak periods following a notification from EPE. If the Peak Time Rebate Pilot Program is approved, EPE is also requesting authorization to establish an accounting order to defer EPE's administrative costs to implement this program for future recovery.

13. EPE is also proposing replacement of its Rule No. 8 Line Extension Policy and related revisions to its Rule 13 Increase or Decrease of Connected Load.

14. Since the 2019 Test Year Period in EPE's 2020 Rate Case, the renewable portfolio standard ("RPS") has increased from 15 percent to 40 percent of EPE's total retail sales to New Mexico customers. EPE is continuing to expand its renewable energy portfolio and prioritizing the integration of flexible, dispatchable generation options, such as battery storage to meet these obligations. Consistent with the Commission Case Nos. 25-00038-UT and 19-00348-UT Final Orders, EPE is proposing to include the annual capacity charges incurred under Commission-approved agreements for the Carne BESS and Santa Teresa BESS (currently recovered through the RPS Cost Rider) and the Buena Vista 1 BESS, in its proposed base rates. EPE is also seeking to include in base rates the capacity costs already incurred under the Commission-approved Buena Vista 1 Power Purchase Agreement since that resource came online in 2023.

15. Pursuant to 17.l.2.10(B)(2)(c)(ii) NMAC, EPE witness Novela identifies the extraordinary events or circumstances, known or projected, which materially alter the utility's operating or financial condition from the conditions existing during the utility's test year period in its last rate case.

16. EPE requests all approvals and determinations necessary to implement the rates as set forth in this Amended Application, including approval of cost of service studies, cost allocations, depreciation rates and tariffs for electric service.

17. As noted above, pursuant to 17.l.2.10.B(2)(a) and (b) NMAC, EPE has attached the authorized form of Notice as **Amended Application Exhibit C**. EPE shall provide an updated form of Notice if ordered to do so by the Hearing Examiner. *See* Sua Sponte Order ¶ 33.

18. In compliance with 17.1.210.11(B) NMAC, EPE will serve a copy of this Amended Application rate case filing package on Utility Division Staff, the Attorney General, and all counsel of record and pro se parties in EPE's last rate case.

19. EPE's exact legal name, address and telephone number are:

El Paso Electric Company
100 N. Stanton Street
El Paso, Texas 79901
(915) 543-5711

20. The exact name, address, and telephone number of EPE's attorneys are:

Nancy B. Burns
El Paso Electric Company
300 Galisteo Street, Suite 206
Santa Fe, New Mexico 87501
(505) 982-7391
nancy.burns@epelectric.com

and

Jeffrey J. Wechsler
325 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 982-3873
jwechsler@spencerfane.com

21. EPE requests electronic service of all pleadings, correspondence and other documents as follows:

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WHEREFORE, EPE requests that the Commission, after notice and hearing, issue a final order granting all approvals required for EPE to implement the revised rates as set forth in EPE's Amended Application, testimony and exhibits, effective for billings on or prior to January 1, 2027, and for such further relief as the Commission deems proper under the circumstances.

Respectfully submitted,

Nancy B. Burns, Deputy General Counsel
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ATTORNEYS FOR EL PASO ELECTRIC COMPANY

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
1	Cover Letter	E.1	Yes	Revision					
2	Application/Executive Summary	E.1	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application			Clearly state that it is the single operative version of EPE's affirmative filing in this docket	
3	Notice to Customers (Attachment to Application)		No						
4	Verification executed by an authorized officer of the Company (Attachment to Application)	E.5	Yes	Addition	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
5	Matrix (Attachment to Application)	E.4	Yes	Addition	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
6	**DIRECT TESTIMONIES**								
7	***Direct Testimony of James A. Schichtl***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 15, Q.20, line 18	$70.7	Pg. 15, Q.20, line 18
8		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.4	Pg. 15, Q.20, line 19	50.5	Pg. 15, Q.20, line 19
9		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$266.0	Pg. 15, Q.20, line 21	$260.2	Pg. 15, Q.20, line 21
10	***Exhibit JS-1 - Residential Bill Comparison***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	April 2025 is $76 May 2025 is $85	Current to Phase 2 Chart	April 2025 is $77 May 2025 is $86	Current to Phase 2 Chart
11	Affirmation - James A. Schichtl	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
12	***Direct Testimony of George Novela***	E.2	Yes	Revision	Updated to describe overall amendments due to Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application			added wording	Pg. 5, Q7
13		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 4, Q.6, line 20	$70.7	Pg. 4, Q.6, line 20
14		E.2	Yes	Revision	Updated to respond to Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application	Section III - Overview of EPE's Application	Pg. 6	Section III - Amended Filing and Compliance with Sua Sponte Order	Pg. 6 - Pg. 13
15		E.2	Yes	Revision	Updated to respond to Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application	Section IV - Overview of EPE	Pg. 14	Section IV - Overview of EPE's Application	Pg. 13
16		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$210.7	Pg. 6, Q.9, line 12	$210.8	Pg. 13, Q.21, line 21
17		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 6, Q.9, line 13	$70.7	Pg. 14, Q.21, line 1
18		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.4	Pg. 6, Q.9, line 14	50.5	Pg. 14, Q.21, line 2
19		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.4	Pg. 6, Q.9, line 17	$70.5	Pg. 14, Q.21, line 5
20		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 7, Q.9, line 3	$70.7	Pg. 14, Q.21, line 11

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
21		E.2	Yes	Revision	Updated to respond to Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application			added wording	Pg. 17, Q. 23, lines 13-15
22		E.2	Yes	Revision	Updated to respond to Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application			Added Footnote 1	Pg. 18, Q 23, line 1 (reference to Footnote) Footnote on pg. 18
23		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.4	Pg. 50, Q.65, line 5	50.5	Pg. 60, Q.77, line 5
24		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 58, Q.72, line 10	$70.7	Pg. 66, Q.84, line 10
25		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.4	Pg. 58, Q.72, line 11	50.5	Pg. 66, Q.84, line 11
		E.2	Yes	Revision	Updated for clarification	$240,534	Pg. 58, Q.72, line 13	$0.241 million	Pg. 66, Q.84, line 13
26		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.4	Pg. 58, Q.72, line 13	$70.5	Pg. 66, Q.84, line 14
27		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 58, Q.72, line 15	$70.7	Pg. 66, Q.84, line 15
		E.2	Yes	Revision	Modified response to Q84 for consistency with Amended filing.		Pg. 59, lines 2-5	updated wording	Pg. 67, lines 3-7
28	Exhibit GN-1 - Compliance Requirements	E.2	No						
29	Exhibit GN-2 - Energy Service Agreement	E.2	No						
30	Exhibit GN-3 - Rate Case Expenses	E.2	No						
31	Exhibit GN-4 -Proposed Tariffs	E.2	Yes	Addition	EPE shall contemporaneously file a complete set of all testimony, exhibits, schedules, workpapers, cost-of-service studies, models, **proposed tariffs,** rate calculations, and any other supporting documents upon which it relies, regardless of whether particular documents were previously filed and remain unchanged. EPE shall not incorporate prior versions of affected documents by general reference where doing so would require Staff, intervenors, or the Hearing Examiner to determine which prior version remains operative.				Added Exhibit GN-4
32	Affirmation - George Novela	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
33	***Direct Testimony of Cynthia S. Prieto***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$250,870 $505,818	Pg. 61, Q.122, line 1	$267,983 $509,714	Pg. 60, Q.122, line 21 Pg. 61, Q.122, line 1
34	Exhibit CSP-1 - Plant Additions (January 2020-October 2025)	E.2	Yes	Revision	Added In-service dates for all projects per RFI CLC 9-1		Exhibit CSP-1, column (k)	Added In-service dates for all projects per RFI CLC 9-1	Exhibit CSP-1, column (k)
35	Exhibit CSP-2 - Palo Verde Generating Station Revalued Net Plant Balances	E.2	No						
36	Exhibit CSP-3 - Covid-19 Costs and Cost Savings	E.2	No						
37	Exhibit CSP-4 - Uncollectible Expense	E.2	No						
38	Affirmation - Cynthia S. Prieto	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
39	***Direct Testimony of Richard S. Gonzalez***	E.2	No						
40	Exhibit RSG-1 - Decommissioning Escalation Rate	E.2	No						
41	Exhibit RSG-2 - Decommissioning Beginning Balances	E.2	No						
42	Exhibit RSG-3 - Straight Line Decomissioning Funding Calculation	E.2	No						
43	Exhibit RSG-4 - Estimated Annual Decommissioning Fund Payments	E.2	No						
44	Exhibit RSG-5 - Weighted Return on Nuclear Decommissiioning Trusts	E.2	No						
45	Affirmation - Richard S. Gonzalez	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				

EPE AMENDED FILING RATE CASE MATRIX

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Line No	**AMENDED RATE CASE FILING PACKAGE[1]**	**Ordering Paragraph[2]**	**Was this Amended?**	**Amendment Type (Revision/ Addition)**	**Reason for Amendment**	**Original Filing Description/ Value**	**Reference in the Original Filing**	**Amended Filing Description/ Value**	**Reference in the Amended Filing**
46	***Direct Testimony of Steven A. Sierra***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 6, Q. 11, line 12	$70.7	Pg. 6, Q. 11, line 12
47		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.4	Pg. 6, Q. 11, line 12	50.5	Pg. 6, Q. 11, line 12
48		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.4	Pg. 6, Q. 11, line 15	$70.5	Pg. 6, Q. 11, line 14
49		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Pg. 7, Q. 12, TABLE SAS-1	Various	Pg. 7, Q. 12, TABLE SAS-1
50		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$355.0	Pg. 10, Q. 16, Graph SAS-1 Data point 12ME 202509 Test Year (As Adjusted)	$353.4	Pg. 10, Q. 16, Graph SAS-1 Data point 12ME 202509 Test Year (As Adjusted)
51		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. WP-A-03, Adjustment No. 8	$1,570,145	Pg. 23, Q. 32, line 8	$3,175,795	Pg. 23, Q. 32, line 8
52		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. WP-A-03, Adjustment No. 8	$371,756	Pg. 23, Q. 32, line 9	$482,967	Pg. 23, Q. 32, line 9
53		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. WP-A-03, Adjustment No. 8	$164,260	Pg. 23, Q. 32, line 15	$461,268	Pg. 23, Q. 32, line 15
54		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. WP-A-03, Adjustment No. 8	$24,626	Pg. 23, Q. 32, line 15	$46,668	Pg. 23, Q. 32, line 15
55		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. WP-A-03, Adjustment No. 8	$5,819	Pg. 23, Q. 32, line 17	$9,977	Pg. 23, Q. 32, line 17
56		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. WP-A-03, Adjustment No. 8	$133,815	Pg. 23, Q. 32, line 17	$404,623	Pg. 23, Q. 32, line 17
57		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. WP-A-03, Adjustment No. 10	"decrease"	Pg. 25, Q. 35, line 16	"increase"	Pg. 25, Q. 35, line 16
58		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. WP-A-03, Adjustment No. 10	$142,056	Pg. 25, Q. 35, line 16	$681,997	Pg. 25, Q. 35, line 16
59	Exhibit SAS-1 - List of EPE's Adjustments to Cost of Service	E.2	No						
60	Exhbiit SAS-2 - Litigation Expenses	E.2	No						
61	Affirmation - Steven A. Sierra	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
62	***Direct Testimony of Jennifer E. Nelson***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. Updated EPE's New Mexico-only implied market capitalization amount.	$852.34	Pg. 106, Q. 103, line 20	$845.62	Pg. 106, Q. 103, line 17
63		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. Updated EPE's New Mexico-only implied market capitalization amount.	3.14	Pg. 107, Q. 103, line 1	3.11	Pg. 106, Q. 103, line 18
64		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. Updated EPE's New Mexico-only implied market capitalization amount.	$407	Pg. 107, Footnote 130.	$403	Pg. 106, Footnote 130.
65		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. Updated EPE's New Mexico-only implied market capitalization amount.	$852.34	Pg. 107, Q. 104, line 16	$845.62	Pg. 107, Q. 104, line 15
66	Exhibit JEN-1 - Resume and Testimony Listing of Jennifer E. Nelson	E.2	No						
67	Exhibit JEN-2 - Constant Growth DCF Results	E.2	No						
68	Exhibit JEN-3 - Quarterly Growth DCF Results	E.2	No						
69	Exhibit JEN-4 - Expected Market Return Calculations	E.2	No						
70	Exhibit JEN-5 - CAPM and Empirical CAPM Results	E.2	No						
71	Exhibit JEN-6 - Bond Yield Plus Risk Premium Analysis	E.2	No						
72	Exhibit JEN-7 - Captila Expendiure Analysis	E.2	No						
73	Exhibit JEN-8 - Regulatory Risk	E.2	No						
74	Exhibit JEN-9 - Small Size Premium Analysis	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision. Updated 'EPE New Mexico Jurisdictional Implied Market Cap' due to change in MN Jurisdictional Proposed Rate Base.	$852.34	Pg. 1	$845.62	Pg 1
75	Exhibit JEN-10 - Proxy Group Capital Structure Analysis	E.2	No						
76	Affirmation - Jennifer E. Nelson	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				

EPE AMENDED FILING RATE CASE MATRIX

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Line No	**AMENDED RATE CASE FILING PACKAGE[1]**	**Ordering Paragraph[2]**	**Was this Amended?**	**Amendment Type (Revision/ Addition)**	**Reason for Amendment**	**Original Filing Description/ Value**	**Reference in the Original Filing**	**Amended Filing Description/ Value**	**Reference in the Amended Filing**
77	***Direct Testimony of Joseph S. Weiss***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$281,149	Pg. 6, Q. 14, line 4	$267,983	Pg. 6, Q. 14, line 4
78		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$250,870	Pg. 22, Q. 48, line 14	$267,983	Pg. 22, Q. 48, line 14
79	Exhibit JSW-1 - Resume and Tesitmony Listing	E.2	No						
80	Exhibit JSW-2 - Cash Working Capital Study - Summary of Working Capital Requirement	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Exhibit JSW-2	Various	Exhibit JSW-2
81	Exhibit JSW-3 - Cash Working Capital - Summary of Revenue Lag	E.2	No						
82	Exhibit JSW-4 - Cash Working Capital Study - Summary of Other Revenues	E.2	No						
83	Exhibit JSW-5 - Cash Working Captial Study - Summary of Fuel Expense Leads	E.2	No						
84	Exhibit JSW-6 - Cash Working Captial Study - Summary of Purchased Power Expense Leads	E.2	No						
85	Exhibit JSW-7 - Cash Working Capital Study - Payroll and Benefits Expense Leads	E.2	No						
86	Exhibit JSW-8 - Cash Working Capital Study - Taxes Other Than Income Taxes	E.2	No						
87	Exhibit JSW-9 - Cash Working Capital Study - Income Tax Expense Leads	E.2	No						
88	Affirmation - Joseph W. Weiss	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
89	***Direct Testimony of Juilissa I. Reza***	E.2	No						
90	Exhibit JIR-1 - Alternative Factor to the 12-Month Rolling Average Component of EPE's Fuel Adjustment Factor	E.2	No						
91	Affirmation - Julissa I. Reza	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
92	***Direct Tesitmony of Lori A. Glander***	E.2	No						
93	Exhibit LAG-1 - Resume of Lori A. Glander	E.2	No						
94	Exhibit LAG-2 - 2023 Decommissioning Cost Study for the Palo Verde Nuclear Generating Station - TLG Document A04-1815-001 Revision 0	E.2	No						
95	Affirmation - Lori A. Glander	E.2	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
96	***Direct Testimony of John J. Spanos***	E.2	No						
97	Exhibit JJS-1 - Statement of Qualifications	E.2	Yes	Revision	Exhibit JJS-1 to the testimony of John J. Spanos inadvertently contained the wrong document. Rather than Mr. Spanos' qualifications, the incorrect attachment contained the depreciation study to which Mr. Spanos testifies	Replaced Exhibit JJS-1 (original filing had depreciation study as Exhibit JJS-1)		Exhibit JJS-1 Statement of Qualifications	
98	Affirmation - John J. Spanos	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
99	***Direct Testimony of Tamera L. Henderson***	E.2	Yes	Revision					
100	Exhibit TLH-1 - Tax Sharing Agreement	E.2	Yes	Revision	Wrong exhibit no. listed on Exhibit Header- change from THL-2 to THL-1	Exhibit TLH-2		Exhibit TLH-1	
101	Affirmation - Tamera L. Henderson	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
102	***Direct Testimony of Victor Martinez***	E.2	No						
103	Exhibit VM-1 - EIM Net Benefits for Test Year	E.2	No						
104	Exhibit VM-2 - EPE 2024 Load Curves	E.2	No						
105	Affirmation - Victor Martinez	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
106	***Direct Testimony of Jeffery M. Hughes***	E.2	No						
107	Exhibit JMH-1 - Map of the Location of EPE's Local Generating Stations	E.2	No						
108	Exhibit JMH-2 - Second Map of the Location of EPE's Local Generating Stations	E.2	No						
109	Exhibit JMH-3 - Summary of Events	E.2	No						
110	Exhibit JMH-4 - Blanket Projects over $200,000 with Descriptions	E.2	No						
111	Exhibit JMH-5 - Remainder of Local Fleet Steam Production and Other Production Projects	E.2	No						
112	Affirmation - Jeffery M. Hughes	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
113	***Direct Testimony of Omar A. Gallegos***	E.2	No						
114	Exhibit OAG-1 - WECC System Map	E.2	No						
115	Exhibit OAG-2 - Southwest Area Extra High Voltage (EHV) Transmission map of the WECC System	E.2	No						
116	Exhibit OAG-3 - EPE Local Area Transmission System	E.2	No						
117	Exhibit OAG-4 - AFP Transmission Line Project Pictures	E.2	No						
118	Exhibit OAG-5 - Transmission Special Projects Over $1 million and less than $5 million and Transmission Blanket Projects Over $1M	E.2	No						
119	Exhibit OAG-6 - Distribution Special Proejcts Over $1 million and less than $5 million and Distribution Blanket Over $1M	E.2	No						
120	Exhibit OAG-7 - Replacement Line Extension Policy	E.2	No						
121	Exhibit OAG-8 - Replacement Rule 13	E.2	No						
122	Affirmation - Omar A. Gallegos	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
123	***Direct Testimony of Enedina Soto***	E.2	No						
124	Exhibit ES-1 - Comparison of Population-Based and Sample-Based Load Studies	E.2	No						
125	Exhibit ES-2 - Effect of Using Net Energy for DG Customers on Allocation Factors	E.2	No						
126	Exhibit ES-3 - Allocation Factor Scenarios	E.2	No						
127	Exhibit ES-4 - Historical Weather in Las Cruces, NM and El Paso, TX	E.2	No						
128	Exhibit ES-5 - Calculation of Rate Class Weather Normalization Adjustments using CDD and HDD Model Coefficients	E.2	No						
129	Exhibit ES-6 - EPE Demand and Energy Forecast Summary	E.2	No						
130	Affirmation - Enedina Soto	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
131	***Direct Testimony of Adrian Hernandez***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$297.0	Pg. 47, Q. 91, line 16	$297.1	Pg. 47, Q. 91, line 16
132		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$210.7	Pg. 47, Q. 91, line 18	$210.8	Pg. 47, Q. 91, line 18
133		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 47, Q. 91, line 19	$70.7	Pg. 47, Q. 91, line 19
134		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.4	Pg. 47, Q. 91, line 19	50.5	Pg. 47, Q. 91, line 19
135		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Pg. 48, Q. 91, TABLE AH-5	Various	Pg. 48, Q. 91, TABLE AH-5
136		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Pg. 63, Q. 124, TABLE AH-6	Various	Pg. 63, Q. 124, TABLE AH-6
137		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Pg. 65, Q. 127, TABLE AH-7	Various	Pg. 65, Q. 127, TABLE AH-7
138		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	5.7	Pg. 65, Q. 127, line 12	5.6	Pg. 65, Q. 127, line 12
139		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$297.0	Pg. 65, Q. 128, line 20	$297.1	Pg. 65, Q. 128, line 20
140		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$210.7	Pg. 66, Q. 128, line 1	$210.8	Pg. 66, Q. 128, line 1
141		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 66, Q. 128, line 2	$70.7	Pg. 66, Q. 128, line 2
142	Exhibit AH-1 - Monthly System Peak Demands	E.2	No						
143	Exhibit AH-2 - Alternative Cost of Service Illustration Results	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				
144	Affirmation - Adrian Hernandez	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				

EPE AMENDED FILING RATE CASE MATRIX

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Line No	AMENDED RATE CASE FILING PACKAGE[1]	Ordering Paragraph[2]	Was this Amended?	Amendment Type (Revision/ Addition)	Reason for Amendment	Original Filing Description/ Value	Reference in the Original Filing	Amended Filing Description/ Value	Reference in the Amended Filing
145	***Direct Testimony of Rene F. Gonzalez***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$38,600	Pg. 51, Q.94, line1	$38,173	Pg. 51, Q.94, line1
146		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$22.00 46.67	Pg. 52, Q.95, line 5	$23.25 55.00	Pg. 52, Q.95, line 5
147	Exhibit RFG-1 - Adjustment of Base Revenues Summary	E.2	No						
148	Exhibit RFG-2 - 2024 and 2025 EE Projected Annual Savings	E.2	No						
149	Exhibit RFG-3 - Energy Efficiency Program Annualization Adjustment	E.2	No						
150	Exhibit RFG-4 - Rate No. 18 - FPPCAC Voltage Factors Calculation	E.2	No						
151	Exhibit RFG-5 - Miscellaneous Charge Comparison	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$529.50 $22.00 $88.25	Page 1 of 1, Lines 11, 13 and 27, column (2)	$521.00 $23.25 $86.75	Page 1 of 1, Lines 11, 13 and 27, column (2)
152	Exhibit RFG-6 - Example of Distribution Capacity Reservation Charge	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Summer Demand Charge $26.32 Non-Summer Demand Charge $21.36 Distribution Capacity Reservation Charge $483,280	Exhibit RFG-6	Summer Demand Charge $20.26 Non-Summer Demand Charge $14.50 Distribution Capacity Reservation Charge $344,820	Exhibit RFG-6
153	Affirmation - Rene F. Gonzalez	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
154	***Direct Testimony of Manuel Carrasco***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.4	Pg. 5, line 6	$70.5	Pg. 5, line 6
155		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 5, line 7	$70.7	Pg. 5, line 7
156		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.422%	Pg. 5, line 8	50.483%	Pg. 5, line 8
157		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.422% $66,488 $70,571,707 $70,638,555	Pg. 5, Footnote 1	50.483% $66,928 $70,657,851 $70,723,779	Pg. 5, Footnote 1
158		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.422% $70,638,555	Pg. 5, Footnote 2	50.483% $70,723,779	Pg. 5, Footnote 2
159		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$70.6	Pg. 6, line 4	$70.7	Pg. 6, line 4
160		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	18.6%	Pg. 6, line 9	18.7%	Pg. 6, line 9
161		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	50.4%	Pg. 7, line 3	50.5%	Pg. 7, line 3
162		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	73.1%	Pg. 7, line 6	73.3%	Pg. 7, line 6
163		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	73.1%	Pg. 7, line 7	73.3%	Pg. 7, line 7
164		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Pg. 8, Table MC-1	Various	Pg. 8, Table MC-1
165		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$126,592,000 73.1%	Pg. 8, line 20	$126,736,000 73.3%	Pg. 8, line 7
166						31.6%	Pg. 8, line 9	31.7%	Pg. 9, line 1
167		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	31.6%	Pg. 9, line 1	31.7%	Pg. 9, line 2
168		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$96,211,000 31.6%	Pg. 9, line 3	$96,266,000 31.7%	Pg. 9, line 3
169		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	31.6%	Pg. 9, line 4	31.7%	Pg. 9, line 4
170		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$96,211,000	Pg. 9, line 5	$96,266,000	Pg. 9, line 5
171		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$126,592,000 31.6%	Pg. 9, line 6	$126,736,000 31.7%	Pg. 9, line 6
172		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	73.1%	Pg. 9, line 8	73.3%	Pg. 9, line 8
173		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Pg. 10, Table MC-2	Various	Pg. 10, Table MC-2
174		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$69.1 million	Pg. 25, Line 20	$69.0 million	Pg. 25, line 20
175		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$0.25799 $0.08915	Pg. 26, line 20	$0.25752 $0.08895	Pg. 26, line 20
176		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	2.89	Pg. 26, line 21	2.90	Pg. 26, line 21
177		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	2.89	Pg. 27, line 4	2.90	Pg. 27, line 4
178		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$19.76 $9.87	Pg. 27, line 14	$19.69 $9.85	Pg. 27, line 14
179		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$31.77	Pg. 27, line 15	$31.69	Pg. 27, line 15
180		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$15.86	Pg. 27, line 16	$15.85	Pg. 27, line 16
181		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$14.36	Pg. 41, line 10	$14.56	Pg. 41, line 10

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
182		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$18.89	Pg. 41, line 11	$19.17	Pg. 41, line 11
183		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$17.874	Pg. 41, line 14	$18.139	Pg. 41, line 14
184		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	39.2%	Pg. 41, line 17	38.6%	Pg. 41, line 17
185		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	3.3	Pg. 43, line 13	3.2	Pg. 43, line 13
186		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Pg. 46, Figure MC-1	Various	Pg. 46, Figure MC-1
187		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Various	Pg. 47, Figure MC-2	Various	Pg. 47, Figure MC-2
188		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$5.38	Pg. 48, line 5	$5.56	Pg. 48, line 5
189		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$19.29	Pg. 48, line 6	$19.34	Pg. 48, line 6
190		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$918	Pg. 49, line 4	$931	Pg. 49, line 4
191		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$1.02	Pg. 49, line 15	$1.04	Pg. 49, line 15
192		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$28	Pg. 51, line 4	$29	Pg. 51, line 4
193		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$16.90	Pg. 55, line 7	$17.17	Pg. 55, line 7
194		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$16.873	Pg. 55, line 10	$17.139	Pg. 55, line 10
195		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	83.0%	Pg. 55, line 11	82.0%	Pg. 55, line 11
196		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$104.64	Pg. 61, line 4	$104.68	Pg. 61, line 4
197		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$104.679	Pg. 61, line 7	$104.713	Pg. 61, line 7
198		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	2.46%	Pg. 61, line 9	2.45%	Pg. 61, line 9
199		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$1,480.68	Pg. 71, line 20	$1,477.02	Pg. 71, line 20
200		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$1,481.157	Pg. 72, line 2	$1,477.492	Pg. 72, line 2
201		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	4.19%	Pg. 72, line 4	4.17%	Pg. 72, line 4
202		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	2.49%	Pg. 72, line 5	2.48%	Pg. 72, line 5
203		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$2,331.77	Pg. 73, line 21	$2,326.99	Pg. 73, line 21
204		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$3,127.22	Pg. 74, line 1	$3,119.13	Pg. 74, line 1
205		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$3,206.742 $3,128.609	Pg. 74, line 4	$3,198.443 $3,120.519	Pg. 74, line 4
206		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	7.0%	Pg. 74, line 6	6.4%	Pg. 74, line 6
207		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	0.99%	Pg. 74, line 7	0.98%	Pg. 74, line 7
208		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$3,894.75 $4,885.02	Pg. 78, line 16	$3,887.11 $4,872.23	Pg. 78, line 16
209		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$4,886.640	Pg. 78, line 20	$4,873.847	Pg. 78, line 20
210		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	2.17%	Pg. 79, line 1	1.8%	Pg. 79, line 1
211		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$0.01134	Pg. 80, line 10	$0.01135	Pg. 80, line 10
212		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$13.03	Pg. 82, line 9	$13.02	Pg. 82, line 9
213		E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$17.03	Pg. 82, line 10	$17.30	Pg. 82, line 10
214	Exhibit MC-01 - Base Revenue Increase Allocation by Rate Class	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Numerous values	All pages	Numerous values	All pages
215	Exhibit MC-02 - Estimated Seasonal Monthly Bills under Current and Proposed Rates	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Based on originally filed rates	All pages	Based on amended filed rates	All pages
216	Exhibit MC-03 - Resource Dispatch: Low Load versus Peak Load	E.2	No						
217	Exhibit MC-04 - Impact of Seasonal Charges on Rate Structures	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Based on originally filed rates	All pages	Based on amended filed rates	All pages
218	Exhibit MC-05 - Default TOD Potential Revenue Shortfall	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Based on originally filed rates	Page 1 of 1	Based on amended filed rates	Page 1 of 1
219	Exhibit MC-06 - Distsribution of Bill Impact for Residential Customers	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Based on originally filed rates	All pages	Based on amended filed rates	All pages
220	Exhibit MC-07 - Residential Monthly Bill Impacts	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Based on originally filed rates	All pages	Based on amended filed rates	All pages

EPE AMENDED FILING RATE CASE MATRIX

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)
Line No	**AMENDED RATE CASE FILING PACKAGE[1]**	**Ordering Paragraph[2]**	**Was this Amended?**	**Amendment Type (Revision/ Addition)**	**Reason for Amendment**	**Original Filing Description/ Value**	**Reference in the Original Filing**	**Amended Filing Description/ Value**	**Reference in the Amended Filing**
221	Exhibit MC-08 - Experimental Off-Peak Demand Analysis	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Numerous values	Pages 1 to 2 and Page 4	Numerous values	Pages 1 to 2 and Page 4
222	Exhibit MC-09 - NM Rate 50 High Load Factor Power Service	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	All rates	Pgs. 1 and 2, Montly Rates section	All rates	Pgs. 1 and 2, Montly Rates section
223	Exhibit MC-10 - NM Rate 51 Large Load Power Service	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	All rates	Pgs. 1 and 2, Montly Rates section	All rates	Pgs. 1 and 2, Montly Rates section
224	Exhibit MC-11 - Large Load Determination of Billing Demand Examples	E.2	No						
225	Exhibit MC-12 - Large Load Cost-of-Service and Rate Design	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	Numerous values	Pages 1 to 3 and Page 5	Numerous values	Pages 1 to 3 and Page 5
226	Exhibit MC-13 - NM Rate 52 Peak Time Rebate Pilot	E.2	No						
227	Affirmation - Manuel Carrasco	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
228	**SUPPLEMENTAL TESTIMONY PURSUANT TO BENCH REQUEST**								
229	**EPE Response to April 24, 2026 Bench Request**	E.2	No						
230	***Supplemental Direct Testimony of George Novela***	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.	$210,732,936	Pg 4, Q8, Line 5	$210,818,160	Pg 4, Q8, Line 5
231	Exhibit GN-1S – Rule 440 Spreadsheet	E.2	No						
232	Supplemental Affirmation - George Novela	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
233	***Supplemental Direct Testimony of Rene F. Gonzalez***	E.2	No						
234	Exhibit RFG-1S – Average Use Per Month Consumption	E.2	No						
235	Supplemental Affirmation - Rene F. Gonzalez	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
236	***Supplemental Direct Testimony of Manuel Carrasco***	E.2	No						
237	Exhibit MC-1S – Fuel In Base Estimate	E.2	No						
238	Supplemental Affirmation - Manuel Carrasco	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
239	***Supplemental Direct Testimony of Steven A. Sierra***	E.2	No						
240	Exhibit SAS-1S - New Mexico Jurisdictionalized Amounts of Executive Compensation	E.2	No						
241	Supplemental Affirmation - Steven A. Sierra	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
242	***Supplemental Direct Testimony of Omar A. Gallegos***	E.2	No						
243	Exhibit OAG-1S: El Paso Electric Company's 2025 Updated New Mexico Loads and Resources Document, April 28, 2026	E.2	No						
244	Supplemental Affirmation - Omar A. Gallegos	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
245	***Supplemental Direct Testimony of Enedina Soto***	E.2	No						
246	Exhibit ES-1S - Difference in Jurisdictional Allocation Factors – Base Period vs Historical Test Year Period	E.2	No						
247	Exhibit ES-2S – Difference in Jurisdictional Allocation Factors by Rate Class – Base Period vs Historical Test Year Period	E.2	No						
248	Supplemental Affirmation - Enedina Soto	E.6	Yes	Revision	Required in Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application				
249	**SCHEDULES**								
250	**A Schedules**								
251	A: Overall Cost of Service	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
252	A-01: Jurisdictional Cost of Service	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
253	A-02: Summary of Revenue Change by Rate Class	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
254	A-03: Summary of Cost of Service and Rate Base Adjustments Total Company	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
255	A-03: Summary of Cost of Service and Rate Base Adjustments New Mexico	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
256	A-04: Summary of Rate Base - Total Company & Jurisdictional	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
257	A-05: Summary of Total Capitalization and the Weighted Average Cost of Capital	E.2	No						

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
258	**B Schedules**								
259	B-01	E.2	No						
260	B-02	E.2	No						
261	B-03	E.2	No						
262	B-04	E.2	No						
263	B-05	E.2	No						
264	B-06	E.2	No						
265	B-07	E.2	No						
266	**C Schedules**								
267	C-01	E.2	No						
268	C-2 (369 pages)	E.2	No						
269	C-3	E.2	No						
270	**D Schedules**								
271	D-1	E.2	No						
272	D-2	E.2	No						
273	**E Schedules**								
274	E-1	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				
275	E-2	E.2	No						
276	E-3	E.2	No						
277	E-4	E.2	No						
278	**F Schedules**								
279	F-1	E.2	No						
280	**G Schedules**								
281	G-01	E.2	No						
282	G-2	E.2	No						
283	G-3	E.2	No						
284	G-4	E.2	No						
285	G-5	E.2	No						
286	G-6	E.2	No						
287	G-7	E.2	No						
288	G-8	E.2	No						
289	G-9	E.2	No						
290	G-10	E.2	No						
291	**H Schedules**								
292	H-01	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
293	H-02	E.2	No						
294	H-03	E.2	No						
295	H-04	E.2	No						
296	H-05	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
297	H-06	E.2	No						
298	H-07	E.2	No						
299	H-08	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
300	H-09	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
301	H-10	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
302	H-11	E.2	No						
303	H-12	E.2	No						
304	H-13	E.2	No						
305	H-14	E.2	No						
306	H-15	E.2	No						
307	H-16	E.2	No						
308	**I Schedules**								
309	I-01	E.2	No						
310	I-02	E.2	No						
311	I-03	E.2	No						
312	**J Scheudles**								
313	J-01	E.2	No						
314	J-02	E.2	No						
315	**K Schedules**								
316	K-01	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
317	K-02	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
318	K-03	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
319	K-04	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
320	K-05	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
321	K-06	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
322	K-07	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
323	K-08	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
324	**L Schedules**								
325	L-01	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
326	**M Schedules**								
327	M-01 Rate Class Allocation Factors	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
328	M-01 Juris Factors	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
329	M-02	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
330	M-03	E.2	No						
331	**N Schedules**								
332	N-01	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
333	**O Schedules**								
334	O-01	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
335	O-2	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
336	O-3	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Schedule
337	O-4	E.2	No						
338	**P Schedules**								
339	P-1	E.2	No						
340	P-1(a)	E.2	No						
341	P-1(b)	E.2	No						
342	P-1(c)	E.2	No						
343	P-1(d)	E.2	No						
344	P-2 (a)(c)(e)	E.2	No						
345	P-2(b)	E.2	No						
346	P-2(d)	E.2	No						
347	P-2(f)	E.2	No						
348	P-3(a)(c)€	E.2	No						
349	P-3(b)	E.2	No						
350	P-3(d)	E.2	No						
351	P-3(f)	E.2	No						
352	P-4(a)(b)(c)(e)	E.2	No						
353	P-4(d)	E.2	No						
354	P-4(f)	E.2	No						
355	P-5(a)	E.2	No						
356	P-5(b)	E.2	No						
357	P-5(c)(i)	E.2	No						
358	P-5(c)(ii)	E.2	No						
359	P-5(c)(iii)	E.2	No						
360	P-5(d)(i)	E.2	No						
361	P-5(d)(ii)	E.2	No						
362	P-6	E.2	No						
363	P-7(a)	E.2	No						
364	P-7(b)1	E.2	No						
365	P-7(b)2	E.2	No						
366	P-8	E.2	No						
367	P-9	E.2	No						
368	P-10	E.2	No						
369	P-11(a)(c)	E.2	No						
370	P-11(b)	E.2	No						
371	P-11(a)(d)	E.2	No						
372	P-11 (a)(e)	E.2	No						
373	P-12	E.2	No						
374	**Q Schedules**								
375	Q-1	E.2	No						
376	Q-2	E.2	No						
377	Q-3	E.2	No						
378	Q-4	E.2	No						
379	Q-5	E.2	No						
380	Q-6	E.2	No						
381	Q-6 Supplemental	E.2	No						

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
382	**WORKPAPERS**								
383	**A Workpapers**								
384	A-03 Total Company	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
385	A-03 New Mexico	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
386	Adjustment 01	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
387	Adjustment 02	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
388	Adjustment 03	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
389	Adjustment 04	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
390	Adjustment 05	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
391	Adjustment 06	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
392	Adjustment 07	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
393	Adjustment 08	E.2	Yes	Addition/Revision	1. The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. 2. Supplemented to include amounts and materials associated with costs incorrectly coded to FERC Account No. 923 which should have been coded to FERC Account No. 930.1- Advertising Expenses				Replaced Workpaper

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
394	Adjustment 09	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
395	Adjustment 10	E.2	Yes	Addition/Revision	1. The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. 2. Lines 1, 2, 6, and 14 of WP A-03, Adjustment 10 incorrectly allocated those costs to the New Mexico jurisdiction using a labor allocator when they should have been direct assignments to the New Mexico jurisdiction				Replaced Workpaper
396	Adjustment 11	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
397	Adjustment 12	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
398	Adjustment 13	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
399	Adjustment 14	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
400	Adjustment 15	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
401	Adjustment 16	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
402	Adjustment 17	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
403	Adjustment 18	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
404	Adjustment 19	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
405	Adjustment 20	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
406	Adjustment 21	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
407	Adjustment 22	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
408	Adjustment 23	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
409	Adjustment 24	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
410	Adjustment 25	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
411	Adjustment 26	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
412	Adjustment 27	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
413	Adjustment 28	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
414	Adjustment 29	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
415	Adjustment 30	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
416	Adjustment 31	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
417	Adjustment 32	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
418	Adjustment 33	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
419	Adjustment 34	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
420	Adjustment 35	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
421	Adjustment 36	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
422	**G Workpapers**	E.2	Yes						
423	G-01	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
424	G-3	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
425	**H Workpapers**	E.2	Yes						
426	H-4.1	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
427	H-4.2	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
428	H-4.3	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
429	H-4.4	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
430	H-4.5	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
431	H-4.6	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
432	H-4.7	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
433	H-4.8	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
434	H-4.9	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
435	H-4.10	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
436	H-4.11	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
437	H-4.12	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
438	H-9.1	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
439	H-9.2	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
440	H-9.3	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
441	H-9.4	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
442	H-12.1	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
443	H-12.2	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
444	H-13.1	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
445	**J Workpapers**	E.2	Yes						
446	J-1	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
447	J-2	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
448	**K Workpapers**	E.2	Yes						
449	K	E.2	Yes	Revision	Updated for change in revenue requirement due to 2nd Errata revision.				Replaced Workpaper
450	K-02	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
451	K-06	E.2	Yes	Addition/Revision	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
452	**M Workpapers**	E.2	Yes						
453	M-1	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
454	M-1 Support	E.2	Yes	Addition	Additional Support for WP M-1				Replaced Workpaper
455	**O Workpapers**	E.2	Yes						
456	O.01	E.2	No						Replaced Workpaper
457	O.2.1	E.2	Yes	Addition/Revision	1. The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. 2. In Tab 11, the formula inadvertently included the "Total Materials Cost" twice in calculating the "Overhead Supervision Adder." As a result, the value on line 13 should be approximately $24.14 as opposed to the listed $32.65. Second, in Tab 13, line 7, "Overhead Transportation Adder" was calculated using the "Billing & Rates Representative" function value when it should have used the "Field Service Representative" function value. Third, in Tab 27, line 8, "Overhead Transportation Adder," mistakenly includes the "Energy Service Representative" function value" and the "Dispatch/Service Dispatcher" function value				Replaced Workpaper

EPE AMENDED FILING RATE CASE MATRIX

(a) Line No	(b) AMENDED RATE CASE FILING PACKAGE[1]	(c) Ordering Paragraph[2]	(d) Was this Amended?	(e) Amendment Type (Revision/ Addition)	(f) Reason for Amendment	(g) Original Filing Description/ Value	(h) Reference in the Original Filing	(i) Amended Filing Description/ Value	(j) Reference in the Amended Filing
458	O.2.2	E.2	Yes	Revision	1. The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco. 2. In Tab 11, the formula inadvertently included the “Total Materials Cost” twice in calculating the “Overhead Supervision Adder.” As a result, the value on line 13 should be approximately $24.14 as opposed to the listed $32.65. Second, in Tab 13, line 7, “Overhead Transportation Adder” was calculated using the “Billing & Rates Representative” function value when it should have used the “Field Service Representative” function value. Third, in Tab 27, line 8, “Overhead Transportation Adder,” mistakenly includes the “Energy Service Representative” function value” and the “Dispatch/Service Dispatcher” function value				Replaced Workpaper
459	O.3	E.2	Yes	Revision					Replaced Workpaper
460	O.4	E.2	Yes	Revision					Replaced Workpaper
461	**P Workpapers**	E.2	Yes						
462	P-2(f)	E.2	Yes	Addition	The Application inadvertently omitted several of the workpapers completed by EPE. Specifically, the workpapers attached to the Application included only workpaper O and workpapers for individual witnesses Nelson, Soto, and Carrasco.				Replaced Workpaper
463	**Nelson Workpapers**								
464	WP-1	E.2	No						
465	WP-2	E.2	No						
466	WP-3	E.2	No						
467	WP-4	E.2	No						
468	WP-5	E.2	No						
469	WP-6	E.2	No						
470	WP-7	E.2	No						
471	WP-8	E.2	No						
472	**Soto Workpapers**								
473	WP ES-01	E.2	No						
474	**Carrasco Workpapers**								
475	WP Exhibit MC-02	E.2	No						
476	WP Exhibit MC-07	E.2	No						
477	WP Exhibit MC-08	E.2	No						
478	**Amended Rule 440 Filings**	E.2	No						
479	**Advice Notice 317**	Paragraph 33 Reserved	No						

[1] *Discovery that will need to be supplemented is listed on the tab titled "Supplemental Discovery"*

[2] Sua Ponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1	**STAFF 1-1**		George Novela		For each Company witness, please provide supporting workbooks and materials for all testimony, tables, charts, and exhibits. Please include supporting Excel files with cells unlocked, editable, and with functions intact.	Yes
2	**STAFF 1-2**		Richard Gonzalez		Please provide copies of credit reports for EPE from the major credit rating agencies (S&P, Moody's, and Fitch) published since January 1, 2020. Include any credit research updates, opinions, analysis, ratings actions, or similar reports provided by the major credit ratings agencies. Please continue to provide any newly published credit reports before the Commission issues its order in this case.	No
3	**STAFF 1-3**	**a.**	Adrian Hernandez		With respect to EPE's revenue requirement (Cost of Service) and Class Cost of Service (CCOS) models: a) Please provide electronic formats of all models and supporting documentation associated with this filing pertaining to the Application, Direct Testimony and exhibits including working intact formulas, links, charts, etc.	Yes
4	**STAFF 1-3**	**b.i**	Adrian Hernandez		If a cloud-based file sharing platform will be utilized, please provide the following: i. Working individual logins for the system.	No
5	**STAFF 1-3**	**b.ii**	Adrian Hernandez		ii. Including a multi-media presentation of the operation of the model(s).	No
6	**STAFF 1-3**	**b.iii**	Adrian Hernandez		iii. EPE contact person(s) for system issues.	No
7	**STAFF 1-3**	**c.i**	Adrian Hernandez		If no direct linkage or upload mechanism exists between the revenue requirement model and the Class Cost of Service model, please: i. Confirm that adjustments to the revenue requirement must be manually entered into the Class Cost of Service model.	No
8	**STAFF 1-3**	**c.ii**	Adrian Hernandez		ii. Provide a version of the workbooks that demonstrates, through a worked example adjustment to Rate Base and O&M (e.g., a $1 million reduction to revenue requirement), how such an adjustment would flow through to the Class Cost of Service and rate design outputs; and	No
9	**STAFF 1-3**	**c.iii**	Adrian Hernandez		iii. Provide all supporting documentation or internal workpapers used to reconcile the revenue requirement model to the Class Cost of Service model in this case.	No
10	**STAFF 1-4**		Richard Gonzalez		Referring to the testimony of Witness Gonzalez at page 22 lines 1-2, please provide a copy of the Moody's credit opinion published on Jan. 22, 2026.	No
11	**STAFF 1-5**		Richard Gonzalez		Referring to the testimony of Witness Gonzalez at page 22 line 8, please provide a copy of the Fitch credit opinion issued on May 1, 2025.	No
12	**STAFF 1-6**		Richard Gonzalez		Witness Gonzalez states on page 22 lines 20-21 that "this requested equity ratio is necessary to help maintain the Company's current investment-grade credit metrics." What calculations have Mr. Gonzalez or EPE made to confirm that the Company cannot maintain its current credit metrics with a different equity ratio?	No
13	**STAFF 1-7**		Jennifer Nelson		Referring to Witness Nelson's description of the criteria used to select her proxy group on page 43 lines 5-20 and page 44 lines 1 through 18 of her testimony, what companies classified by Value Line as Electric Utilities were screened out of her proxy group, and for what reasons?	No
14	**STAFF 1-8**		Jennifer Nelson		Referring to Witness Nelson's testimony on page 54 lines 5-7, what are the time periods for the long-term earnings per share growth rate projections as of November 28 2025 reported by Zacks, I/B/E/S and Value Line?	No
15	**STAFF 1-9**		Jennifer Nelson		Referring to Witness Nelson testimony on page 65 lines 1 through 7, why did Witness Nelson use 10-year adjusted Beta coefficients from Bloomberg in addition to average Beta coefficients from Value Line and Bloomberg?	No
16	**STAFF 1-10**		Jennifer Nelson		Referring to Witness Nelson testimony on page 72 line 29 to page 73 line 3, Witness Nelson notes that the Chretien and Coggins study used a model "similar to the ECAPM." In what ways did this model differ from the ECAPM?	No
17	**STAFF 1-11**	**a.**	George Novela	Steven Sierra	Please refer to the Direct Testimony of Company Witness Sierra at page 8 lines 4-5 in which Mr. Sierra testifies that EPE's proposed New Mexico Revenue Requirement is reasonable and necessary to provide safe, clean, reliable, and affordable energy to EPE's customers. a. Provide all workpapers, analysis, research, or other materials that evaluate customer affordability of the proposed rates.	No
18	**STAFF 1-11**	**b.**	George Novela	Steven Sierra	b. If this is not available, please explain the basis for EPE's claim that the costs resulting from this rate case will result in "affordable energy to EPE's customers."	No
19	**STAFF 1-12**	**a.**	Manny Carrasco	Jim Schichtl	Please refer to the Texas and New Mexico Residential Bill Comparison located at PDF page 57 of EPE's Application. Please provide: a. The underlying models used to calculate bill impacts;	Yes
20	**STAFF 1-12**	**b.**	Manny Carrasco	Jim Schichtl	b. Any segmentation of bill impacts by income level, receipt of energy assistance, or vulnerable populations (seniors, families with young children, medically vulnerable households) available to or analyzed by the Company for its New Mexico customers; and	No
21	**STAFF 1-12**	**c.**	Manny Carrasco	Jim Schichtl	c. Any analysis of bill impacts as a percentage of household income.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
22	**STAFF 1-13**	**a.**	Rene Gonzalez		Please refer to the Direct Testimony of Witness Rene Gonzalez describing the Low-income Rider ("LIR") proposal at page 24 lines 4 through 18. a. Did the Company evaluate any alternatives to reduce low-income customer bills? If yes, please provide any calculations, assumptions, and workpapers. If not, please explain why not.	No
23	**STAFF 1-13**	**b.**	Rene Gonzalez		b. Please identify the number of anticipated customers eligible for the low-income rider, based on SNAP or LIHEAP benefit enrollment.	No
24	**STAFF 1-13**	**c.**	Rene Gonzalez		c. Please identify the total number of households eligible for SNAP or LIHEAP in the Company's service area.	No
25	**STAFF 1-13**	**d.**	Rene Gonzalez		d. Please identify the total amount of LIHEAP payments received by the Company on behalf of customers annually from 2020 – 2025.	No
26	**STAFF 1-13**	**e.**	Rene Gonzalez	Manny Carrasco	e. State the total number of New Mexico residential customers projected to qualify and enroll in the LIR and provide the percentage of total residential customers this represents as well as the annual revenue reduction associated with the LIR, by rate schedule and in total.	No
27	**STAFF 1-13**	**f.**	Rene Gonzalez	Manny Carrasco	f. Please quantify how many low-income customers would still experience total bill increases after application of the Low-Income Rider and provide average and median increases.	Yes
28	**STAFF 1-14**	**a.**	Rene Gonzalez	George Novela	Please refer to Q39-Q41 of the Direct Testimony of Company Witness Rene Gonzalez from page 22 line 18 to page 24 line 9 describing TOD rates and bill protection provisions. a. Provide bill impact results for low-income customers who opt into TOD rates versus standard rates.	No
29	**STAFF 1-14**	**b.**	Rene Gonzalez	George Novela	b. State whether any analysis was performed on the ability of low-income customers to shift load to off-peak periods.	No
30	**STAFF 1-14**	**c.**	Rene Gonzalez	George Novela	c. Identify any barriers EPE has identified for low-income participation in TOD.	No
31	**STAFF 1-15**		Manny Carrasco		Please refer to Exhibit MC-01, tab NM L-1 Full COS. Please provide the derivation of the claimed residential customer-related cost of $17.874/month (Exhibit MC-01, tab NM L-1 Full COS), including each cost component, allocator, and other steps.	Yes
32	**STAFF 1-16**		Manny Carrasco		Please refer to Exhibit MC-06. Please provide the distribution of bill impact for residential customers segmented by income level or by low-income customers.	No
33	**STAFF 1-17**	**a.**	Manny Carrasco		Please refer to Exhibit MC-07 and provide: a. The underlying models used to calculate bill impacts;	No
34	**STAFF 1-17**	**b.**	Manny Carrasco		b. Any segmentation of bill impacts by income level, receipt of energy assistance, or vulnerable populations (seniors, families with young children, medically vulnerable households) available to or analyzed by the Company for its New Mexico customers; and	No
35	**STAFF 1-17**	**c.**	Manny Carrasco		c. Any analysis of bill impacts as a percentage of household income.	No
36	**STAFF 1-18**		George Novela		Please refer to the Direct Testimony of Company Witness Novella at page 39 lines 5-12. Please provide the total per kWh rate increase, including variable fuel and other costs, from 2020 to September 2025 for all New Mexico customers and residential customers.	No
37	**STAFF 1-19**		Cindy Prieto		Please refer to Exhibit CSP-4 Calculation of Uncollectible Expense Ratio (as a % of revenue). To the extent available, provide uncollectible data separated by low-income customers.	No
38	**STAFF 1-20**	**a.**	Cindy Prieto	Rene Gonzalez	To the extent available, provide all arrearage and disconnection data segmented by low income customers for each year from 2020 to the present. a. If such segmentation is not available, explain whether the Company has evaluated disproportionate impacts on low-income customers since 2020, and provide all such analyses.	No
39	**STAFF 1-20**	**b.**	Cindy Prieto	Rene Gonzalez	b. Please quantify any expected changes in arrearages under the proposed rates.	No
40	**STAFF 1-21**	**a.**	Cindy Prieto		Please provide the number of residential disconnections for non-payment: a. Annually for each year from 2020 to the present;	No
41	**STAFF 1-21**	**b.**	Cindy Prieto		b. Monthly, if available	No
42	**STAFF 1-21**	**c.**	Cindy Prieto		c. Please quantify any expected changes in disconnections under proposed rates.	No
43	**STAFF 1-22**		Cindy Prieto		Please provide residential disconnection data for each year from 2020 to the present in each census tract in the Company's service area.	No
44	**STAFF 1-23**		Cindy Prieto		Please provide the percentage of customers disconnected for non-payment for each year from 2020 to the present as well as reconnection rates and average time for reconnection for each year from 2020 to the present.	No
45	**STAFF 1-24**		Manny Carrasco		Please identify whether the Company evaluated customer energy burden under present rates and proposed rates. If so, provide all calculations, assumptions, and workpapers.	No
46	**STAFF 1-25**		George Novela	Manny Carrasco Adrian Hernandez	Please refer to Table AH-6 in the Direct Testimony of Company Witness Hernandez. State whether the Company evaluated any rate design, cost of service adjustments, or other mitigation strategies that would moderate the Residential 73.18% residential class increase.	No
47	**STAFF 1-26**		Adrian Hernandez		Please refer to the Direct Testimony of Company Witness Herandez Q55-Q57 at page 30 line 1 to page 31 line 7. Please quantify the effect on New Mexico revenue requirement and each class revenue responsibility if production costs were allocated based on jurisdictional load net of directly assigned production resources, rather than gross jurisdictional load.	No
48	**STAFF 1-27**		Enedina Soto	Victor Martinez	Please provide all 8760 (annual hourly) system load, generation, and dispatch data for 2020-2025.	No
49	**STAFF 1-28**	**a.**	George Novela		Refer to the direct testimony of Company Witness Hughes Q43 at page 30 line 12 to 17. Please identify each major capital investment subject to Rule 440 consideration included in the proposed revenue requirement and state whether EPE contends the investment was previously approved, previously "condoned," or remains subject to prudence review in this case. For each item identified, please provide: a. The docket number;	No
50	**STAFF 1-28**	**b.**	George Novela		b. Order citation and specific quoted language from any order that EPE relies upon; The original approved cost estimate;	No

SUPPLEMENTAL DISCOVERY

Line No (a)	Intervenor/ Set (a)	Subpart (b)	Sponsor (c)	Co-Sponsor(s) (d)	Question (e)	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8) (f)
51	**STAFF 1-28**	**c.**	George Novela		c. The final cost; and	No
52	**STAFF 1-28**	**d.**	George Novela		d. The percentage variance.	No
53	**STAFF 1-29**		Victor Martinez		Please refer to the direct testimony of Company Witness Victor Martinez Q17 at page 16 line 20 to page 17 line 4 and regarding BESS project specific capacity discussion in Q18-Q27 at page 17 line 6 to page 22 line 3. Please describe operational data or assumptions where necessary regarding duration, dispatch frequency, and capacity contribution of the BV1, Santa Teresa, and Carne BESS facilities.	No
54	**STAFF 1-30**	**a.**	Victor Martinez		Please refer to Q65 of Company Witness Martinez's testimony at page 45 line 16 to page 46 line 14 on regarding EIM and the benefits of and western energy markets. Produce all hourly wholesale electricity price data for the Test Year Period applicable to the Company's system, including but not limited to: a. Locational marginal prices (LMPs), if available;	No
55	**STAFF 1-30**	**b.**	Victor Martinez		b. Regional hub prices; and	No
56	**STAFF 1-30**	**c.**	Victor Martinez		c. Imputed or proxy prices used for planning, dispatch, or cost evaluation.	No
57	**STAFF 1-31**	**a.**	Victor Martinez	Jeff Hughes	Please refer to Q75 at page 51 lines 12 through 21 of Company Witness Martinez's Direct Testimony on the Newman service life extension analysis. Please provide the following: a. Any analysis, workpapers, studies, or other materials used to determine the financial benefit of extending the Newman service life;	No
58	**STAFF 1-31**	**b.**	Victor Martinez	Jeff Hughes	b. Any analysis, workpapers, studies, or other materials	No
59	**STAFF 1-31**	**c.**	Victor Martinez	Jeff Hughes	c. Any analysis, workpapers, studies, or other materials used by the Company to evaluate other resources or market purchases as alternatives to the upgrades at Newman Unit 3.	No
60	**STAFF 1-32**		Omar Gallegos		Please refer to the Direct Testimony of Company Witness Gallegos Q17 at page 13 line 14 to page 14 line 16. Please identify the specific investments at the transmission and distribution level the Company seeks recovery for in this rate case to accommodate increased distributed energy resource deployment.	No
61	**STAFF 1-33**		Omar Gallegos		Please refer to the Direct Testimony of Company Witness Gallegos Q43 at page 34 line 12 through 17 and Table OAG-2 at page 35. Please identify the customer benefit associated with project TS142, Eddy Windfarm 345 KV Interconnection Substation, and explain why the interconnection costs of a TEP wind project wheeled through EPE should be incorporated in the Company's rate base.	No
62	**STAFF 1-34**	**a.**	Victor Martinez	Jeff Hughes	Please refer to the Direct Testimony of Company Witness Hughes Q17 and Q18 at page 11 line 17 to page 12 line 17. a. Please provide any analysis, reports, workpapers, or other materials produced by the Company to assess the O&M costs of increased local generation fleet dispatch based on economic EIM signals.	No
63	**STAFF 1-34**	**b.**	Victor Martinez	Jeff Hughes	b. Please explain how these increased maintenance costs are tracked and allocated to customers.	No
64	**STAFF 1-34**	**c.**	Victor Martinez	Jeff Hughes	c. Please provide any analysis, reports, workpapers, or other materials comparing the costs of EIM participation, including increased O&M costs, to the benefits.	No
65	**STAFF 1-34**	**d.**	Victor Martinez	Jeff Hughes	d. Please provide an analysis of the increased emissions attributable to the increased local generation fleet dispatch.	No
66	**DAC 01-01**		Steven Sierra		General: Please provide detail trial balances by month beginning August 31, 2024, through March 31, 3026.	No
67	**DAC 01-02**		Steven Sierra		Incentive compensation: Please provide copies of all long-term incentive compensation plan documents whose expenses are included in the revenue requirement.	No
68	**DAC 01-03**		Steven Sierra		Incentive compensation: For each long-term incentive plan whose expenses are included in the revenue requirement, please identify the number of employees and amounts covered by the plan for EPE and for each affiliate or operating unit with payroll costs allocated or assigned to New Mexico jurisdictional operations.	No
69	**DAC 01-04**		Steven Sierra		Incentive compensation: Please provide the dollar value of each long-term incentive award included in the revenue requirement, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico.	No
70	**DAC 01-05**		Steven Sierra		Incentive compensation: Please provide the target levels for each long-term incentive award for the test year, and the related jurisdictional amounts, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico.	No
71	**DAC 01-06**		Steven Sierra		Incentive compensation: Please provide copies of all short-term incentive plan documents whose expenses are included in the revenue requirement.	No
72	**DAC 01-07**		Steven Sierra	Adrian Hernandez	Incentive compensation: For each short-term incentive plan included in the revenue requirement, please identify the number of employees and amounts covered by the plan for EPE and for each affiliate or operating unit with payroll costs allocated or assigned to New Mexico jurisdictional operations.	No
73	**DAC 01-08**		Steven Sierra		Incentive compensation: Please provide the total dollar amount for the target levels of short-term incentives included in the revenue requirement, and the related jurisdictional amounts, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico, identifying amounts awarded and allocated based on company earnings, control of capital or expense costs, customer satisfaction, safety, and/or other identified goals or metrics	No
74	**DAC 01-09**		Steven Sierra		Incentive compensation: Please provide the dollar value of each short-term incentive award included in the revenue requirement, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
75	**DAC 01-10**		Steven Sierra		Incentive compensation: Please provide the budgeted amount of each short-term incentive award for the three years ended September 30, 2025, and the related jurisdictional amount, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico.	No
76	**DAC 01-11**		Steven Sierra		Incentive compensation: Please provide the jurisdictional amount of each short-term incentive award for the test year included in adjusted O&M expenses, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico, identifying amounts awarded and allocated based on company earnings, control of capital or expense costs, customer satisfaction, safety, and/or other identified goals or metrics.	No
77	**DAC 01-12**		Steven Sierra		Payroll: Please provide the payroll expense percentages for the test year and each of the three years prior to the test year for EPE and for each affiliated company with payroll included in the revenue requirement.	No
78	**DAC 01-13**		Steven Sierra		Payroll: Please provide the workpaper showing the calculations of the annualized payroll on September 30, 2025, for each payroll group with a separate annualized payroll calculation.	No
79	**DAC 01-14**		Steven Sierra		Payroll: Please provide documentation supporting each adjustment for general pay increases that occurred during the test year or the post-test year period.	No
80	**DAC 01-15**		Steven Sierra		Payroll: Please provide the payroll by pay period for the test year for each employee group with a separate payroll annualization calculation in the Company's exhibits, and showing for each pay period the number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for EPE and for each affiliate or working group with costs allocated to EPE. Please provide this response in Excel compatible format with all formulas fully functional and intact.	No
81	**DAC 01-16**		Steven Sierra		Payroll: Please provide the payroll by pay period for each pay period subsequent to the test year through the latest available date for each employee group with a separate payroll annualization calculation in the Company's exhibits, and showing for each pay period the number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for EPE and for each affiliate of EPE. Please provide this response in Excel compatible format with all formulas fully functional and intact.	No
82	**DAC 01-17**		Steven Sierra		Payroll: Please provide an annualized payroll based on March 31, 2026, employees and pay rates (when available) comparable to the Company's September 30, 2025, payroll annualization adjustment together with supporting workpapers. Please provide this response in Excel compatible format with all formulas fully functional and intact.	No
83	**DAC 01-18**		Steven Sierra		Payroll: Please provide the payroll for the test year and each of the three years preceding the test year, showing for average number of employees, the amount of base pay, the amount of overtime pay, the overtime hours, the amount of incentives paid, and the amount of other pay. Please provide this information separately for EPE and for each affiliate or work group with costs allocated to EPE. Please provide this response in Excel compatible format with all formulas fully functional and intact.	No
84	**DAC 01-19**		Steven Sierra		Payroll: Please provide the Company's policy regarding pay increases, and explain if the Company grants general pay increases, if the general pay increases are granted on the same date for all qualifying employees, an explanation of the alternative dates if that is used instead of a uniform increase date, if the individual increases are based on merit, and the different methods are used to determine the amount pay increases for each payroll group (contract, management's decision, etc.).	No
85	**DAC 01-20**		Steven Sierra		Payroll: If pay increases are granted on a uniform date for groups of employees, please provide the dates each general pay increase was granted during the test year and the certification period, identify the applicable payroll groups for each pay increase, and for each identified payroll group provide the number of employees and base pay by payroll period in the test year and for each pay period following the test year through the latest available date.	No
86	**DAC 01-21**		Steven Sierra		Payroll: If pay increases are granted on a uniform date for groups of employees, please provide the dates each general pay increase was granted in each of the three years preceding the test year, and for each applicable payroll group provide the base pay in the twelve months preceding and following each pay increase.	No
87	**DAC 01-22**		Steven Sierra		Payroll: Please provide a narrative description of any and all programs that the Company and/or its parent company has instituted which resulted in a decrease to the Company's number of employees since the beginning of the test year.	No
88	**DAC 01-23**		Steven Sierra		Payroll: Please provide a narrative description of any and all programs that the Company and/or its parent company plans to institute which could result in a decrease to the Company's number of employees after the end of the test year.	No
89	**DAC 01-24**		Steven Sierra		Payroll: Please quantify the savings which have been achieved or that are expected to be achieved from programs to reduce the number of employees of the Company and/or its parent company.	No
90	**DAC 01-25**		Steven Sierra		Retirement plans: Please provide a narrative describing any changes the Company plans to make to any of its retirement plans or post-retirement benefits within the two years after the end of the test year.	No
91	**DAC 01-26**		Steven Sierra		Retirement plans: Please quantify the savings which have been achieved or that are expected to be achieved from changes to Company's retirement plans or post-retirement benefits	No
92	**DAC 01-27**		Steven Sierra		Retirement plans: Please provide copies of the actuary reports supporting the test year costs for each retirement plan or post-retirement benefits included in the revenue requirement.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
93	**DAC 01-28**		Steven Sierra		Retirement plans: Please provide the amounts included in test year operating expenses for each retirement plan and post-retirement benefits.	No
94	**DAC 01-29**		Steven Sierra		Retirement plans: Please provide the amounts included in pro forma operating expenses for each retirement plan and post-retirement benefits.	No
95	**DAC 01-30**		Steven Sierra		Retirement plans: Please provide a copy of the full document(s) provided by the Company's actuary supporting the level of pension costs and post-retirement benefits included in the revenue requirement.	No
96	**DAC 01-31**		Steven Sierra		Retirement plans: Please identify each non-qualified retirement plan and provide the amount of each included in the revenue requirement separately for EPE and each affiliate or work group with costs allocated to EPE.	No
97	**DAC 01-32**		Julissa Reza	Cindy Prieto Steven Sierra Tammy Henderson	Regulatory Assets and Liabilities: For each regulatory asset and liability, provide an explanation of the item, the reason for including it in rate base, and any related statutes, orders, legal precedent or other available documentary support for including the item in rate base.	No
98	**DAC 01-33**		Cindy Prieto	Steven Sierra Tammy Henderson	Regulatory Assets and Liabilities: For each regulatory asset and liability, provide an analysis of the item showing by month the related revenue or expense, increases and decreases to the account balance with basic descriptive information (i.e. "Storm Damage," Insurance Reimbursements," "Amortization"), and the account balances. This analysis should begin with the later of the origination of the item or the last jurisdictional filing which included the item, and the analysis should continue through latest available date. Please provide the response in Excel compatible format with fully functional formulas.	No
99	**DAC 01-34**		Cindy Prieto	Steven Sierra Tammy Henderson	Regulatory Assets and Liabilities: Please provide the balances of each regulatory asset and liability for each month beginning one month prior to the test year and continuing through the latest available date.	No
100	**DAC 01-35**		Steven Sierra		Outside Services Expense: Please provide an analysis identifying each vendor with costs exceeding $100,000 in the outside services expense account in the test year. For each vendor, provide the service provided by the vendor, the amount included in test year expenses, and any adjustments related to the test year level of expenses related to the vendor, and the amounts paid to the vendor in each of the two years prior to the test year.	No
101	**DAC 01-36**		Steven Sierra		Injuries and Damages Expense: Please provide an analysis of reserve account for Injuries and Damages Expense for each of the three years prior to the test year and for the test year showing the beginning balance, the accruals increasing the reserve account, claims charged to the reserve account, adjusting entries, and the year ending balance for the reserve account.	No
102	**DAC 01-37**		Steven Sierra	Adrian Hernandez	Officers' and Directors' Liability Insurance: Please provide the amount of the officers' and directors' insurance expense included in the adjusted New Mexico retail revenue requirement and provide references to any adjustments related to this expense.	No
103	**DAC 01-38**		Steven Sierra	Adrian Hernandez	Directors' compensation: Please provide the amount of directors' compensation included in the adjusted New Mexico retail revenue requirement and provide references to any adjustments related to this expense.	No
104	**DAC 01-39**		Steven Sierra	Adrian Hernandez	Directors' expenses: Please provide the amount of directors' expenses included in the adjusted New Mexico retail revenue requirement and provide references to any adjustments or discovery responses that include information related to this expense.	No
105	**DAC 01-40**		Steven Sierra		Edison Electric Institute dues: Please produce a copy of any Edison Electric Institute (EEI) membership dues invoices that the Company received during the test year. Indicate whether the membership dues allocated for lobbying purposes is shown on the invoice(s).	No
106	**DAC 01-41**		Steven Sierra	Adrian Hernandez	Edison Electric Institute dues: Please produce the jurisdictional amount of EEI dues expense for the test period requested to be recovered in rates in this proceeding. Also, please indicate the amount included for recovery in the adjusted revenue requirement.	No
107	**DAC 01-42**		Steven Sierra		Edison Electric Institute dues: Please confirm or deny that EPE is not seeking to recover the portion of the EEI dues related to lobbying activities.	No
108	**DAC 01-43**		Richard Gonzalez		Investor relations expense: What type of activities does EPE, or its parent company, undertake that it considers "investor relations"?	No
109	**DAC 01-44**		Richard Gonzalez		Investor relations expense: Please explain how the Company's investor relations activities benefit its customers rather than its shareholders.	No
110	**DAC 01-45**		Richard Gonzalez		Investor relations expense: Can the Company demonstrate any measurable improvements in service reliability, affordability, or access resulting from the Company's investor relations activities? If so, please explain.	No
111	**DAC 01-46**		Cindy Prieto		Investor relations expense: Please provide the total relations O&M expense incurred by or allocated to EPE for the test year and the three calendar years preceding the test year.	No
112	**DAC 01-47**		Cindy Prieto		Investor relations expense: Please provide the total investor relations expense that the Company is requesting to be recovered in base rates in this proceeding.	No
113	**STAFF 2-1**		Manny Carrasco		Please refer to Table MC-3 at page 28 of the Direct Testimony of company witness Carrasco. Please provide all underlying data, workpapers, and analysis used to determine the 60 highest-load days of each year along with the hourly load data.	No
114	**STAFF 2-2**	**a**	Manny Carrasco		Referring to the Direct Testimony of company witness Carrasco Q38 page 28 lines 11 – 20 regarding what analysis EPE performed to support maintaining the current on-peak period hours, did the company evaluate the probability of lost load or any other metric beyond highest daily demand in determining the applicability of the on-peak period? a. If yes, please provide all analysis, reports, workpapers, or other materials produced by the Company.	No
115	**STAFF 2-2**	**b**	Manny Carrasco		b. If not, please explain why not.	No
116	**STAFF 2-3**		Manny Carrasco		Referring to the Direct Testimony of company witness Carrasco Q43 at page 33 lines 2-4, please explain how the reliance on Newman Unit 6, a unit that does not serve NM customers, to establish marginal generation costs is consistent with "prior recommendations and provides a more current estimate of marginal generation costs."	No
117	**STAFF 2-4**		Manny Carrasco		Referring to the Direct Testimony of company witness Carrasco Q44 at page 33 lines 9-17, please explain how the Company determined the 4CP allocator is the appropriate allocation of the on-peak period energy price adder. Please provide supporting workpapers or analyses and cite any past PRC proceedings in which the Commission has approved this allocation.	No
118	**STAFF 2-5**		Manny Carrasco		Referring to the Direct Testimony of company witness Carrasco Q47 at page 36 lines 2-6, please provide any analysis, workpapers or other materials produced by the Company to forecast the likelihood and magnitude of anticipated load shifting under a mandatory opt out TOD rate.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
119	**STAFF 2-6**		Manny Carrasco		Referring to the Direct Testimony of company witness Carrasco Q49 at page 37 lines 14-17, has the Company compared the estimated revenue shortfalls pertaining to the mandatory, opt-out TOD rates under the 10% and 20% shift scenarios with the avoided marginal generation or capacity costs or conducted any other cost benefit analysis? If so, please provide supporting workpapers and analyses.	No
120	**STAFF 2-7**		Manny Carrasco		Referring to the Direct Testimony of company witness Carrasco Q49 at page 37 lines 14-17, has the Company reviewed any studies, research or data from other utilities on expectation of customer usage patterns shifting in response to mandatory TOD rates? Please provide any such references.	No
121	**STAFF 2-8**		Adrian Hernandez		Referring to the Direct Testimony of Company Witness Novela Q30 at page 25 lines 17-19, please identify all savings associated with AMS project deployment and how those savings are reflected in the revenue requirement. Please provide workpapers or analyses that describe or calculate those savings.	No
122	**STAFF 2-9**	**a**	Omar Gallegos		Referring to the Direct Testimony of Company Witness Novela Q30 at page 25 lines 17-19, specifically identify the extent to which the Company has used AMI data for: a. Phase identification or phase balancing;	No
123	**STAFF 2-9**	**b**	Omar Gallegos		b. Transformer load analysis or balancing;	No
124	**STAFF 2-9**	**c**	Omar Gallegos		c. Voltage monitoring or voltage optimization;	No
125	**STAFF 2-9**	**d**	Omar Gallegos		d. Loss analysis or loss reduction; and	No
126	**STAFF 2-9**	**e**	Omar Gallegos		e. Identification of overloaded or under-utilized distribution assets.	No
127	**STAFF 2-10**	**a**	Adrian Hernandez		Identify how the Company has classified AMI capital and O&M costs in its cost of service study in this proceeding. For each instance, identify: a. The FERC account(s) included;	No
128	**STAFF 2-10**	**b**	Adrian Hernandez		b. The allocator(s) applied; and	No
129	**STAFF 2-10**	**c**	Adrian Hernandez		c. The testimony or exhibit supporting that classification.	No
130	**STAFF 2-11**	**a**	Adrian Hernandez	Omar Gallegos	Referring to the Direct Testimony of Company Witness Hernandez Q106 at page 54 line 16 to page 55 line 7 and the CCOS study, explain the cost causation rationale for classifying AMI costs as customer related. In your response, address whether and how this classification reflects: a. System wide operational uses of AMI data;	No
131	**STAFF 2-11**	**b**	Adrian Hernandez	Omar Gallegos	b. Benefits accruing to customers other than the metered customer;	No
132	**STAFF 2-11**	**c**	Adrian Hernandez	Omar Gallegos	c. Improved granularity of segment load data and the accuracy of the power-flow model used for distribution system planning, as identified in U-21-00269-UT EPE Exhibit 14 Davis Direct Testimony at 6-14; and	No
133	**STAFF 2-11**	**d**	Adrian Hernandez	Omar Gallegos	d. Whether the company evaluated if any portion of AMI costs should be classified as joint and common distribution system costs. If not, explain why no such evaluation was performed.	No
134	**STAFF 2-12**		Adrian Hernandez		Referring to the Direct Testimony of Company Witness Hernandez Q106 at page 54 line 18-20 and the CCOS study, please identify any external benchmarks, regulatory precedents, or industry studies relied upon to support El Paso Electric's proposed allocation of AMI costs, including but not limited to prior commission orders, NARUC manuals, or company filings in other jurisdictions.	No
135	**STAFF 2-13**		Enedina Soto		Referring to the Direct Testimony of Company witness Soto Q50 at page 37 lines 9 - 17, how has the Company evaluated the impact of AMI deployment on system losses and the ability of the AMS to reduce distribution system losses?	No
136	**STAFF 2-14**	**a**	George Novela		Has the Company evaluated whether AMI enabled rate structures or programs could reduce system peak demand or defer generation, transmission, or distribution investments? a. If yes, provide all supporting analyses.	No
137	**STAFF 2-14**	**b**	George Novela		b. If no, explain why such evaluation has not been undertaken.	No
138	**STAFF 2-15**	**a**	Manny Carrasco	George Novela	Please refer to the June 23, 2021 Commission Order Adopting the Recommended Decision with Modifications in the Company's last rate case, 20-00104-UT, at 19 paragraph 52 in which the Commission order that, in EPE's next rate case application, "EPE must provide a study of the impacts of seasonal charges up both TOD rate structures and standard rate structures. The study must include an analysis as to whether raising the Winter seasonal charge to the level of the Summer seasonal charge could fund a more effective TOD rate structure, possibly including lower on-peak rates." Please describe how the Company has complied with this directive on TOD rate structure, including references to all relevant testimony and exhibits filed in the instant proceeding. a) If the Company did not comply with this directive, please explain why not.	No
139	**STAFF 2-15**	**b**	Manny Carrasco	George Novela	b) Please explain any additional action taken or analysis, workpapers, or other materials developed by the Company to assess the impacts of seasonal charges on both TOD and standard rate structures.	No
140	**STAFF 2-16**	**a**	Jennifer Nelson		Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 305 paragraph M in which the Hearing Examiner recommended that in its next base rate case, "EPE shall use IBES as one source of its growth estimates in its DCF analysis or analyses." Please describe how the Company has complied with this directive to use IBES as one source of its growth estimates in its DCF analysis or analyses, including references to all relevant testimony and exhibits filed in the instant proceeding. a. If the Company did not comply with this directive, please explain why not.	No
141	**STAFF 2-16**	**b**	Jennifer Nelson		b. Please explain any additional action taken or analysis, workpapers, or other materials developed by the Company to assess the appropriateness of IBES or other growth estimates in its DCF analysis.	No
142	**STAFF 2-17**	**a**	Adrian Hernandez		Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 305 paragraph S in which the Hearing Examiner recommended that in its next base rate case, "EPE shall submit an alternative cost of service that assumes reopening Rate No. 7 to new customers.". Please describe how the Company has complied with this directive, including references to all relevant testimony and exhibits filed in the instant proceeding. a) If the Company did not comply with this directive, please explain why not.	No
143	**STAFF 2-17**	**b**	Adrian Hernandez		b) Please explain any action taken or analysis, workpapers, or other materials developed by the Company to assess the impact of reopening Rate No. 7 to new customers.	No
144	**STAFF 2-18**	**a**	George Novela		Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 305 paragraph T in which the Hearing Examiner recommended that within 6 months of issuance of the final order in 20-00104-UT, EPE shall file in a new docket "a request for a mediator for EPE and interested persons to discuss possible modifications to Rate No. 29 to make it more effective" and that in its next rate case, EPE shall "report on the results of the mediation and propose any modifications to Rate No. 29 agreed to in mediation.". Please describe how the Company has complied with this directive to report on the results of the mediation and any proposed modifications to Rate No. 29, including references to all relevant testimony and exhibits filed in the instant proceeding. a) If the Company did not comply with this directive, please explain why not.	No
145	**STAFF 2-18**	**b**	George Novela	Rene Gonzalez	b) Please explain any action taken or analysis, workpapers, or other materials developed by the Company to assess modifications to Rule No. 29.	No
146	**STAFF 2-19**		Rene Gonzalez	George Novela	Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 305 paragraph T. Please describe how the Company has complied with this directive to provide notice that the Commission might order significant changes to Rule No. 29, including references to all relevant testimony and exhibits filed in the instant proceeding. If the Company did not comply with this directive, please explain why not.	No
147	**STAFF 2-20**	**a**	Rene Gonzalez		Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 306 paragraph V. Please identify all relevant testimony and exhibits that describe how the Company has complied with this directive to report the following in the instant proceeding: a. The number of customers receiving service under Rate No. 42 by rate class	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
148	**STAFF 2-20**	**b**	Rene Gonzalez		b. The maximum number of customers that have received service under Rate No. 42 at any one time since the effective date of the rate	No
149	**STAFF 2-20**	**c**	Rene Gonzalez		c. The average bill for Rate No. 42 customers	No
150	**STAFF 2-20**	**d**	Enedina Soto		d. Load data and the load profile of Rate No. 42 customers, including how the electric vehicle charging load coincides with EPE's system peak; and	No
151	**STAFF 2-20**	**e**	Enedina Soto		Available data to inform future programs and rates as well as to better understand the impact of electric vehicle charging on the electric grid.	No
152	**STAFF 2-20**	**f**	George Novela		If the Company did not comply with any component of this directive, please explain why it did not comply.	No
153	**STAFF 2-21**		Rene Gonzalez		Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 306 paragraph W in which the Hearing Examiner recommended that "EPE shall expand eligibility under its proposed Rate No. 42 to include charging activity operating at 480v."Please confirm that the Company has expanded eligibility under Rate No. 42 to include charging activity operating at 480V. Please identify all relevant testimony and exhibits that identify this expanded eligibility in this proceeding. If not identified, please explain why.	No
154	**STAFF 2-22**	**a**	Rene Gonzalez	Manny Carrasco	Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 306-307 paragraphs X.1-4 in which the Hearing Examiner recommended that EPE provide a report within 14 months of issuance of a final order in 20-00104-UT regarding any proposed changes to its TOD rate design. Please provide an updated account of: a. By customer class, the number of existing customers who switched service from the Standard option to the TOD option since the Company's last rate case;	No
155	**STAFF 2-22**	**b**	Rene Gonzalez	Manny Carrasco	b. By customer class, the number of new customers who chose service under the Standard option and who chose service under the TOD option since the Company's last rate case;	No
156	**STAFF 2-22**	**c**	Rene Gonzalez	Manny Carrasco	c. By customer class, the peak demand savings achieved by TOD option customers since the Company's last rate case; and	No
157	**STAFF 2-22**	**d**	Rene Gonzalez	Manny Carrasco	d. By customer class, since the last rate case, (1) the number of customers who elected to receive service under the TOD option and whose total billings for the initial 12-month period exceeded the billings under the Standard option; (2) the total amount credited by EPE to such customers for the difference in billings; and (3) the number of such customers who reverted to the Standard option.	No
158	**STAFF 2-23**	**a**	George Novela		Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 307 paragraph Z in which the Hearing Examiner recommended that EPE, in all future base rate case filings, state any reference to a cost-of-service dollar on a New Mexico jurisdictional basis. Please identify all relevant testimony showing the Company has complied with this directive to ensure all cost-of-service related dollar amount in testimony is stated on a New Mexico jurisdictional basis. a. If it is not possible to identify all relevant testimony, please explain how the Company ensured compliance with this directive.	No
159	**STAFF 2-23**	**b**	George Novela		b. If the Company did not comply with this directive, please explain why not.	No
160	**STAFF 2-24**		George Novela		Please refer to the April 6, 2021 Recommended Decision in the Company's last rate case, 20-00104-UT at 307 paragraph Z. Please explain how the Company ensured all relevant exhibits making reference to a cost-of-service related dollar amount in exhibits to testimony, schedules, and workpapers were stated on a total company and New Mexico jurisdictional basis. If the Company did not comply with this directive, please explain why not.	No
161	**STAFF 2-25**	**a**	Adrian Hernandez		Please refer to the Direct Testimony of Company witness Hernandez at 40 line 8 –13. a. Please identify all analysis, studies, reports, workpapers, or other materials that support the Company's classification of battery-capacity costs as demand related.	No
162	**STAFF 2-25**	**b**	Legal		b. Please explain why the Company proposes direct assignment of Carne, Santa Teresa and Buena Vista battery capacity to the New Mexico jurisdiction.	No
163	**STAFF 2-25**	**c.i**	Victor Martinez		c. For each battery resource, please identify all functions it is capable of performing and analysis quantifying the proportion of use attributable to each function including but not limited to: i. Capacity	No
164	**STAFF 2-25**	**c.ii**	Victor Martinez		ii. Energy arbitrage, including EIM participation support	No
165	**STAFF 2-25**	**c.iii**	Omar Gallegos		iii. Ancillary services	No
166	**STAFF 2-25**	**c.iv**	Omar Gallegos		iv. Transmission support	No
167	**STAFF 2-25**	**c.v**	Omar Gallegos		v. Distribution deferral	No
168	**STAFF 2-25**	**d**	Omar Gallegos		d. Please explain how the cost of energy used to charge battery resources was treated in the COSS.	No
169	**STAFF 2-26**	**a**	Manny Carrasco		Please refer to Exhibit MC-9 (Rate No. 50). Please provide a complete description of eligibility criteria for the proposed tariff, including: a. minimum demand threshold	No
170	**STAFF 2-26**	**b**	Manny Carrasco		b. load factor requirements	No
171	**STAFF 2-26**	**c**	Manny Carrasco		c. customer type restrictions	No
172	**STAFF 2-26**	**d**	Manny Carrasco		d. any geographic or system constraints	No
173	**STAFF 2-27**		Manny Carrasco		Please refer to the Direct Testimony of Company Witness Carrasco Q119 page 88 lines 11-18. Please identify the industry literature reviewed to develop the proposed large load tariffs.	No
174	**STAFF 2-28**		Manny Carrasco		Please refer to the Direct Testimony of Company Witness Carrasco Q124 page 90 lines 12 –18 to page 92 lines 1-5. Please provide a complete list of the other electric utilities reviewed, what thresholds those utilities use to designate large loads, and any other factors examined in the determination of the Proposed Rate No. 50 (High Load Factor Power) threshold of 30 MW.	No
175	**STAFF 2-29**	**a**	Manny Carrasco		Please refer to the Direct Testimony of Company Witness Carrasco Q127 page 92 line 1-5 in which Witness Carrasco testifies that the source for the Rate 50 charges is a cost-of-service study and rate design model for a hypothetical rate class for a 100 MW hyperscale data centers. a. Please explain why a hypothetical customer was used as a basis for the proposed rate class.	No
176	**STAFF 2-29**	**b**	Manny Carrasco		b. Please explain why a 100 MW customer was used as a basis for the proposed rate class.	No
177	**STAFF 2-29**	**c**	Manny Carrasco		Please explain why a hyperscale data center was used as the basis for the proposed rate class and identify any other load/usage patterns the Company anticipates to be eligible for this tariff.	No
178	**STAFF 2-29**	**d**	Manny Carrasco		Please provide any analysis, workpapers, or other materials produced by the Company evaluating the cost of serving other hypothetical or potential large load customers that would take service under this new tariff.	No
179	**STAFF 2-30**	**a**	Manny Carrasco		Please refer to the Direct Testimony of Company Witness Carrasco Q127 page 92 line 7–17. a. Please list all other electric utilities' large load tariff rate design reviewed as a part of the development of this proposal and what factors were compared.	No
180	**STAFF 2-30**	**b.i**	Manny Carrasco		b. Please quantify the proportion of transmission capacity costs, distribution system capacity costs, and 4CP and 4CP A&E production costs proposed to be recovered through the demand charge. i. Where the demand charge does not recover 100% of those costs, please explain why not and how the Company proposes to recover these costs.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
181	**STAFF 2-31**	**a**	Manny Carrasco		Please refer to Exhibit MC-10 (Rate No. 51). Please provide a complete description of eligibility criteria for the proposed tariff, including: a. minimum demand threshold;	No
182	**STAFF 2-31**	**b**	Manny Carrasco		b. load factor requirements;	No
183	**STAFF 2-31**	**c**	Manny Carrasco		c. customer type restrictions; and	No
184	**STAFF 2-31**	**d**	Manny Carrasco		d. any geographic or system constraints.	No
185	**STAFF 2-32**		Manny Carrasco		Please refer to Exhibit MC-10 page 6. Please explain, in the case of a customer's demand falling below the 10 MW threshold, how the Company's ESA, tariff, or other proposed customer requirements will ensure customers taking service under Rate Schedule No. 51 will pay the full costs they impose upon the system. Please provide references to any testimony or exhibits.	No
186	**STAFF 2-33**	**a**	Manny Carrasco		Please refer to Exhibit MC-12 (Hypothetical Rate Large Load COSS). Please confirm whether the proposed large load tariff fully recovers all:\ a. Incremental production cost	No
187	**STAFF 2-33**	**b**	Manny Carrasco		b. System upgrade costs, including but not limited to transmission and distribution costs, capacity upgrades, reliability upgrades, and grid modernization expenses required to serve these new customers	No
188	**STAFF 2-33**	**c**	Manny Carrasco		c. If not, please quantify the shortfall and how this is proposed to be recovered.	No
189	**STAFF 2-34**		Manny Carrasco	George Novela	Please refer to the Direct Testimony of Company Witness Carrasco page 6 lines 1 to 3 in which Witness Carrasco testifies that EPE is "proposing to move rate classes to the full recovery of their respective cost of service, thereby eliminating inter-class subsidies to the extent reflected in the CCOS." Please explain how the Company ensured its proposed specialized large load tariff is consistent with the Company's stated intent of "eliminating inter-class subsidies."	No
190	**STAFF 2-35**		George Novela		Please refer to the Direct Testimony of Company witness Novela Q9 page 8 line 10– 11. Please quantify the amount and function of costs that EPE asserts would be shifted to other customer classes absent the proposed large load tariffs.	No
191	**STAFF 2-36**		George Novela		Please refer to the Direct Testimony of Company witness Novela Q55 page 46 line 9 – 11 in which Mr. Novela testifies that the proposed large load tariff schedules offer provisions to ensure that other customers will not be subsidizing any costs associated with serving large load customers. Please identify the specific provisions in the proposed example ESA that ensure "other customers will not be subsidizing any costs associated with serving large load customers."	No
192	**STAFF 2-37**		Legal		Please refer to the Direct Testimony of Company witness Novela Q57 page 47 line 4-7. Please explain what materials the Company intends to file to support the ESAs in its recommended compliance docket proposal for Commission evaluation of all ESAs under Rate Nos. 50 and 51.	No
193	**STAFF 2-38**		George Novela	Manny Carrasco	Please refer to the Direct Testimony of Company witness Novela Q58 page 47 line 13-15. Please identify the specific "issues with existing rates" that the large load tariff proposals address. Provide references to all testimony, exhibits, or other workpapers identifying how these issues are addressed.	No
194	**STAFF 2-39**		George Novela		Please refer to Exhibit GN-2 (Energy Services Agreement). Please identify all provisions, attachments, or sections the Company intends to redact or make confidential when filed in the proposed ESA compliance docket.	No
195	**STAFF 2-40**		George Novela		Please refer to the Direct Testimony of Company witness Novela page 9 lines 3-5. Please identify the year over year load growth by rate class and system-wide for every calendar year from 2020 through 2025, the annual average load growth (in mWh and %) since the last rate case, and how the Company determined this was "extreme."	No
196	**STAFF 2-41**	**a**	George Novela		Please refer to the Direct Testimony of Company witness Novela page 9 lines 5-6. a. Please state how the Company defines electrification in the testimony referenced above.	No
197	**STAFF 2-41**	**b**	George Novela		b. Please provide all analyses, studies, reports, or other materials used by the Company to determine the level of expansion of electrification throughout the Company's service territory and what portion of load growth is driven by electrification.	No
198	**STAFF 2-42**		Omar Gallegos		Please refer to the Direct Testimony of Company witness Gallegos page 74 line 15-17. How did the Company determine an approximate per customer connection cost of $8,996 was reasonable? Please provide all analyses, studies, workpapers, or other materials used to make this determination.	No
199	**STAFF 2-43**	**a**	Omar Gallegos		Please refer to the Direct Testimony of Company witness Gallegos page 68 – 72, describing the Company's distribution system investments including Project DN185 and Project DN145. a. Please provide the actual load growth for every calendar year from 2020 through 2025 at each substation driving the need for investment.	No
200	**STAFF 2-43**	**b**	Omar Gallegos		b. Please provide the actual load growth by rate class for every calendar year from 2020 through 2025 for each substation. If this is not feasible, please distinguish between residential and non-residential customer load growth.	No
201	**STAFF 2-43**	**c**	Omar Gallegos		c. Please provide the free or available capacity level for each substation before and after project completion.	No
202	**STAFF 2-44**	**a**	Adrian Hernandez	Manny Carrasco	Please refer to the Direct Testimony of Company Witness Carrasco Q54 page 41 line 12-13 referencing Exhibit MC-01 at tab NM L-1 Full COS. Please provide all workpapers, accounting detail, and other materials to support the Company's stated Customer Component Costs assigned to NM Rate 01 – Residential including as stated on page 1 of Exhibit MC-1: a.Customer Other - $761,797	Yes
203	**STAFF 2-44**	**b**	Adrian Hernandez	Manny Carrasco	b. Customer 369 – Services $2,444,667	Yes
204	**STAFF 2-45**	**a**	Manny Carrasco		Please refer to the Direct Testimony of Company Witness Carrasco Q54 page 41 line 17-19. Did EPE evaluate any other residential rate design proposals, other than the proposed increase to the Customer Charge? a.If yes, please provide any analyses, studies, reports, or other materials used by the Company to evaluate alternative rate designs.	No
205	**STAFF 2-45**	**b**	Manny Carrasco		b. If not, please explain why not.	No
206	**STAFF 2-46**	**a**	Manny Carrasco		Please refer to the Direct Testimony of Company Witness Carrasco Q55 page 42 line 8-14. a.Is the Company aware of any Commission rule, policy, or prior directive that requires the customer charge to be updated after a set period of time?	No
207	**STAFF 2-46**	**b**	Manny Carrasco		If yes, please provide all relevant citations to past Commission action or current rule.	No
208	**STAFF 2-47**	**a**	Manny Carrasco		Please refer to the Direct testimony of Company Witness Carrasco Q55 page 42 line 10-12 and the Recommended Decision in Case No. 20-00104-UT, the Company's last rate case, page 229. a. Is the Company aware of any Commission rule, policy, directive, or other guidance that deviates from the order quoted in the RD in Case No. 20-00104-UT: "This 'Commission has not adopted in any rate case the principal or general policy that a utility's monthly service charge recovers all of the cost of the minimum system required to serve each customer'. Case No. 10-00379-UT, Final Order Partially Adopting Recommended Decision at paragraph 25."	No
209	**STAFF 2-48**	**a**	Rene Gonzalez		Please provide any analyses, studies, workpapers or other materials assessing the rate impacts of recovery of the proposed low-income discount including but not limited to recovery from all rate classes not just residential. a. If the Company did not assess recovery of the low-income discount from all customer classes, please explain why not.	No
210	**STAFF 2-49**		George Novela		Please refer to the Direct testimony of Company Witness Novela page 19 line 18-20. Please quantify the potential load impacts from the interested data center customers and provide a list with the current status of all new large loads the Company is evaluating for interconnection to its system.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
211	**STAFF 2-50**		George Novela		Please refer to the Direct testimony of Company Witness Novela page 37 line 4-13. Please provide an explanation of the current status of the Time-varying Rate Pilot Program (TVRPP) and quantify impacts to date, including but not limited to number of customers participating, magnitude of observed load shifting, customer bill savings, and any assessment completed on avoided generation, transmission, or distribution capacity investments.	No
212	**STAFF 2-51**		Steven Sierra		Please provide actuals operations and maintenance expense by FERC account for calendar years 2020 through the end of the base period.	No
213	**STAFF 2-52**		Richard Gonzalez		Please provide all monthly, quarterly, and annual budget variance reports prepared for the period beginning July 1, 2020 through current month/year. This request seeks regularly prepared reports that identify and explain variances between actual and budgeted operating results, including but not limited to variances in construction expenditures, plant closings, revenues, sales, and Operations and Maintenance expense by FERC account, cost center, or business unit.	No
214	**STAFF 2-53**		Steven Sierra		Please provide a list of all affiliates that charge amounts to EPE, a description of services provided, and the amounts charged for calendar years 2021 through the end of the base period and the amounts reflected in the Base Period and Test Period.	No
215	**STAFF 2-54**		Steven Sierra		Please provide the percentage of salary and wage increases granted for calendar years 2021 through the end of the base period separately for union and non-union employees, identifying the effective date of each increase. Also provide any increases reflected in the Test Period.	No
216	**STAFF 2-55**	**a**	Steven Sierra		For new employee positions included in this filing: a) The number of new positions included in the Base Period and Test Period.	No
217	**STAFF 2-55**	**b**	Steven Sierra		b) Please provide the amount of any expenses claimed for new employee positions added from September 1, 2025 to the most current month available.	No
218	**STAFF 2-56**	**a**	Steven Sierra		Please provide, by month for the past twenty-four months, a) the authorized employees by department and	No
219	**STAFF 2-56**	**b**	Steven Sierra		b) the actual employees by department.	No
220	**STAFF 2-57**	**a**	Steven Sierra		For the Future vacancy rate please provide the following: a) The number of vacancies by position type; and	No
221	**STAFF 2-57**	**b**	Steven Sierra		b) The number of vacancies by employee grade.	No
222	**STAFF 2-58**	**a**	Steven Sierra		For overtime expenditures please provide the following: a) The yearly overtime costs incurred by EPE between 2022 and 2026;	No
223	**STAFF 2-58**	**b**	Steven Sierra		b) The yearly overtime costs for the Base Period, and Test Period; and	No
224	**STAFF 2-58**	**c**	Steven Sierra		c) Please identify the tab, row, and column number where the Test Period data amount is located.	No
225	**STAFF 2-59**		Steven Sierra		Please provide the actual percentage of labor capitalized in each of calendar years 2020 through the end of the Base Period as well as the capitalization percentage reflected in the Test Period.	No
226	**STAFF 2-60**	**a**	Steven Sierra		Please provide a description of all incentive compensation programs provided to employees. For each program, provide: a) A description of the program;	No
227	**STAFF 2-60**	**b**	Steven Sierra		b) The plan document;	No
228	**STAFF 2-60**	**c**	Steven Sierra		c) Corporate scorecards or other calculations used to measure performance;	No
229	**STAFF 2-60**	**d**	Steven Sierra		d) Amounts awarded in calendar years 2020 through the end of the base period; and	No
230	**STAFF 2-60**	**e**	Steven Sierra		e) Amounts included in the Test period revenue requirement.	No
231	**STAFF 2-61**	**a**	Steven Sierra		Please provide a description of all incentive compensation programs provided to officers and executives that differ from programs offered to other employee categories. For each program, provide: a) A description of the program;	No
232	**STAFF 2-61**	**b**	Steven Sierra		b) The plan document;	No
233	**STAFF 2-61**	**c**	Steven Sierra		c) Performance scorecards or calculations;	No
234	**STAFF 2-61**	**d**	Steven Sierra		d) Amounts awarded in calendar years 2020 through the end of the base period, and	No
235	**STAFF 2-61**	**e**	Steven Sierra		e) Amounts included in the Test Period revenue requirement.	No
236	**STAFF 2-61**	**f**	Steven Sierra		f) Please identify the tab, row, and column number where the Test Period data amount is located.	No
237	**STAFF 2-62**		Steven Sierra		Please provide the compensation, bonuses, and benefits provided to EPE directors in calendar years 2020 through the end of the base period and the amounts included in the Test Period. Please identify the tab, row, and column number where the test period amount is located.	No
238	**STAFF 2-63**	**a**	George Novela		For each of EPE's three most recent base rate case filings, provide: a) The amount of increase requested;	No
239	**STAFF 2-63**	**b**	George Novela		b) The percentage increase requested;	No
240	**STAFF 2-63**	**c**	George Novela		c) The amount of increase granted;	No
241	**STAFF 2-63**	**d**	George Novela		d) Whether the case was litigated or settled;	No
242	**STAFF 2-63**	**e**	George Novela		e) The total rate case expenses requested;	No
243	**STAFF 2-63**	**f**	George Novela		f) The total rate case costs incurred;	No
244	**STAFF 2-63**	**g**	George Novela		g) The number of internal witnesses who provided testimony on behalf of EPE;	No
245	**STAFF 2-63**	**h**	George Novela		h) The number of external witnesses who provided testimony on behalf of EPE; and	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
246	**STAFF 2-63**	**i**	George Novela		i) The effective date of new rates.	No
247	**STAFF 2-64**		George Novela		Please describe in detail the process by which EPE determined the number of witnesses to sponsor direct testimony in this proceeding. In your response, identify all factors considered, any internal guidelines or criteria applied, and the individuals or roles involved in making that determination. In addition, provide any non-privileged documents that reflect or memorialize the evaluation or decision to present 18 direct witnesses in this case.	No
248	**STAFF 2-65**		George Novela		Please provide copies of all contracts with consultants or other third parties for rate case services claimed in this filing.	No
249	**STAFF 2-66**		Legal		Please provide copies of all requests for proposal issued for rate case services associated with this filing.	No
250	**STAFF 2-67**	**a**	Steven Sierra		Please provide a full, complete, and itemized accounting of outside service expenses incurred during the Base Period and Test Period, identifying the vendor, amount paid, and nature of services provided as well as: a) Please indicate the specific case the services were provided.	No
251	**STAFF 2-67**	**b**	Steven Sierra		b) Please provide the total travel costs included in the regulatory expenses.	No
252	**STAFF 2-67**	**c**	George Novela		c) Please provide a summary of the rate case expenses that have been incurred as of March 1, 2026 and those that are projected to be incurred from this same date.	No
253	**STAFF 2-67**	**d**	George Novela		d) Please indicate if any of the forecasted budgets included in the rate case expenses have been updated or modified compared to the as filed budgets.	No
254	**STAFF 2-67**	**e**	Steven Sierra		e) Please identify the tab, row, and column number where the test period data for regulatory expenses amount is located.	No
255	**STAFF 2-68**		George Novela		Please provide a full, complete, and itemized accounting of internal costs incurred during the Base Period and Test Period, included in rate case expenses, including but not limited to any labor/overtime costs incurred, travel costs.	No
256	**STAFF 2-69**		Steven Sierra		Please provide the amount of expenses for memberships and dues included in the Base Period and Test Period, identifying the organization paid and the employees participating (union, management, directors, etc.).	No
257	**STAFF 2-70**		Steven Sierra		Please provide the amount of lobbying costs included in the Base Period and Test Period revenue requirement.	No
258	**STAFF 2-71**	**a**	Steven Sierra		Please provide the amount of costs reflected in the Base Period and Test Period for: a) Community affairs;	No
259	**STAFF 2-71**	**b**	Steven Sierra		b) Government relations.	No
260	**STAFF 2-72**	**a**	Steven Sierra		Please provide the amount of advertising costs included in the Base Period and Test Period, segmented as: a) Educational;	Yes
261	**STAFF 2-72**	**b**	Steven Sierra		b) Promotional;	Yes
262	**STAFF 2-72**	**c**	Steven Sierra		c) Corporate; and	Yes
263	**STAFF 2-72**	**d**	Steven Sierra		d) Other.	Yes
264	**STAFF 2-72**	**e**	Steven Sierra		e) Please identify the tab, row, and column number where the test period amount is located.	Yes
265	**STAFF 2-73**		Richard Gonzalez		Please provide a one-year forward-looking Operations and Maintenance expense and capital expense budget by FERC account prepared immediately preceding each of the three most recent calendar years, as well as all subsequently prepared one-year budgets currently available.	No
266	**STAFF 2-74**		Julissa Reza	Victor Martinez Rene Gonzalez	Please identify all costs associated with the Carne Energy Storage Agreement, Buena Vista 1 Battery Energy Storage System, and Buena Vista 1 Long Term Purchased Power Agreement that are currently recovered through riders, trackers, balancing accounts, deferred accounts, regulatory assets, or any other recovery mechanism, which EPE now proposes to include in base rates.	No
267	**STAFF 2-75**	**a**	Julissa Reza	Victor Martinez Rene Gonzalez	For each cost identified in response to the above, please provide: a) the current recovery mechanism;	No
268	**STAFF 2-75**	**b**	Julissa Reza	Victor Martinez Rene Gonzalez	b) the amounts recovered to date;	No
269	**STAFF 2-75**	**c**	Julissa Reza	Victor Martinez Rene Gonzalez	c) current outstanding balances;	No
270	**STAFF 2-75**	**d**	Julissa Reza	Victor Martinez Rene Gonzalez	d) amortization schedules;	No
271	**STAFF 2-75**	**e**	Julissa Reza	Victor Martinez Rene Gonzalez	e) balancing account activity;	No
272	**STAFF 2-75**	**f**	Julissa Reza	Victor Martinez Rene Gonzalez	f) deferred asset balances;	No
273	**STAFF 2-75**	**g**	Julissa Reza	Victor Martinez Rene Gonzalez	g) associated accounting journal entries;	No
274	**STAFF 2-75**	**h**	Julissa Reza	Victor Martinez Rene Gonzalez	h) FERC account classifications;	No
275	**STAFF 2-75**	**i**	Julissa Reza	Victor Martinez Rene Gonzalez	i) transition or rollover adjustments; and	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
276	**STAFF 2-75**	**j**	Julissa Reza	Victor Martinez Rene Gonzalez	j) all reconciliation workpapers supporting the proposed transfer to base rates.	No
277	**STAFF 2-76**	**a**	Cindy Prieto		Please identify all Advanced Metering System ("AMS") project costs proposed to be transitioned from the AMS Rider into base rates, including: a) total capital costs incurred;	No
278	**STAFF 2-76**	**b**	Cindy Prieto		b) AFUDC balances;	No
279	**STAFF 2-76**	**c**	Cindy Prieto		c) accumulated depreciation;	No
280	**STAFF 2-76**	**d**	Cindy Prieto		d) net book value;	No
281	**STAFF 2-76**	**e**	Cindy Prieto		e) and Test Period O&M expenses through the September 30, 2025 Base Period	No
282	**STAFF 2-77**		George Novela	Adrian Hernandez	Please provide all workpapers, accounting schedules, and supporting documentation demonstrating how AMS Rider-recovered costs were separated from costs proposed for future recovery in base rates.	No
283	**STAFF 2-78**	**a**	George Novela	Cindy Prieto	Please explain in detail the proposed ratemaking treatment for AMS Rider balances upon transition of AMS project costs into base rates, including: a) disposition of any remaining regulatory asset or liability balances;	No
284	**STAFF 2-78**	**b**	George Novela	Cindy Prieto	b) treatment of over- or under-recoveries;	No
285	**STAFF 2-78**	**c**	George Novela	Cindy Prieto	c) amortization treatment;	No
286	**STAFF 2-78**	**d**	George Novela	Cindy Prieto	d) and any proposed reconciliation adjustments.	No
287	**STAFF 2-79**		Manny Carrasco		Please identify all FERC accounts and subaccounts used to record AMS project costs, AMS Rider recoveries, AFUDC, depreciation expense, and AMS-related O&M expenses.	No
288	**STAFF 2-80**		George Novela		Please explain how EPE ensured that AMS project costs proposed for inclusion in base rates are not simultaneously being recovered through the AMS Rider or any other recovery mechanism.	No
289	**STAFF 2-81**		George Novela		For all CCN projects that are entering service and are being proposed for recovery in this proceeding, please list the projects, NMPRC Case Number, certificated project costs, and the project costs included for recovery in this proceeding.	No
289	**DAC 2-1**	**a**	Adrian Hernandez		Please refer to the Direct Testimony of Company Witness Adrian Hernandez, page 64, where it describes the alternative CCOS illustration prepared that moves all City/County customers into Rate 07. Please provide the following information for each group of customers that were moved for this CCOS illustration grouped by their rate class of origin for each month of the test year: a. Number of Customers	No
290	**DAC 2-1**	**b**	Adrian Hernandez		b. kWh Sales	No
291	**DAC 2-1**	**c**	Adrian Hernandez		c. Coincident Demand (kW)	No
292	**DAC 2-1**	**d**	Adrian Hernandez	Enedina Soto Rene Gonzalez	d. Non-Coincident Demand (kW).	No
293	**DAC 2-2**		Adrian Hernandez		Referring to the CCOS illustration that moves all City/County customers into Rate 07, please provide both the Unit Cost Analysis tables for this CCOS illustration similar to what is included in Exhibit MC-1 and provide the Cost of Service and CCOS Model similar to what was provided in response to Staff 1-03 in electronic executable format.	Yes
294	**DAC 2-3**		Adrian Hernandez		Please refer to Table AH-7 on page 65 of the Direct Testimony of Company Witness Adrian Hernandez. The last row in Table AH-7 shows percent for the unit label, but the number appears to be in numeric decimal format and not divided by 100 to convert to percent. If true, please provide a corrected Table AH-7. Also, the text on page 65 appears to overlap Table AH-7 and is cut off in the PDF document. Please provide a clean version of this page without missing or overlapping text	Yes
295	**DAC 2-4**		Manny Carrasco		Please explain the reasoning for choosing certain rate classes for a 2-phase rate change and not others?	No
296	**DAC 2-5**		Manny Carrasco		Company Witness Manuel Carrasco states "EPE recognizes that a 73.1% increase in base rate revenues in one step would place significant financial and affordability pressures on its residential customers". Please explain how the Company determined the percent increase threshold for base rate increases that would (or would not) place significant financial and affordability pressures on customers.	No
297	**DAC 2-6**		Enedina Soto		Please provide the calculations of the 4CP Average & Excess and 4CP demand allocation factors in electronic executable format and a detailed description of how each was calculated. Please include all source files with monthly rate class data in electronic executable format.	No
298	**DAC 2-7**		Rene Gonzalez	Manny Carrasco	How much of the annual costs of the Carne ESA and Santa Teresa ESA are currently being recovered in the RPS Cost Rider? Please provide the answer in dollars separated into demand and energy components (if applicable).	No
299	**DAC 2-8**		Rene Gonzalez	Manny Carrasco	Are the full costs of the Carne ESA and Santa Teresa ESA included in the RPS Cost Rider used for "Current Base Rates + Current Riders" section in Section C of Exhibit MC-2?	No
300	**DAC 2-9**		Manny Carrasco		Are the any costs of the Carne ESA and Santa Teresa ESA included in the RPS Cost Rider used for "Proposed Base Rates + Current Riders (AMS Charge Rolled Into Customer Charge)" section in Section C of Exhibit MC-2?	No
301	**DAC 2-10**		George Novela	Manny Carrasco Rene Gonzalez	What costs will continue to be collected in the RPS Cost Rider if Phase 2 rates were to be implemented as proposed by the Company? Provide a brief description for each cost item/resource that would continue to be collected in the RPS Cost Rider.	No
302	**DAC 3-1**	**a**	Steven Sierra		Compensation. Please provide the complete non-executive compensation benchmarking studies relied upon by EPE in preparing this rate case filing, including any study conducted by a third-party consultant. For each study provided, please provide: a. The full study report including peer group compensation, selection criteria applied to identify comparative companies, and data sources used.	No
303	**DAC 3-1**	**b**	Steven Sierra		b. Where multiple peer classes or size tiers were evaluated, the quantitative results, including median, 25th percentile, and 75th percentile compensation levels for each tier separately.	No
304	**DAC 3-1**	**c**	Steven Sierra		c. Documentation showing how EPE was evaluated against each selection criterion used to define comparative groups including but not limited to annual revenues, total assets, number of employees, and market capitalization and which peer class or tier EPE fell within by each criterion.	No
305	**DAC 3-1**	**d**	Steven Sierra		d. The rationale for the comparative group or peer class ultimately selected as the benchmark for setting salaries and other compensation, including any analysis of alternative peer groups considered.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
306	**DAC 3-1**	**e**	Steven Sierra		e. The current base salary for each employee position included in the rate case pro forma, the benchmark comparative level used for that position, and the percentile rank of EPE's salary relative to the benchmarking group.	No
307	**DAC 3-1**	**f**	Steven Sierra		f. The current incentive pay for each employee position included in the rate case pro forma, the benchmark comparative level used for that position, and the percentile rank of EPE's salary relative to the benchmarking group.	No
308	**DAC 3-1**	**g**	Steven Sierra		g. The current other compensation for each employee position included in the rate case pro forma, the benchmark comparative level used for that position, and the percentile rank of EPE's salary relative to the benchmarking group.	No
309	**DAC 3-2**	**a**	Steven Sierra		Compensation. Please provide the complete executive compensation benchmarking studies relied upon by EPE in preparing this rate case filing, including any study conducted by a third-party consultant. For each study provided, please provide: a. The full study report including peer group compensation, selection criteria applied to identify comparative companies, and data sources used.	No
310	**DAC 3-2**	**b**	Steven Sierra		b. Where multiple peer classes or size tiers were evaluated, the quantitative results, including median, 25th percentile, and 75th percentile compensation levels for each tier separately.	No
311	**DAC 3-2**	**c**	Steven Sierra		c. Documentation showing how EPE was evaluated against each selection criterion used to define comparative groups including but not limited to annual revenues, total assets, number of employees, and market capitalization and which peer class or tier EPE fell within by each criterion.	No
312	**DAC 3-2**	**d**	Steven Sierra		d. The rationale for the comparative group or peer class ultimately selected as the benchmark for setting salaries and other compensation, including any analysis of alternative peer groups considered.	No
313	**DAC 3-2**	**e**	Steven Sierra		e. The current base salary for each employee position included in the rate case pro forma, the benchmark comparative level used for that position, and the percentile rank of EPE's salary relative to the benchmarking group.	No
314	**DAC 3-2**	**f**	Steven Sierra		f. The current incentive pay for each employee position included in the rate case pro forma, the benchmark comparative level used for that position, and the percentile rank of EPE's salary relative to the benchmarking group.	No
315	**DAC 3-2**	**g**	Steven Sierra		g. The current other compensation for each employee position included in the rate case pro forma, the benchmark comparative level used for that position, and the percentile rank of EPE's salary relative to the benchmarking group.	No
316	**DAC 3-3**		Steven Sierra	Adrian Hernandez	Compensation. Excess Benefit Plans: Please identify each non-qualified benefit plan and provide the amount of each included in the revenue requirement separately for EPE and each affiliate or work group with costs allocated to EPE.	No
317	**DAC 3-4**		Steven Sierra		Compensation. For each metric in each short-term incentive plan, please show the target level and the amount actually paid for each metric, and the percentage of target the amount paid reflects, for each year 2021 through 2026.	No
318	**DAC 3-5**		Steven Sierra		Compensation. For each employee at EPE, please provide the total compensation paid, salary paid, short-term incentives paid, long-term incentives paid, other compensation paid, the amount for each type of compensation included in operating expense for ratemaking purposes, the amount capitalized and included in rate base. (No names, titles, or positions are needed for this response).	No
319	**DAC 3-6**		Steven Sierra		Compensation. For each employee with costs allocated to EPE, please provide the total compensation received in the test year, salary received, short-term incentives received, long-term incentives received, other compensation received, the amount for each type of compensation allocated to EPE, and the amount included in operating expense for ratemaking purposes, and the amount capitalized and included in rate base. (No names, titles, or positions are needed for this response).	No
320	**DAC 3-7**		Adrian Hernandez	Manny Carrasco	Revenue. Please identify the percentage of every dollar a residential customer pays EPE that goes towards company profits for the test year used in this case.	No
321	**DAC 3-8**		Legal		Legal Expenses. Regarding Ex. SAS-2 at page 2, row 9, please describe in detail the outside legal fees incurred to litigate NMSC Case No. S-1-SC-40286 (2020 Rate Case Remand Order Appeal, NMPRC Docket No. 20-00104-UT), (both total amount and amount included in the test year used in this case).	No
322	**CLC 1-1**		George Novela		Please provide copies of any agreements (including attachments, exhibits, amendments, addenda, memoranda of understanding, and other written revisions or clarifications) that EPE has entered into with potential large load customers as defined in the Company's testimony and proposed Rate Nos. 50 and 51, regardless of whether the large load customer is or will be located within EPE's New Mexico or Texas service area.	No
323	**CLC 1-2**		George Novela		Please provide copies of all correspondence relating to the agreements produced in response to Request for Production CLC 1-1, including correspondence internal to EPE amongst its employees, officers, owners, counsel, and consultants and correspondence between EPE and the potential clients and their agents and representatives, between EPE and entities involved in the designing, permitting or financing of the operations of the potential large load customers; correspondence between EPE and the entities that own or control land that might be used for the sites of the large load customers' operations; correspondence between EPE and entities that might be involved with or affected by the transmission and distribution facilities and services needed to provide electric utility service to the potential large load customers; and correspondence between EPE and federal, state, or local governmental or quasi-governmental entities or agencies that might be involved in authorizing or facilitating the development of the large load customers' facilities and electric generation, transmission, or distribution facilities and services used to serve the potential large load customers.	No
324	**CLC 1-3**		George Novela		To the extent not otherwise produced in response to Requests for Production CLC 1-1 and 1-2, please provide copies of all correspondence relating to potential electric utility service large load customers as defined in the Company's testimony and proposed Rate Nos. 50 and 51, regardless of whether that potential large load customer is or will be located within EPE's New Mexico or Texas service area and regardless of whether binding agreements regarding utility service have been reached. Your response should include, at minimum, correspondence internal to EPE amongst its employees, officers, owners, counsel, and consultants; correspondence between EPE and the representatives of the potential large load customers (including but not limited to draft agreements with attachments, exhibits, amendments, addenda, memoranda of understanding, and other written revisions or clarifications; correspondence between EPE and entities involved in the designing, permitting or financing of the operations of the potential large load customers); correspondence between EPE and the entities that own or control land that might be used for the sites of the large load customers' operations; correspondence between EPE and entities that might be involved with or affected by the transmission and distribution facilities and services needed to provide electric utility service to the potential large load customers; and correspondence between EPE or potential large load customers and federal, state, or local governmental or quasi-governmental entities or agencies that might be involved in authorizing or facilitating the development of the large load customers' facilities and electric generation, transmission, or distribution facilities and services to be used to serve the potential large load customers.	No
325	**CLC 1-4**		Jim Schichtl	George Novela	If not produced in response to Requests for Production CLC 1-2 through CLC 1-3, please provide copies of any agreements (including attachments, exhibits, amendments, addenda, memoranda of understanding, and other written revisions or clarifications) and all correspondence relating to the potential large load customer who has requested "80 MW of firm load, with the prospect of significantly large MW commitments in the future" identified in the Direct Testimony of James Schichtl at page 47, lines 9-12.	No
326	**CLC 1-5**		Omar Gallegos		Please provide a copy of every FERC cluster study that evaluated transmission service and/or transmission system upgrades in connection with each investment for which EPE is seeking cost recovery for the first time in this proceeding (i.e., facilities not included in rate base in NMPRC Case No. 20-00104-UT), including amendments, revisions, or modifications to each such study.	No
327	**CLC 1-6**		Omar Gallegos		For each EPE procurement of energy or capacity from a third party developer and for each EPE procurement of energy or capacity from a self-built project that EPE has selected to serve New Mexico and/or Texas jurisdictional customers but which was not in commercial operation as of the end of the base period in this case, September 30, 2025, please provide a copy of every FERC cluster study that evaluated transmission service and/or transmission system upgrades in connection with each procurement, including amendments, revisions, or modifications to each such study.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	**Intervenor/ Set**	**Subpart**	**Sponsor**	**Co-Sponsor(s)**	**Question**	**Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)**
328	**CLC 1-7**		Omar Gallegos		Provide copies of all Large Generator Interconnection Agreements that EPE has executed at any time with any renewable energy producer from which EPE purchased or otherwise obtained renewable energy and/or capacity during the base period of October 1, 2024 through September 30, 2025, including attachments, exhibits, amendments, addenda, memoranda of understanding, and other written revisions or clarifications, and copies of contractual agreements or terms that were subsequently superseded.	No
329	**CLC 1-8**		Omar Gallegos		Provide copies of all Large Generator Interconnection Agreements that EPE has executed at any time with any renewable energy producer from which EPE presently has binding a purchased power agreement and/or energy storage agreement but which had not reached its Commercial Operation Date (COD) by the end of the base period in this case, September 30, 2025. Include attachments, exhibits, amendments, addenda, memoranda of understanding, and other written revisions or clarifications, and copies of contractual agreements or terms that were subsequently superseded.	No
330	**CLC 1-9**		Omar Gallegos		Please provide a copy of every Distribution Expansion Plan prepared by EPE since 2010, as well as any amendments, modifications, revisions, or updates to each such plan.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
331	**CLC 1-10**		Omar Gallegos		Please provide a copy of every System Expansion Plan prepared by EPE since 2010, as well as any amendments, modifications, revisions, or updates to each such plan.	No
332	**CLC 1-11**		Omar Gallegos		Please provide a copy of every long-term purchased power agreement (PPA) or energy storage agreement (ESA) that EPE has entered into that has not been presented to the NMPRC for approval in a docketed proceeding, including attachments, exhibits, amendments, addenda, memoranda of understanding, and other written revisions or clarifications. Your answer should include, among other agreements, EPE's contracts regarding the Milagro Project, for which the short-term procurement of renewable energy was approved by the Commission in NMPRC Case No. 24-00176-UT, but in which docket the relevant agreement or agreements were not entered into evidence.	No
333	**CLC 1-12**		Omar Gallegos		Please provide copies of every written document that has amended, modified, clarified, or explicated each long-term purchased power agreement (PPA) or energy storage agreement (ESA) that EPE has entered into that previously has been presented to the NMPRC for approval in a docketed proceeding, regardless of whether such document has been designated as a contractual amendment or otherwise formally incorporated into the original agreement.	No
334	**CLC 1-13**		Enedina Soto		Please refer to the spreadsheet labeled Staff 01-27_Attachment 01 provided by EPE in response to Interrogatory and Request for Production Staff 1-27 of Staff's First Set of Discovery Requests to EPE. Produce copies of documents that record EPE's hourly system-wide and New Mexico jurisdictional peak loads for each hour from January 1, 2020 through December 31, 2025.	No
335	**CLC 1-14**		Victor Martinez		Referring to EPE's response to Interrogatory and Request for Production Staff 1-29, provide the calculations that resulted in the "Peak Contribution (MW)" values stated for the Buena Vista 1, Santa Teresa, and Carne battery energy storage systems ("BESS") stated in that response. Also provide any alternative calculations of the capacity contributions of each of those facilities that EPE has performed or has had others perform, identifying the source of the document.	No
336	**CLC 1-15**		Victor Martinez		Provide documentation of the energy production, battery storage charging status, battery storage charge level, battery storage discharge, and deliveries of energy from the Buena Vista 1 solar facility directly to EPE's system on an hourly basis, or on 30-minute, 15-minute or any other smaller interval basis reported to or recorded by EPE since that facility began producing energy, including the test period prior to the contractual Commercial Operation Date.	No
337	**CLC 1-16**		Manny Carrasco	Jim Schictl	Please provide the workpapers and other documents that support the New Mexico and Texas residential bill comparisons set forth in bar chart format in Exhibit JS-01 of the Direct Testimony of James Schichtl.	No
338	**CLC 1-17**		Manny Carrasco	Jim Schictl	Referring to Exhibit JS-01 of the Direct Testimony of James Schichtl, please provide any analyses that EPE has performed, in bar chart form or otherwise, of Texas residential customer monthly bills under the rates approved in the final order of PUCT Docket No. 57568.	No
339	**CLC 1-18**		George Novela		Please refer to Table GN-1 on page 19 of the Direct Testimony of George Novela and provide (a) documentation supporting the stated annual system peak MW and year-over-year changes and (b) documentation of the New Mexico jurisdictional load at the time of annual system peak during the years 2020 through 2025.	No
340	**CLC 1-19**	**a**	George Novela		Please refer to the Direct Testimony of George Novela at pages 56 through 58 and Exhibit GN-3; Workpaper A-3, Adjustment No. 10; and the Direct Testimony of Julissa I. Reza at pages 8 through 9 and provide: (a) copies of any requests for proposals or other solicitations for legal counsel and expert witnesses for the preparation and presentation of this New Mexico general rate proceeding;	No
341	**CLC 1-19**	**b**	George Novela		(b) copies of any responses to EPE's solicitations to the requests identified in your response to Request for Production CLC 1-19;	No
342	**CLC 1-19**	**c**	George Novela		(c) copies of any proposals or cost estimates received by EPE in connection with potential legal or expert consulting services in connection with this rate case;	No
343	**CLC 1-19**	**d**	George Novela		(d) copies of correspondence between EPE and its potential and selected counsel and consultants or expert witnesses regarding the scope and estimated cost of their services in this proceeding;	No
344	**CLC 1-19**	**e**	George Novela		(e) copies of all invoices or billing statements for legal or consulting services in connection with this case that EPE has received, including detailed daily statements showing the time spent by each employee of the law firm or consulting firm and that person's hourly billing rates; and	No
345	**CLC 1-19**	**f**	George Novela		(f) copies of records of EPE's remittance payments for each invoice or billing statement received. Please recall that for this discovery request, like all others, is continuous and EPE is obligated to update its response in a timely and complete manner.	No
346	**CLC 1-20**		George Novela		Please refer to the Direct Testimony of George Novela at pages 56 through 58 and Exhibit GN-3; the Direct Testimony of Julissa I. Reza at pages 8 through 9, and Workpaper A-3, Adjustment No. 10, and provide copies of all estimates, bids or proposals, and other documents that support EPE's request for $104,800 of "Other" expenses for the present rate case other than "Outside Legal Services" and "Outside Consulting." Please recall that for this discovery request, like all others, is continuous and EPE is obligated to update its response in a timely and complete manner.	No
347	**CLC 1-21**		N/A		Please provide copies of any estimates that EPE has made of the amount of time that attorneys employed by the Company and other EPE employees and officers will spend on this rate proceeding, including actual time spent to date and projections of future time that likely will be devoted to this general rate proceeding. Please recall that for this discovery request, like all others, is continuous and EPE is obligated to update its response in a timely and complete manner.	No
348	**CLC 1-22**		N/A		Referring to your response to Request for Production CLC 1-21, if any of EPE's employees and officers who in any manner have been involved in the preparation of EPE's rate application in this Case No. 25-00082-UT, in the preparation and presentation of EPE's workpapers for its application, in the development and preparation of discovery responses, and in the development of supplemental testimony, rebuttal testimony, hearing testimony, hearing exhibits, or legal pleadings and filings submit itemized timesheets as part of their ordinary job responsibilities or specifically in conjunction with litigation or regulatory proceedings, provide copies of such timesheets. Please recall that for this discovery request, like all others, is continuous and EPE is obligated to update its response in a timely and complete manner.	No
349	**CLC 1-23**		Steven Sierra		Please refer to the Direct Testimony of Steven A. Sierra at pages 23 through 24 and Workpaper A-3, pages 1 through 236 of 236. Produce legible copies of the images of media activities included throughout that workpaper and audio, video, and/or audio/video files for each advertisement included in EPE's claimed base period Advertising Expense.	Yes
350	**CLC 1-24**		Richard Gonzalez		Please refer to the Direct Testimony of Richard S. Gonzalez at page 11 and Table RSG-3 and provide documentation supporting each equity infusion, including but not limited to relevant board resolutions and evidence of funds transfers.	No
351	**CLC 1-25**		Richard Gonzalez		Please refer to the Direct Testimony of Richard S. Gonzalez at pages 12 through 15 and Schedule G-1. Provide the Schedule G-01, Workpaper cited in Footnote 1 of Schedule G-01.	No
352	**CLC 1-26**		Victor Martinez		Please refer to the Direct Testimony of Victor Martinez at page 4 and provide copies of EPE's Energy Resources Policies and Procedures as of the 2019 base period in EPE's last general rate proceeding, NMPRC Case No. 20-00104-UT, and each subsequent revision to date.	No
353	**CLC 1-27**	**a**	Victor Martinez		Please refer to the Direct Testimony of Victor Martinez at Exhibit VM-2 and provide: (a) the workpapers including executable spreadsheets used to produce those graphs;	No
354	**CLC 1-27**	**b**	Victor Martinez		(b) the source information for developing each those spreadsheets;	No
355	**CLC 1-27**	**c**	Victor Martinez		(c) the same source information used in Exhibit VM-2 for the month of September 2024;	No
356	**CLC 1-27**	**d**	Victor Martinez		(d) the same source information used in Exhibit VM-2 for the months of June through September 2025 (i.e., part of the base period of the present case);	No
357	**CLC 1-27**	**e**	Victor Martinez		(e) any analyses that EPE has done of the same issues using 2025 data (i.e., load duration curve for the top 100 native system load hours, typical summer weekday system load profile, net load (duck curve)), whether or not in a similar graphical format.	No
358	**CLC 1-28**		Omar Gallegos	Victor Martinez	Referring to the Direct Testimony of Victor Martinez at Exhibit VM-2 and your response to Request for Production CLC 1-27, provide any analysis that EPE has performed of its net load (inclusive of renewable energy production) once the resources that it is proposing to bring on line before the summer of 2027, including but not limited to the Carne Project and the Santa Teresa Project for which EPE is seeking rate recovery in this proceeding.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
359	**CLC 1-29**		Victor Martinez	Omar Gallegos	Referring to the Direct Testimony of Victor Martinez at Exhibit VM-2 and your response to Request for Production CLC 1-27, provide any analysis that EPE has performed of its net load (inclusive of renewable energy production) once the resources that it is Request for Production CLC 1-27, provide any analysis that EPE has performed of its net load (inclusive of renewable energy production and battery storage resources) once the resources that it is proposing to bring on line in 2026, including but not limited to the Carne Project and the Santa Teresa Project for which EPE is seeking rate recovery in this proceeding.	No
360	**CLC 1-30**		Victor Martinez		Please refer to the Direct Testimony of Victor Martinez at pages 16 through 18 and provide all documents showing how the Buena Vista 1 battery energy storage system ("BESS") has been deployed since it entered service in 2023 (including any testing prior to reaching the agreed-upon Commercial Operation Date in the summer of 2023) not produced in response to Request for Production CLC 1-15. Your response should include communications and notices between EPE and the owner or operator of the Buena Vista 1 BESS regarding charging, discharging, BESS facility and capacity availability or unavailability, and round-trip energy losses. Your response also should include internal documentation of how and when EPE determined to call upon the BESS capacity and how EPE determined too allocate BESS capacity and BESS energy discharges to the New Mexico and Texas jurisdictions, both in real time and for rate recovery purposes.	No
361	**CLC 1-31**		Victor Martinez		Referring to the Direct Testimony of Victor Martinez at pages 16 through 18 and your responses to Requests for Production CLC 1-15 and 1-30, please provide documentation of EPE's recovery of costs associated with the Buena Vista 1 BESS from its Texas retail customers since that facility was first operated.	No
362	**CLC 1-32**		Victor Martinez		Referring to the Direct Testimony of Victor Martinez at pages 16 through 18 and your responses to Requests for Production CLC 1-15 and 1-30, please provide EPE's direct testimony and schedules initially presented by EPE in its Texas general rate case, PUCT Docket No. 57568, in which EPE proposed the allocation factor or factors for Buena Vista I BESS costs incurred prior that rate case.	No
363	**CLC 1-33**		Victor Martinez		Referring to the Direct Testimony of Victor Martinez at pages 16 through 18 and your responses to Requests for Production CLC 1-15 and 1-30, please provide EPE's direct testimony and schedules initially presented by EPE in its Texas general rate case, PUCT Docket No. 57568, in which EPE proposed the allocation factor or factors for Buena Vista I BESS costs to be incurred prospectively.	No
364	**CLC 1-34**		Victor Martinez		Referring to the Direct Testimony of Victor Martinez at pages 16 through 18 and your responses to Requests for Production CLC 1-15 and 1-30, please provide documentation of the allocation factor or factors authorized by the PUCT in PUCT Docket No. 57568 for recovery of Buena Vista I BESS costs incurred prior to that rate case that were utilized by EPE in calculating its compliance tariffs pursuant to that final order.	No
365	**CLC 1-35**		Victor Martinez		Referring to the Direct Testimony of Victor Martinez at pages 16 through 18 and your responses to Requests for Production CLC 1-15 and 1-30, please provide documentation of the allocation factor or factors authorized by the PUCT in PUCT Docket No. 57568 for recovery of prospective Buena Vista I BESS costs that were utilized by EPE in calculating its compliance tariffs pursuant to that final order.	No
366	**CLC 1-36**		Victor Martinez		Please refer to the Direct Testimony of Victor Martinez at page 35, provide the supporting documentation and workpapers for Figure VM-1.	No
367	**CLC 1-37**		Victor Martinez		Please refer to the Direct Testimony of Victor Martinez at page 35, provide the data and supporting documentation for the same information graphed in Figure VM-1 for (a) the first nine months of 2025 and (b) all of 2025.	No
368	**CLC 1-38**		N/A		Please provide EPE's "costing model" for all days from April 2023 through March 2026.	No
369	**CLC 2-1**		Steven Sierra		Please and Schedule H-1, pages 1 and 2 of 4, lines 16 through 30, and provide detailed supporting documentation on a monthly basis for each FERC Account line item relating to the $110.5 million of Total Company non-fuel Palo Verde Nuclear Generation Station (PVNGS) operations and maintenance (O&M) expenses "including A&G costs," that Mr. Martinez testifies about.	No
370	**CLC 2-2**		Victor Martinez	Cindy Prieto	Referring to Exhibit CSP-1 of the Direct Testimony of Cynthia S. Prieto and the Direct Testimony of Victor Martinez at pages 29 through 33, provide detailed, itemized records for the $218,168,608 of Palo Verde Improvements from January 1, 2020 through September 30, 2025, identified as "GP009" on line 226 of Exhibit CSP-1 of the Direct Testimony of Cynthia S. Prieto, including but not limited to the nature of the undertaking, its cost, and the date upon which work on the improvement, repair, or replacement commenced. Also provide similarly detailed, itemized records for each of the adjustments made on line 226.	No
371	**CLC 2-3**		Adrian Hernandez		Provide EPE's calculations and workpapers reflecting the derivation of an allocation factor of 13.63647% to the New Mexico jurisdiction for all PVNGS capital additions from January 1, 2020 through October 31, 2025, shown on line 226 of Exhibit CSP-1 of the Direct Testimony of Cynthia S. Prieto,	No
372	**CLC 2-4**		Victor Martinez	Jeff Hughes	Please refer to the Direct Testimony of Victor Martinez at page 51, lines 7 through 21 and provide EPE's analysis of the capacity deferment value of extending the life of Newman Unit 3, including all input data and executable copies of the spreadsheets used by EPE.	No
373	**CLC 2-5**		Victor Martinez	Jeff Hughes	Referring to the Direct Testimony of Victor Martinez at page 51, provide copies of all internal analyses of engineering or operational alternatives to the work performed on Newman Unit 3 in 2023, as well as analyses of costs and analyses of benefits.	No
374	**CLC 2-6**		Victor Martinez	Jeff Hughes	Referring to the Direct Testimony of Victor Martinez at page 51, provide copies of all EPE requests for external analyses of options and alternatives for addressing the forced outage of Newman Unit 3 in 2023, including analyses of costs for each option or alternative and any analyses of benefits; copies of responses to EPE's requests relating to options and alternatives; and correspondence and communications regarding such requests for external analyses.	No
375	**CLC 2-7**		Victor Martinez	Jeff Hughes	Referring to the Direct Testimony of Victor Martinez at page 51, provide copies of any bids or proposals obtained by EPE for undertaking repairs and improvements on Newman Unit 3 in 2023m as week as any bids or proposals for potential alternatives to the work that EPE chose to have performed.	No
376	**CLC 2-8**		Victor Martinez	Jeff Hughes	Referring to the Direct Testimony of Victor Martinez at pages 51 to 52, provide documents relating to outage of Newman Unit 3 that EPE had planned for later in 2023, including but not limited to engineering studies and budget documents.	No
377	**CLC 2-9**	**1**	Adrian Hernandez		Please refer to Table AH-7 on page 65 of the Direct Testimony of Adrian Hernandez, as corrected in EPE's Notice of Errata and Filing of Replacement Exhibits filed on April 15, 2026, and Exhibit AH-2 referenced therein and provide: (1) the calculations and workpapers that support the figures stated on that Tabel AH-3; and	No
378	**CLC 2-9**	**2**	Adrian Hernandez		(2) the workpapers and source data that support Exhibit AH-2. (Note that the excel spreadsheet for Exhibit AH-2, produced as by EPE in response to Staff Interrogatory and Request for Production 1-1, in a folder labeled STAFF 01-01_Attachment 12 within a folder labeled STAFF 01-01 Attachments contains a "Read-only" spreadsheet that includes only the bar chart with no data or references to data.)	Yes
379	**CLC 2-10**		Adrian Hernandez		Please refer to Exhibit AH-1 attached to the Direct Testimony of Adrian Hernandez and provide the historical information used to develop those bar charts. (Note that the excel spreadsheet for Exhibit AH-1, produced as by EPE in response to Staff Interrogatory and Request for Production 1-1, in a folder labeled STAFF 01-01_Attachment 12 within a folder labeled STAFF 01-01 Attachments contains a "Read-only" spreadsheet that includes only the bar chart with no data or references to data.)	No
380	**CLC 2-11**		Richard Gonzalez		Please refer to the Moody's Ratings opinion produced in response to Interrogatory and Request for Production Staff 1-2 labeled STAFF 01-02_Attachment 06 and produce a copy of the capital plan update released during the first quarter of 2026 that is mentioned on page 1 of that opinion.	No
381	**CLC 2-12**		Richard Gonzalez		Please provide copies of every credit rating report or update or other financial analyst report concerning EPE issued after those produced in response Interrogatory and Request for Production Staff 1-2.	No
382	**CLC 2-13**		Jennifer Nelson		Please produce a copy of the EPE 2024 Corporate Sustainability Report cited in footnote 113 of the Direct Testimony of Jennifer E. Nelson, at page 97.	No
383	**CLC 2-14**		Jennifer Nelson		Referring to EPE's response to Request for Production CLC 2-13, above, provide copies of any EPE Corporate Sustainability Reports or similar documents issued by EPE after the 2024 report cited by Jennifer E. Nelson.	No
384	**CLC 2-15**		Jennifer Nelson		Please refer to the Direct Testimony of Jennifer E. Nelson at page 97, line 15 through page 98, line 4 and footnote 114. Produce the data relating to the percentage of net generation from nuclear plants of each of Ms. Nelson's proxy group utilities to which that testimony refers and which is not included in the Figure JEN-16 to which her testimony and footnote 114 refer.	No
385	**CLC 2-16**		Julissa Reza		Please refer to Workpaper A-03, Adjustment No. 10 and the line items for FERC Account No. 928 on Schedule A-03 for the Total Company and New Mexico jurisdictions and provide itemized general ledger entries and invoices that support each amount shown as Regulatory Commission Expenses during the base period, as well as for EPE's proposed adjustments.	Yes

SUPPLEMENTAL DISCOVERY

Line No (a)	Intervenor/ Set (b)	Subpart (c)	Sponsor (d)	Co-Sponsor(s)	Question (e)	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8) (f)
386	**CLC 2-17**	**a**	Julissa Reza	Adrian Hernandez	Please refer to Workpaper A-03, Adjustment No. 10 and the line items for FERC Account No. 928 on Schedule A-03 for the Total Company and New Mexico jurisdictions and provide: (a) references to EPE's jurisdictional cost allocators for Regulatory Commission Expenses in FERC Account No. 928 and	Yes
387	**CLC 2-17**	**b**	Adrian Hernandez		(b) EPE's calculations supporting the jurisdictional cost allocation factors proposed in this proceeding.	No
388	**CLC 2-18**	**a**	Steven Sierra		Please refer to Exhibit SAS-1 attached to the Direct Testimony of Steven A. Sierra and Workpaper A-03 for the Total Company and the New Mexico jurisdiction and provide (a) itemized general ledger entries and invoices that support each amount shown as Outside Services Employed during the base period, as well as for EPE's proposed adjustments, if any; and	No
389	**CLC 2-18**	**b**	Steven Sierra	Adrian Hernandez	(b) EPE's calculations supporting the jurisdictional cost allocation factors proposed in this proceeding for FERC Account 923 Outside Services Employed.	No
390	**CLC 2-19**	**a**	Victor Martinez		Please refer to the Direct Testimony of Victor Martinez at pages 29 through 33 and provide itemized records of individual Palo Verde Nuclear Generating Station (PVNGS) capital additions since January 1, 2020 that: (a) cost EPE, on a total company basis, $1,000,000 or more for generation-related additions or improvements or $500,000 or more for transmission-related additions or improvements during the period from January 1, 2020 through December 26, 2022;	No
391	**CLC 2-19**	**b**	Victor Martinez		(b) cost EPE, on a total company basis, $2,000,000 or more for generation-related additions, improvements, repairs or replacements or $1,000,000 or more for transmission-related additions, improvements, repairs or replacements from December 27, 2022 through October 31, 2025.	No
392	**CLC 2-20**	**a**	Victor Martinez		Please refer to the Direct Testimony of Victor Martinez at page 42, lines 4 through 5 and provide the following documents: (a) EPE's detailed calculations resulting in an O&M cost of $2.63 per MWh for the PVNGS Water Resources Facility; and	No
393	**CLC 2-20**	**b**	Victor Martinez		(b) corresponding data about individual O&M cost components and, if available, calculations of the PVNGS Water Resource Facility O&M costs on a per-MWh basis for each year from 2019 through 2025. Consulting."	No
394	**CLC 2-21**		Legal		Please provide copies of any estimates that EPE has made of the amount of time that attorneys employed by the Company and other EPE employees and officers will spend on this rate proceeding, including actual time spent to date and projections of future time that likely will be devoted to this general rate proceeding. Please recall that for this discovery request, like all others, is continuous and EPE is obligated to update its response in a timely and complete manner.	No
395	**CLC 2-22**		Victor Martinez		Please refer to the Direct Testimony of Jeffery M. Hughes at page 46, lines 3 through 8 and the Direct Testimony of Victor Martinez at page 50, line 13 through page 51, line 21, which state that the benefit of extending the useful life of Newman Unit 3 for an additional five years is approximately $10.6 million in deferred capital costs. Provide the analysis performed by Energy Resources to "determine the capacity deferment value" of extending the service life of Newman Unit 3, including all input data and assumptions.	No
396	**CLC 2-23**		Jeff Hughes	Victor Martinez	Referring to your response to Request for Production CLC 2-22, provide copies of any analyses that EPE conducted to assess alternatives to the work it chose to do on Newman Unit 3 and the economic and operational costs and benefits of any alternatives considered by EPE.	No
397	**DAC 4-1**		Manny Carrasco		Please provide the rate design model used to develop the proposed Phase 1 and Phase 2 rates in executable electronic format with formulae intact. If not self-contained in the same file, please provide any and all workpapers used for rate design in executable electronic format.	No
398	**DAC 4-2**		Rene Gonzalez	Manuel Carrasco	Please provide a table showing the assumed annual number of Rate 7 customers and annual kWh taking service under each Rate 7 option (Standard and Optional Time of Day Rate) for the base period and the test year period.	No
399	**DAC 4-3**	**a**	Rene Gonzalez		Please provide the following historical data for Rate 3 and Rate 7 by month for 2018 through 2025: A. Number of Customers	No
400	**DAC 4-3**	**b**	Rene Gonzalez		B. kWh Sales	No
401	**DAC 4-3**	**c**	Rene Gonzalez		C. kW Billing Demand	No
402	**DAC 4-3**	**d**	Enedina Soto		D. kW Non-Coincident Demand	No
403	**DAC 4-3**	**e**	Enedina Soto		E. kW Coincident Demand	No
404	**DAC 4-4**	**a**	Rene Gonzalez	Enedina Soto	Please provide the following data for Rate 3 and Rate 7 by month for the Base Year and the Test Year: A. Number of Customers	No
405	**DAC 4-4**	**b**	Rene Gonzalez		B. kWh Sales	No
406	**DAC 4-4**	**c**	Rene Gonzalez		C. kW Billing Demand	No
407	**DAC 4-4**	**d**	Enedina Soto		D. kW Non-Coincident Demand	No
408	**DAC 4-4**	**e**	Enedina Soto		E. kW Coincident Demand	No
409	**DAC 4-5**		Jim Schichtl		Regarding the testimony of James A. Schichtl at 17:2-15 where Mr. Schichtl states a "reasonable ROE and capital structure are essential to enable EPE to continue investing at the pace the Company deems necessary to meet its goals". Please identify the goals Mr. Schichtl is referring to.	No
410	**DAC 4-6**		Richard Gonzalez		Refer to EPE's General Diversification Plan (NMPRC Case No. 19-00234-UT Certificate of Stipulation, Stipulation Ex. B at 6) where EPE states "[a]s a part of the IIF umbrella, the IIF Investors (who are the indirect limited partners in each of the three master partnerships) constitute the investors providing capital for IIF US 2's activities." Please identify the entity responsible for approving all equity investments and the source of those funds.	No
411	**DAC 4-7**		Jim Schichtl		Please state whether EPE, its parent company Infrastructure Investments Fund ("IIF"), its holding company Sun Jupiter Holdings LLC, or ultimate parent J.P. Morgan Chase & Co. have any equity interest, financial stake, or operational role in Project Jupiter or its associated power microgrid.	No
412	**DAC 4-8**		Jim Schichtl		Please identify all current or former employees, officers, or board members of EPE, Sun Jupiter Holdings LLC, IIF, or J.P. Morgan who currently serve on the board of directors, management team, or advisory board for STACK Infrastructure, Oracle, or any Project Jupiter-related entity.	No
413	**DAC 4-9**		Richard Gonzalez		Please identify all utilities that IIF, or its subsidiary or other affiliated interests, own, hold, or otherwise control, and their current ROEs and capital structure and when they were awarded.	No
414	**DAC 4-10**		Richard Gonzalez		Refer to EPE's Final Stipulated Regulatory Commitments (NMPRC Case No. 19-00234-UT Certificate of Stipulation, Stipulation Ex. A at ¶ 27). Please identify each instance where EPE's Board of Directors did not approve the payment of dividends.	No
415	**DAC 4-11**		George Novela		Refer to EPE's Final Stipulated Regulatory Commitments (NMPRC Case No. 19-00234-UT Certificate of Stipulation, Stipulation Ex. A at ¶¶ 21-22). Please identify the transaction costs (including but not limited to: IIF US 2 time and expenses; EPE change-of-control payments; any tax impact as a result of the Transaction; certain executive severance costs related to the Transaction; and third-party costs, including Stipulation Exhibit A bank advisors, external legal advisors, rating agencies, expert witnesses and consultants in each case paid to advance or consummate the transaction, and goodwill associated with the transaction) and the separate accounts where the transaction costs were recorded.	No
416	**STAFF 3-1**	**a**	George Novela	Jim Schichtl	Please provide EPE's definition of the term "affordability" as the term relates to public utility rates regulated by the New Mexico Public Regulation Commission. In doing so, a. Provide all workpapers, analysis, research, or other materials that supports EPE's definition of affordability.	No
417	**STAFF 3-1**	**b**	George Novela	Jim Schichtl	b. If this is not available, please explain the basis for EPE's definition of affordability related to public utility rates regulated by the New Mexico Public Regulation Commission.	No
418	**STAFF 3-2**	**a**	George Novela	Jim Schichtl	Do you contend that affordability as you have defined the term above is relevant to a rate case before the New Mexico Public Regulation Commission? If your answer is in the affirmative, please: a.Explain in detail how affordability is relevant and how affordability is taken into account in the evaluations and calculations that are performed as part of a rate case before the Commission.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
419	**STAFF 3-2**	**b**	George Novela	Jim Schichtl	b .Provide any previous testimony that was submitted by any member of EPE that addresses the issue of affordability in a rate case before the Commission.	No
420	**STAFF 3-2**	**c**	George Novela	Jim Schichtl	c.Identify all previous recommended decisions or final orders of the Commission that you contend supports your answer.	No
421	**STAFF 3-2**	**a**	George Novela	Jim Schichtl	If your answer is not affirmative, please: a. Explain why EPE does not believe that it is relevant to take affordability, as defined, into account in the evaluations and calculations that are performed as part of a rate case before the Commission.	No
422	**STAFF 3-3**	**a**	Rene Gonzalez	George Novela	Regarding public utility rates for low-income customers, a. Provide EPE's definition of low-income customer, including both EPE's definition of low-income customer in New Mexico generally as well as in EPE's service area specifically.	No
423	**STAFF 3-3**	**b**	Manny Carrasco	George Novela	b. Has EPE evaluated any alternatives to reduce low-income customer bills besides the proposal included in the Company's Application in this case, whether in New Mexico more generally or in EPE's service area specifically? If yes, please provide any calculations, assumptions, and workpapers. If not, please explain why not.	No
424	**STAFF 3-3**	**c**	Manny Carrasco	George Novela	c. Has EPE performed any analysis on the ability of low-income customers to shift load to off-peak period, whether in New Mexico more generally or in EPE's service area specifically? If yes, provide that analysis. If no, explain why not.	No
425	**STAFF 3-3**	**d**	Manny Carrasco		d. Identify how EPE anticipates low-income customers should participate in time-of-day rates generally (not specific to EPE's proposed rates).	No
426	**STAFF 3-4**	**a**	Rene Gonzalez		Please explain EPE's decisions regarding the methodology selected by the Company to reduce low-income customer bills. a. Why did EPE choose the methodology it has presented in this case, specifically the Low-Income Rider?	No
427	**STAFF 3-4**	**b**	Rene Gonzalez		b. Provide data, workbooks, studies, and analysis supporting this decision.	No
428	**STAFF 3-4**	**c**	Rene Gonzalez		c. What alternative methods did EPE consider?	No
429	**STAFF 3-4**	**d**	Rene Gonzalez		d. Why were they rejected for the chosen methodology?	No
430	**STAFF 3-4**	**e**	Rene Gonzalez		e. If EPE did not consider alternative methods, why did EPE make this decision?	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
431	**STAFF 3-5**	**a**	George Novela		For EPE's Residential Customers, please answer the following questions: a. What level of bill increase does EPE believe its customers can afford?	No
432	**STAFF 3-5**	**b**	George Novela		b. How did EPE determine the answer to 3-5(a)?	No
433	**STAFF 3-5**	**c**	George Novela		c.Would any cost above the amount, or level of increase, indicated in EPE's response to 3-5(a) be unaffordable?	No
434	**STAFF 3-5**	**d**	George Novela		Would any cost at or below the amount, or level of increase, indicated in EPE's response to 3-5(a) be affordable?	No
435	**STAFF 3-5**	**e**	George Novela		What options has EPE considered to mitigate the impacts of affordability for customers who do not qualify for the low-income rider?	No
436	**STAFF 3-6**	**a**	George Novela		For EPE's Low-Income Residential Customers, please answer the following questions: a. What level of bill increase does EPE believe its customers can afford?	No
437	**STAFF 3-6**	**b**	George Novela		b. How did EPE determine the answer to 3-6(a)?	No
438	**STAFF 3-6**	**c**	George Novela		c. Would any cost above the amount, or level of increase, indicated in EPE's response to 3-6(a) be unaffordable?	No
439	**STAFF 3-6**	**d**	George Novela		d. Would any cost at or below the amount, or level of increase, indicated in EPE's response to 3-6(a) be affordable?	No
440	**STAFF 3-6**	**e**	George Novela		e.What options has EPE considered to mitigate the impacts of affordability for these customers?	No
441	**STAFF 3-7**	**a**	George Novela		For EPE's Commercial and Industrial Customers, please answer the following questions: a. What level of bill increase does EPE believe its customers can afford?	No
442	**STAFF 3-7**	**b**	George Novela		b. How did EPE determine the answer to 3-7(a)?	No
443	**STAFF 3-7**	**c**	George Novela		c. Would any above the amount, or level of increase, indicated in EPE's response to 3-7(a) be unaffordable?	No
444	**STAFF 3-7**	**d**	George Novela		d. Would any cost at or below the amount, or level of increase, indicated in EPE's response to 3-7(a) be affordable?	No
445	**STAFF 3-7**	**e**	George Novela		e. What options has EPE considered to mitigate the impacts of affordability for these customers?	No
446	**STAFF 3-8**	**a**	Cindy Prieto		For EPE's Residential customers, please answer the following questions: a. Provide a spreadsheet detailing the number of residential customers in arrears on a month-to-month basis dating back to 2020.	No
447	**STAFF 3-8**	**b**	Cindy Prieto		b. Provide a spreadsheet detailing the number of residential customers in arrears on a at year end basis for each year dating back to 2020 and the number of customers currently in arrears as of the time of this request.	No
448	**STAFF 3-9**	**a**	Cindy Prieto		For EPE's commercial customers, please answer the following questions: a. Provide a spreadsheet detailing the number of commercial customers in arrears on a month-to-month basis dating back to 2020.	No
449	**STAFF 3-9**	**b**	Cindy Prieto		b. Provide a spreadsheet detailing the number of commercial customers in arrears on a at year end basis for each year dating back to 2020 and the number of customers currently in arrears as of the time of this request.	No
450	**STAFF 3-10**	**a**	Cindy Prieto		For EPE's customers not included in response to questions 3-8 and 3-9 , please answer the following questions: a. Provide a spreadsheet detailing the number of customers, by customer class, in arrears on a month-to-month basis dating back to 2020.	No
451	**STAFF 3-10**	**b**	Cindy Prieto		b.Provide a spreadsheet detailing the number of customers, by customer class, in arrears on a at year end basis for each year dating back to 2020 and the number of customers currently in arrears as of the time of this request.	No
452	**STAFF 3-11**	**a**	George Novela		Please provide EPE's definition of the term "energy burden" as the term relates to public utility rates regulated by the New Mexico Public Regulation Commission. In doing so, a. Provide all workpapers, analysis, research, or other materials that supports EPE's definition of affordability.	No
453	**STAFF 3-11**	**b**	George Novela		b. If this is not available, please explain the basis for EPE's definition of energy burden related to public utility rates regulated by the New Mexico Public Regulation Commission.	No
454	**STAFF 3-12**	**a**	George Novela		Do you contend that energy burden, as you have defined the term above, is relevant to a rate case before the New Mexico Public Regulation Commission? If your answer is in the affirmative, please: a. Explain in detail how energy burden is relevant and how energy burden is taken into account in the evaluations and calculations that are performed as part of a rate case before the Commission.	No
455	**STAFF 3-12**	**b**	George Novela		b. Provide any previous testimony that was submitted by any member of EPE that addresses the issue of energy burden in a rate case before the Commission.	No
456	**STAFF 3-12**	**c**	George Novela		c. Identify all previous recommended decisions or final orders of the Commission that you contend supports your answer.	No
457	**STAFF 3-12**	**a**	George Novela		If your answer is not affirmative, please: a. Explain why EPE does not believe that it is relevant to take energy burden, as defined, into account in the evaluations and calculations that are performed as part of a rate case before the Commission.	No
458	**STAFF 3-13**		George Novela		What analysis has EPE conducted to determine the proportion of energy burdened customers in its service territory? If EPE has conducted no such analysis, please provide a detailed explanation as to why EPE does not believe it is relevant to understand the dynamics of energy burden as it relates to customers in the Company's service territory.	No
459	**STAFF 3-14**		George Novela		Does EPE believe that each and every customer who is energy burdened in the Company's New Mexico service territory will qualify for and be able to utilize the low-income rider?	No
460	**STAFF 3-15**	**a**	Richard Gonzalez		Regarding EPE's response to Interrogatory and Request for Production Staff 1-6: a. Please provide the return on equity assumed by the forecast in the chart showing Cash from Operations pre-WC to debt ratio for 2026 to 2030.	No
461	**STAFF 3-15**	**b**	Richard Gonzalez		b. Please provide all workpapers used in the calculation of the chart showing Cash from Operations pre-WC to debt ratio for 2026 to 2030.	No
462	**STAFF 3-16**		Rene Gonzalez		Please provide the Excel files for WP O.2.1 and WP O.2.2 with all formulas intact.	Yes
463	**STAFF 4-1**		Enedina Soto		Please provide the total system hourly load (MW) for all 8,760 hours of the test year and any projected year available.	No
464	**STAFF 4-2**		Enedina Soto		Please provide the New Mexico jurisdictional hourly load (MW) for all 8,760 hours of the test year and any projected year available, including all workpapers and formulas used to derive the jurisdictional hourly load from system hourly load.	No
465	**STAFF 4-3**	**a**	Enedina Soto		Please provide the hourly load shapes (MW) for each New Mexico customer class in the test year and any projected year available. a. Please provide load at generation data.	No
466	**STAFF 4-3**	**b**	Enedina Soto		b. If this is not possible, please identify the loss multiplier used in the test year.	No
467	**STAFF 4-4**		Enedina Soto		Please provide the hourly generation data for customer generation in the test year and any projected year or please confirm the hourly load data provided in response to question 2 is net of the outflow from customer generation.	No
468	**STAFF 4-5**		Jeff Hughes	Victor Martinez	Please provide a complete list of all generating units and storage resources dispatched to serve system load, including for each unit: name, plant, fuel type, minimum load, ramp rates, start up times, minimum up/down times, heat rate curves, COD, and retirement date (expected or actual).	No
469	**STAFF 4-6**		Jeff Hughes	Victor Martinez	Please provide seasonal capacity ratings and derates for all generating units in the test year and any projected year.	No
470	**STAFF 4-7**		Jeff Hughes	Victor Martinez	Please provide all applicable forced outage rates (EFORd), planned outage schedules, and derate data for each generating unit in the test year and any projected year.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
471	**STAFF 4-8**		Jeff Hughes	Victor Martinez	Please provide all environmental, emissions, or operational constraints applicable to each generating unit in the test year and any projected year.	No
472	**STAFF 4-9**		Adrian Hernandez		Please provide the jurisdictional assignment of each generating unit (e.g., system share vs. New Mexico share), including all supporting workpapers, for the test year and any projected year.	No
473	**STAFF 4-10**	**a**	Jeff Hughes	Victor Martinez	For the test year and any projected year, provide all hourly dispatch outputs (8760) for each generating unit and storage resource, including: a. Unit on/off status	No
474	**STAFF 4-10**	**b**	Jeff Hughes	Victor Martinez	b. Hourly generation (MWh)	No
475	**STAFF 4-10**	**c**	Jeff Hughes	Victor Martinez	c. Hourly marginal or incremental cost	No
476	**STAFF 4-10**	**d**	Jeff Hughes	Victor Martinez	d. Start-up events	No
477	**STAFF 4-10**	**e**	Jeff Hughes	Victor Martinez	e. Operating reserve status	No
478	**STAFF 4-11**	**a**	Victor Martinez		Please provide all modeled outputs or calculations related to probability of dispatch, including: a. Expected hours of operation by unit	No
479	**STAFF 4-11**	**b**	Victor Martinez		b. Dispatch frequency by load level	No
480	**STAFF 4-11**	**c**	Victor Martinez		c. Any probability-of-dispatch metrics already developed	No
481	**STAFF 4-12**		Omar Gallegos	Victor Martinez	Please provide all planning reserve margin assumptions or requirements for both system and New Mexico jurisdiction in the test year and any projected year.	No
482	**STAFF 4-13**		Victor Martinez		Please provide the Company's operating reserve policy and identify how much operating reserve was planned for in each hour of the test year and any projected year.	No
483	**DAC 5-1**		Manny Carrasco		What additional expenses were included in the Large Load Tariff CCOS analysis used to develop Rates 50 and 51? Please provide a list of each additional expense and the dollar amount.	No
484	**DAC 5-2**		Manny Carrasco		What effect would using a 30 MW data center customer instead of 100 MW have on the hypothetical high load factor rate class (Rate 50)? Would Rate 50 customer, demand and energy rates increase or decrease? Please explain.	No
485	**DAC 5-3**		Manny Carrasco		If only a 30 MW customer joins Rate 50 before the Company's next rate case filing, will this cause an interclass subsidy assuming no other changes to assumptions made by the Company in its filing? Please explain.	No
486	**DAC 5-4**	**A**	Manny Carrasco	George Novela	Are the rates proposed for Rate 50 and Rate 51 designed to collect all expected costs to serve future customers that may be served by these rate classes? If not, please answer the following: A. What costs are not included?	No
487	**DAC 5-4**	**B**	Manny Carrasco	George Novela	B. How will those costs be collected?	No
488	**DAC 5-4**	**C**	Manny Carrasco	George Novela	C. Who will pay for those costs?	No
489	**DAC 5-5**		Manny Carrasco		Please refer to lines 30, 31 and 32 of EPE Exhibit MC-01, specifically the worksheet titled "NM L-1 Full COS". Please identify if these are test year billing determinants or are they something else, and if so, what?	No
490	**DAC 5-6**		Enedina Soto		Please provide a table showing the average monthly and annual load factor in percent for each rate class during the base year and test year in electronic executable format.	No
491	**DAC 5-7**		Adrian Hernandez	Enedina Soto Rene F. Gonzalez	The response to DAC 2-1a has a table that begins with October 2024 and ends with September 2024 while the response to DAC 2-1b through DAC 2-1d show October 2024 through September 2025. Please confirm if the dates in DAC 2-1a are correct and should be October 2024 through September 2025. If not, please explain.	No
492	**DAC 5-8**		Adrian Hernandez	Enedina Soto Rene F. Gonzalez	Please provide updated versions of tables provided in response to DAC 2-1a and 2-1b with totals below each column in electronic executable format.	No
493	**DAC 5-9**		Enedina Soto		Please provide updated versions of tables provided in response to DAC 2-1c and 2-1d showing total kW demand by month instead of average kW and provide a total below each column in electronic executable format.	No
494	**DAC 5-10**		Adrian Hernandez	Manny Carrasco Rene F. Gonzalez	Exhibit MC-01 shows a total of 1,838,616,537 kWh and 2,311,574 kW while Exhibit DAC 01-02_Attachment 01 shows a total of 1,839,035,960 kWh and 2,332,745 kW. Please explain this discrepancy. If in error, please provide a corrected version of DAC 02-02_Attachment 01.	No
495	**DAC 5-11**		Adrian Hernandez	Manny Carrasco	If DAC 02-02_Attachment 01 requires a correction to billing units in lines 28 through 31, what impact does this have on lines 1 through 28?	No
496	**DAC 5-12**	**A**	Adrian Hernandez		In reference to the Company's response to DAC 2-2, please provide the following: A. PDF version (or other non-executable format) showing any worksheets of the CCOS model that changed from the filed CCOS model and were used to produce the results provided in DAC 02-02_Attachment 01.	Yes
497	**DAC 5-12**	**B**	Adrian Hernandez		B. Excel version of allocation factors used in the alternative CCOS model similar to the response to DAC 02-06 that reflect customers moved to Rate 7 (PDF or other non-executable format if Excel not available).	Yes
498	**DAC 5-13**		Adrian Hernandez	Manny Carrasco Rene F. Gonzalez	The kWh increase in Rate 7 in DAC 02-02_Attachment 01 compared to Rate 7 in Exhibit MC-01 is 25,342,835 kWh. The total kWh provided in response to DAC 2-1 is approximately 24,763,819 kWh. Please explain this difference and any adjustments made before it was used in the alternative CCOS analysis for moving customers into Rate 7.	No
499	**DAC 5-14**		Enedina Soto	Manny Carrasco	The kW increase in Rate 7 in DAC 02-02_Attachment 01 compared to Rate 7 in Exhibit MC-01 is 99,353 kW. The total Non-Coincident kW provided in response to DAC 2-1 is approximately 79,146 kW. Please explain this difference and any adjustments made before it was used in the alternative CCOS analysis for moving customers into Rate 7.	No
500	**DAC 5-15**		Adrian Hernandez		If any of the above responses require a corrected version of DAC 02-02_Attachment 01 or a correction to any direct testimony provided by Company witnesses, please provide updated versions of both.	No
501	**CLC 3-1**	**a**	Steven Sierra		Please refer to: (1) EPE's First Supplemental Response to DAC 1-35 (Doña Ana County) and DAC 1-35 Supplemental_Attachment 01, showing Test Year Total Company Outside Services of $100,000 or more per vendor totaling $8,733,932; (2) EPE's April 15, 2026 Notice of Errata, WP A-03 TOTAL COMPANY at page 7, line 161, column (b) and page 9, line 161 columns (am) through (aq) showing Base Period and Adjusted Test Period Account 923.000 Outside Services Employed in the amount of $10,498,819; (3) EPE's April 15, 2026 Notice of Errata, WP A-03 TOTAL COMPANY at page 10, line 169, columns (b) and (j) and page 12, line 169, columns (am through (aq); and (4) EPE's April 15, 2026 Notice of Errata, WP A-03 NEW MEXICO, at page 13, lines 132 and 138 and page 16, lines 132 and 138, and provide the following information with supporting documentation including invoices: (a) Referring to the line items on DAC 1-35 Supplemental_Attachment 01 for Culturespan Marketing, Hahn Agency, and TexHahnMedia Inc., explain in detail why EPE believes it has properly accounted for these services under FERC Account No. 930.000 Outside Service rather than FERC Account No. 930.100 General Advertising Exp, providing quantification and invoices that demonstrate that these expenses have been properly accounted for and are not being double collected in EPE's cost of service study or proposed rates.	Yes
502	**CLC 3-1**	**b**	Steven Sierra		(b) Provide a listing of Outside Services obtained by EPE during the Test Period similar to DAC 1-35 Supplemental_Attachment 01, by vendor and amount, that accounts for the difference of $1,764,887, between the WP A-03 amount for Outside Services and the DAC 1-35 Supplemental_Attachment 01 total Test Period costs, and explain whether the only reason each vendor was excluded from DAC 1-35 Supplemental_Attachment 01 was because the total cost for its services was less than $100,000 or whether there were other reasons for the exclusion of that vendor's total charges from DAC 1-35 Supplemental_Attachment 01, explaining such other reasons.	No
503	**CLC 3-1**	**c**	Steven Sierra		(c) Identify the amounts for each vendor listed in DAC 1-35 Supplemental_Attachment 01 as well as for each of the smaller vendors identified in your response to Interrogatory and Request for Production ~~CLC 1-1(b)~~ (CLC 3-1(b)) that have been attributed by EPE in its rate filing as costs for advertising, contributions, donations, dues, subscriptions, membership fees, or lobbying expenses subject to NMPRC Rule 17.3.350 NMAC. To the extent that EPE has not, in response to Interrogatory and Request for Production ~~CLC 1-1(a)~~ (CLC 3-1(a)) and Requests for Production CLC 1-19, 1-20, 2-17, and 2-18, produced base period invoices for each of the vendors listed in DAC 1-35 Supplemental_Attachment 01 and in your response to this Interrogatory and Request for Production of Documents CLC 1-1(c), please produce those invoices and describe any allocations of the invoiced amounts made by EPE among various FERC accounts.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
504	**CLC 3-1**	**d**	Steven Sierra		(d) Identify the amounts for each vendor listed in DAC 1-35 Supplemental_Attachment 01 as well as for each of the smaller vendors identified in your response to Interrogatory and Request for Production ~~CLC 1-1(b)~~ (CLC 3-1(b)) that have been attributed by EPE in its rate filing as litigation costs or regulatory expenses that it seeks to recover in whole or in part from New Mexico ratepayers in this case. To the extent that EPE has not, in response to Interrogatories and Requests for Production ~~CLC 1-1(a), (b), and (c)~~ (CLC 3-1(a), (b) and (c) and Requests for Production CLC 1-19, 1-20, 2-17, and 2-18, produced base period invoices for each of the vendors listed in DAC 1-35 Supplemental_Attachment 01 and for each of the smaller venoder identified in your response to this Interrogatory and Request for Production of Documents CLC 1-1, please produce those invoices and describe any allocations of the invoiced amounts made by EPE among various FERC accounts.	No
505	**CLC 3-2**	**a**	Julissa Reza	Adrian Hernandez Victor Martinez	Please refer to Workpaper A-3, Adjustment No. 2, Page 2 of 3 at lines 11 and 12 and footnote (f) and Page 3 of 3 in the columns labeled Buena Vista and BV Battery Deferred Capacity Costs and footnotes (a) and (b), and provide the following information, documents, and calculations: (a) Does EPE presently determine the allocation of Buena Vista 1 PPA energy between New Mexico and Texas on a monthly basis?	No
506	**CLC 3-2**	**b**	Julissa Reza	Victor Martinez	(b) Does EPE propose to continue to determine the allocation of Buena Vista I PPA energy between New Mexico and Texas on a monthly basis?	No
507	**CLC 3-2**	**c**	Julissa Reza	Victor Martinez	(c) On what basis has EPE allocated the capacity of the Buena Vista 1 battery energy storage facility (BESS) between New Mexico and Texas since its Commercial Operation Date (COD)? Explain your answer in detail, including any changes in the allocation methodology that have occurred since the Buena Vista 1 BESS became operational and the present time.	No
508	**CLC 3-2**	**d**	Julissa Reza	Adrian Hernandez	(d) Referring to Workpaper A-3, Adjustment No. 2, Page 3 of 3, does EPE intend to allocate 0.204547 of the Buena Vista I BESS capacity to the New Mexico jurisdiction consistently once the rates approved by the NMPRC in this case take effect?	No
509	**CLC 3-2**	**e**	Julissa Reza	Adrian Hernandez	(e) Referring to your response to Interrogatory and Request for Production ~~CLC 1-2(d)~~ (CLC 3-2(d)), if your answer is yes explain in detail how EPE will assure that exactly 0.204547 of the Buena Vista I BESS capacity is assigned to the New Mexico jurisdiction going forward, in light of EPE's own day-to-day operations and the terms of the Buena Vista I PPA, including but not limited to the provisions that give the owner of the facility control over charging and discharging decisions during the months of June, July, and August.	No
510	**CLC 3-2**	**f**	Julissa Reza		(f) Describe EPE's methodology or methodologies for allocating Buena Vista I BESS capacity to the Texas jurisdiction, from the COD of that facility through the implementation of new rates following the PUCT's final order on rehearing of PUCT Docket No. 57568.	No

SUPPLEMENTAL DISCOVERY

Line No	(a) Intervenor/ Set	(b) Subpart	(c) Sponsor	(d) Co-Sponsor(s)	(e) Question	(f) Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
511	**CLC 3-2**	**g**	Julissa Reza		(g) Quantify the amounts of Buena Vista I BESS capacity that have been allocated to the New Mexico and Texas jurisdictions on a monthly basis since that facility began operating, and provide supporting documentation including but not limited to EPE's calculations, filed FPPCAC or other periodic reports to the NMPRC, the PUCT, and the FERC, as applicable, and the Company's workpapers supporting such filings with regulatory commissions.	No
512	**CLC 3-2**	**h**	Julissa Reza		(h) Quantify the amount of Buena Vista I BESS capacity that will be allocated to the Texas jurisdiction as a result of the PUCT's final order on rehearing of PUCT Docket No. 57568, and provide supporting workpapers and other documents, including but not limited to those submitted to the PUCT, its hearing officers, or its staff.	No
513	**CLC 3-2**	**i**	Julissa Reza		(i) Provide detailed, monthly calculations of the claimed amounts for EPE's requested recovery of Buena Vista I BESS capacity costs from the initiation of payments for that capacity under the Buena Vista I PPA through the end of the base period in this proceeding, including PPA payments and requested carrying charge accruals.	No
514	**CLC 3-3**		George Novela		Please refer to the following documents submitted by EPE to the NMPRC in NMPRC Case No. 21-00069-UT: Unopposed Comprehensive Stipulation filed on April 29, 2022, Attachments A, B, and C, and admit that the Attachments to the Unopposed Comprehensive Stipulation reflect EPE's best estimate of New Mexico AMS-related costs prior to commencement of the AMS Project. Admit:_____ Deny:_____	No
515	**CLC 3-4**		George Novela		Please refer to the following documents submitted by EPE to the NMPRC in NMPRC Case No. 21-00069-UT: (a) Unopposed Comprehensive Stipulation filed on April 29, 2022, Attachments A, B, and C (b) Notice of EPE's Compliance Filing, filed on November 9, 2022, Exhibit A Admit that the AMS Cost Rider tariff submitted in the Notice of EPE's Compliance Filing reflected EPE's best estimate of cost of New Mexico AMS project costs as projected by EPE in the Attachments to the Unopposed Comprehensive Stipulation in accordance with the terms of that stipulation. Admit:_____ Deny:_____	No
516	**CLC 3-5**		Adrian Hernandez		Please refer to the following documents submitted by EPE to the NMPRC in NMPRC Case No. 21-00069-UT: (a) Advice Notice No. 284, EPE's Proposed Changes to Original Rate Schedule No. 284, Advanced Metering System Rider; Case No. 21-00269-UT Compliance Filing, submitted on March 2, 2023; (b) Notice of EPE's Compliance Advice Notice Filing [Advice Notice No. 305] filed on January 30, 2025; and (c) Notice of EPE's Compliance Advice Notice Filing [Advice Notice No. 315] filed on January 30, 2026. Admit that each of these three documents includes an accurate accounting of EPE's New Mexico AMS project costs through the end of the calendar year preceding the date of filing and an accurate accounting of revenues received by EPE through the AMS Cost Rider through the end of the preceding calendar year. Admit:_____ Deny:_____	No
517	**CLC 3-6**	**a**	Adrian Hernandez		Please refer to EPE's response to Staff Interrogatory and Request for Production of Documents 2-77 (Part 4 of EPE's responses to Staff's Second Set of Discovery Requests to EPE) and provide the following information and documentation: (a) Provide references to tabs, pages, lines and columns of Workpaper K (STAFF 01-03 Supplemental_Attachment 01) in which each and every capital cost and expense and every amount of depreciation expense, depreciation accrual, tax expense, other tax consequences, and every other related cost or revenue is stated, both on a Total Company basis and on a New Mexico jurisdictional basis. If you refer to a figure on Workpaper K that is not exclusively related to the AMS project, provide the Total Company and/or New Mexico jurisdictional AMS-related amount or amounts and supporting documentation for such an allocation or breakdown of costs and revenues listed on Workpaper K.	Yes
518	**CLC 3-6**	**b**	Adrian Hernandez		(b) Provide, on a yearly basis through 2025 and on a base period basis (October 2024 through September 2025), a detailed listing of the costs and revenues associated with the New Mexico AMS system. At minimum, the costs should be separated into the same categories used in Attachments A and B of the Unopposed Comprehensive Stipulation approved in NMPRC Case No. 21-00269-UT.	No
519	**CLC 3-6**	**c**	Adrian Hernandez		(c) Provide, on a yearly basis through 2025 and on a basis period basis (October 2024 through September 2025) the costs and revenues associated with the Texas AMS system. At minimum, the costs should be separated into the same categories used in Attachments A and B of the Unopposed Comprehensive Stipulation approved in NMPRC Case No. 21-00269-UT.	No
520	**CLC 3-6**	**d**	Adrian Hernandez		(d) Provide invoices and EPE accounting data demonstrating that the costs of the entire AMS system are equal to the sum of the costs assigned to the New Mexico system and to the Texas system. If that is not the case, explain in detail why not and quantify the differences.	No
521	**CLC 3-7**	**a**	Omar Gallegos	Cynthia Prieto	Please refer to the Direct Testimony of Omar A. Gallegos at Q135 and Q136 on pages 84 to 86. (a) Provide a detailed breakdown of the New Mexico investment in legacy meter plant from January 1, 2020 through December 31, 2023, including but not limited to the number of legacy meters installed for each rate class during each year of that period; the costs of the legacy meters installed for each rate class for each year of that period; the costs of EPE labor for installation of the legacy meters installed for each rate class during each year of that period; the costs of contract labor for installation of the legacy meters installed for each rate class during each year of that period; and the costs of other materials and supplies associated with the installation of legacy meters for each rate class for each year of that period.	No
522	**CLC 3-7**	**b.i**	Omar Gallegos	Cynthia Prieto	(b) Identify how many legacy meters installed for each rate class during each year of the period from January 1, 2020 through December 31, 2023 were (a) taken from EPE's inventory of new meters and	No
523	**CLC 3-7**	**b.ii**	Omar Gallegos	Cynthia Prieto	(b) were taken from EPE's inventory of previously used meters taken out of service due to meter testing or customer cancellation or changes in service.	No
524	**CLC 3-7**	**c**	Omar Gallegos	Cynthia Prieto	(c) Provide the approximate difference in cost for a legacy meter installation using a previously installed legacy meter and a legacy meter installation using a new legacy meter, by rate class and by type of meter.	No
525	**CLC 3-8**		Omar Gallegos		Please refer to the Unopposed Comprehensive Stipulation in NMPRC Case No. 21-000269-UT at Section 2.2 and identify the amounts of service equipment costs, as that term is defined in that section of the Stipulation, incurred by EPE on a year by year basis, for the test period of this case, from the beginning of the AMS project through the end of the test period, and for the period after the end of the test period.	No
526	**CLC 3-9**		N/A		Referring to your response to Interrogatory and Request for Production ~~CLC 1-8~~ (CLC 3-8), provide reference to each line item and column in EPE's base period and test period cost of service studies, including schedules and workpapers, that includes costs associated with meter reading during the base period; quantify the amount of each such line item associated with meter reading; and provide a detailed breakdown on a monthly basis of the nature and source of those costs, i.e., EPE salaries, wages and benefits, outside services charges, taxes, insurance, vehicle costs, vehicle depreciation expenses, vehicle operating expenses, etc.	No
527	**CLC 3-10**		Omar Gallegos		Please refer to the Unopposed Comprehensive Stipulation in NMPRC Case No. 21-000269-UT at Section 2.3 and describe in detail the measures that EPE took to avoid duplicative activities. To the extent possible, quantify the reduction in potential AMS project costs achieved by those measures.	No
528	**CLC 3-11**		Omar Gallegos		Please refer to the Unopposed Comprehensive Stipulation in NMPRC Case No. 21-000269-UT at Section 2.4 and describe in detail the efforts that EPE undertook to seek federal funding through the Infrastructure and Jobs Act for the AMS project. Provide documentation of amounts received by EPE and of denial of applications made by EPE.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
529	**CLC 3-12**		Adrian Hernandez		Please refer to the Unopposed Comprehensive Stipulation in NMPRC Case No. 21-000269-UT at Section 3.1 and provide documentation of EPE's recording and track of AMS project costs including but not limited to all line items on Attachment B to that stipulation.	No
530	**CLC 3-13**		Adrian Hernandez		Please refer to the Unopposed Comprehensive Stipulation in NMPRC Case No. 21-000269-UT at Section 3.1 and provide a yearly statement of the costs incurred in connection with the AMS project broken down into the categories set forth in Attachment A to that Stipulation, through calendar year 2025.	No
531	**CLC 3-14**		Adrian Hernandez		Please refer to the Unopposed Comprehensive Stipulation in NMPRC Case No. 21-000269-UT at Section 3.1 and provide a yearly statement of the costs incurred in connection with the AMS project during the base period for this case broken down into the categories set forth in Attachment A to that Stipulation.	No
532	**CLC 3-15**		Adrian Hernandez		Please refer to the Unopposed Comprehensive Stipulation in NMPRC Case No. 21-000269-UT at Section 3.1 and provide a statement of the costs incurred in connection with the AMS project on a quarterly basis beginning with the fourth quarter of 2025, broken down into the categories set forth in Attachment A to that Stipulation.	No
533	**CLC 3-16**		Omar Gallegos		Please refer to the Unopposed Comprehensive Stipulation in NMPRC Case No. 21-000269-UT at Section 3.1 and provide a statement of the annual costs EPE expects to be incurred in connection with the AMS project in 2026 and 2027, broken down into the categories set forth in Attachment A to that Stipulation.	No
534	**CLC 3-17**	**a**	Omar Gallegos		Please describe in detail the changes in EPE's meter-reading practices and costs for each year of the AMS program, beginning in 2022 through the end of the base period, as well as for all of 2025 and into 2026, including but not limited to (a) the number of meter readers employed directly by EPE on a full-time basis;	No
535	**CLC 3-17**	**b**	Omar Gallegos		(b) the number of meter readers employed directly by EPE on a part-time basis:	No
536	**CLC 3-17**	**c**	Omar Gallegos		(c) the number of meter readers utilized by EPE on a full-time basis through contractual arrangements;	No
537	**CLC 3-17**	**d**	Omar Gallegos		(d) the number of meter readers utilized by EPE on a part-time basis through contractual arrangements;	No
538	**CLC 3-17**	**e**	Omar Gallegos		(e) the roles, if any played, by meter readers as EPE was transitioning to AMS meter use, i.e., in customer education.	No
539	**CLC 3-18**		N/A		Referring to your response to Interrogatories and Requests for Production ~~CLC 1-8 and CLC 1-12~~, (CLC 3-8 and CLC 3-12) provide reference to each line item and column in EPE's base period and test period cost of service studies, including schedules and workpapers, that includes costs associated with meter reading during the base period; quantify the amount of each such line item associated with meter reading; and provide a detailed breakdown on a monthly basis of the nature and source of those costs, i.e., EPE salaries, wages and benefits, outside services charges, taxes, insurance, vehicle costs, vehicle depreciation expenses, vehicle operating expenses, etc.	No
540	**CLC 3-19**	**a**	Omar Gallegos		Please describe in detail the changes in EPE's meter-reading practices and costs for each year of the AMS program, beginning in 2022 through the end of the base period, as well as for all of 2025 and into 2026, including but not limited to (a) the number of meter readers employed directly by EPE on a full-time basis;	No
541	**CLC 3-19**	**b**	Omar Gallegos		(b) the number of meter readers employed directly by EPE on a part-time basis:	No
542	**CLC 3-19**	**c**	Omar Gallegos		(c) the number of meter readers utilized by EPE on a full-time basis through contractual arrangements;	No
543	**CLC 3-19**	**d**	Omar Gallegos		(d) the number of meter readers utilized by EPE on a part-time basis through contractual arrangements;	No
544	**CLC 3-19**	**e**	Omar Gallegos		(e) the roles, if any played, by meter readers as EPE was transitioning to AMS meter use, i.e., in customer education.	No
545	**CLC 3-20**	**a**	Rene Gonzalez		Referring to the Direct Testimony of Rene F. Gonzalez at page 53 and Workpapers O.2.1, pages 7 through 10 and O.2.2, pages 1 through 9 and provide the following information, explanations for your answers, and supporting documents: (a) Was the number of customers who chose to opt out of AMS in New Mexico equal to 268 at the end of the base period, September 2025, as indicated in Workpaper O.2.2, page 3 of 9?	No
546	**CLC 3-20**	**b**	Rene Gonzalez		(b) Is EPE projecting that there will be an additional 677 New Mexico customers opting out of AMS in New Mexico on an annual basis going forward, as indicated by Workpaper O.2.1, pages 8, 9, and 10?	No
547	**CLC 3-20**	**c**	Rene Gonzalez		(c) Or is EPE projecting, as indicated by Workpaper O.2.1, page 7 (8,124 ÷ 12), that there will be a total of 677 customers in New Mexico that will opt out of AMS service going forward?	No
548	**CLC 3-20**	**d**	Rene Gonzalez		(d) Please refer to Workpaper O.2.2 , page 1 of 9, at line 6. Why has EPE stated as the "Test Year Count" for Monthly Fee for Opt-Out Metering Service the base period total of 1,917 when, as should by line 6, pages 2 and 3 of that workpaper, the number of New Mexico AMS opt-out customers was growing monthly from 93 in October 2024 to 268 in September 2025? Explain your answer in detail.	No
549	**CLC 3-20**	**e**	Rene Gonzalez		(e) Please refer to Workpaper O.2.1, page 1 of 9, column (a), lines 7, 8, and 9 and pages 2 and 3 of 9, line 6. Explain why EPE charged a total of 200 one-time opt-out fees while the number of opt-out customers grew by only 175 from October 2024 through September 2025?	No
550	**CLC 3-20**	**f**	Rene Gonzalez		(f) Please refer to Workpaper O.2.2, page 1, column (c), at lines 6 and 37 and to your response to Interrogatory and Request for Production of Documents ~~CLC 1-10(d)~~ (CLC 3-10(d)) and explain in detail why EPE has included in "Test Year" revenue for monthly opt-out service fees only $12,882.24 based on 1,917 billings of that fee when it is projecting higher numbers of opt-out customers and monthly fees going forward?	No
551	**CLC 3-20**	**g**	Rene Gonzalez		(g) Explain whether EPE has normalized an of its proposed new or changed or unchanged Miscellaneous Service Charges based upon anticipated growth or decline in the number of customers in New Mexico generally or upon expected growth or decline in the usage of such special services.	No
552	**CLC 3-20**	**h**	Rene Gonzalez		(h) Explain in detail and provide supporting documentation for the cost calculations for monthly opt-out service charges shown on page 7 of Workpaper O.2.1 and for the three different one-time fees for opt-out service, showing on pages 8 through 10 of that workpaper, separately addressing the labor, stores and transportation charges and overhead costs and the "Fixed Costs."	No
553	**CLC 3-21**		George Novela		Please refer to EPE's responses to Interrogatories and Requests for Production Staff 2-77 and 2-80 and explain in detail whether EPE anticipates that, after the present rate case is completed, the reconciliation process outlined in the Unopposed Comprehensive Stipulation in Case No. 21-00269-UT allows for EPE to utilize the AMS Cost Rider to recover costs incurred by adding AMS meters and other capital additions to the AMS system after the project completion in 2025.	No
554	**CLC 3-22**		George Novela		Please refer to EPE's responses to Interrogatories and Requests for Production Staff 2-77 and 2-80 and explain in detail whether EPE anticipates that, after the present rate case is completed, the reconciliation process outlined in the Unopposed Comprehensive Stipulation in Case No. 21-00269-UT allows for EPE to utilize the AMS Cost Rider to recover O&M costs in connection with the AMS project after the project completion in 2025 or, alternatively, after the effective date of the rates approved in this general rate proceeding..	No
555	**CLC 3-23**		Adrian Hernandez		Please refer to EPE's responses to Interrogatories and Requests for Production Staff 2-77 and 2-80 and explain in detail, with line item references to EPE's testimony, exhibits, schedules, and workpapers, how much O&M expense related to the AMS project is proposed to be included in base rates to be set in this rate proceeding.	No

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
556	**CLC 3-24**		Adrian Hernandez	George Novela	For each and every Request for Admissions ~~(CLC 1-3 through CLC 1-5)~~ (CLC 3-3 through CLC 3-5) for which your response is anything other than an unqualified admission, please explain in detail the basis for your response; identify any testimonies, exhibits, and/or discovery responses served by EPE in this NMPRC Case No. 25-00038-UT that support your explanation; and provide copies of any other analyses or documents that support your explanation.	No
557	**CLC 4-1**	**a**	Steven Sierra		Please refer to: EPE's response to Doña Ana County's ("DAC") Interrogatory and Request for Production of Documents 1-1, specifically the attachments labeled DAC 01-01_Attachment 11 Voluminous through DAC 01-01_Attachment 20 Voluminous, and provide the following information and supporting documentation: (a) Explain how the General Ledger monthly and cumulative entries with the Project Description WR731 – 2026 NM RATE CASE are developed, addressing each category under which costs were assigned to the 2026 NM RATE CASE separately, i.e., OTHER REGULATORY ASSETS, ADMIN & GEN SALARIES, OFFICE SUPPLIES & EXP, OUTSIDE SVS EMPLOYED, INJURIES AND DAMAGES, EMPLOYEE PENSIONS & BEN, MAINT OF STATION EQUIP, TAXES OTH INC-TX – OPER, METER READING EXPENSES, etc	No
558	**CLC 4-1**	**b**	N/A		(b) Identify on a monthly basis the costs associated with EPE employees that EPE has accounted for under the FERC Uniform System of Accounts as being expended for or allocated to this 2026 New Mexico rate case. Please remain aware that this, like all other discovery requests, is ongoing in nature and you are obligated to timely update your responses.	No
559	**CLC 4-1**	**c**	George Novela		(c) Identify on a monthly basis the costs associated with the use of supplies and materials that EPE has accounted for under the FERC Uniform System of Accounts as being expended for or allocated to this 2026 New Mexico rate case. Please remain aware that this, like all other discovery requests, is ongoing in nature and you are obligated to timely update your responses.	No
560	**CLC 4-1**	**d**	George Novela		(d) Identify on a monthly basis the costs associated with travel and meals and other incidental expenses incurred by EPE's employees that EPE has accounted for under the FERC Uniform System of Accounts as being expended for or allocated to this 2026 New Mexico rate case. Please remain aware that this, like all other discovery requests, is ongoing in nature and you are obligated to timely update your responses	No
561	**CLC 4-1**	**e**	George Novela		(e) Identify on a monthly basis the costs associated with outside services, including but not limited to consultants and expert witnesses, that EPE has accounted for under the FERC Uniform System of Accounts as being expended for or allocated to this 2026 New Mexico rate case. Please remain aware that this, like all other discovery requests, is ongoing in nature and you are obligated to timely update your responses	No
562	**CLC 4-1**	**f**	N/A		(f) Provide the total costs associated with EPE employees that EPE accounted for under the FERC Uniform System of Accounts as being expended for or allocated to its 2020-21 Mexico rate case, NMPRC Case No. 20-00104-UT, through the time that the rates approved by the NMPRC in June 2021 took effect in July 2021. If EPE is unable to provide this information as of the date in mid-July 2021 when the approved rates took effect, provide that information through the end of June 2021.	No
563	**CLC 4-1**	**g**	N/A		(g) Provide the total costs associated with outside services, including but not limited to consultants and expert witnesses, that EPE accounted for under the FERC Uniform System of Accounts as being expended for or allocated to its 2020-21 Mexico rate case, NMPRC Case No. 20-00104-UT, through the time that the rates approved by the NMPRC in June 2021 took effect in July 2021. If EPE is unable to provide this information as of the date in mid-July 2021 when the approved rates took effect, provide that information through the end of June 2021.	No
564	**CLC 4-1**	**h**	N/A		(h) Identify on a monthly basis all costs associated with EPE employees that EPE accounted for under the FERC Uniform System of Accounts as being expended for or allocated to the 2020-2021 New Mexico general rate case, NMPRC Case No. 20-00104-UT, after the rates in that case took effect in July 2021, including EPE's appeal of that rate case order to the New Mexico Supreme Court.. If EPE is unable to provide this information as of the date in mid-July 2021 when the approved rates took effect, provide that information beginning as of July 2021	No
565	**CLC 4-1**	**i**	N/A		(i) Identify on a monthly basis all costs associated outside services, including but not limited to consultants and expert witnesses, that EPE accounted for under the FERC Uniform System of Accounts as being expended for or allocated to its 2020-21 Mexico rate case, NMPRC Case No. 20-00104-UT, after the rates in that case took effect in July 2021, including EPE's appeal of that rate case order to the New Mexico Supreme Court.. If EPE is unable to provide this information as of the date in mid-July 2021 when the approved rates took effect, provide that information beginning as of the beginning of July 2021.	No
566	**CLC 4-2**		Steven Sierra		Please refer to EPE's response to Interrogatory and Request for Production DAC 3-4 and provide EPE's rationale for splitting the personal performance metric 50/50 between financial and non-financial metrics for purposes of this New Mexico rate case. Also provide documentation of the "personal performance" metric or criteria utilized during each year of the three-year period chosen by EPE for estimating the rate case revenue requirement request for short term incentive plan cost recovery, as well as for the base period of this proceeding	No
567	**CLC 4-3**	**a**	Adrian Hernandez		Please refer to EPE's responses to Interrogatories and Requests for Production DAC 1-6 and 1-7 to Staff Interrogatory and Request for Production of Documents 2-77 (Part 4 of EPE's responses to Staff's Second Set of Discovery Requests to EPE) and provide the following information and documentation: (a) Provide references to tabs, pages, lines and columns of Workpaper K (STAFF 01-03 Supplemental_Attachment 01) in which each and every capital cost and expense and every amount of depreciation expense, depreciation accrual, tax expense, other tax consequences, and every other related cost or revenue is stated, both on a Total Company basis and on a New Mexico jurisdictional basis. If you refer to a figure on Workpaper K that is not exclusively related to the AMS project, provide the Total Company and/or New Mexico jurisdictional AMS-related amount or amounts and supporting documentation for such an allocation or breakdown of costs and revenues listed on Workpaper K.	Yes
568	**CLC 4-3**	**b**	Adrian Hernandez		(b) Provide, on a yearly basis through 2025 and on a base period basis (October 2024 through September 2025), a detailed listing of the costs and revenues associated with the New Mexico AMS system. At minimum, the costs should be separated into the same categories used in Attachments A and B of the Unopposed Comprehensive Stipulation approved in NMPRC Case No. 21-00269-UT	No
569	**CLC 4-3**	**c**	Adrian Hernandez		(c) Provide, on a yearly basis through 2025 and on a basis period basis (October 2024 through September 2025) the costs and revenues associated with the Texas AMS system. At minimum, the costs should be separated into the same categories used in Attachments A and B of the Unopposed Comprehensive Stipulation approved in NMPRC Case No. 21-00269-UT.	No
570	**CLC 4-3**	**d**	Adrian Hernandez		(d) Provide invoices and EPE accounting data demonstrating that the costs of the entire AMS system are equal to the sum of the costs assigned to the New Mexico system and to the Texas system. If that is not the case, explain in detail why not and quantify the differences.	No
571	**CLC 4-4**		Steven Sierra		Please refer to EPE's responses to Interrogatories and Requests for Production DAC 1-7 and DAC 1-8 and explain the references to Workpaper A-3, Adjustment No 3, page 9, when Workpaper A-3, Adjustment No. 3, consists of only three pages.	No
572	**CLC 4-5**	**a**	Steven Sierra	Adrian Hernandez	Please refer to your response to Interrogatory and Request for Production DAC 1-7 and provide the following information: (a) Provide references to EPE's testimony, exhibits, schedules, workpapers and/or discovery responses in which the New Mexico allocation of $873,108 of EPE's claimed non-financial bonus amount of $3,608,671 is developed and presented.	No
573	**CLC 4-5**	**b**	Steven Sierra		(b) Explain in detail why EPE is proposing that New Mexico ratepayers be allocated 24.1947% of the claimed non-financial bonus amount, including a detailed discussion of EPE's development of applicable jurisdictional allocation factors and a explanation of the overall reasonableness of New Mexico ratepayers bearing such a proportion when their allocated shares of EPE's loads, energy, and rate base are lower.	No
574	**CLC 4-6**	**a**	Rene Gonzalez		Please refer to the Direct Testimony of Rene F. Gonzalez at Q43 on page 25 and provide the following information: (a) What arrangements has EPE made with the New Mexico Human Services Department and/or New Mexico Health Care Authority to obtain access to information about its New Mexico customers' eligibility to receive either SNAP or LIHEAP benefits?	No
575	**CLC 4-6**	**b**	Rene Gonzalez		(b) What arrangements has EPE made with the New Mexico Human Services Department and/or New Mexico Health Care Authority to obtain access to information about the termination of its New Mexico customers' eligibility to receive either SNAP or LIHEAP benefits?	No

SUPPLEMENTAL DISCOVERY

Line No	(a) Intervenor/ Set	(b) Subpart	(c) Sponsor	(d) Co-Sponsor(s)	(e) Question	(f) Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
576	**CLC 4-6**	**c**	Rene Gonzalez		(c) Assuming that EPE has or will have access to information possessed by New Mexico Human Services Department and/or New Mexico Health Care Authority concerning its New Mexico customers' eligibility or ineligibility to receive SNAP or LIHEAP benefits, how will EPE notify those customers of the change in their status for receiving the low-income credit related to the residential customer charge?	No
577	**CLC 4-6**	**d**	Rene Gonzalez		(d) Assuming that EPE has or will have access to information possessed by New Mexico Human Services Department and/or New Mexico Health Care Authority concerning its New Mexico customers' eligibility or ineligibility to receive SNAP or LIHEAP benefits, when will EPE notify those customers of the change in their status for receiving the low-income credit related to the residential customer charge?	No
578	**CLC 4-6**	**e**	Rene Gonzalez		(e) What protocols will EPE employ to ensure that participating low-income customers do not learn of their becoming ineligible for the low-income credit at a time and in a manner in which the customer will be burdened by having an unexpected payment to make?	No
579	**CLC 4-6**	**f**	Rene Gonzalez		(f) What protocols will EPE employ to ensure that participating low-income customers who become ineligible for the low-income credit will not be exposed to lowered credit ratings as a result of becoming eligible or ineligible for the low-income credit on a potentially monthly basis?	No
580	**CLC 4-6**	**g**	Rene Gonzalez		(g) Has EPE estimated the costs to the Company of implementing, monitoring, and maintaining a low-income customer credit that is in flux on a monthly basis? If so, provide EPE's detailed estimates and state the amount of such costs (both internal and external) included in its proposed New Mexico revenue requirement, itemized to explain the nature and amounts of such costs and the FERC account numbers under which each such cost is included.	No
581	**CLC 4-6**	**h**	Rene Gonzalez		(h) If EPE has not estimated the costs to the Company of implementing, monitoring, and maintaining a low-income customer credit for New Mexico customers, please provide EPE's current costs of implementing a similar program in Texas, similarly itemized and EPE's estimate of the start-up costs for such a program.	No
582	**CLC 4-6**	**i**	Manny Carrasco		(i) Referring to Manuel Carrasco's Direct Testimony at Q62 on page 49, as well as Workpaper O.01 at pages 2 and 3 of 58, that EPE's cost estimates for the impact of lost revenues are based on 5,239 residential customers participating in the low-income credit for 12 months of the year, explain how EPE will address the possibility of considerably higher participation and the potential for participating customers being eligible intermittently during any given year.	No
583	**CLC 4-6**	**j**	Rene Gonzalez		(j) Explain and, to the extent possible, quantify the benefits that EPE has experienced with a similar low-income program in terms of reduced arrearages, lower bad debt, and fewer customer service shut-offs and restarts.	No
584	**CLC 4-7**	**a**	Cindy Prieto		Please refer to the Direct Testimony of Cynthia S. Prieto at Q131 through Q133 on pages 65 through 67 and provide the following information and supporting documents: (a) Explain in detail the additional debt collection measures that EPE undertook during the base period of this case	No
585	**CLC 4-7**	**b**	Cindy Prieto		(b) Identify and quantify the costs of the additional debt collection measures that EPE undertook during the base period of this case, describing the nature of the costs, whether they were in connection with EPE's existing employees, with new EPE employees, or by outside service providers.	No
586	**CLC 4-7**	**c**	Cindy Prieto		(c) Provide invoices from third parties for their roles in the additional debt collection measures taken beginning in October 2024.	No
587	**CLC 4-7**	**d**	Cindy Prieto		(d) Provide EPE's internal costs connected with this debt collection effort on a monthly basis, including personnel costs and other costs associated with this effort.	No
588	**CLC 4-7**	**e**	Cindy Prieto		(e) Provide references to line items in EPE's total company and New Mexico jurisdiction cost of service study and any workpapers in this proceeding that incorporate the internal and external costs identified in response to Interrogatory and Request for Production CLC 2-7(b) through 2-7(d).	No
589	**CLC 4-7**	**f**	Cindy Prieto		(f) If EPE has conducted, or has had conducted on its behalf, any analysis of the efficacy and cost/benefit value of its revised debt collection measures, provide copies of such analyses. If EPE has not conducted such analyses, explain why not.	No
590	**CLC 4-7**	**g**	Cindy Prieto		(g) Referring to Ms. Prieto's Direct Testimony at page 66, lines 11 through 16, state whether EPE has adopted a permanent policy of extending the period for collection of arrears from six months to one year if, as her testimony indicates, the 2024-2025 changes in practices and policies were effective in reducing bad debt write-offs and improving EPE's collection rates. If your answer is yes, explain those changes. If your answer is no, explain why not.	No
591	**CLC 4-7**	**h**	Cindy Prieto		(h) If EPE has returned to its previous policy of writing off accounts in arrears after six months, identify all adjustments made to EPE's base period expenses due to the termination of the extended collection period effort.	No
592	**CLC 4-7**	**i**	Cindy Prieto		(i) If EPE has not made any test period adjustments to its base period actual costs as a result of its return to its prior debt collection practices, explain why not.	No
593	**CLC 4-7**	**j**	Cindy Prieto		(j) If EPE has returned to its previous policy of writing off accounts in arrears after six months, identify all adjustments made to EPE's base period revenues due to the termination of the extended collection period effort.	No
594	**CLC 4-7**	**k**	Cindy Prieto		(k) If EPE has not made any test period adjustments to its base period revenues as a result of its return to its prior debt collection practices, explain why not.	No
595	**CLC 4-8**	**a**	Adrian Hernandez	Victor Martinez	Please refer to EPE's response to Interrogatory and Request for Production Staff 1-29 and provide the following information and documents: (a) Explain in detail how the data about the operational characteristics of the Buena Vista I, Carne, and Santa Teresa BESS facilities tabulated in that answer were used in developing EPE's total company cost of service study, jurisdictional cost of service study, and New Mexico revenue requirement in this proceeding, providing a written description and references to the tabs, pages, lines, and columns of the affected schedules and workpapers, with information about numbers used in those schedules and workpapers if not self-evident.	No
596	**CLC 4-8**	**b**	Victor Martinez	Adrian Hernandez	(b) Explain in detail how EPE determined the Peak Contribution (MW) for each of those facilities. Provide the Company's calculations, workpapers, and supporting data.	No
597	**CLC 5-1**		Steven Sierra		Please refer to EPE's Response to Staff Interrogatory and Request for Production 2-60 and provide copies of the LongTerm Incentive Plan ("LTIP") performance criteria and anonymized scoresheets for each of the years from 2018 (paid during the base period of NMPRC Case No. 20-00104-UT) through the most recently available plan year.	No
598	**CLC 5-2**		George Novela		Please produce the Company's workpapers and other supporting documentation for Schedule K-8.	Yes
599	**CLC 5-3**		Adrian Hernandez		Provide EPE's calculations and workpapers reflecting the derivation of an allocation factor of 13.63647% to the New Mexico jurisdiction for all PVNGS capital additions from January 1, 2020 through October 31, 2025, shown on line 226 of Exhibit CSP-1 of the Direct Testimony of Cynthia S. Prieto,	No
600	**CLC 5-4**		Omar Gallegos		Please refer to EPE's objections and response to Request for Production CLC 1-5 and provide a copy of every EPE System Impact Study or similar analysis relating to each FERC cluster study that evaluated transmission service and/or transmission system upgrades in connection with each investment for which EPE is seeking cost recovery for the first time in this proceeding (i.e., facilities not included in rate base in NMPRC Case No. 20-00104-UT), including amendments, revisions, or modifications to each such study.	No
601	**STAFF 5-1**	**a**	N/A		Please provide the following for each Transmission or Distribution capital project included in EPE's Application with total Company or New Mexico gross additions of $5 million or more, including any related blanket project or customer-connection project: a. project name, project number, location, in-service date, total cost, New Mexico jurisdictional amount, and applicable Rule 440 filing or amended Rule 440 filing;	No
602	**STAFF 5-1**	**b**	N/A		b.all project-specific engineering support for the project, including load-flow or power-flow studies, contingency analyses, feeder or substation loading analyses, voltage analyses, interconnection studies, protection/relay studies, and planning workpapers;	No
603	**STAFF 5-1**	**c**	N/A		c. documentation showing the load growth, reliability need, outage history, NERC/TPL requirement, interconnection obligation, wildfire—mitigation need, or other system condition that caused EPE to undertake the project;	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
604	**STAFF 5-1**	**d**	N/A		d. any before-and-after analyses showing the project's effect on capacity, loading, voltage, reliability, and line losses; if no before-and-after line-loss analysis was performed, state that fact and explain why such analysis was not performed;	No
605	**STAFF 5-1**	**e**	N/A		e. all alternatives considered, including deferral, lower-cost, operational, or non-wires alternatives where applicable, and the reasons each alternative was rejected; and	No
606	**STAFF 5-1**	**f**	N/A		f. final scope, cost estimate, actual cost, change orders, procurement/bid documentation, variance explanations, customer or third-party contribution information and used-and-useful support.	No
607	**STAFF 5-2**		Manny Carrasco		Provide seasonal bill impacts resulting from EPE's proposal in this case for each rate class for a range of consumption levels.	Yes
608	**STAFF 5-3**		Manny Carrasco		Does EPE's evaluation of bill impacts for customers, residential and otherwise, represent the increase to FPPCAC costs that would result from EPE's proposal in Docket No. 26-0000093-UT to move energy costs currently being recovered through the RPS Rider into the FPPCAC and the increase in base rates resulting from EPE's proposal in this case to move capacity costs currently being recovered through the RPS Rider into base rates? If the answer is no, please provide seasonal bill impacts resulting from EPE's proposal in this case for each rate class for a range of consumption levels inclusive of EPE's proposal in Docket No. 26-0000093-UT to move energy costs currently being recovered through the RPS Rider into the FPPCAC and the increase in base rates resulting from EPE's proposal in this case to move capacity costs currently being recovered through the RPS Rider into base rates.	No
609	**STAFF 5-4**		Rene Gonzalez		How many customers in EPE's New Mexico service territory does EPE believe would be eligible for the proposed Low-Income Rider? If this number is unknown, please provide EPE's best estimate and data supporting that estimate. What percent of EPE's residential customers in New Mexico, assuming residential customers are the only type of customers who are eligible based on EPE's Application in this case, does this represent?	No
610	**STAFF 5-5**	**a**	Cindy Prieto		Refer to Direct Testimony of Cynthia S. Prieto, Exhibit CSP-3, please provide the following: a) Breakdown of FERC accounts of the total costs associated with both the Cost and Cost Savings related to the COVID-19 PANDEMIC Regulatory Asset.	No
611	**STAFF 5-5**	**b**	Cindy Prieto		b) Please provide Staff with supporting documentation of what these costs consist of totaling the remaining balance.	No
612	**STAFF 5-5**	**c**	Cindy Prieto		c) Please state if any collections have occurred.	No
613	**STAFF 5-5**	**d**	Cindy Prieto		d) Provide Staff with specific start date and end date of costs associated with COVID costs.	No
614	**STAFF 5-6**	**a**	George Novela		Please refer to Direct Testimony of George Novela, Exhibit GN-3 and provide Staff with the following: a) Provide detailed information (business name, address location, etc.) of vendors/contractors in each category-Outside Legal Services, Outside Consulting, Other.	No
615	**STAFF 5-6**	**b**	George Novela		b) Within each category provide which FERC account these costs fall under.	No
616	**STAFF 5-6**	**c**	George Novela		c) In regards to "Other" in the amount of $104,800, please provide specific details of what this consists of.	No
617	**STAFF 5-6**	**d**	George Novela		d) Please provide how much cost is associated with traveling.	No
618	**STAFF 5-7**		Cindy Prieto		Please refer to Direct Testimony of Cynthia S. Prieto, Page 78, and provide Staff with the total amount which was adjusted in relation to the $1.2 million per year historical test year. And, if this amount differs from the $1.2 million figure, please provide details.	No
619	**STAFF 5-8**	**a**	Cindy Prieto		Please provide staff with the following in regard to Bad Debt Expense/Uncollectible Receivables: a) The Closing Balances for the last ten years.	No
620	**STAFF 5-8**	**b**	Cindy Prieto		b) What is the process for collecting unpaid bills?	No
621	**STAFF 5-8**	**c**	Cindy Prieto		c) How long is a utility account inactive until it is placed in uncollectibles?	No
622	**STAFF 5-9**		Cindy Prieto		Please provide an itemized breakdown of the $5,244,616 legacy meter investment as detailed in Omar A. Gallegos Direct Testimony (p.85, lines 1-2).	No
623	**STAFF 5-10**		George Novela		Please provide all 530 schedules and workpapers in native format with formulae intact.	Yes
624	**CLC 6-1**	**a**	Enedina Soto	Adrian Hernandez	Please refer to the Direct Testimony of Enedina Soto at Q22 through Q26 on pages 11 through 13 and the Direct Testimony of Adrian Hernandez at Q50 through Q56 on pages 27 through 31 and provide the following information, references, and supporting documents: (a) What is the relevance of Ms. Soto's testimony that "[t]he New Mexico load contribution for each substation is updated on an annual basis" in the context of the various uses of New Mexico load for determination of the allocation factors shown on Schedules M-01 and M-02 and related workpapers, which are not limited to the time of the annual native system peak?	No
625	**CLC 6-1**	**b**	Enedina Soto		(b) Explain in detail what actual measurements of New Mexico load, measured at New Mexico substations, at the Texas-New Mexico border, at customer meters, or anywhere else, are taken to determine monthly, daily, hour, momentary, or other peak New Mexico loads reported on Schedules M-01, M-02, P-1(a), P-1(b), P-1(c), and Workpaper M-1.	No
626	**CLC 6-1**	**c**	Adrian Hernandez		(c) Identify which pages of the M-01 Schedules, some of which are labeled M-01.05 and some of which are labeled M-01.01, are for the "Base Year" and which are for the "Test Year," explaining the differences between what one would presume would be unadjusted "Base Year" data and adjusted "Test Year" data.	No
627	**CLC 6-1**	**d**	Adrian Hernandez	Enedina Soto	(d) Provide copies of EPE's workpapers for Schedules M-1 and P-1 in executable spreadsheet format.	Yes
628	**CLC 6-1**	**e**	Enedina Soto		(e) Referring to the testimony of Mr. Hernandez in Q54 and Ms. Soto at Q24 through Q26, explain in detail, with references to the Series M schedules and the Workpapers for Schedule M-1, how, where, and in what amounts of kW, kWh, and dollars EPE made adjustment in each of those schedules for each generation or energy storage resource assigned or dedicated to New Mexico or to Texas, including but not limited to Ms. Soto's examples of Newman Unit 6 being assigned to Texas and the Carne project being assigned to New Mexico.	No
629	**CLC 6-1**	**f**	Enedina Soto		(f) Referring to your response to Interrogatory and Request for Production ~~CLC 3-1(e)~~ (CLC 6-1(e)), explain and quantify how EPE made adjustments from the base period to the test period to	No
630	**CLC 6-1**	**g**	Enedina Soto		explain and quantify how EPE made adjustments from the base period to the test period to reflect the temporary dedication or allocation of all production of the Milagro Project to	No
631	**CLC 6-1**	**h**	Enedina Soto		[illegible] explain and quantify how EPE made adjustments from the base period to the test period to reflect the temporary reallocation of all production of the Macho Springs purchased power	No
632	**CLC 6-1**	**i**	Enedina Soto		(i) Referring to your response to Interrogatory and Request for Production ~~CLC 3-1(e)~~ (CLC6-1(e)), explain and quantify how EPE made adjustments from the base period to the test period to	No
633	**CLC 6-1**	**j**	Enedina Soto		(j) Produce, in native format, all documents, workpapers, and other calculations utilized by EPE in developing the adjustments discussed above in this Interrogatory and Request for	No
634	**CLC 6-1**	**k**	Enedina Soto		(k) Produce, in native format, all documents, workpapers, and other calculations utilized by EPE in developing its proposed demand, energy, and customer cost allocations on a total	No
635	**CLC 6-1**	**l**	Adrian Hernandez		(l) Produce, in native format, all documents, workpapers, and other calculations utilized by EPE in developing every allocation factor set forth in Schedule M-1, including D-E-C based allocation factors and each and every "internally generated" allocation factor.	No
636	**CLC-DAC 1-1**		Jennifer Nelson		Please provide all exhibits, schedules, and workpapers utilized and/or filed by Ms. Nelson in this case in Excel format.	Yes
637	**CLC-DAC 1-2**		Jennifer Nelson		Please identify and provide all source documents relied upon and/or cited by Ms. Nelson in this case.	No
638	**CLC-DAC 1-3**		Jennifer Nelson		Please provide copies of testimony filed by Ms. Nelson over the past two years.	No
639	**CLC-DAC 1-4**		Jennifer Nelson		Please provide a list of all proceedings in which Ms. Nelson has filed testimony.	No
640	**CLC-DAC 1-5**		Jennifer Nelson		Please provide a list of all proceedings in which the authorized return on equity recommended by Ms. Nelson was adopted by the regulatory commission in that proceeding.	No
641	**CLC-DAC 1-6**		Richard Gonzalez		Please provide the most current reports from the major rating agencies for EPE.	No
642	**CLC-DAC 1-7**		Richard Gonzalez		Please provide a copy of all reports prepared by security analysts that describe EPE from 2025 – present.	No
643	**CLC-DAC 1-8**	**a**	Enedina Soto		Please provide the EPE's forecasted growth rates for the following factors over the longest period available, and provide the source for such forecasts, as well as the time period for such forecasts, and the source of the information: a. Total load	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
644	**CLC-DAC 1-8**	**b**	Enedina Soto		b. Total customers	No
645	**CLC-DAC 1-8**	**c**	Richard Gonzalez		c. Total revenue	No
646	**CLC-DAC 1-8**	**d**	Richard Gonzalez		d. Net income	No
647	**CLC-DAC 1-8**	**e**	Richard Gonzalez		e. Rate base	No
648	**CLC-DAC 1-9**	**a**	Enedina Soto		Please provide EPE's annual figures for the following items over the past 10 years and the source of such information: a. Total load	No
649	**CLC-DAC 1-9**	**b**	George Novela		b. Total customers	No
650	**CLC-DAC 1-9**	**c**	Steven Sierra		c. Total revenue	No
651	**CLC-DAC 1-9**	**d**	Steven Sierra		d. Operating Income	No
652	**CLC-DAC 1-9**	**e**	Steven Sierra		e. Net Income	No
653	**CLC-DAC 1-9**	**f**	Cindy Prieto		f. Rate base	No
654	**CLC-DAC 1-10**	**a**	Steven Sierra		Please provide the following financial information for the Company for the most recent annual reporting period: a. Earnings before interest and taxes	No
655	**CLC-DAC 1-10**	**b**	Steven Sierra		b. Interst expense	No
656	**CLC-DAC 1-10**	**c**	Steven Sierra		c. Amount of book debt capital	No
657	**CLC-DAC 1-10**	**d**	Steven Sierra		d. Amount of book equity capital	No
658	**CLC-DAC 1-10**	**e**	Steven Sierra		e. Cost of debt	No
659	**CLC-DAC 1-11**	**a**	N/A		a. Current capital structure	No
660	**CLC-DAC 1-11**	**b**	N/A		b. Cost of debt	No
661	**CLC-DAC 1-12**		Jennifer Nelson		Referring to Ms. Nelson's testimony at page 4, please provide all support for the claim that the DCF is the Commission's preferred methodology.	No
662	**CLC-DAC 1-13**	**a**	John Spanos		Please provide all property data utilized in the depreciation study (Exhibit JJS-1), including, but not limited to, additions, retirements, transfers, sales, adjustments, cost of removal, and salvage data. a. Please provide this data by account, placement, and experience year since the date of inception	No
663	**CLC-DAC 1-13**	**b**	John Spanos		b. Please provide all survivors for each account as of the study date.	No
664	**CLC-DAC 1-13**	**c**	John Spanos		c. Please include all transaction codes and a description of each transaction code.	No
665	**CLC-DAC 1-13**	**d**	John Spanos		d. Please also provide a description of any production unit / group / location codes if applicable.	No
666	**CLC-DAC 1-13**	**e**	John Spanos		e. Please provide a description or legend for each account number.	No
667	**CLC-DAC 1-13**	**f**	John Spanos		f. This data should allow for the reconstruction of the analysis and calculations performed as part of the depreciation study.	No
668	**CLC-DAC 1-13**	**g**	John Spanos		g. Please provide this information in Excel format with formulae intact where applicable	No
669	**CLC-DAC 1-14**		John Spanos		Please provide all workpapers, schedules, tables, and exhibits used in the depreciation study or relied upon in conducting the depreciation study in Excel format with formulae intact where applicable.	No
670	**CLC-DAC 1-15**		John Spanos		Please provide all final observed life tables generated for each account in Excel format	No
671	**CLC-DAC 1-16**		John Spanos		Please provide all remaining life calculations in Excel format.	No
672	**CLC-DAC 1-17**		John Spanos		Please provide the average age of survivors as of the study date for each account.	No
673	**CLC-DAC 1-18**		John Spanos	Cindy Prieto	Please provide the book reserve (accumulated depreciation) balances for each account as of the depreciation study date.	No
674	**CLC-DAC 1-19**		John Spanos		Please provide the theoretical reserve (aka "calculated accumulated depreciation") amounts for each account based on the parameters proposed in the depreciation study and support for such calculations. Please confirm the total amount of the difference between the theoretical reserve balance and actual book reserve balance.	No
675	**CLC-DAC 1-20**		John Spanos		Please identify and describe any changes in the depreciation system / methodology between the previous depreciation study and the depreciation study filed in this case.	No
676	**CLC-DAC 1-21**		John Spanos		Please provide a schedule showing the currently-approved and proposed survivor curves, net salvage rates, and depreciation rates, and depreciation accrual for each account.	No
677	**CLC-DAC 1-22**		Cindy Prieto		Please provide a copy of the most recent Commission order(s) regarding currently-approved depreciation rates and probable retirement dates of any production units.	No
678	**CLC-DAC 1-23**		George Novela		Please provide a copy of the Company's most recently-filed integrated resource plan; please also provide a copy of the most recently prepared integrated resource plan.	No
679	**CLC-DAC 1-24**	**a**	John Spanos		Please identify all plant tours taken in relation to the depreciation study. For each such tour: a. Identify those in attendance and their titles and job descriptions.	No
680	**CLC-DAC 1-24**	**b**	John Spanos		b. Provide all conversation notes taken during the tour.	No
681	**CLC-DAC 1-24**	**c**	John Spanos		c. Provide all photographs and images taken during the tour.	No
682	**CLC-DAC 1-24**	**d**	John Spanos		d. Provide all written materials obtained during the tour.	No
683	**CLC-DAC 1-25**		John Spanos		Please specifically identify and describe any information obtained from any plant tour, field trip, or discussion with Company personnel, that would indicate that the average service lives of any life span or mass property would be shorter or longer than what is indicated by the retirement rate described by the Company's plant data.	No
684	**CLC-DAC 1-26**		John Spanos		Please provide all external sources relied upon in conducting the depreciation study, including industry surveys, statistics, and reports.	No
685	**CLC-DAC 1-27**		John Spanos		Please identify and provide copies of Company programs and plans that might substantially affect the remaining lives of any plant assets.	No
686	**CLC-DAC 1-28**		John Spanos		Please state whether the recorded vintage years of retirement have been modified in the historical data used to conduct the depreciation study. If so, please specifically identify such modifications by account, and provide all justification and support for the same	No
687	**CLC-DAC 1-29**		John Spanos		Please state whether any historical retirement data has been adjusted or excluded from net salvage value calculations and analysis, and if so, please provide all details and support.	No
688	**CLC-DAC 1-30**		John Spanos		Please identify any proposed changes in the probable retirement dates of any production units and provide justification and support for such proposed changes.	No
689	**CLC-DAC 1-31**		John Spanos		Please provide all decommissioning studies relied upon for support of any terminal net salvage requested in this case and provide a schedule showing the calculations of how the estimated decommissioning costs affected the proposed production net salvage rates.	No
690	**CCAE 1-1**		George Novela		If not already provided, please provide all workpapers, in Excel format with formulas intact.	Yes
691	**CCAE 1-2**		George Novela		Please provide all of the Company's responses to interrogatories and production requests received from any party in this proceeding. Please also produce such materials on a continuing basis until the close of the proceeding	No
692	**CCAE 1-3**	**a**	Adrian Hernandez		Please refer to page 5 to page 63 of Adrian Hernandez's Direct Testimony, which describes the Company's cost of service study and each of its components, including the functional cost-of-service study ("FOCOS"), the demand, energy, and customer components study ("DEC Study"), the jurisdictional cost-of-service study ("JCOS"), and the class cost of service study ("CCOS"). a. Please provide all executable work papers (e.g. Microsoft Excel Spreadsheets and similar files) for the cost of service study and each of its components, including the FOCOS, DEC Study, JCOS, and CCOS.	Yes
693	**CCAE 1-3**	**b**	Adrian Hernandez		b. Please identify and provide any live or functional models that the Company used to produce the cost of service study and each of its components, including the FOCOS, DEC Study, JCOS, and CCOS.	No
694	**CCAE 1-4**	**a**	Manny Carrasco		Please refer to page 33, lines 16 to 17 of Manuel Carrasco's Direct Testimony, which states "[t]he resulting on-peak energy price adders by rate class, along with the corresponding percentages, are shown in EPE's rate design model, Workpaper O.1." a. Please provide an executable version (e.g., Microsoft Excel Spreadsheets, live or functional rate design models, and similar files) of Workpaper O.1.	Yes
695	**CCAE 1-4**	**b**	Manny Carrasco		b. Please identify and provide any other live or functional rate design models and executable work papers (e.g., Microsoft Excel Spreadsheets and similar files) that the Company used to produce its proposed rates.	Yes

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
696	**CCAE 1-5**	**a**	Manny Carrasco	Adrian Hernandez	Please refer to page 96, lines 15 to 16 of Manuel Carrasco's Direct Testimony, which states "Exhibit MC-12 is a workpaper that includes all the cost of service and rate design calculations that support this section of this testimony." Please also refer to page 92, lines 1 to 3 and page 94, lines 14 to 16 of Manuel Carrasco's Direct Testimony, which state that the source of the Rate 50 and Rate 51 charges "is a cost-of-service study and rate design model for a hypothetical rate class." a. Please provide an executable version (e.g., Microsoft Excel Spreadsheets, live or functional rate design models, and similar files) of Exhibit MC-12, along with any workbooks, workpapers, or other documents used in creating Exhibit MC-12.	Yes
697	**CCAE 1-5**	**b**	Manny Carrasco	Enedina Soto	b. Please identify and provide any live or functional rate design models that the Company used to produce Rate 50 and Rate 51.	Yes
698	**CCAE 1-5**	**c**	Manny Carrasco		c. Please provide the cost-of-service study used in creating Rate 50 and Rate 51 in electronic Excel format with formulas intact.	Yes
699	**CCAE 1-5**	**d**	Manny Carrasco		d. Please identify and provide any other executable work papers (e.g., Microsoft Excel Spreadsheets and similar files) that the Company used to produce Rate 50 and Rate 51.	No
700	**CLC 7-1**	**a**	Enedina Soto		Please refer to the Direct Testimony of Enedina Soto at Q24 on page 12 and the Direct Testimony of Adrian Hernandez at Q49 through Q57 on pages 26 through 31 and provide the following information, references, and supporting documents: (a) How did EPE "directly assign[ ]" generation from EPE's resources that are assigned to serve customers from a specific jurisdiction to that jurisdiction and remove that generation from the retail customers' energy and demand usage used in the jurisdictional allocators? Explain your answer in detail, addressing among other things the method by which the generation from directly assigned resources was measured; the points in time or other manners in which the generation that was removed from jurisdictional allocators was identified and measured; and how those measurements were utilized to "remove" such generation from the retail customers' energy and demand usage used in the jurisdictional allocations used by EPE in this case.	No
701	**CLC 7-1**	**b**	Enedina Soto		(b) Provide detailed references to EPE's schedules and already filed workpapers in this docket that explain, support, and quantify the measurements, calculations, and allocation factors addressed in Interrogatory and Request for Production ~~CLC 4-1(a)~~ (CLC 7-1(a)), as well as all other workpapers, calculations, and other data and analyses used by EPE in making these allocator adjustments.	No
702	**CLC 7-1**	**c**	Enedina Soto		(c) Explain in detail what actual measurements of dedicated or directly-assigned resources' generation were utilized on a unit-by-unit basis for the calculations and development of allocation factors addressed in Interrogatory and Request for Production ~~CLC 4-1(a)~~ (CLC 7-1(a)) and (b).	No
703	**CLC 7-1**	**d**	Enedina Soto		(d) Provide detailed references to EPE's schedules, already filed workpapers, and discovery responses in this docket that explain, support, and quantify the measurements, calculations, and allocation factors addressed in Interrogatory and Request for Production ~~CLC 4-1(a)~~ (CLC 7-1(a)), as well as all other records, workpapers, calculations, and other data and analyses that support this unit-by-unit assessment of directly assigned generation resources.	No
704	**CLC 7-1**	**e**	Enedina Soto		(e) Explain how EPE evaluated and quantified the impact of battery energy storage (BESS) resources in making adjustments to its jurisdictional cost allocators to reflect dedicated or directly assigned resources that currently exist or that are expected to enter into service, including but not limited to the Santa Teresa Project, the Milagro Project, and the Carne Project.	No
705	**CLC 7-1**	**f**	Enedina Soto		(f) Provide detailed references to EPE's schedules, already filed workpapers, and discovery responses in this docket that explain, support, and quantify the measurements, calculations, and allocation factors addressed in Interrogatory and Request for Production ~~CLC 4-1(e)~~ CLC 7-1(e), as well as all other records, workpapers, calculations, and other data and analyses that support this unit-by-unit assessment of directly assigned generation resources.	No
706	**CLC 7-1**	**g**	Enedina Soto		(g) Provide hourly information for the base period and for the months since the base period on the energy production and BESS charging and discharging of each directly assigned EPE resource.	No
707	**CLC 7-1**	**h**	Enedina Soto		(h) If EPE does not have hourly information regarding the energy production of its generation and BESS units, explain why not.	No
708	**NMDOJ 1-1**		Richard Gonzalez		Please refer to the table pertaining to your requested equity ratio in El Paso Electric Company's (EPE's) Response to Staff Discovery Request 1-6. Please provide the calculations used to produce the table, as well as supporting workpapers and direct sources used in these calculations.	No
709	**NMDOJ 1-2**	**a**	Jennifer Nelson		Please refer to Figure JEN-16, on page 47 of the Direct Testimony of Jennifer E. Nelson, filed with the Application in question. a. Please confirm or deny that all of the companies in the proxy group, other than EPE, are holding companies that own multiple utilities, rather than single utility companies, and that the listed market capitalizations are those of the holding companies. If you deny that any or all of the market capitalizations are for holding companies, please explain your denial:	No
710	**NMDOJ 1-2**	**b**	Jennifer Nelson		b. Please confirm or deny that the market capitalization of EPE listed in JEN-16 is that for EPE itself, as a subsidiary, rather than the capitalization of EPE's parent holding company, Sun Jupiter LLC's. If you deny, please explain.	No
711	**NMDOJ 1-2**	**c**	Jennifer Nelson		c. Please confirm or deny that the market capitalization of EPE's holding Company, Sun Jupiter LLC, is not available publicly. If you deny, please explain and state where the data is available publicly. If you confirm, please provide the data, under the protective order, if necessary.	No
712	**NMDOJ 1-3**		Jennifer Nelson		Please refer to page 82 of the Direct Testimony of Jennifer E. Nelson, concerning the effect of business risk relative to the proxy group on the recommended return on equity. In past utility rate cases in which Ms. Nelson has testified, in any jurisdiction, has she ever claimed that a utility's level of business risk was such that it should favor a lower recommended return on equity than the average of the relevant proxy group? If so, please provide such testimony.	No
713	**NMDOJ 1-4**		Jennifer Nelson		Please refer to page 97 of the Direct Testimony of Jennifer E. Nelson, concerning the effect of the mix of an electric utility's generation fleet, particularly the percentage of nuclear generation used by the utility, on the return on equity. In past electric utility cases where Ms. Nelson has testified, in any jurisdiction, has she ever argued that the mix of a utility's generation fleet should favor a lower recommended return on equity? If so, please provide such testimony. In addition, please state the percentage of nuclear generation employed by each electric utility on whose behalf Ms. Nelson has ever testified, at the time of her testimony.	No
714	**NMDOJ 1-5**	**a**	Richard Gonzalez		Please refer to page 22 of the Direct Testimony of Richard Gonzalez, concerning his claim that a credit downgrade could result from a too low cash coverage ratio (Cash Flow from Operations pre-working capital to Debt or a too high coverage ratio (Funds from Operations leverage) a. Please state the calculations used to determine cash coverage ratio (Cash Flow from Operations pre-working capital) and coverage ratio (Funds from Operations leverage), including all constants and variables.	No
715	**NMDOJ 1-5**	**b**	Richard Gonzalez		b. Please provide the values for each component of cash coverage ratio (Cash Flow from Operations pre-working capital) and coverage ratio (Funds from Operations leverage) for 2021-2025.	No
716	**NMDOJ 1-5**	**c**	Richard Gonzalez		c. Please also provide the projected values for each component listed in NMDOJ 1-5(b) for 2026-2030, based on the assumption that EPE's instant application, including capital structure is approved.	No
717	**NMDOJ 1-5**	**d**	Richard Gonzalez		d. Please also provide the projected values for each component listed in NMDOJ 1-5(b) for 2026-2030, based on other scenarios of ROE modeled by EPE in the past year.	No
718	**NMDOJ 1-5**	**e**	Richard Gonzalez		e. Please describe how changes in the return on equity and separately, equity ratio, change the Funds from Operations leverage coverage ratio used by Fitch Ratings, Inc., as including supporting formulas and calculations, preferably in Excel format.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
719	**NMDOJ 1-6**	**a**	Richard Gonzalez		Please refer to the Direct Testimony of Ellen Lapson, filed in January, 2025, on behalf of EPE in support of Application of El Paso Electric Company to Change Rates, Pub. Util. Comm'n of Tex. Docket No. 57568, (Lapson testimony) P. 20, line 12 to P. 23, line 16. a. Please provide the "financial forecasting model that produces a forecasted balance sheet, income statement, and cash flow statement based upon various input assumptions," mentioned on P. 20, lines 13-14 of Lapson Testimony.	No
720	**NMDOJ 1-6**	**b**	Richard Gonzalez		b. Please describe how changes in the return on equity and separately, the ratio of equity to debt, change Moody's ratio of CFO pre-Working Capital/Debt. Please include supporting formulas and calculations, preferably in Excel format.	No
721	**DAC 6-1**		Enedina Soto	Rene Gonzalez	How does the load data in DAC 04-03_Attachment 02 relate to the load data in STAFF 04_03_Attachment 01? If any calculations are needed to connect the data in these two files, please explain and provide any workpapers showing these calculations in electronic format.	No
722	**DAC 6-2**		Enedina Soto		Should the maximum demand (coincident or non-coincident) for October 2024 through September 2025 for Rate 3 or Rate 7 in DAC 04_03_Attachment 02 match the maximum demand for kW (meter) or kW (Source) for the corresponding rate class and month in STAFF 04_03_Attachment 01? Please explain why or why not. If any calculations are needed to connect the data, please explain and provide any workpapers showing these calculations in electronic format.	No
723	**DAC 6-3**		Rene Gonzalez		Please refer to DAC 04-04_Attachment 01. Please describe in detail how you determined the adjustment from Base Year to Test Year for Rate 3 and Rate 7 for all three billing determinant categories.	No
724	**DAC 6-4**		Rene Gonzalez		Please refer to DAC 04-04_Attachment 01, Section C. kW Billing Demand. Total Billing Demand for Rate 3 was 436,558 kW for the Base Year and 423,995 kW for the Test Year for a decrease of approximately 2.9 percent. Total Billing Demand for Rate 7 was 231,042 kW for the Base Year and 229,367 kW for the Test Year for a decrease of approximately 0.7 percent. Why was billing demand decreased more for Rate 3 than Rate 7 from Base Year to Test Year?	No
725	**STAFF 6-1**	**a)**	Omar Gallegos	Rene Gonzalez	Refer to workpaper O.3, p. 2/25 (Rate 11), lines 7-8. Please explain and document the representations that 31w-50w LED is equivalent to a 150w HPS and that 51w-100w LED is equivalent to 250w HPS. Please provide the following information as well as any other information or analysis you deem relevant: Provide manufacturer specification sheets for all LED luminaires in the 31w-100w range that the Company currently installs.	No
726	**STAFF 6-1**	**b)**	Omar Gallegos		Provide manufacturer specification sheets for all 150w and 250w HPS luminaires the Company currently installs or has most recently installed.	No
727	**STAFF 6-1**	**c)**	Omar Gallegos	Rene Gonzalez	Provide any analysis of HPS-LED luminaire equivalency the Company relies on in making the equivalency statements cited above.	No
728	**STAFF 6-1**	**d)**	Omar Gallegos	Rene Gonzalez	Given that a 50w LED uses 61% more energy than a 31w LED luminaire, explain why the Company believes they are both equivalent to a 150w HPS luminaire. Please provide the same explanation for the 51w-100w LED range being equivalent to 250w HPS.	No
729	**STAFF 6-1**	**e)**	Omar Gallegos		Please explain what, if any, factors other than luminaire wattage that the Company uses when deciding which LED luminaire model to use in replacement of any given 150w or 250w HPS luminaire.	No
730	**STAFF 6-2**	**a)**	Omar Gallegos		Please state whether the Company observes each of the following standards when designing roadway lighting installations: IESNA RP-8-22	No
731	**STAFF 6-2**	**b)**	Omar Gallegos		Design Lights Consortium DLC listed products	No
732	**STAFF 6-2**	**c)**	Omar Gallegos		Design Lights Consortium DLC Luna products	No
733	**STAFF 6-2**	**d)**	Omar Gallegos		Dark Sky Consortium approved luminaires	No
734	**STAFF 6-2**	**e)**	Omar Gallegos		Any other luminaire or design specifications the Company observes.	No
735	**STAFF 6-3**	**a)**	Omar Gallegos	Rene Gonzalez	Please state the number of luminaires the Company currently has in service (Company-owned lights only) for each of the IESNA Luminaire Distribution Patterns I-V: For LED luminaires	No
736	**STAFF 6-3**	**b)**	Omar Gallegos	Rene Gonzalez	For HID luminaires	No
737	**STAFF 6-4**		Omar Gallegos		Please state whether the luminaire distribution patterns provided in response to the preceding question is representative of luminaires the Company currently installs. If it is not, please describe the Company's current policy and practices concerning luminaire distribution patterns.	No
738	**STAFF 6-5**	**a)**	Omar Gallegos	Rene Gonzalez	Please state the number of company-owned LED luminaires currently in service in the following CCT ranges: Below 2750 CCT	No
739	**STAFF 6-5**	**b)**	Omar Gallegos	Rene Gonzalez	2750-3250	No
740	**STAFF 6-5**	**c)**	Omar Gallegos	Rene Gonzalez	3250-3750	No
741	**STAFF 6-5**	**d)**	Omar Gallegos	Rene Gonzalez	3750-4250	No
742	**STAFF 6-5**	**e)**	Omar Gallegos	Rene Gonzalez	Above 4250.	No
743	**STAFF 6-6**		Omar Gallegos	Rene Gonzalez	Please state whether the CCT distribution of LED luminaires provided in the preceding response is representative of LED luminaires the Company currently installs. If it is not, please describe the Company's current policy and practices concerning luminaire CCTs.	No
744	**STAFF 6-7**		Omar Gallegos	Rene Gonzalez	Please describe in detail whether and how a customer may specify LED luminaire model selections, including wattage, lumen output, light distribution pattern, CCT and luminaire design (e.g., for decorative posttop models). Please also describe how customer choice affects customer cost.	No
745	**STAFF 6-8**		Omar Gallegos		Does the Company currently install new HID luminaires?	No
746	**STAFF 6-9**		Omar Gallegos		Does the Company currently re-lamp HID luminaires?	No
747	**STAFF 6-10**	**a)**	Omar Gallegos		Please describe in detail the processes by which the Company converts HID to LED installations. Include in your response the following topics and address anything else you deem relevant: Are HID-LED conversions initiated by the customer or the Company?	No
748	**STAFF 6-10**	**b)**	Omar Gallegos		Are customer contributions required for HID-LED conversions? Please describe criteria and method for determining contribution.	No
749	**STAFF 6-10**	**c)**	Rene Gonzalez		Do customers who pay for conversions pay the same tariff as customers who receive Company-paid conversions?	No
750	**STAFF 6-10**	**d)**	Omar Gallegos		If HID-LED conversions require customer approval, please provide anonymized sample communications including HID-LED luminaire equivalencies, required customer contribution, projected changes in bill and projected changes in energy use.	No
751	**STAFF 6-10**	**e)**	Omar Gallegos		Does the Company conduct photometric surveys of LED installations to check for compliance with roadway lighting standards?	No
752	**STAFF 6-11**	**a)**	Omar Gallegos		Please provide the following streetlight reliability data for calendar years 2023-2025: Number of reported streetlight outages	No
753	**STAFF 6-11**	**b)**	Omar Gallegos		Average service restoration time	No
754	**STAFF 6-11**	**c)**	Omar Gallegos		Number of outages exceeding 10 days duration	No
755	**STAFF 6-12**		Omar Gallegos		Does the Company use any method, other than customer/public reporting, to identify streetlight outages? Please specifically address networked lighting controls and direct field inspections in your answer, as well as anything else you deem relevant.	No
756	**STAFF 6-13**	**a)**	Rene Gonzalez		Does the Company adjust streetlight rates or customer bills to reflect service time lost to streetlight outages? Specifically, please address and describe: Bill credits	No
757	**STAFF 6-13**	**b)**	Rene Gonzalez		Adjustments to streetlight electric sales forecast.	No
758	**STAFF 6-14**		Omar Gallegos	Rene Gonzalez	Please provide any written policies, tariffs, internal guidelines, customer-facing materials, or other responsive documentation regarding permanently removing a streetlight from service at the customer's request.	No
759	**STAFF 6-15**		Omar Gallegos	Rene Gonzalez	Please provide any written policies, tariffs, internal guidelines, customer-facing materials, or other responsive documentation regarding installing new streetlights.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
760	**STAFF 6-16**		Omar Gallegos	Rene Gonzalez	Please provide any written policies, tariffs, internal guidelines, customer-facing materials, or other responsive documentation regarding customer acquisition of company-owned streetlights and associated assets (e.g., support arm, post, conductor, etc.).	No
761	**CLC 8-1**	**(a)**	Steven Sierra		Please refer to EPE's response to Request for Production of Documents CLC 2-1 and provide the following documents and information: (a) Referring to CLC 02-01_Attachment 02 CONFIDENTIAL MATERIAL, explain the allocation methodology or methodologies for Palo Verde Nuclear Generating Station ("PVNGS") operations and maintenance ("O&M") costs and provide copies of agreements or other documents that support that methodology or those methodologies.	No
762	**CLC 8-1**	**(b)**	Steven Sierra		(b) To the extent that any monthly allocation of PVNGS O&M does not match any participant's ownership interest, including but not limited to EPE's ownership interest, explain why not and provide copies of agreements or other documents that support any allocation other than on a percentage of ownership basis.	No
763	**CLC 8-1**	**(c)**	Steven Sierra		(c) Referring to CLC 02-01_Attachment 02 CONFIDENTIAL MATERIAL, explain the nature of the categories used for the line item costs on each page of that document.	No
764	**CLC 8-1**	**(d)**	Steven Sierra		(d) Referring to CLC 02-01_Attachment 02 CONFIDENTIAL MATERIAL, separate each line item O&M expense amount into the appropriate FERC account or accounts.	No
765	**CLC 8-2**	**(a)**	Adrian Hernandez		Please refer to the Direct Testimony of Adrian Hernandez at Q61 on page 33 and provide the following information and documents: (a) Explain in detail what Mr. Hernandez means by "directly related" when he testifies that "any costs directly related to PVGS Unit 3 will not be allocated to New Mexico." Among other things, provide examples of what types of costs would be "directly related" and what types of costs would not be considered to be "directly" related.	No
766	**CLC 8-2**	**(b)**	Adrian Hernandez		(b) Provide references to pages, lines, and columns in EPE's rate case exhibits, schedules, and workpapers that identify which costs were considered to be "directly related" to PVNGS Unit 3, along with similar references to the places in exhibits, schedules, and workpapers that show the removal or exclusion of those costs from the proposed revenue requirement and/or rates for New Mexico retail customers.	Yes
767	**CLC 8-2**	**(c)**	Adrian Hernandez		(c) To the extent that EPE's filed rate case exhibits, schedules, and workpapers do not clearly and discretely identify each and every cost directly related to PVNGS Unit 3 and how those costs were allocated in manner that does not cause New Mexico ratepayers to pay any such amounts, provide explanation of, and additional supporting documentation and quantification of, the costs "directly related" to PVNGS Unit 3 that EPE did not allocate to New Mexico for the purpose of determining its proposed New Mexico revenue requirement and class rates.	No
768	**CLC 8-2**	**(d)**	Adrian Hernandez		(d) Provide detailed references to the tabs, lines, and columns in EPE's cost of service spreadsheet produced in discovery as STAFF 01-03_Attachment 01 where EPE's intention not to allocate any costs directly related to PVNGS Unit 3 are shown. If the figure in a particular cell of that spreadsheet encompasses costs other than the ones "directly related" to PVNGS Unit 3 that EPE intended not to allocate to New Mexico customers, provide a breakdown of the costs "directly related" to PVNGS Unit 3 and the costs not directly related to PVNGS Unit 3.	Yes
769	**CLC 8-2**	**(e)**	Adrian Hernandez		(e) Provide copies of any calculations other than those provided in STAFF 01-03_Attachment 01 that explicate or demonstrate EPE's identification of costs related to PVNGS Unit 3 that were considered to be "directly related" to PVNGS Unit 3 and therefore were excluded from allocation to New Mexico customers.	No
770	**CLC 8-2**	**(f)**	Adrian Hernandez		(f) Describe and quantify any costs related to PVNGS Unit 3 that EPE did not consider to be "directly related" to PVNGS Unit 3 and therefore did not exclude from allocation to New Mexico retail customer rates.	No
771	**CLC 8-2**	**(g)**	Adrian Hernandez		(g) Provide specific references to EPE's filed rate case exhibits, schedules, and workpapers, including pages, lines, columns, or tabs, where the costs identified in response to Interrogatory and Request for Production ~~CLC 5-2(f)~~ (CLC 8-2(f)) were allocated, in whole or in part, to New Mexico ratepayers. If any such dollar amount was partially allocated to New Mexico ratepayers, explain the basis for the partial allocation and provide supporting documentation, including but not limited to workpapers and calculations.	No
772	CLC 8-2	**(h)**	Adrian Hernandez		(h) If any of EPE's filed exhibits, schedules, workpapers, or discovery responses cited in your responses to this Interrogatory and Request for Production ~~CLC 5-2~~ (CLC 8-2) do not clearly and discretely identify each and every cost directly related to PVNGS Unit 3 and demonstrate how those costs were allocated in manner that does not cause New Mexico ratepayers to pay any such amounts, provide explanation of EPE's proposed treatment of those costs, along with additional supporting documentation and calculations.	No
773	**CLC 8-3**		Adrian Hernandez		Please refer to the Direct Testimony of Adrian Hernandez at Q61 on page 33 and explain his testimony that "***one-third of PVNGS Unit 3*** Common and Water Resource Facility costs will be handled in the same way and will not be allocated to New Mexico." In particular, provide figures for PVNGS Unit 3 Common costs and PVNGS Unit 3 Water Resource Facility costs and explain why Mr. Hernandez's testimony implies that two-thirds of PVNGS Unit 3 Common costs and two-thirds of PVNGS Unit 3 Water Resource Facility costs will be allocated to New Mexico customers.	No
774	**CLC 8-4**		Adrian Hernandez		If it was not Mr. Hernandez's intention to testify in Q61 on page 33 that one-third of all PVNGS Unit 3 Common costs and one-third of all PVNGS Water Resource Facility costs were not allocated to New Mexico, explain how EPE developed a one-third allocation factor and provide references to exhibits, schedules, workpapers, and discovery responses that identify and quantify the costs that New Mexico customers are being asked to bear and the allocation factor or factors and calculations used in those determinations of cost responsibility	No
775	**CLC 8-5**		Adrian Hernandez		Please refer to the Direct Testimony of Adrian Hernandez in Q61 on page 33, lines 11 through 15, and identify precisely, by page, tab, row, line and column, where each of the PVNGS Unit 3-related allocation factors were (developed in EPE's exhibits, schedules, workpapers, and documents produced in response to discovery requests.	No
776	**CLC 8-6**		Adrian Hernandez		Please refer to the Direct Testimony of Adrian Hernandez in Q61 on page 33, lines 11 through 15, and identify precisely, by page, tab, row, line and column, where each of the PVNGS Unit 3-related allocation factors was applied in EPE's exhibits, schedules, workpapers, and documents produced in response to discovery requests to allocate costs to the New Mexico jurisdiction and/or to specific New Mexico rate classes. Your answer should include, but not be limited to, citations within the excel cost of service workbook produced in response to Staff's first set of discovery requests to EPE as STAFF 01-03_Attachment 01.	Yes
777	**CLC 8-7**		Adrian Hernandez		Please refer to your response to Interrogatory and Request for Production ~~CLC 5-6~~ (CLC 8-6) and provide any calculations or other workpapers used by EPE in developing its rate case application in this docket other than its filed exhibits, schedules and workpapers and its discovery responses that explain, support, or otherwise describe the Company's efforts to assure that New Mexico customers do not bear costs for PVNGS Unit 3, which has been excluded from rate base and decertified for decades and which EPE stopped using for service to New Mexico retail customers after the Commission issued its Final Order in NMPRC Case No. 20-00104-UT.	No
778	**CLC 8-8**		Cindy Prieto		Please refer to Exhibit CSP-1 of the Direct Testimony of Cynthia S. Prieto and explain what is meant by "Gross Additions," among other things distinguishing between "gross additions" and costs that might properly be classified as rate base additions. Among other things, please explain whether the "Gross Additions" and "Post-Base Period Additions (October 2025)" include construction work in progress ("CWIP"), as is suggested by lines 285 through 287 on page 6 of 11, which include amounts incurred up to September 30, 2025 and during October 2025 for the Felina Project which, to the City's best knowledge, was not completed or in operation during those periods.	No

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	**Intervenor/ Set**	**Subpart**	**Sponsor**	**Co-Sponsor(s)**	**Question**	**Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)**
779	**CLC 8-9**		Adrian Hernandez		Please refer to the Direct Testimony of Cynthia S. Prieto at Q90 on pages 46 and 47 and the Direct Testimony of Adrian Hernandez at Q58 on pages 31-32. Describe in detail and quantify which costs related to Newman Unit 6 were excluded from allocation to New Mexico customers, with references to pages, tabs, lines, rows and columns of EPE's rate case Application exhibits and schedules, its Errata Notice workpapers, and any discovery responses provided to date (including but not limited to STAFF 01-03_Attachment 01).	Yes
780	**CLC 8-10**		Jeff Hughes		Referring to Interrogatory and Request for Production CLC 5-9 and your response to that discovery request, explain in detail how EPE identified "common" costs of Newman Unit 6 as part of existing Newman Generating Station and made cost assignments and allocations to assure that, like Mr. Hernandez testified concerning PVNGS Unit 3, no costs related to that generating unit to which the NMPRC denied a certificate of public convenience and necessity ("CCN") in NMPRC Case No. 19-00349-UT, have been allocated to New Mexico customers in EPE's proposal in this Case No. 25-00082-UT.	No
781	**CLC 8-11**		Jeff Hughes		Referring to your responses to Interrogatories and Requests for Production ~~CLC 5-9 and 5-10~~ (CLC 8-9, 8-10), explain EPE's distinctions in the treatment of "directly related" costs of Newman Unit 6 and "common" costs of Newman Unit 6 as part of the Newman Generating Station and provide references to pages, tabs, lines, rows and columns of EPE's rate case Application exhibits and schedules, its Errata Notice workpapers, and any discovery responses provided to date (including but not limited to STAFF 01-03_Attachment 01, that reflect EPE's proposed rate recovery treatment of costs that have been or could have been categorized as "directly related" to Newman Unit 6 and costs that have been or could have been categorized as "common" costs of the Newman Generating Station since the addition of Newman Unit 6.	No
782	**CLC 8-12**		Cindy Prieto		Referring to your responses to Interrogatories and Requests for Production ~~CLC 5-9, 5-10, and 5-11~~ (CLC 8-9, 8-10, 8-11) , provide copies of analyses in any format, calculations, or other evaluations that EPE has performed that reflect its chosen treatment of costs associated with Newman Unit 6 and any alternative treatments that the Company has considered. Your answer should include capital costs, i.e., rate base, O&M costs, fuel costs, insurance, taxes of any type, regulatory fees, and any other costs that either have changed as a result of Newman Unit 6 having entered service in 2023 and having been operated by EPE without a New Mexico CCN since then.	No
783	**CLC 8-13**		Jeff Hughes		Please identify and quantify the costs of any modifications to the Newman generating station site that were incurred in connection with the construction and operation of Newman Unit 6; describe EPE's proposed treatment of those costs in its New Mexico rate application in this case; and provide detailed and, if appropriate, annotated references to pages, tabs, lines, rows and columns of EPE's rate case Application exhibits and schedules, its Errata Notice workpapers, and any discovery responses provided to date (including but not limited to STAFF 01-03_Attachment 01).	No
784	**CLC 8-14**		Omar Gallegos		Please identify and quantify the costs of any modifications to EPE's transmission system and/or its contractual transmission service rights and obligations that were made to facilitate the construction and operation of Newman Unit 6; describe EPE's proposed treatment of those costs in its New Mexico rate application in this case; and provide detailed and, if appropriate, annotated references to pages, tabs, lines, rows and columns of EPE's rate case Application exhibits and schedules, its Errata Notice workpapers, and any discovery responses provided to date (including but not limited to STAFF 01-03_Attachment 01).	No
785	**CLC 8-15**		Jeff Hughes	Omar Gallegos	Please identify and quantify the costs of any additions or modifications to EPE's generation and transmission system operations facilities, equipment, and personnel that have been made to facilitate the construction and operation of Newman Unit 6; describe EPE's proposed treatment of those costs in its New Mexico rate application in this case; and provide detailed and, if appropriate, annotated references to pages, tabs, lines, rows and columns of EPE's rate case Application exhibits and schedules, its Errata Notice workpapers, and any discovery responses provided to date (including but not limited to STAFF 01-03_Attachment 01).	No
786	**CLC 8-16 A**		Enedina Soto		Please refer to the Direct Testimony of Enendina Soto at Q24 on page 12 and provide EPE's workpapers and any other documents reflecting and supporting how and in what numbers "[g]eneration from EPE's resources that are assigned to service customers from a specific jurisdiction were directly assigned to the relevant jurisdiction and removed from the retail customers' energy and demand usage used in the jurisdictional allocators." Your answer should include explanation and quantification of the amounts of generation from each renewable energy or battery storage facility that is directly assigned to a specific jurisdiction, regardless of whether that that renewable energy and battery storage is procured through purchased power agreements("PPAs") or energy storage agreements ("ESAs") or is owned by EPE. Your answer should also show how the amounts of generation from each generation resource that is assigned to serve a specific jurisdiction were explicitly incorporated into the New Mexico jurisdictional energy and demand allocators.	No
787	**CLC 8-16 B**		Enedina Soto		Provide the source data and documents for the amounts of directly assigned generation that were directly assigned and removed from the retail customers' energy and demand usage used in the jurisdictional allocators, as stated in the Direct Testimony of Enendina Soto at Q24 on page 12.	No
788	**CLC 9-1**	**a**	Cindy Prieto		Please refer to Exhibit CSP-1 attached to the Direct Testimony of Cynthia S. Prieto and provide the following information: (a) For each line item Project that does not have an in-service date listed in column (k), provide the most accurate in-service date available to EPE. If the day or the month is uncertain, at minimum provide the year.	No
789	**CLC 9-1**	**b**	Cindy Prieto		(b) For any line item Project for which EPE cannot provide an in-serve date in accordance with Interrogatory and Request for Production ~~CLC 6-1~~ (CLC 9-1), explain why EPE cannot provide any in-service date.	No
790	**CLC 9-1**	**c**	Omar Gallegos	Jeff Hughes	(c) For each line item Project for which EPE has filed a report under NMPRC Rule 17.5.440 NMAC, whether or not that report covered the line item in part or in whole, identify the Company's number for that report or reports, the date of filing of that report or reports, and the date of filing of any amendments to the report or reports.	No
791	**CLC 9-2**	**a**	Cindy Prieto		Please refer to the Direct Testimony of Adrian Hernandez at Q61 on page 33, the Direct Testimony of Cynthia S. Prieto at 226-27 of Exhibit CSP-1 lines, EPE's responses to the City's Second Set of Requests for Production of Documents at CLC 02-02_Attachment 01, and EPE's responses to Interrogatories and Requests for Production ~~CLC 5-2 and 5-3~~ (CLC 8-2 and CLC 8-3), and provide the following information and supporting documents, as well as references to EPE's relevant testimony, exhibits, schedules, workpapers, and discovery requests: (a) In developing the rate base additions for PVNGS requested for recovery from New Mexico retail customers in this Case No. 25-00082-UT, did EPE remove the costs of the work orders listed on CLC 02-02_Attachment 01 as being rate base additionsfor Palo Verde Nuclear Generating Station ("PVNGS") Unit 3? If your answer is no, explain in detail why not. If your answer is yes, refer to EPE's filed testimony, exhibits, schedules and workpapers that demonstrate that such additions were made to EPE's proposed test period rate base and New Mexico revenue requirement	No
792	**CLC 9-2**	**b**	Cindy Prieto		(b) In developing the rate base additions for PVNGS requested for recovery from New Mexico retail customers in this Case No. 25-00082-UT, did EPE sum the amounts for work orders listed on CLC 02-02_Attachment 01 identified as being rate base additions for PVGS Common and for work orders identified as being rate base additions for PVNG Water Reclamation and divide that sum by three? If your answer is no, explain in detail why not. If your answer is yes, refer to EPE's filed testimony, exhibits, schedules and workpapers that demonstrate that such adjustments were made to EPE's proposed test period rate base and New Mexico revenue requirement.	No
793	**CLC 9-2**	**c**	Cindy Prieto	Adrian Hernandez	(c) To the extent that EPE's filed rate case exhibits, schedules, and workpapers do not clearly and fully demonstrate the adjustments to EPE's proposed New Mexico jurisdictional rate base discussed in Interrogatory and Request for Production ~~CLC 6-2(a) and (b)~~ CLC 9-2(a) and (b), provide additional documentation, including but not limited to calculations and evidence of cost amounts for work orders listed on CLC 02-02_Attachment 01 that do not match the figures set forth in that discovery response.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
794	**CLC 9-3**	**a**	Victor Martinez		Please refer to the Direct Testimony of Victor Martinez at Q75 on page 51; EPE's responses and objections to Interrogatory and Request for Production Staff 1-31; STAFF 01-31_Attachment 01; and EPE's objections and response to Request for Production CLC 2-4, and provide the following information and documents: (a) Explain why EPE believes that a new 228-MW simple cycle generating unit presents an appropriate proxy for replacement of an older 90-MW generating unit.	No
795	**CLC 9-3**	**b**	Victor Martinez		(b) Provide the heat rates for Newman Unit 6 and Newman Unit 3.	No
796	**CLC 9-3**	**c**	Victor Martinez		(c) Explain why EPE believes that the cost of a generating unit completed in 2023 at a cost significantly in excess of its projected cost represents an appropriate proxy for replacement of Newman Unit 3.	No
797	**CLC 9-3**	**d**	Victor Martinez		d) Explain why, as stated in EPE's response to Interrogatory and Request for Production Staff 1-31(c), EPE did not evaluate upgrading Newman Unit 3 "against a discrete set of alternative resources."	No
798	**CLC 9-3**	**e**	Victor Martinez		(e) Provide the levelized costs of capacity for each electric generation resource bid into any request for proposals ("RFP") for capacity and/or energy issued by EPE since 2017, when EPE issued the RFP that resulted in its selection of Newman Unit 6.	No
799	**CLC 9-3**	**f**	Victor Martinez		(f) Referring to Mr. Martinez's testimony in Q75, is the spreadsheet produced in response to Interrogatory and Request for Production Staff 1-3--STAFF 01-31_Attachment 01—the levelized cost of energy spreadsheet mentioned on page 51, line 15 of that testimony? If your answer is no, produce a copy of the spreadsheet to which the testimony refers.	No
800	**CLC 9-3**	**g**	Victor Martinez		(g) Referring to Mr. Martinez's testimony in Q75, produce copies of the analysis that Energy Resources did to compare or evaluate the "costs of Newman 3 upgrades against that proxy price" that resulted in your conclusion that savings of $10.6 million in deferred capital costs would arise from pursuing the Newman 6 upgrades and a five-year life extension.	No
801	**CLC 9-3**	**h**	Victor Martinez		(h) Referring to your response to Interrogatory and Request for Production ~~CLC 6-3(g)~~ (CLC 9-3(g), also provide documentation setting forth the assumptions used in that evaluation of the cost of Newman 3 upgrades against the "proxy price" based on Newman Unit 6 costs and explain why those assumptions were reasonable.	No
802	**CLC 9-3**	**i**	Victor Martinez		(i) State when the analysis described in Mr. Martinez's testimony was performed.	No
803	**CLC 9-3**	**j**	Victor Martinez		(j) Identify, describe, and to the extent possible quantify any changes in the assumptions used for the spreadsheet developing the levelized cost of energy for Newman Unit 6.	No
804	**CLC 9-3**	**k**	Victor Martinez		(k) Identify, describe, and to the extent possible quantify any changes to the Newman 3 upgrade costs used in the analysis described by Mr. Martinez in relation to the Newman Unit 3 upgrade costs that EPE ultimately expended and for which EPE is seeking rate recovery in this case.	No
805	**CLC 9-4**	**a**	Jeff Hughes		Please refer to the Direct Testimony of Victor Martinez at Q75 on page 51; EPE's responses and objections to Interrogatory and Request for Production Staff 1-31; STAFF 01-31_Attachment 01; EPE's objections and responses to Requests for Production CLC 2-4 and CLC-25; CLC 02-05_Attachment 01; and the Direct Testimony of Jeffery M. Hughes at Q60 through Q65 on pages 42-47 and Exhibits JMH-3 and JMH-4, and provide the following information and documents: (a) When was the document produced as CLC 02-05_Attachment 01 prepared?	No
806	**CLC 9-4**	**b**	Jeff Hughes		(b) When was Exhibit JMH-3 sent to EPE?	No
807	**CLC 9-4**	**c**	Jeff Hughes		(c) Did Burns & McDonnell prepare any evaluations or estimates of the costs to repair the damage to Newman Unit 3 that is the subject of Exhibit JMH-3? If so, provide copies of any estimates prepared by Burns & McDonnell.	No
808	**CLC 9-4**	**d**	Jeff Hughes		(d) Provide documentation of any other estimates for the repairs and upgrade of Newman Unit 3 that were prepared internally by EPE or by external third parties.	No
809	**CLC 9-4**	**e**	Jeff Hughes		(e) How did EPE use the document produced as CLC 02-05_Attachment 01 in its decision to go forward with the upgrades of Newman Unit 3, if at all? Explain your answer in detail.	No
810	**CLC 9-4**	**f**	Jeff Hughes		(f) Referring to the document produced as CLC 02-05_Attachment 01, explain the bases for the "Total Project Capital Cost Estimate" of $7,500,000 stated on the top of that document.	No
811	**CLC 9-4**	**g**	Jeff Hughes		(g) Referring to the document produced as CLC 02-05_Attachment 01, explain the assumptions around the statement about potential cost savings or cost avoidance that refers to "avoid[ing] the cost of replacement dispatchable capacity of approximately $160M for 100 MW of capacity," including at minimum the assumed duration of the acquisition of such 100 MW of capacity, the assumed price and other terms for the acquisition of 100 MW of capacity, and the assumed source of such replacement capacity, i.e., market purchases of what duration at which locations or the acquisition of rights in generation facilities.	No
812	**CLC 9-4**	**h**	Jeff Hughes		(h) Referring to the document produced as CLC 02-05_Attachment 01, how did EPE in fact replace the generation capacity of Newman Unit 3 during the outage that lasted from June 28, 2023 until at least April 28, 2024, according to Mr. Hughes's testimony and his Exhibit JMH-4. Provide a detailed narrative of EPE's operations throughout that period without the use of Newman Unit 3, identifying EPE's altered use of its existing resources and any purchases that EPE made to compensate for the unavailability of Newman Unit 3. Your answer should include the costs of replacement power and energy, the costs of additional wear and tear on EPE's existing generation assets, and any other relevant costs or savings, both as estimated by EPE or others on	No
813	**CLC 9-4**	**i**	Jeff Hughes		(i) Please refer to the "Total Project Capital Cost Estimate" of $7,500,000 stated on the top of the document produced as CLC 02-05_Attachment 01 and to the Direct Testimony of Jeffery M. Hughes at Q60 on page 43, stating that the original budget for the Newman Unit 3 Major Inspection and Capital Improvement Project was $2.8 million of O&M and $700,000 of capital costs. Explain how much of the $7,500,000 was O&M and how much of it was capital costs.	No
814	**CLC 9-4**	**j**	Jeff Hughes		(j) Please refer to the "Total Project Capital Cost Estimate" of $7,500,000 stated on the top of the document produced as CLC 02-05_Attachment 01 and to the Direct Testimony of Jeffery M. Hughes at Q60 on page 43, stating that the original budget for the Newman Unit 3 Major Inspection and Capital Improvement Project was $2.8 million of O&M and $700,000 of capital costs. Explain in detail how EPE ended up with such different estimates for a similar project.	No
815	**CLC 9-4**	**k**	Jeff Hughes		(k) Please refer to the document produced as CLC 02-05_Attachment 01 and explain in detail what costs and what generation resources were taken into consideration in the section of the document labeled "Internal Rate of Return (IRR) and Net Present Value (NPV)."	No
816	**CLC 9-4**	**l**	Jeff Hughes		(l) Please refer to the document produced as CLC 02-05_Attachment 01 and the statement under the heading "Describe alternatives considered," which states that the alternative would be the purchase of two LM6000 for a total capacity of about 100 MW. Explain whether that alternative was considered at all and why it was not used instead of EPE's comparison to the costs of Newman Unit 6 in the evaluation discussed by Mr. Martinez in his direct testimony.	No
817	**CLC 9-4**	**m**	Jeff Hughes		(m) Please refer to Mr. Hughes' Direct Testimony at Q65 on page 46, as well as Exhibit CSP-1 attached to the Direct Testimony of Cynthia S. Prieto, and identify where in EPE's rate case application an adjustment was made to the costs of the Newman Unit 3 major inspection and upgrades to reflect the insurance recovery of approximately $1.8 million. If the referenced exhibits, schedules, and/or workpapers do not clearly reflect that adjustment, provide detailed supporting information and documentation to demonstrate that the reduction in costs sought for recovery was made in EPE's rate case filing and the amounts of that reduction.	No
818	**CLC 9-5**	**a**	Jeff Hughes		Please refer to the Direct Testimony of Jeffery EPE's response to Request for Production CLC 2-7, including CLC 02-07_Attachment 01 CONFIDENTIAL MATERIAL, and provide the following information and documents: (a) Provide a copy of the request for proposals ("RFP") that resulted in the proposals included in CLC 02-07_Attachment 01 CONFIDENTIAL MATERIAL.	No
819	**CLC 9-5**	**b**	Jeff Hughes		(b) Did the RFP produced in response to Interrogatory and Request for Production ~~CLC 6-4(a)~~ (CLC 9-4(a)) encompass all of the work that was done on Newman Unit 3 before it was returned to service in spring 2024? Explain your answer in detail.	No
820	**CLC 9-5**	**c**	Jeff Hughes		(c) Provide copies of any subsequently issued RFPs relating to work on Newman Unit 3 during 2023 and 2024.	No
821	**CLC 9-5**	**d**	Jeff Hughes		(d) Did the proposals submitted in response to the RFPs relating to work on Newman Unit 3 issued subsequently to the first such RFP, if any, combined with the work done in response to the first RFP, all of the work that was done on Newman Unit 3 before it was returned to service in spring 2024? Explain your answer in detail.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
822	**CLC 9-5**	**e**	Jeff Hughes		(e) Did each of the responses and proposals received in response to the first RFP concerning the 2023 Newman Unit 3 outage address all of the requirements of that RFP? Explain your answer in detail.	No
823	**CLC 9-5**	**f**	Jeff Hughes		(f) In light of the terms of the responses to the first RFP produced by EPE as CLC 02-07_Attachment 01 CONFIDENTIAL MATERIAL, including but not limiting to the pricing proposals, what caused EPE to select the contractor that it chose to do the work? Explain your answer in detail.	No
824	**CLC 9-5**	**g**	Jeff Hughes		(g) Provide copies of all invoices, work orders, or other documents reflecting changes to the scope and the cost of the work done on Newman Unit 3 during 2023 and 2024 that EPE authorized and paid.	No
825	**CLC 9-5**	**h**	Jeff Hughes		(h) Provide an accounting of, or a detailed estimate of, the amounts of EPE labor, EPE-owned materials and supplies, and EPE-owned equipment used in making repairs and improvements to Newman Unit 3 during 2023 and 2024.	No
826	**CLC 9-5**	**i**	Jeff Hughes		(i) Identify and quantify the EPE labor-related costs that were was capitalized and included in the proposed rate base additions for the "life extension" of Newman Unit 6. Provide supporting documentation.	No
827	**CLC 9-5**	**j**	Jeff Hughes		(j) In light of the terms of the responses to the first RFP produced by EPE as CLC 02-07_Attachment 01 CONFIDENTIAL MATERIAL, including but not limiting to the pricing proposals, explain why EPE believes that the external and internal costs that it incurred in connection with the 2023-2024 inspection, repairs, and upgrades of Newman Unit 3 were reasonable.	No
828	**CLC 9-6**	**a**	Julissa Reza	Steven Sierra George Novela	Please refer to EPE's Schedule A-03; EPE's Workpaper A-03 and Workpaper A-3, Adjustment Nos. 10 and 22; EPE's responses to Requests for Production CLC 2-17 and 2-18 and provide the following information and supporting documents: (a) Referring to page 3 of 3 of Adjustment No. 10 to Workpaper A-3, explain in detail Footnote (B) and the effect of that statement on the total Regulatory Commission Expense that EPE seeks to recover from New Mexico ratepayers in this case.	No
829	**CLC 9-6**	**b**	Julissa Reza		(b) Referring to page 3 of 3 of Adjustment No. 10 to Workpaper A-3, explain in detail Footnote (C) and describe the effect of that statement on the total Regulatory Commission Expense that EPE seeks to recover from New Mexico ratepayers in this case, among other things identifying the rider referred to in each line item that includes Footnote C, the jurisdictions and/or customer classes to which each such rate rider applies, and the annual and long-term recovery amounts associated with each such rider.	No
830	**CLC 9-6**	**c**	Julissa Reza		(c) Referring to page 3 of 3 of Adjustment No. 10 to Workpaper A-3 at line 28, Footnote (C), explain in detail why the FERC Transmission Rate Case Costs Amortization is described as being recovered in a separate rider and identify any amounts that EPE has recovered or intends to recover through a rider applicable to New Mexico retail electric customers.	No
831	**CLC 9-6**	**d**	Julissa Reza		(d) Referring to page 3 of 3 of Adjustment No. 10 to Workpaper A-3, explain in detail Footnote (D), explain the reclassification of costs on each line item containing Footnote D, and demonstrate that those reclassified costs are not included anywhere else in EPE's Application in this case, as amounts to be recovered from New Mexico ratepayers, in part or in whole.	No
832	**CLC 9-6**	**e**	legal		(e) Referring to page 3 of 3 of Adjustment No. 10 to Workpaper A-3 at line 6, explain why the "New Mexico Black Mountain Line Location ROW" cost is proposed to be allocated to New Mexico customers in light of the fact that EPE's application in NMPRC Case No. 26-0000077 for a 300-foot right-of-way is intended to serve a new 100-MW solar PV and 50-MW battery storage facility that were selected to be resources dedicated to providing electric service to EPE's Texas retail customers.	No
833	**CLC 9-6**	**f**	Adrian Hernandez	Steven Sierra	(f) Referring to page 3 of 3 of Adjustment No. 10 to Workpaper A-3 and [Errata Exhibit C] Schedule A-03 Total Company, p. 5 of 7, lines 167 and 168 and Schedule A-03 New Mexico, p. 5 of 7, line 137, explain whether EPE is seeking to recover in this rate proceeding $2,096,397 from New Mexico ratepayers as FERC Account No. 928 Regulatory Commission expenses.	Yes
834	**CLC 9-6**	**g**	Adrian Hernandez	Julissa Reza	(g) Referring to Interrogatory and Request for Production CLC 6-6(f) and your response to that discovery request, explain in detail why the sum of the amounts in column (e) of page 3 of 3 Workpaper A-3 Adjustment No. 10 that appear to be allocated to New Mexico ratepayers pursuant to the footnotes accompanying each such "Total Company Amount" sum to approximately $2.43 million, while Schedule A-03 New Mexico, page 5 of 7 line 137 and Workpaper A-03 New Mexico, pages 13, 14, 15 and16 at line 137 indicate that EPE is seeking $2,096,937 from New Mexico customers, including an adjustment "To Reflect Rate Relief" of $231,562. Among other things, your answer should specifically identify and quantify any costs in column (e) that have been allocated less than 100% to New Mexico and any FERC account costs that have been allocated to New Mexico that do not appear in column (e).	Yes
835	**CLC 9-6**	**h**	Adrian Hernandez	Julissa Reza	(h) For each line item in column (e) of page 3 of 3 of Workpaper No. 3 for which any costs are allocated to New Mexico customers, state the amount of costs allocated to New Mexico, describe the allocation factor, if any, and identify its source in EPE's rate filing package or elsewhere, and provide copies of the actual, dated invoices and itemized billing statements submitted to EPE for payment in connection with each regulatory docket or matter identified in those line items, as well as evidence of when EPE paid each invoice. If the amounts of the invoices do not total to the amounts listed in column (e), provided a detailed explanation and quantification.	Yes
836	**CLC 9-6**	**i**	Steven Sierra		(i) Referring to EPE's responses to Requests for Production CLC 2-16 and 2-17 and to EPE's supplemental response to Doña Ana County's Interrogatory and Request for Production of Documents 1-35, DAC-01-35_Suppmental_Attachment 01, as well as to [Exhibit C] Replacement Schedule A-03 Total Company lines 167 and 168, which divides FERC Account 928 into Accounts 928.000 Regulatory Commission Exp and 928.010 Energy Efficiency Expense, followed by 930.100 General Advertising Exp, and explain and demonstrate that none of the advertising expenses that EPE is seeking to recover in this rate proceeding have been or will be recovered from New Mexico ratepayers through the Efficient Use of Energy Recovery Factor ("EUERF"), which has a significant allowance for advertising expenditures for EPE's New Mexico Energy Efficiency and Demand Response program.	No
837	**CLC 9-7**	**a**	Julissa Reza	Steven Sierra George Novela	Please refer to your response to Request for Production CLC 2-16 and CLC 02-16_Attachment 01 and CLC 02-16_Attachment 02 and to Workpaper A-3, Adjustment No. 10 and provide the following: (a) For each page of CLC 02-16_Attachment 02, identify the line item or line items on Workpaper A-3, Adjustment No. 10, page 3 of 3 and CLC 02-16_Attachment 01 to which the summary of invoices and the occasional detailed service provider statements correspond.	Yes
838	**CLC 9-7**	**b**	Julissa Reza	Steven Sierra George Novela	(b) With respect to your response to Interrogatory and Request for Production ~~CLC 6-7(a)~~ (CLC 9-7(a)), in any instance in which the invoice and/or provider statement does not correspond to a single, discrete line item on Workpaper A-3, Adjustment No. 10, page 3 of 3 and/or CLC 02-16_Attachment 01, provide a detailed explanation and quantification of any allocations of billing statements made by EPE in its rate application filing.	No
839	**CLC 9-7**	**c**	Julissa Reza	Steven Sierra George Novela	(c) Provide complete and detailed billing statements from each provider that EPE has included in its request for recovery of Regulatory Commission Expense, whether in FERC Account 928 or elsewhere.	No
840	**CLC 9-8**	**a**	Omar Gallegos	Victor Martinez	Please refer to EPE's response to Request for Production CLC 2-19 and state whether EPE believes that any of its transmission additions since January 1, 2020 are related to the Palo Verde Nuclear Generating Station ("PVNGS") and EPE's ability to deliver energy from that generating station to its retail customers in New Mexico and Texas or EPE's ability to make off-system sales. If your answer is yes, identify: (a) which transmission additions or replacements or improvements for which EPE seeks recovery in this case are related to PVNGS;	No
841	**CLC 9-8**	**b**	Omar Gallegos		(b) the cost of each PVNGS-related plant additions; and	No
842	**CLC 9-8**	**c**	Omar Gallegos		(c) the NMPRC Rule 17.5.440 NMAC report or reports that EPE filed in connection with that transmission addition, improvement, or replacement.	No
843	**NMDOJ 2-1**	**a**	Manny Carrasco		For the test period, (a) What percent of the 1,180,224 total residential annual customer bills are above and below the annual average monthly residential usage level?	No
844	**NMDOJ 2-1**	**b**	Manny Carrasco		(b) What percent of the 393,408 total residential summer customer bills are above and below the average summer monthly residential usage level?	No
845	**NMDOJ 2-1**	**c**	Manny Carrasco		(c) What percent of the 786,816 total residential summer customer bills are above and below the average winter monthly residential usage level?	No
846	**NMDOJ 2-2**	**a**	Adrian Hernandez		(a) Please summarize the jurisdictional allocation methods used by EPE in its last Texas rate case.	No
847	**NMDOJ 2-2**	**b**	Adrian Hernandez		(b) If these allocation methods are different than the jurisdictional allocation methods used in this case, please explain why EPE is using different methods.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
848	**NMDOJ 2-3**		Manny Carrasco	Rene Gonzalez	EPE Exhibit MC-01 (page 1 of 9) shows that total customer-related costs associated with the Rate 01 – Residential class is equal to $21,095,924. Does this total amount of $21,095,924 include the current AMS surcharge, which Schedule O-2 (page 1 of 20) shows to be $3,446,254 in total? If not, where is the AMS surcharge proposed to be collected?	Yes
849	**NMDOJ 2-4**	**a**	George Novela		(a) EPE claims that full-cost base-revenue allocations are necessary at this time because “it has become clear based on the long history of moderation steps from past rate cases…that proposed revenue allocation by rate class at full cost is needed.” (Novela Direct at page 55) Please elaborate as to why such a need “has become clear.”	No
850	**NMDOJ 2-4**	**b**	George Novela		(b) EPE does acknowledge, however, that it was appropriate in its past rate cases to moderate revenue increases to some classes because “promoting cost-based rates is only one of a number frequently recognized goals of rate design” including gradualism and that “gradualism limits increases and rate shock.” (Novela Direct at page 54). Please explain what specifically is different now – as compared to EPE’s past rate cases – that necessitates it abandoning the long-standing Commission practice of rate mitigation and stability through banding and gradualism?	No
851	**NMDOJ 2-5**	**a**	Manny Carrasco	Omar Gallegos	Please provide the cost basis for the Facility Charge under Rate Nos. 50 and 51, including: (a) the formula used to compute the Facility Charge;	No
852	**NMDOJ 2-5**	**b**	Manny Carrasco		(b) which categories of cost are recovered through the Facility Charge as opposed to base rates;	No
853	**NMDOJ 2-5**	**c**	Manny Carrasco		(c) the dedicated-substation, interconnection and transmission, and incremental-generation cost components and dollar amounts, both for the prospective BorderPlex Digital-Verde 80 MW customer and for the hypothetical 100 MW high-load-factor customer EPE modeled; and	No
854	**NMDOJ 2-5**	**d**	Manny Carrasco		(d) the cost-recovery term and any true-up provision.	No
855	**NMDOJ 2-6**		Manny Carrasco		Please provide, in native electronic format with formulas intact, the class cost-of-service study and rate-design model underlying the hypothetical 100 MW, 85 percent load-factor Rate No. 50 customer (Exhibit MC-01 / NM L-1), and please provide the same analysis run for a 30 MW customer at the Rate No. 50 eligibility threshold.	No
856	**NMDOJ 2-7**		Manny Carrasco		For each large-load-driven capital project (dedicated substation, interconnection or network upgrades, and incremental generation), please identify the total cost and state the dollar amount and percentage that EPE recovers from the large-load customer (through direct charge, contribution in aid of construction, the Facility Charge, or minimum-demand billing) as opposed to the amount recovered through base rates from other customers.	No
857	**NMDOJ 2-8**		Manny Carrasco		Please state whether any large-load-driven generation, transmission, substation, or distribution cost is allocated to the Residential class in EPE’s class cost-of-service study in this case, and if so, please explain how EPE distinguishes the large-load-driven increment of any shared upgrade from the portion that serves other customers.	No
858	**NMDOJ 2-9**		Manny Carrasco		Please describe EPE’s “but-for” contribution-in-aid-of-construction and line-extension policy as applied to large-load customers under Rate Nos. 50 and 51, and please explain how Administrative and General expense and general plant are assigned to Rate Nos. 50 and 51 in the class cost-of-service study, that is, whether a high-demand, low-labor customer bears its cost-causative share of those overheads.	No
859	**NMDOJ 2-10**		Manny Carrasco		Please reconcile the minimum-demand ratchet stated in the Rate No. 50 and Rate No. 51 tariff sheets with the period used in the worked billing-demand example in EPE’s supporting workpapers (the tariff sheets and the example appear to use different measurement periods), and please state which period controls.	No
860	**NMDOJ 2-11**	**a**	Manny Carrasco		Regarding the $1.02 per month Low-Income Rider add-on charged to non-participating Residential customers: (a) please state where any over-collection from the add-on in Phase 1 is booked;	No
861	**NMDOJ 2-11**	**b**	Manny Carrasco		(b) please state whether the $1.02 add-on changes between Phase 1 and Phase 2 and, if it does not, the basis for holding it constant; and	Yes
862	**NMDOJ 2-11**	**c**	Manny Carrasco	Rene Gonzalez	(c) please describe any true-up mechanism if actual enrollment differs from the 5,329 customers assumed in Workpaper O.1.	No
863	**NMDOJ 2-12**	**a**	Manny Carrasco		Regarding the Peak Time Rebate Pilot Program (Rate No. 52): (a) please provide the analytical basis for the pilot design, including the rebate level and the event parameters;	No
864	**NMDOJ 2-12**	**b**	Manny Carrasco		(b) please provide the evaluation plan, including the metrics and methodology EPE will use to assess the pilot; and	No
865	**NMDOJ 2-12**	**c**	Manny Carrasco		(c) please describe the accounting-order or other ratemaking treatment EPE proposes for any revenue effect of the pilot.	No
866	**NMDOJ 2-13**		Manny Carrasco		Please confirm that EPE does not possess price-elasticity data specific to its New Mexico service territory and did not make any quantitative estimate of customer response to the proposed Time-of-Day price differentials, such that the proof of revenue assumes no change in usage, and please produce any price-elasticity or load-research study in EPE’s possession bearing on residential response to time-differentiated rates.	No
867	**NMDOJ 2-14**		Manny Carrasco		Referring to Workpaper O.1 (produced as EPE’s response to Doña Ana County 4-1), please provide the class-by-class comparison of the revenue produced by the proposed on-peak adder to the Four-Coincident-Peak production cost allocated to each class, showing the per-class On-Peak Recovery percentages and Expected On-Peak Load Factors used.	No
868	**NMDOJ 2-15**		Manny Carrasco		Please describe the accounting-order or true-up mechanics EPE proposes for any revenue shortfall resulting from default enrollment or opt-out under the modified Time-of-Day rates.	No
869	**NMDOJ 2-16**		Manny Carrasco		Please provide, in native electronic format, the residential customer counts and annual kWh by usage band underlying Figures MC-1 and MC-2 and Exhibit MC-06.	No
870	**NMDOJ 2-17**		Manny Carrasco		Please provide EPE’s workpapers, in native electronic format, quantifying the effect on the Residential class of moving the Carne, Santa Teresa, and Buena Vista 1 battery capacity costs from the Renewable Portfolio Standard Cost Rider into base rates, showing the change from the rider’s per-kilowatt-hour energy basis to the base-rate Four-Coincident-Peak Average-and-Excess demand basis and the resulting dollar effect on the Residential class.	No
871	**NMDOJ 2-18**		Manny Carrasco		Please provide the workpaper and arithmetic supporting EPE’s statement that it does not intend to seek recovery of approximately $27 million in revenue foregone between the Phase 1 and Phase 2 effective dates, reconciled to the per-phase percentage increases and the nine-month gap between the phases.	Yes
872	**CLC 10-1**	**a**	Manny Carrasco	Omar Gallegos	Please refer to the Direct Testimony of Manual Carrasco (“Carrasco Direct) at pp. 82-84 discussing the Company’s proposal to add a demand charge to Schedule No. 42 for loads of 15 kW or more. (a) Please provide the workpapers associated with Figure MC-3 located at p. 83 of Witness Carrasco’s testimony.	No
873	**CLC 10-1**	**b**	Manny Carrasco		(b) For each “Max kW” measurement reflected in Figure MC-3, please provide the date and time of the peak non-coincident demand.	No
874	**CLC 10-1**	**c**	Manny Carrasco		(c) Please explain whether customers that take service under Schedule No. 42 pay for any distribution upgrades needed to accommodate new EV charging load.	No
875	**CLC 10-1**	**d**	Manny Carrasco		(d) Did any Schedule No. 42 customers cause the Company to make distribution upgrades that would not have been made except for the new EV load and which the Schedule No. 42 customer did not pay for?	No
876	**CLC 10-1**	**e**	Manny Carrasco		(e) Please provide the underlying data and associated calculations for Witness Carrasco’s statement at p. 83 lines 2-3 “EPE’s load study for Rate No. 42 shows that non-coincident demands averaged between 18 kW and 37 kW during the Base Period.”	No
877	**CLC 10-1**	**f**	Manny Carrasco		(f) Please explain with specificity what Witness Carrasco means by the term “noncoincident demands” at p. 83 line 2. For instance, are the kW amounts listed the sum of individual customer non-coincident demands, the average maximum monthly demand per Schedule No. 42 customer, or some other metric.	No
878	**CLC 10-2**	**a**	Manny Carrasco		Please refer to Carrasco Direct at p. 82 lines 2-11 stating in reference to the proposed customer charges for Schedule No. 42 “The combined service Customer Charge will fully include the costs related to meters, services drops, and meter reading, which are the most relevant incremental customer-related cost to provide this service and to avoid the duplication in the recovery of other customer-related costs paid by customers through their non-EV charging rate schedule. The single service Customer Charge will include all customer-related costs to provide this service. EPE is proposing to increase the monthly Customer Charge for Experimental Electric Vehicle Charging from $3.55 to $13.03 for combined service and to $17.03 for single service to reflect the customer related costs determined by its cost-of-service study.” (a) Please provide the complete derivation of the present Schedule No. 42 customer charge of $3.55/month as approved in the Company’s 2020 general rate case by line item for components related to meters, service drops, and meter reading.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
879	**CLC 10-2**	**b**	Manny Carrasco		(b) Please provide a comprehensive explanation of all of the differences between the Company's calculation of the customer charge for Schedule No. 42 in its 2020 general rate case and the proposed calculation in this case.	No
880	**CLC 10-2**	**c**	Manny Carrasco		(c) Please confirm that each Schedule No. 42 customer is provided with both a dedicated service drop and meter for the EV charger enrolled on Schedule No. 42. If your response is anything other than an unqualified confirmation, please explain in detail.	No
881	**CLC 10-2**	**d**	Manny Carrasco		(d) Please explain the Company's classification of Schedule No. 42 metering, service drop, and meter reading costs as exclusively customer-related based on the principle of cost causation. Your response should specifically explain why a customer-related classification is warranted considering the objective of Schedule No. 42 to promote shifting of EV charging load to off-peak time periods.	No
882	**CLC 10-3**	**a**	Omar Gallegos		Please refer to the Direct Testimony of Adrian Hernandez ("Hernandez Direct") at p. 52 discussing the reasonableness of using Maximum Class Demand as the allocator factor for primary voltage plant. For each individual substation and distribution feeder on the Company's system, please provide the following information separately, in spreadsheet format, for the 2024 and 2025 calendar years. (a) The date and time, in prevailing time hour ending format, of the maximum annual peak demand.	No
883	**CLC 10-3**	**b**	Omar Gallegos		(b) The maximum annual peak demand in kW.	No
884	**CLC 10-3**	**c**	Omar Gallegos		(c) The maximum amount of demand, in kW, that the substation or feeder can accommodate (i.e., the design capacity).	No
885	**CLC 10-4**	**a**	Adrian Hernandez		Please refer to Hernandez Direct at p. 57 lines 20-21 stating "Account No. 902 - Meter Reading Expenses are based on a non-AMS meter-related allocation factor…". (a) Please explain in detail the cost causation basis for using a non-AMS meter-related allocation factor for meter reading costs.	No
886	**CLC 10-5**	**a**	Adrian Hernandez		Please refer to the Company's response to Staff 01-03, Attachment 1, the executable version of the Company's cost of service study, in the tab labeled Alloc NM RC – Op Exp. (a) Please explain the cost causation basis for classifying the expense line item for the Company's time-varying rate pilot (SS818: NM TIME VARYING RATE – TVR) as customer-related.	No
887	**CLC 10-5**	**b**	Adrian Hernandez		(b) Please explain in detail the Company's methodologies for classifying and allocating expenses associated with Project WR811: PANDEMIC – NEW MEXICO. Your response should specifically explain whether the classification and allocation is based on direct assignment of individual types of pandemic costs to individual DEC components, or whether a more generalized method (e.g., labor) was used.	No
888	**CLC 10-5**	**c**	Steven Sierra		(c) Please identify the specific types of costs that the Company has logged in FERC Account 587 (Customer Installation Expenses) and classified as Customer – 370 Meters as differentiated from metering expenses logged in FERC Account 586.	No
889	**CLC 10-6**	**a**	Adrian Hernandez		Please refer to the Company's response to Staff 01-03, Attachment 1, the executable version of the Company's cost of service study, in the tab labeled Total Co – Op Exp. (a) Please explain in detail the adjustments, if any, that the Company has made to its Test Year meter reading expenses to account for reductions in meter reading expenses associated with full deployment of its Advanced Metering System ("AMS") at the time when new rates would take effect. If your response is that the Company did not make any such adjustments, please explain in detail why it did not do so.	No
890	**CLC 10-6**	**b**	Omar Gallegos		(b) Please provide any analysis that the Company has done of its actual reductions in New Mexico jurisdictional meter reading expenses due to the deployment of its AMS.	No
891	**CLC 10-6**	**c**	Omar Gallegos		(c) Please provide an estimate of New Mexico jurisdictional meter reading-related operational savings that the Company expects to realize during 2027 relative to non-AMS deployment scenario.	No
892	**CLC 10-7**	**a**	Adrian Hernandez		Please refer to EPE's base period and test period allocation factors, Schedule M-1, pp. 2 and 4, specifically Line 22, CUSTLAB-902: Customer Related Labor-902 Meter Reading; Line 26, DISTLAB_INSTALL: Distribution Related Labor Install on Cust Premises; and Line 47, EXP_902: 902 Meter Reading Exp, and provide the following information and documents: (a) Explain in detail why EPE's New Mexico jurisdictional cost allocators for those functions are approximately 50%, whereas New Mexico customers represent approximately 23.7% of the Company's total number of customers.	No
893	**CLC 10-7**	**b**	Adrian Hernandez		(b) Explain in detail, including FERC account numbers and dollar amounts, each adjustment EPE made to its base period costs, either through allocation factors or through direct expense and plant adjustments, to reflect the fact that EPE's installation and operation of its AMS in New Mexico was completed during the base period.	No
894	**CLC 10-7**	**c**	Adrian Hernandez		(c) Provide documentation of the derivation of the three allocation factors identified in this interrogatory and request for production of documents, for the base period and for the test period allocation factors.	No
895	**CLC 10-7**	**d**	Adrian Hernandez		(d) Provide documentation of the derivation of any other allocation factors relating to the AMS project and ongoing AMS costs identified in your response to this interrogatory and request for production of documents, for the base period and for the test period allocation factors.	No
896	**CLC 10-7**	**e**	Adrian Hernandez		(e) Identify, quantify, and explain in detail each adjustment relating to AMS costs that was made in EPE's Schedule A-3 and its workpapers for Schedule A-3.	No
897	**CLC 10-8**		Enedina Soto		Please refer to EPE's Application at Schedule P-1(b) and the Schedule P-1(b) that EPE filed as part of its rate application in NMPRC Case No. 20-00104-UT (2019 base period). Explain how it is possible that the NM jurisdiction's system peak load (on the peak day of the year) could have increased by 40.8% from 2019 to 2025, while the Texas jurisdiction system peak load only increased by 12.6%.	No
898	**CLC 10-9**	**a**	Enedina Soto	Rene Gonzalez	Please refer to Workpaper M-1 as filed by EPE on April 15, 2026 in its Notice of Errata and to the excel spreadsheets on June 23, 2026 in response to Staff Interrogatory and Request for Production 5-10 as STAFF 05-10_Attachment 15, including "WP M-01" and "WP M-01 Additional Support," and provide the following information and documents: (a) Referring to STAFF 05-10_Attachment 15, WP M-01, produce the entire workpaper for Schedule M-01, consisting of ten pages in pdf format, not only pages 8 through 10, in executable native format.	Yes
899	**CLC 10-9**	**b**	Enedina Soto		(b) State the purpose of STAFF 05-10_Attachment 15, WP M-01 Additional Support and explain why it was not presented by EPE as part of its NMPRC rate case filing package workpapers on April 15, 2026.	Yes
900	**CLC 10-9**	**c**	Enedina Soto		(c) Referring to Workpaper M-1, state whether pages 1 through 5 represent unadjusted base period data. If your answer is anything other than an unqualified yes, (1) explain in detail how the information on those pages diverges from EPE's actual base period data; (1) provide documents that support and explain the divergences, and (3) provide EPE's calculations that incorporate the differences described in your response to this interrogatory and request for production of documents.	No
901	**CLC 10-9**	**d**	Enedina Soto		(d) Referring to Workpaper M-1, state whether pages 6 through 10 represent EPE's adjustments to base period unadjusted data.	No
902	**CLC 10-9**	**e**	Enedina Soto		(e) Referring to your response to Interrogatory and Request for Production ~~CLC 7-9(d)~~ (CLC 10-9(d), explain in detail each adjustment made by EPE to the data used on pages 1 through 10 of Workpaper M-1; quantify each adjustment made by EPE; and describe and quantify the effect of each adjustment on EPE's proposed data and allocation factors.	No
903	**CLC 10-9**	**f**	Enedina Soto		(f) Referring to STAFF 05-10_Attachment 15, WP M-01 Additional Support, describe the reasons for each adjustment from the unadjusted to the adjusted data for each category and allocation factor and quantify the changes.	No
904	**CLC 10-9**	**g**	Enedina Soto		(g) Referring to STAFF 05-10_Attachment 15, WP M-01 Additional Support, explain in detail the sources of the data and any calculations performed by EPE to develop the figures at the bottom of many of the pages or tabs relating to Dedicated Resources. Provide copies of EPE's records used to state that data. If those figures do not reflect direct measurements, explain in detail why not and provide copies of the underlying data that EPE used as well as the calculations EPE performed to develop the figures on the spreadsheet.	Yes
905	**CLC 10-9**	**h**	Enedina Soto		(h) Referring to STAFF 05-10_Attachment 15, WP M-01 Additional Support, for each page or tab that refers to energy, demand, resources, etc. dedicated to other jurisdictions, provide a narrative explanation of the components of each such figure stated on those pages and provide a breakdown of the numerical results by generation (or storage) resource and by the jurisdiction at issue.	Yes
906	**CLC 10-9**	**i**	Enedina Soto		(i) Explain how the adjustments for resources dedicated to various jurisdictions or to energy assigned to various jurisdictions were used in developing the allocation factors proposed by EPE in this case.	Yes
907	**CLC 10-9**	**j**	Enedina Soto		(j) Referring to STAFF 05-10_Attachment 15, WP M-01 Additional Support, for each page or tab that refers to the Santa Teresa Solar & BESS or the Carne Solar & BESS, explain in detail how EPE projected the output and BESS usage of facilities that were not in operation at the time that the Company prepared its rate filing. Provide all supporting documents and calculations.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
908	**CLC 10-10**		Enedina Soto		Referring to Interrogatory and Request for Production CLC 1-10, your response to that interrogatory, and STAFF 05-10_Attachment 15, WP M-01 Additional Support, explain whether EPE has performed any analysis of its system peak loads based on the time of day at which its native load minus solar and BESS production is at the highest level, both on a system-wide basis and on the basis of allocations to the New Mexico and "Other" jurisdictions. If EPE has performed any such analysis, please produce copies and provide explanations. If EPE has not performed any such analysis, please explain why not.	No
909	**CCAE 2-1**	**a**	Jeff Hughes		Please refer to Table JMH-1 on Page 7 of Jeffery Hughes' Direct Testimony, which identifies EPE-owned generating stations and its larger third-party renewable resources as of the end of Test Year Period. For all the generating stations listed in Table JMH-1, excluding stations and units that do not serve New Mexico or are not included in base rates, please provide in a live, unlocked Excel workbook with all formulas intact that includes the following information for the historical test year period ending September 30, 2025: a. Hourly gross and net generation in MW for all 8,760 hours in the test year, disaggregated by generation station and, where applicable, unit;	No
910	**CCAE 2-1**	**b**	Jeff Hughes		b. Annual O&M expenses, disaggregated by generation station and, where applicable, unit;	No
911	**CCAE 2-1**	**c**	Cindy Prieto		c. Annual depreciation expenses, disaggregated by generation station and, where applicable, unit;	No
912	**CCAE 2-1**	**d**	Jeff Hughes		d. Annual fuel expenses, disaggregated by generation station and, where applicable, unit;	No
913	**CCAE 2-1**	**e**	Tammy Henderson		e. Annual property tax expenses, disaggregated by generation station;	No
914	**CCAE 2-1**	**f**	Steven Sierra		f. Book plant value, disaggregated by generation station and, where applicable, unit; and	No
915	**CCAE 2-1**	**g**	Julissa Reza		g. End-of-year accumulated depreciation, disaggregated by generation station and, where applicable, unit.	No
916	**CCAE 2-2**	**a**	Victor Martinez		Please refer to page 12, lines 1 to 17 of Jeffery Hughes' Direct Testimony, which discusses the Company's participation in the EIM. Please provide in a live, unlocked Excel workbook with all formulas intact the following information for each remote and local generating station listed in Table JMH-1 included in New Mexico base rates, disaggregated by generating station and unit where applicable: a. Hourly EIM-initiated dispatch in MW;	No
917	**CCAE 2-2**	**b**	Victor Martinez		b. Incremental O&M and depreciation expense associated with EIM-initiated dispatch; and	No
918	**CCAE 2-2**	**c**	Victor Martinez		c. Revenues associated with EIM-initiated dispatch. If available, provide this information on an hourly basis.	No
919	**CCAE 2-3**	**a**	Enedina Soto		Please refer to page 5, lines 6 to 10 of Enedina Soto's Direct Testimony, which identifies rate classes in New Mexico for which the Company utilizes a census study. Please also refer to page 8, lines 4 to 12 of Enedina Soto's Direct Testimony, which identifies rate classes in New Mexico for which the Company utilizes a sample study. Finally, please refer to Schedule P-1(b). Please provide the following load research information in a live, unlocked Excel spreadsheet with all formulas and links intact: a. For each rate class, provide the 8,760 hourly load profile for the test year period ending September 30, 2025.	No
920	**CCAE 2-3**	**b**	Enedina Soto		b. For rate classes represented through a sample study, provide the sample size for each class, and all workpapers used to prepare the sample data and extrapolate class-level hourly load results in Excel format.	No
921	**CCAE 2-4**		Enedina Soto		Please refer to page 11, line 7 to page 13, line 3 of Enedina Soto's Direct Testimony, which discusses the jurisdictional energy and demand allocators. Please provide all workpapers used to prepare jurisdictional energy and demand allocators in live, unlocked Excel spreadsheets with all formulas and links intact.	No
922	**CCAE 2-5**		Adrian Hernandez		Please refer to page 29, lines 2 to 3 of Adrian Hernandez's Direct Testimony, which states "Refer to Schedule M-1 for EPE's full list of jurisdictional allocation factors." Please also refer to Schedule M-01.05. Please provide, in live, unlocked Excel spreadsheets with all formulas and links intact, all workpapers used to develop the class allocation factors on page 1, lines 1 to 27 of Schedule M-01.05.	No
923	**CLC-DAC 2-1**	**a**	Steven Sierra		Compensation: Please identify each individual for whom compensation costs were allocated or assigned to EPE during the test year, who are not direct employees of EPE. For each person identified, please provide the following information: a. The position and title of the individual, a brief description of their duties, and amount of total compensation paid to each person in the test year.	No
924	**CLC-DAC 2-1**	**b**	Steven Sierra		b. For each person listed in part (a) above, please provide a break-down of compensation components including base pay, short-term incentives, long-term incentives, bonuses, and any other compensation.	No
925	**CLC-DAC 2-1**	**c**	Steven Sierra		c. For each person listed in part (b), indicate the amounts of total compensation paid (base pay, short-term incentives, long-term incentives, bonuses, and other compensation) that has been allocated or assigned to EPE for the test year.	No
926	**CLC-DAC 2-1**	**d**	Steven Sierra		d. For each amount provided in item (c), please indicate the amounts included in operating expense for ratemaking purposes in this case.	No
927	**CLC-DAC 2-1**	**e**	Steven Sierra		e. For each amount provided in item (c), please indicate the amounts capitalized and included in rate base for ratemaking purposes in this case.	No
928	**CLC-DAC 2-2**		Steven Sierra		Compensation: For each person identified in Item 1 above, please provide (1) the amount of travel expenses allocated or assigned to EPE during the test year, and (2) the portion of those travel expenses included in the proposed revenue requirement in this case.	No
929	**CLC-DAC 2-3**		Steven Sierra		Compensation: For each person identified in Item 1 above, please provide (1) the amount of meals and entertainment expense allocated or assigned to EPE during the test year, and (2) the portion of those meals and entertainment expenses included in the proposed revenue requirement in this case.	No
930	**CLC-DAC 2-4**		Steven Sierra		Compensation: For each person identified in Item 1 above, please provide (1) the amount of membership dues and expenses allocated or assigned to EPE during the test year, and (2) the portion of those membership dues and expenses included in the proposed revenue requirement in this case and (3) the organization(s) to which the membership dues are paid.	No
931	**CLC-DAC 2-5**		Steven Sierra		Incentive compensation: Please provide copies of all short-term incentive plan ("STIP") documents for Palo Verde Generating Station ("PVGS") employees whose expenses are included in the revenue requirement.	No
932	**CLC-DAC 2-6**		Steven Sierra		Incentive compensation: Please provide copies of all short-term incentive plan ("STIP") documents for plans allocated to PVGS with costs included in the EPE revenue requirement	No
933	**CLC-DAC 2-7**		Steven Sierra		Incentive compensation: Please provide the PVGS STIP plan metric or goals and the weighting of those plan metrics or goals for all plans with costs included in the EPE revenue requirement.	No
934	**CLC-DAC 2-8**		Steven Sierra		Incentive compensation: For each PVGS short-term incentive plan included in the revenue requirement, please identify the number of employees and amounts covered by the plan for costs allocated or assigned to New Mexico jurisdictional operations.	No
935	**CLC-DAC 2-9**		Steven Sierra	Adrian Hernandez	Incentive compensation: Please provide the total dollar amount for the target levels of PVGS short-term incentives included in the revenue requirement, and the related jurisdictional amounts of costs allocated to New Mexico, identifying amounts awarded and allocated based on company earnings, control of capital or expense costs, customer satisfaction, safety, and/or other identified goals or metrics.	No
936	**CLC-DAC 2-10**		Steven Sierra		Incentive compensation: Please provide the dollar value of each PVGS short-term incentive award included in the revenue requirement, separately identifying amounts allocated to New Mexico	No
937	**CLC-DAC 2-11**		Steven Sierra	Adrian Hernandez	Incentive compensation: Please provide the budgeted amount of each PVGS short-term incentive award for the three years ended September 30, 2025, and the related jurisdictional amount, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico	No
938	**CLC-DAC 2-12**		Steven Sierra		Incentive compensation: Please provide the jurisdictional amount of each PVGS short-term incentive award for the test year included in adjusted O&M expenses, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico, identifying amounts awarded and allocated based on company earnings, control of capital or expense costs, customer satisfaction, safety, and/or other identified goals or metrics.	No
939	**CLC-DAC 2-13**		Steven Sierra		Incentive compensation: Please provide copies of all long-term ("LTIP") documents for Palo Verde Generating Station ("PVGS") employees whose expenses are included in the revenue requirement.	No
940	**CLC-DAC 2-14**		Steven Sierra		Incentive compensation: Please provide copies of all LTIP documents for plans allocated to PVGS with costs included in the EPE revenue requirement.	No
941	**CLC-DAC 2-15**		Steven Sierra		Incentive compensation: Please provide the PVGS LTIP plan metric or goals and the weighting of those plan metrics or goals for all plans with costs included in the EPE revenue requirement.	No
942	**CLC-DAC 2-16**		Steven Sierra		Incentive compensation: For each PVGS long-term incentive plan included in the revenue requirement, please identify the number of employees and amounts covered by the plan for costs allocated or assigned to New Mexico jurisdictional operations.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
943	**CLC-DAC 2-17**		Steven Sierra		Incentive compensation: Please provide the total dollar amount for the target levels of PVGS long-term incentives included in the revenue requirement, and the related jurisdictional amounts of costs allocated to New Mexico, identifying amounts awarded and allocated based on company earnings, control of capital or expense costs, customer satisfaction, safety, and/or other identified goals or metrics.	No
944	**CLC-DAC 2-18**		Steven Sierra		Incentive compensation: Please provide the dollar value of each PVGS long-term incentive award included in the revenue requirement, separately identifying amounts allocated to New Mexico.	No
945	**CLC-DAC 2-19**		Steven Sierra		Incentive compensation: Please provide the jurisdictional amount of each PVGS long-term incentive award for the test year included in adjusted O&M expenses, separately identifying amounts for each affiliate or operating group with incentive costs allocated to New Mexico.	No
946	**CLC-DAC 2-20**		Steven Sierra		Incentive compensation: Please provide (1) the jurisdictional amount of PVGS short-term incentive awards included in adjusted O&M expenses and (2) the jurisdictional amount of PVGS long-term incentive awards included in adjusted O&M expenses.	No
947	**CLC-DAC 2-21**		Jim Schichtl		Project Jupiter: Please refer to EPE's response to DAC 4-7 where EPE states "EPE is not aware any equity interest, financial stake, or operational role in Project Jupiter or its associated power microgrid held by IIF, Sun Jupiter Holdings LLC, or J.P. Morgan Chase & Co." and Attachment 1, Project Jupiter Commitment Letter (12/21/2025) signed be JP Morgan Chase Bank N.A. Does this document change EPE's response to DAC 4-7?	No
948	**CLC-DAC 2-22**		Richard Gonzalez		Project Jupiter: Regarding EPE's response to DAC 4-9, please provide a copy of EPE's latest Commission approved General Diversification Plan.	No
949	**CLC-DAC 2-23**		George Novela		Project Jupiter: Please provide any service agreements, memorandums of understanding, or any other agreements regarding EPE providing service and interconnection with Project Jupiter.	No
950	**CLC-DAC 2-24**		George Novela		Project Jupiter: Please refer to the Direct Testimony of George Novella at 44:4-6 regarding Original Rate No. 50 – High Load Factor Service Rate ("Rate 50") and the Original Rate No. 51 – Large Load Service Rate ("Rate 51") (collectively, "Large Load") tariff schedules. Does EPE propose to serve Project Jupiter under the new Large Load tariff?	No
951	**CLC-DAC 2-25**		Jim Schichtl		Project Jupiter: Please refer to the Direct Testimony of George Novella at 44:4-6 regarding Original Rate No. 50 – High Load Factor Service Rate ("Rate 50") and the Original Rate No. 51 – Large Load Service Rate ("Rate 51") (collectively, "Large Load") tariff schedules and Attachment 1 herein. Does EPE consider the service to Project Jupiter an affiliate transaction? If not, why?	No
952	**CLC-DAC 2-26**		Jim Schichtl		Project Jupiter: Please refer to the Direct Testimony of George Novella at 44:4-6 regarding Original Rate No. 50 – High Load Factor Service Rate ("Rate 50") and the Original Rate No. 51 – Large Load Service Rate ("Rate 51") (collectively, "Large Load") tariff schedules and Attachment 1 herein. If an EPE affiliate had a financial interest in a customer who would qualify for one of the Large Load tariff schedules, would the creation of a Large Load tariff to serve affiliated interests qualify as an affiliate transaction? If not, why?	No
953	**CLC-DAC 2-27**		Jim Schichtl		Project Jupiter: Please refer to EPE's response to DAC 4-7 where EPE states "EPE is not aware any equity interest, financial stake, or operational role in Project Jupiter or its associated power microgrid held by IIF, Sun Jupiter Holdings LLC, or J.P. Morgan Chase & Co." and Attachment 1, Project Jupiter Commitment Letter (12/21/2025) signed be JP Morgan Chase Bank N.A. How would EPE know if JP Morgan Chase & Co. had a financial stake in one of EPE's affiliated interests?	No
954	**CCAE 3-1**	**a**	George Novela		Please provide the following information regarding page 46, lines 9 to 14 of George Novela's Direct Testimony, which states "[t]he proposed Large Load tariff schedules, presented by Mr. Carrasco, require a large load customer to execute an energy service agreement ('ESA') with EPE that must be filed with the Commission before taking service under the rate. I have included an example ESA as Exhibit GN-2 to my testimony. I note Section 10 of the sample agreement is a placeholder for any additional terms and conditions that may be necessary for or specific to a customer." a. Please state whether the Company intends to implement any requirements (i.e., consistent, minimum, or mandatory requirements) for each of the ESAs that it executes with large load customers.	No
955	**CCAE 3-1**	**b**	George Novela		b. If the answer to subpart (a) is yes, please identify the requirements (i.e., consistent, minimum, or mandatory requirements) the Company intends to execute in each ESA with a large load customer.	No
956	**CCAE 3-1**	**c**	George Novela		c. Please identify and provide examples of the "additional terms and conditions" that may be included in ESAs under Section 10 of the sample agreement.	No
957	**CCAE 3-2**	**a**	George Novela		Please provide the following information regarding page 47, lines 4 to 7 of George Novela's Direct Testimony, which states "EPE requests that the Commission open a new Rate No. 50 and Rate No. 51 compliance docket for the purpose of filing executed ESAs. Within a reasonable time following execution, EPE will cause the ESA to be filed and served through PRC e360 on counsel of record and pro se parties to EPE's last general rate case." a. Will the Company make executed ESAs filed in the Rate No. 50 and Rate No. 51 compliance dockets publicly available (i.e., not confidential and available to members of the public)?	No
958	**CCAE 3-2**	**b**	George Novela		b. Does the Company intend for the Commission to approve or issue any decisions regarding the ESAs filed in the new Rate No. 50 and Rate No. 51 compliance dockets?	No
959	**CCAE 3-2**	**c**	George Novela		c. If the answer to subpart (b) is yes, please explain how the Commission would evaluate the ESAs.	No
960	**CCAE 3-3**	**a**	Manny Carrasco		Please provide the following information regarding page 93, line 21 to page 94, line 3 of Manuel Carrasco's Direct Testimony, which states "[t]he Rate 51 threshold of 10 MW was determined by considering that some large load customers could place greater financial risk for the Company if they are served under Rate 09. The 10 MW minimum ensures that the eligible customers are aware of the extra requirements to obtain the service to meet their needs." a. Please explain why "some large load customers could place greater financial risk for the Company if they are served under Rate 09."	No
961	**CCAE 3-3**	**b**	Manny Carrasco		b. Please identify the "extra requirements to obtain the service to meet [eligible customers] needs," aside from the 10 MW minimum.	No
962	**CCAE 3-4**	**a**	Manny Carrasco		Please provide the following information regarding page 94, lines 14 to 16 of Manuel Carrasco's Direct Testimony, which states "[t]he source for the Rate 51 charges is a cost-of-service study and rate design model for a hypothetical rate class for a 25 MW AI training center that operates at a 45% load factor." a. Please explain why the Company used a 25 MW AI training center in the hypothetical rate class for the cost-of-service study and rate design model.	No
963	**CCAE 3-4**	**b**	Manny Carrasco		b. Please explain why the Company used a 45% load factor in the hypothetical rate class for the cost-of-service study and rate design model.	No
964	**CCAE 3-5**		Omar Gallegos		Please refer to page 87, line 20 to page 88, line 2 of Omar Gallegos' Direct Testimony, which states "[o]ne or more EPE customers with significant load have requested an additional Primary Voltage line and related distribution facilities as a back-up to their regular main Primary Voltage line and related distributed facilities." Please identity the "[o]ne or more EPE customers with significant load" that "have requested an additional Primary Voltage line and related distribution facilities as a back-up to their regular main Primary Voltage line and related distributed facilities."	No
965	**CCAE 3-6**	**a**	Omar Gallegos		Please provide the following information regarding page 93, lines 2 to 6 of Omar Gallegos' Direct Testimony, which states "[t]he Company and the customer will enter into a written agreement addressing the cost recovery guarantee as well as the Infrastructure Capacity Charge and the period of time over which it will be paid. If the customer chooses not to move forward with their project, EPE will allow a refund of any unused funds towards construction efforts that had begun in good faith." a. Please state whether the Company will provide any limitations (time-based or otherwise) regarding the refund of any unused funds if the customer chooses not to move forward with their project.	No
966	**CCAE 3-6**	**b**	Omar Gallegos		b. If the answer to subpart (a) is yes, please identify and explain the limitations (time-based or otherwise) regarding the refund of any unused funds if the customer chooses not to move forward with their project.	No
967	**STAFF 7-1**	**a**	Manny Carrasco		Please refer to the Direct Testimony of Omar A. Gallegos, Page 89, Line 5, the Direct Testimony of Enedina Soto, Page 26, Lines 17-20, and the Direct Testimony of Manuel Carrasco, Page 87, Lines 12-21, and provide Staff with the following information: a) Are there any costs associated with the implementation of data centers that have been included in EPE's Cost of Service?	No
968	**STAFF 7-1**	**b**	Manny Carrasco		b) Are there any costs associated with large load customers, other than data centers, that have been included in EPE's Cost of Service?	No
969	**STAFF 7-1**	**c**	George Novela		c) Will ratepayers be responsible for bearing any costs associated with data centers?	No
970	**STAFF 7-1**	**d**	George Novela		d) If yes, which rate classes would be responsible for bearing these costs associated with data centers, and where can Staff find these costs?	No
971	**STAFF 7-1**	**e**	George Novela		e) Has EPE issued any services, contracts agreements, etc. associated with data centers?	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
972	**STAFF 7-1**	**f**	George Novela		f) Is EPE currently communicating with any potential customers that would take service under either NM Rate 50 or NM Rate 51?	No
973	**STAFF 7-1**	**g**	George Novela		g) Provide Staff with specific or anticipated start date and end dates of services associated with data centers or other large load customers.	No
974	**STAFF 7-2**	**a.1**	Richard Gonzalez		Please provide all workpapers, electronic models (with formulas intact), and supporting documentation used to calculate the annual decommissioning trust contributions presented in Exhibit RSG-4. Please include in your response: a) A detailed, step-by-step explanation describing how the Company progressed from the 2023 TLG Decommissioning Study cost estimates to the final recommended annual contribution amounts in Exhibit RSG-4. This explanation should identify each intermediate calculation, assumption, and data transformation, including: 1. the escalation of base-year TLG costs;	No
975	**STAFF 7-2**	**a.2**	Richard Gonzalez		2. the development of the annual escalated decommissioning cost stream;	No
976	**STAFF 7-2**	**a.3**	Richard Gonzalez		3. the identification of the total funding target required to meet escalated costs;	No
977	**STAFF 7-2**	**a.4**	Richard Gonzalez		4. the use of beginning trust balances, accumulated contributions, and historical earnings;	No
978	**STAFF 7-2**	**a.5**	Richard Gonzalez		5. the application of investment-earnings assumptions; and	No
979	**STAFF 7-2**	**a.6**	Richard Gonzalez		6. any iterative, goal-seek, or other numerical methods used to determine the annual funding amounts.	No
980	**STAFF 7-2**	**b**	Richard Gonzalez		b) All models, spreadsheets, or schedules showing how beginning fund balances and accumulated earnings as of September 30, 2025 were incorporated into the analysis.	No
981	**STAFF 7-2**	**c**	Richard Gonzalez		c) All schedules showing the development of the escalated decommissioning-cost projections from the TLG Study, including all escalation factors and methodologies applied.	No
982	**STAFF 7-2**	**d**	Richard Gonzalez		d) All interest-earning assumptions used in the model, including the derivation and application of the 4.57% earnings rate and any sensitivity or scenario analyses performed.	No
983	**STAFF 7-2**	**e**	Richard Gonzalez		e) A complete, unlocked version of the straight-line funding model referenced in Exhibit RSG-3 with all formulas intact, including all inputs and assumptions necessary to reproduce the Exhibit RSG-4 contribution amounts.	No
984	**STAFF 7-2**	**f**	Richard Gonzalez		f) A reconciliation demonstrating how the proposed annual contributions, when combined with projected earnings on the fund, are sufficient to meet the full escalated decommissioning cost obligations and achieve the identified funding target. This reconciliation should clearly show the relationship between annual contributions, annual earnings, annual escalated costs, and the resulting projected year-end balances.	No
985	**NMSU 1-1**		John Spanos		Please provide GFT Infrastructure, Inc.'s (formerly Gannet Fleming) most recent version of the database it maintains for the Service Life and Net Salvage Statistics by the Federal Energy Regulatory Commission ("FERC") Account, currently approved for U.S. Electric Utilities, in Microsoft Excel format.	No
986	**NMSU 1-2**		John Spanos		Please provide any filing schedules sponsored by Mr. Spanos, or related to the June 30, 2025, Depreciation Study ("Depreciation Study") filed as Exhibit JJS-1, in Excel format with all formulas and links intact.	No
987	**NMSU 1-3**		Lori Glander		Please provide any filing schedules sponsored by Ms. Glander, or related to the Palo Verde decommissioning study filed as Exhibit LAG-2, in Excel format with all formulas and links intact.	No
988	**NMSU 1-4**		John Spanos		Please provide all workpapers in complete electronic format, with all formulas and links intact, supporting the terminal net salvage rates in Exhibit JJS-1 Table 3, including a tie-out of terminal retirement values listed in Table 2 to their source files.	No
989	**NMSU 1-5**		John Spanos		Regarding pages 16 and 17 of Mr. Spanos' direct testimony, please provide a detailed explanation of how the terminal dismantlement components of the production net salvage rates were determined. Please provide any and all source files or workpapers related to the decommissioning of El Paso Electric's production plants.	No
990	**NMSU 1-6**		John Spanos		Please provide all workpapers in complete electronic format, with all formulas and links intact, supporting Exhibit JJS-1 Table 2.	No
991	**NMSU 1-7**		John Spanos		Please provide all workpapers in complete electronic format, with all formulas and links intact, supporting Exhibit JJS-1 Table 3.	No
992	**NMSU 1-8**		John Spanos		Please provide in Microsoft Excel format all vintage plant balances data utilized to conduct the Detailed Depreciation Calculations for all accounts presented in Part IX of the Depreciation Study.	No
993	**NMSU 1-9**		John Spanos		Please provide the workpapers, in complete format with all formulas and links intact, or the Depreciation accounting data files that support the levels of Book Reserve shown in Column 6 of Table 1, of the Depreciation Study, Exhibit JJS-1. Additionally, please explain if the values are the actual level of Book Reserve for each account or if the Book Reserve has been reallocated to each account.	No
994	**NMSU 1-10**		John Spanos		Please provide in Microsoft Excel format a comparison of the currently approved and proposed depreciation rates and parameters, including Probable Retirement Date (if applicable), Average Service Life/Iowa Curve, and net salvage rate for each account in the Depreciation Study, Exhibit JJS-1.	No
995	**NMSU 1-11**		John Spanos		Please provide in Microsoft Excel format a table that compares the currently approved depreciation rates and expense to the proposed depreciation rates and expense for each account in the Depreciation Study, Exhibit JJS-1.	No
996	**NMSU 1-12**		John Spanos		Please provide all notes, documents, and photographs created due to Mr. Spanos' or Gannett Fleming's site visits and Company interviews that took place in preparation for the Depreciation Study.	No
997	**NMSU 1-13**		John Spanos		For each account where other utility estimates were incorporated into Mr. Spanos' final net salvage recommendation for the Depreciation Study, please provide a detailed description of the estimates incorporated into the recommendation.	No
998	**NMSU 1-14**		John Spanos		Please provide a table comparing the currently approved and proposed interim, terminal, and average net salvage rates for each production plant location.	No
999	**NMSU 1-15**		John Spanos		Please provide any and all fitting analysis results related to the determination of the proposed survivor curve for each account presented in Part VII of the Depreciation Study, Exhibit JJS-1. This may include the sum of squared differences for the proposed curve and the actual data, a ranking of curves considered for the account, etc.	No
1000	**NMSU 1-16**		John Spanos		Please provide all additional workpapers in native Excel format with formulas and links intact for the Depreciation study, Exhibit JJS-1.	No
1001	**NMSU 1-17**		Omar Gallegos		Please provide El Paso Electric's most recent Integrated Resource Plan.	No
1002	**NMSU 1-18**		Omar Gallegos		Please provide the production plant retirement dates assumed in El Paso Electric's most recent Integrated Resource Plan.	No
1003	**NMSU 1-19**		Omar Gallegos	John Spanos	Please provide a comparison of the production plant retirement dates in Exhibit JJS-1 and those listed in the Company's most recent Integrated Resource Plan. If there are any discrepancies between the dates listed, please provide a detailed explanation of why the discrepancies exist, and indicate which retirement dates the Company is planning to utilize.	No
1004	**NMSU 1-20**		Jeff Hughes		Regarding the 2045 retirement date for Newman Unit 5, Newman Zero Liquid Discharge, Rio Grande Unit 9, and Montana Power Station Units 1-4, has the Company considered converting any or all of these plants to Hydrogen plants in order to continue operating these locations? If yes, please provide a detailed explanation regarding whether the Company plans to pursue these conversions. If no, please provide a detailed explanation regarding why not.	No
1005	**NMSU 1-21**		Jeff Hughes		Regarding Newman Unit 5, Newman Zero Liquid Discharge, Rio Grande Unit 9, and Montana Power Station Units 1-4, rather than shutting down these plants, has the Company considered any additional alternative methods to continue utilizing these plants while still complying with the New Mexico Statutory Requirements?	No
1006	**NMSU 1-22**		John Spanos		Regarding Table 1 of Exhibit JJS-1, please provide a detailed explanation as to why Account 350.10 – Land Rights – Isleta has a 2043 retirement date and please provide supporting documentation for this retirement date.	No
1007	**NMSU 1-23**		John Spanos		Regarding Table 1 of Exhibit JJS-1, please provide a detailed explanation as to why the assets in Account 390.00 have retirement dates of 2041, 2058, and 2065. Please provide any and all supporting documentation regarding these retirement dates.	No
1008	**NMSU 1-24**		John Spanos		Regarding Table 1 of Exhibit JJS-1, please provide a detailed explanation regarding the why the survivor curves and net salvage rates listed for the existing solar accounts 338.20, 338.40, and .338.70 differ from those listed for the Felina Solar Project.	No
1009	**NMSU 1-25**		Omar Gallegos		Please confirm the Felina Solar Plant is estimated to have a 30-year life. If confirmed, please provide information regarding how the 30-year lifespan was determined.	No
1010	**NMSU 1-26**		Omar Gallegos		Please explain whether or not the Company will replace individual solar panels as needed over the life of the Felina Solar Farm.	No
1011	**NMSU 1-27**		Omar Gallegos		Please provide information regarding the Company's anticipated maintenance schedule for the Felina Solar Farm.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1012	**NMSU 1-28**		Omar Gallegos		Please provide a detailed narrative explaining the feasibility of perpetually using the site of the Felina Solar Farm.	No
1013	**NMSU 1-29**		Omar Gallegos		Please explain if the Company owns or leases the land at the site of the Felina Solar Farm. If leased, identify the length of the lease agreement.	No
1014	**NMSU 1-30**	**a**	Cindy Prieto		Regarding the Small Scale Solar Production Plant accounts, please clarify the following: a. What assets are included in these accounts?	No
1015	**NMSU 1-30**	**b**	Cindy Prieto		b. Are the assets related to the Small Scale Solar located in one spot or multiple locations?	No
1016	**NMSU 1-30**	**c**	Cindy Prieto		c. If the assets are located in multiple locations, please provide a list of the locations and the assets broken out by location.	No
1017	**NMSU 1-31**		Omar Gallegos	Adrian Hernandez	Please explain whether or not the Company will replace individual solar panels as needed over the life of the Small Scale Solar assets.	No
1018	**NMSU 1-32**		Omar Gallegos		Please provide information regarding the Company's anticipated maintenance schedule for the Small Scale Solar assets.	No
1019	**NMSU 1-33**		Omar Gallegos		Please provide a detailed narrative explaining the feasibility of perpetually using the site(s) of the Small Scale Solar assets.	No
1020	**NMSU 1-34**		Omar Gallegos		Please explain if the Company owns or leases the land at the site (or sites) of the Small Scale Solar assets. If leased, identify the length of the lease agreement(s).	No
1021	**NMSU 1-35**		Omar Gallegos		Please explain whether there are differences in the materials utilized in the assets located at Felina Solar plant and the Small Scale Solar. If there are differences, please describe how the materials may impact the life of the plant.	No
1022	**NMSU 1-36**		John Spanos		Please explain why the Palo Verde Nuclear Generating Station is not included in Exhibit JJS-1.	No
1023	**NMSU 1-37**		John Spanos		Please provide the most recently approved depreciation rates for the Company's Texas jurisdiction in the same format as Table 1 of Exhibit JJS-1, in Microsoft Excel format.	No
1024	**NMSU 2-1**		George Novela		Please provide a copy of all data requests issued to EPE by all parties to this proceeding to date, and please continue to provide copies of all new data requests as they become available.	No
1025	**NMSU 2-2**		George Novela		Please provide a copy of all responses issued by EPE to all parties' data requests in this proceeding to date, and please continue to provide copies of all new responses as they become available.	No
1026	**NMSU 2-3**		George Novela		To the extent not already provided, please provide all schedules, exhibits, tables, figures and supporting workpapers in electronic format with all formulas intact supporting the direct and supplemental testimonies of all EPE witnesses. This is an ongoing request for all subsequent testimonies	Yes
1027	**NMSU 2-4**		Richard Gonzalez		Please provide copies of all publications and credit reports referenced in or considered by witnesses Ms. Nelson and Mr. Gonzalez. This is an ongoing request for all subsequent testimonies filed by these witnesses.	No
1028	**NMSU 2-5**		Richard Gonzalez		To the extent not already provided, please provide executable electronic copies with formulas and links intact for all charts, tables, figures, schedules and exhibits used in support of the direct and supplemental testimony filed by witness Ms. Nelson and Mr. Gonzalez. This is an ongoing request for all subsequent testimonies filed by these witnesses.	No
1029	**NMSU 2-6**		Richard Gonzalez		Please provide copies of all credit reports published by Standard & Poor's ("S&P"), Moody's and Fitch Ratings for EPE and its parent company, issued over the last two years. This is an ongoing request	No
1030	**NMSU 2-7**		Richard Gonzalez		Please provide complete copies of the most recent credit reports issued by S&P, Moody's and Fitch Ratings that discuss the current credit outlook of the regulated utility industry. This is an ongoing request.	No
1031	**NMSU 2-8**		Richard Gonzalez		Referring to pages 20-21 of Mr. Rodrigez direct testimony he states that Moody's identifies if the cashflow coverage ratio falls below 15%, it will result in credit downgrade. If not already provided in response to the questions above, please provide the Moody's report Mr. Rodrigez is referring to. Please identify the historical cashflow coverage ratio calculated by Moody's.	No
1032	**NMSU 2-9**		Richard Gonzalez		Referring to pages 20-21 of Mr. Rodrigez direct testimony he states that Fitches states that if EPE's coverage ratio exceeds 5.3x on a sustained basis, it could result in credit downgrade. If not already provided in response to the questions above, please provide the Fitch report Mr. Rodrigez is referring to. Please identify the historical coverage ratio calculated by Fitch.	No
1033	**NMSU 2-10**		Richard Gonzalez		Please state whether EPE has been downgraded by Fitch or Moody's since its 2020 rate case (CASE NO. 20-00104-12 UT)?	No
1034	**NMSU 2-11**		Richard Gonzalez		Please provide copies of all correspondence, presentations and all other materials that EPE or its parent company have provided to credit and equity analysts over the last two years. This is an ongoing request for all subsequent testimonies.	No
1035	**NMSU 2-12**		Richard Gonzalez		Please identify the amount of net income and annual dividend EPE has paid to its parent Company over the last five years and the projected dividend payment through 2026.	No
1036	**NMSU 2-13**		Richard Gonzalez		On electronic spreadsheet with all formulas intact please provide EPE' earned and authorized return on equity over the last 5 years and provide all financial statements supporting these calculations.	No
1037	**NMSU 2-14**		Richard Gonzalez		In electronic format with all formulas intact, please identify the Commission approved capital structure, cost of equity, cost of debt, and rate of return in EPE' last three regulatory proceedings. Please identify the docket and order numbers.	No
1038	**NMSU 2-15**	**a**	Richard Gonzalez		To the best of EPE' knowledge, all else equal, approximately how much would the interest rate on EPE' debt issuances change if it experienced: a. A one-notch credit downgrade?	No
1039	**NMSU 2-15**	**b**	Richard Gonzalez		A two-notch credit downgrade?	No
1040	**NMSU 2-15**	**c**	Richard Gonzalez		A one-notch credit upgrade?	No
1041	**NMSU 2-15**	**d**	Richard Gonzalez		A two-notch credit upgrade?	No
1042	**NMSU 2-15**	**e**	Richard Gonzalez		If, for any reason, you are unable to answer (a)-(d) due to missing information or assumptions, please identify all additional information that would be necessary for you to provide an answer	No
1043	**NMSU 2-16**		Richard Gonzalez		Since its last rate case filing, has EPE ever found itself unable to access sufficient debt capital from the debt markets when it needed to? If so, please describe each such instance in detail	No
1044	**NMSU 2-17**		Richard Gonzalez		Since its last rate case filing, has EPE or its parent ever found itself unable to access sufficient equity capital when it needed to? If so, please describe each such instance in detail.	No
1045	**NMSU 2-18**		Richard Gonzalez		Please provide a projection of EPE's capital expenditures out over the next five years, and an estimate of the sources of cash available to fund these capital expenditures broken out by external debt markets, external equity infusions from its parent company, retained earnings, depreciation expense, deferred taxes and other sources (explain). Please also include in this response the funding planned for debt maturity, retirements and/or refinancing over this same time period.	No
1046	**NMSU 2-19**		Richard Gonzalez	Cindy Prieto	In electronic format with all formulas intact, please provide the monthly average balances for construction work in progress and short-term debt for the most recent 13-month and the base period, ending September 30, 2025. Please identify the amount of short-term debt included in the regulatory capital structure, if any	No
1047	**NMSU 2-20**		Richard Gonzalez		Please explain whether EPE recorded any goodwill asset on its balance sheet. If affirmative, please identify the goodwill amount and state whether it was removed from the Company's equity balance.	No
1048	**NMSU 2-21**		Richard Gonzalez		Please provide the amount of capitalized interest estimated to be paid during the test year related to construction projects for EPE.	No
1049	**NMSU 2-22**		Richard Gonzalez		In electronic format with all formulas intact, please provide the regulated five-year projected and five-year historical capital structure for EPE. Please include a breakdown of all sources of equity capital including retained earnings, paid-in capital (equity infusion), and debt capital, both long-term and short-term debt, etc.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1050	**NMSU 2-23**		Richard Gonzalez		Please describe how EPE accesses external capital. If the Company's external capital is provided by its parent company under a credit agreement, please describe the terms of the credit agreement and the associated service fees	No
1051	**NMSU 2-24**		Richard Gonzalez		Please provide the most recent senior secured, unsecured and corporate credit ratings of EPE, assigned by S&P, Moody's and Fitch. Also, please provide EPE' S&P business and financial risk profiles and identify the benchmark volatility table (standard, medial or low) used by S&P. Finally, identify the Moody's risk grid used to evaluate EPE' credit metrics.	No
1052	**NMSU 2-25**		Richard Gonzalez		To the extent not already provided, please provide in electronic format with all formulas intact, EPE' credit metric calculations relied on by S&P and Moody's for the last five years and three-year projections if available. Please include all financial statements used to derive these credit metrics. In addition, please provide S&P and Moody's benchmark ranges for the credit metrics.	No
1053	**NMSU 2-26**		Cindy Prieto		Please state whether EPE' regulated retail operations have any off-balance sheet debt such as purchased power agreements and operating leases. If the answer is "yes," provide the amount of each off-balance sheet debt item and estimate the related imputed interest and amortization expense associated with these off-balance sheet debt equivalents specific to BHEA's jurisdictional regulated retail electric operations.	No
1054	**NMSU 2-27**		Richard Gonzalez		Do any of EPE' outstanding long-term debt issues have call provisions? If the answer is "yes," please provide a list of the callable issues with the following: a) outstanding balance, b) issuance date, c) maturity date, d) coupon payment percent, e) annual interest expense, and f) call price (as a percent of par).	No
1055	**NMSU 2-28**	**a**	Richard Gonzalez		Has EPE performed any debt refinancing feasibility studies on its outstanding debt issues? If the answer is "yes," please provide the following: a. A detailed description of the results from the study	No
1056	**NMSU 2-28**	**b**	Richard Gonzalez		b. A detailed description of the conclusions(s) made by EPE based on the results of the study.	No
1057	**NMSU 2-28**	**c**	Richard Gonzalez		c. All debt refinancing feasibility studies in electronic format with all formulas intact	No
1058	**NMSU 3-1**		George Novela		Please provide a copy of all data requests issued to El Paso Electric by all parties to this proceeding to date, and please continue to provide copies of all new data requests as they become available.	No
1059	**NMSU 3-2**		George Novela		Please provide a copy of all responses issued by El Paso Electric to all parties' data requests in this proceeding to date, and please continue to provide copies of all new responses as they become available.	No
1060	**NMSU 3-3**		Adrian Hernandez		Please provide the working Excel model of EPE's Class Cost of Service Study or studies, with all formulas and links intact and not password-protected.	Yes
1061	**NMSU 3-4**		Manny Carrasco		Please provide the working Excel model that derives EPE's retail proof of revenue based on class billing determinants and tariff rate/rider charges, that develops the current retail revenue at current rates by rate class and the proposed retail revenue requirement by rate class. The proof of revenue should be based on the same class billing determinants, unless the company has proposed a change in class measurement of demand, energy and customers billing factors.	Yes
1062	**NMSU 3-5**		Adrian Hernandez		Please provide all workpapers and exhibits supporting witness Adrian Hernandez's direct testimony in Excel format, with all formulas and links intact, and not password-protected.	Yes
1063	**NMSU 3-6**		Manny Carrasco		Please provide all workpapers and exhibits supporting witness Manuel Carrasco's direct testimony in Excel format, with all formulas and links intact, and not password-protected.	Yes
1064	**NMSU 3-7**		Adrian Hernandez		Please provide all workpapers and exhibits in Excel format, with all formulas and links intact and not password-protected, supporting Schedule K-01 through K-08.	Yes
1065	**NMSU 3-8**		Adrian Hernandez		Please provide all workpapers and exhibits in Excel format, with all formulas and links intact and not password-protected, supporting Schedule L.	Yes
1066	**NMSU 3-9**		Enedina Soto	Adrian Hernandez	Please provide all workpapers and exhibits in Excel format, with all formulas and links intact and not password-protected, supporting Schedules M-01 through M-03.	No
1067	**NMSU 3-10**		Adrian Hernandez		Please provide all workpapers and exhibits in Excel format, with all formulas and links intact and not password-protected, supporting Schedule N-01.	Yes
1068	**DOD 1-1**		Adrian Hernandez		Please confirm that the most recent electronic version of the Company's Class Cost of Service ("CCOS") study is STAFF 01-03 Supplemental_Attachment 01. If not confirmed, please provide the most recent electronic version of the Company's CCOS study, including all supporting workpapers, schedules, links, etc	Yes
1069	**DOD 1-2**		Adrian Hernandez		Reference the Company's response to the preceding request. Please indicate whether the current CCOS model incorporates all updates, revisions, corrections, modifications, and other changes reflected in subsequent discovery responses, supplemental responses, and supporting workpapers produced in this proceeding. If not, please provide an updated executable version of the CCOS model that incorporates all such changes, together with all supporting workpapers, schedules, formulas, links, and source files.	Yes
1070	**DOD 1-3**		Adrian Hernandez		Provide copies of all Excel files and associated workpapers for the Jurisdictional Cost of Service (JCOS) and Class Cost of Service (CCOS) studies—including all supporting Excel files related to energy, demand, and customer allocators—that were filed by the Company in its last rate case, Case No. C-20-00104-UT	Yes
1071	**DOD 1-4**		Manny Carrasco	Hernandez?	Provide copies of all Excel files and associated workpapers related to the rate design and revenue proof (e.g., Workpaper O), as well as all Excel exhibits and workpapers for witnesses who supported the CCOS and rate design proposals in the Company's last rate case, Case No. C-20-00104-UT.	Yes
1072	**DOD 1-5**	**1**	Adrian Hernandez		Please provide an executable electronic version of the Company's Class Cost of Service ("CCOS") study, including all supporting workpapers, schedules, links, etc., applying all of the following alternative assumptions: 1. Production Plant: Modify the CCOS study so that all demand-related production plant costs, including peaking generation plant, are allocated using the D1PROD – 4CP Average & Excess (4CP A&E) allocator. Do not allocate any production plant costs using D2PROD – 4CP;	No
1073	**DOD 1-5**	**2**	Adrian Hernandez		2. Production O&M: Modify the CCOS study so that all demand-related production O&M costs, including FERC Account 556 – System Control and Load Dispatching, are allocated using the D1PROD –4CP A&E allocator. Do not allocate any production O&M costs using DPROD12 – 12CP-A&E or D2PROD – 4CP;	No
1074	**DOD 1-5**	**3**	Adrian Hernandez		3. Transmission Plant and O&M: Modify the CCOS study so that all transmission plant costs and all transmission O&M costs, including FERC Account 561 – Load Dispatching, are allocated using a 4CP A&E transmission allocator developed using the same methodology used to develop D1PROD – 4CP A&E. Do not allocate any transmission plant or transmission O&M costs using DTRAN12 – 12CP . or D2TRAN – 4CP. If the Company does not maintain a transmission-specific 4CP A&E Trans. allocator, please develop and provide that allocator, including all supporting calculations and source data.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	**Intervenor/ Set**	**Subpart**	**Sponsor**	**Co-Sponsor(s)**	**Question**	**Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)**
1075	**DOD 1-6**	**1**	Adrian Hernandez		Please provide an executable electronic version of the Company's Class Cost of Service ("CCOS") study, including all supporting workpapers, schedules, links, etc., applying all of the following alternative assumptions: 1. Production Plant: Modify the CCOS study so that all demand-related production plant costs, including peaking generation plant, are allocated using the D1PROD – 4CP Average & Excess (4CP A&E) allocator. Do not allocate any production plant costs using D2PROD – 4CP;	No
1076	**DOD 1-6**	**2**	Adrian Hernandez		2. Production O&M: Modify the CCOS study so that all demand-related production O&M costs, including FERC Account 556 – System Control and Load Dispatching, are allocated using the D1PROD –4CP A&E allocator. Do not allocate any production O&M costs using DPROD12 – 12CP-A&E or D2PROD – 4CP;	No
1077	**DOD 1-6**	**3**	Adrian Hernandez		3. Transmission Plant and O&M: Modify the CCOS study so that all transmission plant costs and all transmission O&M costs, including FERC Account 561 – Load Dispatching, are allocated using D2TRAN – 4CP. Do not allocate any transmission plant or transmission O&M costs using DTRAN12 – 12CP.	No
1078	**DOD 1-7**		Richard Gonzalez		In Microsoft Excel format with all formulas intact, please identify the Commission-approved capital structure, authorized return on equity, authorized cost of debt, and overall rate of return for El Paso Electric Company ("EPE" or "Company") in each of EPE's last four New Mexico and Texas retail electric rate proceedings. Please identify the jurisdiction, docket or case number, order number, date of each order, effective date of the rates, and provide copies of the final orders or decisions authorizing each return.	No
1079	**DOD 1-8**		Richard Gonzalez	Jennifer Nelson	Please provide EPE's actual annualized return on equity for each quarter for the past five years, calculated on both a total-company and New Mexico-jurisdictional basis. Please provide all underlying data, adjustments, financial statements, and workpapers in Microsoft Excel format with all formulas and cell references intact.	No
1080	**DOD 1-9**		Richard Gonzalez		Please provide the most current balances for all components of EPE's capital structure, including long-term debt, short-term debt, common equity, preferred stock, Rio Grande Resources Trust obligations, revolving credit facility borrowings, term loans, equity contributions, dividends, and any amounts excluded from the requested capital structure. For each component, provide the net outstanding balance, effective cost rate, maturity date, source of funds, and the reason for inclusion or exclusion from the requested capital structure and cost of capital.	No
1081	**DOD 1-10**		Richard Gonzalez		Please provide copies of all credit reports, credit opinions, ratings presentations, issuer commentaries, and outlook reports for EPE, Sun Jupiter Holdings LLC, IIF US Holding 2 LP, Infrastructure Investments Fund, and any relevant parent or affiliate, from Moody's, S&P, Fitch, or any other credit rating agency, published over the past five years.	No
1082	**DOD 1-11**		Richard Gonzalez		For the period January 1, 2020 through the date of the response, please list all credit ratings and outlooks for EPE, Sun Jupiter Holdings LLC, IIF US Holding 2 LP, Infrastructure Investments Fund, and any relevant parent or affiliate by Moody's, S&P, Fitch, or any other rating agency. For each initial rating, affirmation, outlook change, upgrade, downgrade, watch placement, or withdrawal, provide the date, rating agency, rating action, report or press release, and all supporting communications or presentations provided to or received from the agency.	No
1083	**DOD 1-12**		Richard Gonzalez		Please provide copies of all prospectuses, offering memoranda, private placement memoranda, note purchase agreements, term sheets, indentures, board approvals, underwriting materials, and regulatory approvals for any security issuance, debt issuance, refinancing, revolver draw, term loan, Rio Grande Resources Trust financing, pollution control bond transaction, or other financing by EPE, Rio Grande Resources Trust, Sun Jupiter Holdings LLC, or any relevant parent or affiliate over the last five years, including the $173 million 6.41% Senior Unsecured Notes issued in October 2025.	No
1084	**DOD 1-13**		Richard Gonzalez		Over the past five years, please provide the dollar amount, date, source, purpose, and accounting treatment of all equity infusions, capital contributions, intercompany advances, parent support payments, dividends, distributions, or other transfers between EPE and Sun Jupiter Holdings LLC, IIF US Holding 2 LP, Infrastructure Investments Fund, or any relevant parent or affiliate. Include the October 2025 $170 million equity infusion, the October 2025 $101.6 million dividend, and all documents supporting EPE's statement that it received $975 million of equity infusions from Sun Jupiter since the 2020 Rate Case.	No
1085	**DOD 1-14**		Steven Sierra		Please provide copies of EPE's annual financial reports submitted to the Commission, FERC Form 1 reports, SEC filings or reports, audited financial statements, management letters, and annual reports for the past five years. If any responsive materials are maintained by a parent or affiliate rather than EPE, please identify the entity and provide the relevant financial statements and schedules.	No
1086	**DOD 1-15**	**a**	Cindy Prieto		Please provide: a.) the end-of-quarter rate base amounts for EPE for each quarter from January 1, 2020 through the Base Period and Test Year Period used in this case, separately for total company and New Mexico jurisdictional amounts;	No
1087	**DOD 1-15**	**b**	Richard Gonzalez		b.) the end-of-quarter balances of short-term debt, long-term debt, common equity, preferred stock, and any other capital component for the same period;	No
1088	**DOD 1-15**	**c**	Cindy Prieto		c.) all amounts excluded from rate base or capital structure, including nuclear fuel financed through Rio Grande Resources Trust, construction work in progress, revolving credit facility borrowings, and term loans;	No
1089	**DOD 1-15**	**d**	Cindy Prieto		d.) the data and workpapers in both PDF and Microsoft Excel formats, with all data and formulas intact	No
1090	**DOD 1-16**	**a**	Richard Gonzalez		Please provide: a.) the daily amounts of short-term debt, revolving credit facility borrowings, term loans, and Rio Grande Resources Trust borrowings for EPE for the period January 1, 2020 through the date of the response and for the Test Year Period;	No
1091	**DOD 1-16**	**b**	Richard Gonzalez		b.) the daily cost rate, benchmark rate, spread, fees, and interest expense associated with each short-term borrowing;	No
1092	**DOD 1-16**	**c**	Richard Gonzalez		c.) the purpose for each borrowing and whether the amount was included in or excluded from the requested cost of debt and capital structure;	No
1093	**DOD 1-16**	**d**	Richard Gonzalez		d.) the data in Microsoft Excel format with all data and formulas embedded in the worksheet.	No
1094	**DOD 1-17**	**a**	Jennifer Nelson		Reference Nelson Direct at 41-45. a.) Please provide the master list of all electric utility companies considered for inclusion in Ms. Nelson's proxy group;	No
1095	**DOD 1-17**	**b**	Jennifer Nelson		b.) please provide the underlying data and formulas used to determine whether each company met each screening criterion, including dividend history, analyst coverage, EPS growth sources, credit ratings, vertical integration, regulated operating income percentages, regulated electric operating income percentages, merger or transaction activity, and other financial events;	No
1096	**DOD 1-17**	**c**	Jennifer Nelson		c.) do any companies included in Ms. Nelson's proxy group no longer meet her criteria for inclusion;	No
1097	**DOD 1-17**	**d**	Jennifer Nelson		d.) are there any companies originally excluded that now meet the criteria;	No

SUPPLEMENTAL DISCOVERY

Line No	(a) Intervenor/ Set	(b) Subpart	(c) Sponsor	(d) Co-Sponsor(s)	(e) Question	(f) Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1098	**DOD 1-17**	**e**	Jennifer Nelson		e.) if the response to subparts (c.) or (d.) is yes, please discuss each circumstance and whether Ms. Nelson would include or exclude the relevant company if she were preparing her testimony today.	No
1099	**DOD 1-18**	**a**	Jennifer Nelson		Reference Nelson Direct at 51-78 and Exhibits JEN-2 through JEN-6. a.) Please provide all workpapers, models, source data, and formulas supporting Ms. Nelson's Constant Growth DCF, Quarterly Growth DCF, CAPM, Empirical CAPM, and Bond Yield Plus Risk Premium analyses;	No
1100	**DOD 1-18**	**b**	Jennifer Nelson		b.) provide the daily stock prices, dividends, dividend yields, analyst EPS growth rates, Treasury yields, beta coefficients, market return estimates, market risk premiums, authorized ROE data, and regression data used in each model;	No
1101	**DOD 1-18**	**c**	Jennifer Nelson		c.) provide the data in native Microsoft Excel format with formulas intact and links to source data identified;	No
1102	**DOD 1-18**	**d**	Jennifer Nelson		d.) identify every judgmental adjustment, exclusion, averaging convention, and data cutoff date used;	No
1103	**DOD 1-18**	**e**	Jennifer Nelson		e.) provide updated model results using the most current data available as of the date of the response	No
1104	**DOD 1-19**		Richard Gonzalez		Reference Gonzalez Direct at 11-15, Nelson Direct at 109-115, and Schedule G-1. Please provide native Microsoft Excel copies, with all formulas and links intact, of all schedules, workpapers, models, and source files calculating EPE's requested capital structure, requested return on equity, requested cost of long-term debt, and requested weighted average cost of capital. The response should include all source data from EPE's books, trial balances, debt schedules, equity accounts, dividend records, financing records, and revenue requirement schedules necessary to trace the requested 55.50% common equity ratio, 44.50% long-term debt ratio, 10.70% return on equity, 5.426% cost of debt, and 8.354% overall rate of return to the filing.	No
1105	**DOD 1-20**		Richard Gonzalez		Reference Schedule G-1, Gonzalez Direct at 12-15, and Nelson Direct at 110 and 113-115. Please explain why EPE proposes to use a total-company capital structure for New Mexico ratemaking purposes rather than a New Mexico-jurisdictional capital structure. Provide all analyses comparing the requested total-company capital structure to a New Mexico-jurisdictional capital structure, including jurisdictional allocation factors, jurisdictional rate base balances, jurisdictional debt and equity assignments if any, and the revenue requirement impact of using a New Mexico-jurisdictional capital structure, EPE's actual book capital structure at the end of the Base Period, EPE's actual book capital structure at the end of the Test Year Period, and EPE's consolidated parent-level capital structure.	No
1106	**DOD 1-21**	**a**	Richard Gonzalez		Reference the Application's description of the Base Period and Test Year Period and Gonzalez Direct at 12-13. Please provide all support for EPE's capital structure measurement method, including any use of point-in-time balances, monthly averages, thirteen-month averages, Base Period balances, Test Year balances, post-Base Period adjustments, known and measurable changes, pro forma debt issuances, equity infusions, and dividends. Provide alternative weighted average cost of capital and revenue requirement calculations using: a.) a thirteen-month average capital structure;	No
1107	**DOD 1-21**	**b**	Richard Gonzalez		b.) a monthly average capital structure over the Base Period;	No
1108	**DOD 1-21**	**c**	Richard Gonzalez		c.) the actual capital structure at the end of the Base Period;	No
1109	**DOD 1-21**	**d**	Richard Gonzalez		d.) the actual capital structure at the end of the Test Year Period;	No
1110	**DOD 1-21**	**e**	Richard Gonzalez		e.) the requested adjusted capital structure.	No
1111	**DOD 1-22**		Richard Gonzalez		Reference Gonzalez Direct at 14 and Schedule G-3. Please provide the complete embedded cost of long-term debt calculation supporting EPE's requested 5.426% cost of debt, including each debt series, issue date, maturity date, principal amount outstanding, coupon rate, stated yield, effective interest rate, premiums, discounts, issuance expenses, reacquired debt costs, gains or losses on refinancing, amortization schedules, sinking fund requirements, interest rate swaps or hedges, and all accounting entries. Provide the supporting workpapers in native Microsoft Excel format with formulas intact.	No
1112	**DOD 1-23**		Richard Gonzalez		Reference Gonzalez Direct at 13 and Schedule G-1. Please provide all workpapers and source documents supporting the treatment of the October 2025 $173 million 6.41% Senior Unsecured Notes, the October 2025 $170 million equity infusion, and the October 2025 $101.6 million dividend in EPE's requested capital structure and cost of capital. Reconcile the amounts, dates, journal entries, cash receipts or disbursements, and account balances for each transaction to Schedule G-1, EPE's general ledger, and any financing approvals. Explain whether, and to what extent, the transaction was included in the Base Period, Test Year Period, adjusted capital structure, cost of debt, or revenue requirement.	No
1113	**DOD 1-24**		Richard Gonzalez		Reference Gonzalez Direct at 12-13 and 21. Please identify every liability, financing obligation, lease, power purchase agreement, capacity contract, Rio Grande Resources Trust obligation, revolving credit facility borrowing, term loan, short-term borrowing, tax equity obligation, construction-related obligation, or other item excluded from EPE's requested regulatory capital structure but considered by EPE, its lenders, or any rating agency in evaluating EPE's credit quality. For each item, provide the amount, term, cost rate, counterparty, reason for exclusion from the requested capital structure, any rating-agency debt imputation or adjustment, and the revenue requirement impact of including the obligation in the capital structure or cost of debt.	No
1114	**DOD 1-25**		Richard Gonzalez		Reference Gonzalez Direct at 12, 15, 16-22, and Nelson Direct at 113-115. Please provide all internal policies, board materials, treasury memoranda, liquidity plans, dividend policies, capital allocation plans, rating-agency presentation materials, and financial planning documents supporting EPE's requested equity ratio and its stated objective of maintaining investment-grade credit ratings. Include all minimum target ratios, rating-agency threshold analyses, funds-from-operations-to-debt targets, cash-flow-to-debt targets, debt-to-EBITDA targets, interest coverage targets, dividend restrictions, equity support expectations, and parent support assumptions.	No
1115	**DOD 1-26**		Richard Gonzalez		Reference Gonzalez Direct at 16-22. Please provide all credit metric calculations, rating-agency schedules, rating-agency presentations, and financial forecasts provided to, received from, or discussed with Moody's, Fitch, S&P, or any other rating agency since January 1, 2021. Include all unredacted versions of any schedules or presentations, all correspondence concerning potential upgrades, downgrades, outlook changes, or rating triggers, and all calculations of FFO/debt, CFO pre-working-capital/debt, debt/EBITDA, EBIT interest coverage, retained cash flow/debt, debt capitalization, and any other metric used by the rating agency.	No
1116	**DOD 1-27**		Jennifer Nelson		Reference Nelson Direct. Please provide all workpapers and source documents supporting any comparison of EPE's regulatory risk to the proxy group, including Regulatory Research Associates ratings, S&P regulatory advantage or credit-supportiveness assessments, Moody's regulatory framework assessments, authorized return on equity comparisons, capital structure comparisons, use of historical or projected test years, rate-case lag comparisons, construction work in progress treatment, fuel and purchased power adjustment mechanisms, renewable or battery riders, grid modernization riders, other trackers or surcharges, and any jurisdictional risk adjustments considered by Ms. Nelson or EPE.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1117	**DOD 1-28**		Jennifer Nelson		Reference Nelson Direct at 106-109. Please provide all analyses, source documents, and workpapers supporting Ms. Nelson's conclusion that EPE's smaller size and business-risk profile should influence the requested return on equity. Identify every source used to evaluate size-related risk, including any Kroll, Duff & Phelps, Bloomberg, Value Line, S&P, Moody's, Fitch, or academic source. Quantify the effect on the requested return on equity of including and excluding any size-risk consideration or small-size premium.	No
1118	**DOD 1-29**		Jennifer Nelson	Richard Gonzalez	Reference the Application, Gonzalez Direct at 12-15, Nelson Direct at 108-109, and EPE's testimony concerning transmission, distribution, advanced metering, battery energy storage, renewable, reliability, and growth-related capital investments. Please provide a capital-expenditure-to-net-plant comparison for EPE and for each proxy group company for the past five historical years and each forecast year used in this case. Include capital expenditures, net plant, gross plant, depreciation expense, construction work in progress, capex-to-net-plant ratios, capex-to-depreciation ratios, and all workpapers or source documents relied on to conclude that EPE's capital expenditure program increases risk or supports the requested return on equity or equity ratio.	No
1119	**DOD 1-30**		Jennifer Nelson		Reference Nelson Direct at 112-114 and Exhibit JEN-10. Please provide the operating-subsidiary capital structure analysis for each company in Ms. Nelson's proxy group, including the capital structure of each regulated electric operating subsidiary, holding company, and consolidated parent. Identify all adjustments made to remove non-utility operations, short-term debt, securitization debt, imputed debt, goodwill, noncontrolling interests, or other nonregulated items. Explain whether any proxy company would be excluded or weighted differently if the analysis used regulated operating subsidiary capital structures rather than consolidated holding-company capital structures.	No
1120	**DOD 1-31**	**a**	Richard Gonzalez		Reference Gonzalez Direct at 11-15, Nelson Direct at 109-115, and Schedule G-1. a.) Has EPE, Rio Grande Resources Trust, Sun Jupiter Holdings LLC, or any relevant parent or affiliate issued any debt, equity, common stock, preferred stock, notes, bonds, or other securities since the Base Period or Test Year Period used in this filing;	No
1121	**DOD 1-31**	**b**	Richard Gonzalez		b.) if yes, provide all supporting information, including monthly shares or principal amounts issued, offering price, coupon, yield, underwriting discount, issuance expense, maturity, use of proceeds, and regulatory approvals;	No
1122	**DOD 1-31**	**c**	Richard Gonzalez		c.) does EPE, Rio Grande Resources Trust, Sun Jupiter Holdings LLC, or any relevant parent or affiliate plan to issue any debt, equity, or other securities over the next five years;	No
1123	**DOD 1-31**	**d**	Richard Gonzalez		d.) if yes, provide the expected timing, amount, instrument, cost rate, use of proceeds, underwriting discount, issuance expense, and effect on EPE's capital structure and cost of capital.	No
1124	**DOD 1-32**		George Novela		Provide a comprehensive list of clauses, rate mechanisms, trackers, riders, surcharges, regulatory assets, deferrals, or other mechanisms that the Commission permits EPE to use for cost recovery between general rate cases. Include, at a minimum, the Fuel and Purchased Power Cost Adjustment Clause, AMS Rider or surcharge, RPS Cost Rider, Community Solar Program Administrative Cost Rider, low-income rider, electric vehicle riders, demand response or peak-time rebate programs, BESS or purchased power capacity cost recovery, and any mechanisms proposed to be moved into base rates in this case. For each mechanism, identify the relevant docket numbers, Commission orders, annual amounts recovered, balances deferred, amounts proposed for base-rate recovery, and copies of the corresponding Commission decisions or orders in the most recent proceedings.	No
1125	**DOD 1-33**		Jim Schichtl		Please provide an organizational chart or diagram that details the corporate structure and relationship of EPE, Rio Grande Resources Trust, Sun Jupiter Holdings LLC, IIF US Holding 2 LP, Infrastructure Investments Fund, all other affiliates and subsidiaries, and any parent company. The response should identify each entity's ownership percentage, jurisdiction of organization, officers and directors, role in financing or providing services to EPE, affiliate transactions with EPE, and any shared services or cost allocation arrangements	No
1126	**DOD 1-34**	**a**	George Novela	Tammy Henderson	Has EPE pursued, received, or utilized any federal, state, local, or other governmental grants, tax credits, incentives, rebates, subsidized financing, low-interest loans, loan guarantees, or similar funding sources for projects included in the Application, whether partially or fully funded by such sources? If so, please provide the following details for each project: a.) the date the funding was applied for, awarded, secured, received, or used;	No
1127	**DOD 1-34**	**b**	George Novela	Tammy Henderson	b.) a general description of the funded project;	No
1128	**DOD 1-34**	**c**	George Novela	Tammy Henderson	c.) the source of funding;	No
1129	**DOD 1-34**	**d**	George Novela	Tammy Henderson	d.) the amount awarded or received;	No
1130	**DOD 1-34**	**e**	George Novela	Tammy Henderson	e.) the total anticipated and actual project cost;	No
1131	**DOD 1-34**	**f**	George Novela	Tammy Henderson	f.) the amount reflected in rate base, O&M expense, deferred costs, or any rider or tracker;	No
1132	**DOD 1-34**	**g**	George Novela	Tammy Henderson	g.) whether the funding reduced the revenue requirement requested in this case;	No
1133	**DOD 1-34**	**h**	George Novela	Tammy Henderson	h.) the expected project completion date.	No
1134	**DOD 1-35**	**a**	Adrian Hernandez		What is the revenue requirement impact of a 1 basis-point, 5 basis-point, 10 basis-point, 25 basis-point, 50 basis-point, 75 basis-point, and 100 basis-point increase and decrease in EPE's currently authorized return on equity, authorized capital structure, authorized cost of debt, requested return on equity, requested capital structure, and requested cost of debt, all else remaining equal? Please provide the same estimated revenue requirement impacts assuming: a.) EPE's requested 55.50% common equity ratio, 44.50% long-term debt ratio, 10.70% return on equity, 5.426% cost of debt, and 8.354% overall rate of return;	No
1135	**DOD 1-35**	**.l**	Adrian Hernandez		b.) a 50.00% common equity and 50.00% long-term debt capital structure;	No
1136	**DOD 1-35**	**c**	Adrian Hernandez		c.) EPE's actual Base Period capital structure;	No
1137	**DOD 1-35**	**d**	Adrian Hernandez		d.) EPE's actual Test Year capital structure;	No
1138	**DOD 1-35**	**e**	Adrian Hernandez		e.) any New Mexico-jurisdictional capital structure identified in response to these data requests. Please provide all calculations in Microsoft Excel format with formulas intact and separately identify impacts on the requested net revenue increase, non-fuel base rate revenue deficiency, phase-in proposal, each rider or tracker proposed in this case, and each customer class.	No
1139	**CCAE 4-1**		Omar Gallegos		Please refer to page 24, lines 8 to 9 of Omar Gallegos' Direct Testimony, which states "[t]he output of this process is EPE's annual Ten-year System Expansion Plan." Please provide the Company's current Ten-Year System Expansion Plan	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1140	**CCAE 4-2**	**a**	Enedina Soto		Please provide the following information regarding page 40, lines 6 to 14 of Enedina Soto's Direct Testimony and Exhibit ES-6 a. Please confirm that the demand and energy forecasts in Exhibit ES-6 refer to EPE's New Mexico service territory, not to EPE's service territory in Texas or other jurisdictions.	No
1141	**CCAE 4-2**	**b**	Enedina Soto		Please provide demand and energy forecasts equivalent to Exhibit ES-6 for the EPE's Texas service territories and EPE's service territories in other jurisdictions.	No
1142	**CCAE 4-3**		Enedina Soto		Please identify and provide all workpapers used to prepare Schedule P-1	No
1143	**CCAE 4-4**	**a**	Omar Gallegos		Please provide the following information regarding Section 3(E)(5) ("Load Requests at Distribution Voltage for 30 MW or Greater") on page 23 of Exhibit OAG-7 ("Company's Line Extension Policies and Construction Charges"). a. Please describe in detail the specific transmission and distribution facilities that EPE considers to be within the scope of the "unplanned substation upgrades" and "transmission line upgrades." For each facility type, please state and explain whether EPE considers it to be a dedicated facility, a shared facility, or both depending on circumstances	No
1144	**CCAE 4-4**	**b**	Omar Gallegos		b. At what voltage level does EPE consider a large load customer's cost responsibility to end under proposed Section 3(E)(5)? Please provide the specific voltage cutoff and explain the Company's rationale. If EPE's cost responsibility framework varies by facility type rather than voltage level alone, please describe how EPE determines the boundary of customer cost responsibility for each facility type.	No
1145	**CCAE 4-4**	**c**	Omar Gallegos		c. Does proposed Section 3(E)(5) apply to shared transmission facilities, that is, facilities that serve or will serve multiple customers but were nonetheless required, accelerated, or expanded due to a large load service request? If yes, please explain how costs are allocated between the large load customer and other customers. If no, explain how EPE proposes to recover those costs.	No
1146	**CCAE 4-4**	**d**	Omar Gallegos		d. Has EPE considered extending the cost recovery framework of proposed Section 3(E)(5) to transmission network upgrades, that is, upgrades to shared bulk transmission facilities that would not have been required but for the large load customer's interconnection request? If yes, please describe what was considered and why it was not proposed. If no, please explain how EPE proposes to recover such costs and which customers will bear them.	No
1147	**CCAE 4-5**	**a**	Omar Gallegos		Please refer again to Section 3(E)(5) ("Load Requests at Distribution Voltage for 30 MW or Greater") on page 23 of Exhibit OAG-7 ("Company's Line Extension Policies and Construction Charges"), which describes "unplanned substation upgrades." Please define what EPE means by "unplanned substation upgrades." Specifically: a. Does the term "unplanned substation upgrades" include substation upgrades that were included in EPE's capital plan prior to receipt of a large load service request but were accelerated in timing due to that request?	No
1148	**CCAE 4-5**	**b**	Omar Gallegos		b. Does the term "unplanned substation upgrades" include substation upgrades that were expanded in scope or capacity due to a large load service request?	No
1149	**CCAE 4-5**	**c**	Omar Gallegos		c. For purposes of Section 3(E)(5), what other criteria does EPE apply to determine whether a substation upgrade is "unplanned"?	No
1150	**CCAE 4-6**	**a**	Omar Gallegos		Please refer again to Section 3(E)(5) ("Load Requests at Distribution Voltage for 30 MW or Greater") on page 23 of Exhibit OAG-7 ("Company's Line Extension Policies and Construction Charges"), which describes the Infrastructure Capacity Charge. a. Please describe in detail the methodology EPE proposes to use to calculate the Infrastructure Capacity Charge for a specific large load customer, including all inputs and formulas used in the calculation. If no standardized methodology exists, explain how EPE ensures consistency and comparability of the Infrastructure Capacity Charge across different large load customers.	No
1151	**CCAE 4-6**	**b**	Omar Gallegos		b. Does EPE's proposed Infrastructure Capacity Charge include any mechanism for refund to the large load customers once the customer begins paying rates that contribute to recovery of the same facilities? If no, please explain why not and whether EPE has considered such a mechanism	No
1152	**CCAE 4-7**	**a**	Omar Gallegos		Please provide the following information regarding Section 3(E)(4) ("Load Requests Greater Than 740 kVA") on pages 22 to 23 of Exhibit OAG-7 ("Company's Line Extension Policies and Construction Charges"), which describes the Connected Load and the Distribution Capacity Reservation Charge a. Please describe in detail how EPE proposes to verify planned Connected Load under Section 3(E)(4), including what specific documentation or evidence EPE considers to be sufficient verification and what criteria are applied.	No
1153	**CCAE 4-7**	**b**	Omar Gallegos		b. Does verification of additional planned Connected Load trigger any independent customer contribution requirement, or does the customer's financial obligation depend only on the Section 3(B) revenue deficiency test outlined on pages 10 to 12 of Exhibit OAG-7?	No
1154	**CCAE 4-7**	**c**	Omar Gallegos		c. If a customer verifies additional Connected Load but that load never materializes, what is EPE's remedy and what costs, if any, does the customer bear beyond the one-time Distribution Capacity Reservation Charge already paid?	No
1155	**CCAE 4-7**	**d.i**	Omar Gallegos		d. Please explain why the Distribution Capacity Reservation Charge is one-time rather than annual. Specifically: i. Please state and explain whether EPE modeled whether a one-time charge is sufficient to deter speculative reservations.	No
1156	**CCAE 4-7**	**d.ii**	Omar Gallegos		ii. Please state and explain whether EPE considered an annually recurring charge.	No
1157	**CCAE 4-8**	**a.i**	Jim Schichtl	George Novela	Please refer to pages 4 to 5 of Exhibit MC-9 ("Original Rate No. 50, High Load Factor Power Service Rate") and Exhibit MC-10 ("Original Rate No. 51, Large Load Power Service Rate"), which both state "[i]f financial security is required pursuant to the above, then the Company and Customer will agree on an Initial Security Amount to be included in the Energy Service Agreement and such amount is subject to change annually, as described below. The Initial Security Amount shall reflect the initial incremental investment exposure of the Company prior to the Annual Security Adjustment, Customer's Estimated Load Forecast, Customer's cash contributions for Facilities, and other Customer characteristics as necessary." a. Please explain in detail how the Company proposes to calculate the Initial Security Amount, including: i. All inputs and formulas used in the calculation;	No
1158	**CCAE 4-8**	**a.ii**	Jim Schichtl	George Novela	ii. How each listed factor — incremental investment exposure, load forecast, cash contributions, and customer characteristics — is quantified and weighted; and	No
1159	**CCAE 4-8**	**a.iii**	Jim Schichtl	George Novela	iii. Whether a standardized methodology exists for this calculation or whether it is determined on a case-by-case basis through negotiation with individual customers	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1160	**CCAE 4-8**	**b**	Jim Schichtl	George Novela	b. If the Company determines the Initial Security Amount on a case-by-case basis, please explain how EPE will ensure consistency and comparability of the Initial Security Amount across different large load customers, and what regulatory oversight (if any) applies to the negotiated amount.	No
1161	**CCAE 4-9**	**a**	Jim Schichtl	George Novela	Please refer to page 5 of Exhibit MC-9 ("Original Rate No. 50, High Load Factor Power Service Rate"), which states that "[c]ustomers terminating service under this rate schedule or engaging in any, as the result of an event of default under the terms of the Energy Service Agreement or this rate schedule prior to the end of the Initial Term or any renewal thereof may be subject to damages or other exit fees as set forth in the Energy Services Agreement." a. Please explain in detail how EPE proposes to calculate potential exit fees and/or damages for customers terminating service prior to the end of the contract term.	No
1162	**CCAE 4-9**	**b**	Jim Schichtl	George Novela	b. Please provide any inputs, formulas, or workpapers that the Company will use to calculate potential exit fees and/or damages for customers terminating service prior to the end of the contract term.	No
1163	**NMSU 4-1**		Lori Glander		If not already provided, please provide all workpapers, in an electronic format with all formulas intact, supporting Ms. Glander's Decommissioning Cost Study.	No
1164	**NMSU 4-2**		Steven Sierra		For each of the past five years and for EPE's 12 months ending September 30, 2025 test year, please provide a breakdown of EPE's Operations and Maintenance ("O&M") expense by account and split between labor and non-labor.	No
1165	**NMSU 4-3**		Rene Gonzalez		Please provide EPE's proof of revenue at present rates and proof of revenue at proposed rates in an electronic format with all formulas intact.	No
1166	**NMSU 4-4**		Rene Gonzalez		Please provide actual sales volumes by rate schedule by month for the last ten years through the most recent available month.	No
1167	**NMSU 4-5**		Rene Gonzalez		Please provide normalized sales volumes (weather, COVID, etc.) by rate schedule by month for the last ten years through the most recent available month.	No
1168	**NMSU 4-6**		Rene Gonzalez		Please provide the number of customers by rate scheduled for the last ten years through the most recent available month.	No
1169	**NMSU 4-7**		Steven Sierra		Has EPE included any costs for Directors' and Officers' Liability Insurance in the proposed revenue requirements? If so, please explain and indicate the amount of cost included for the Company	No
1170	**NMSU 4-8**		Steven Sierra		Please provide descriptions of all Directors' and Officers' Liability Insurance policies that describe the coverages, the actions and people covered, and payment terms.	No
1171	**NMSU 4-9**		Steven Sierra		Please provide workpapers, in an electronic format with all formulas intact, supporting EPE's injury and damages expense for the last five years and the test year. For each payment, please include the payment amount, payment date, date of incident, and a description of the incident.	No
1172	**NMSU 4-10**		Steven Sierra		Please provide the level of dues, donations, and charitable contributions included in EPE's revenue requirement (both expense and any capitalized amounts). Please list each due, donation, and contribution separately.	No
1173	**NMSU 4-11**		Steven Sierra		Please provide the level of meals and entertainment costs included in EPE's proposed revenue requirement.	No
1174	**NMSU 4-12**		Cindy Prieto		Does EPE sell their accounts receivables to a third party?	No
1175	**NMSU 4-13**		Joe Weiss		Please detail how electronic or online payments affect the revenue lag components (i.e. service period, billing lag, and collection lag) in Mr. Weiss's lead/lag study	No
1176	**NMSU 4-14**		Joe Weiss		Have any studies been performed to evaluate the effectiveness of electronic or online payments to reduce the collection lag of customers. If so, please provide all studies. If not, please detail why no studies have been done.	No
1177	**NMSU 4-15**		Joe Weiss		For each expense item included in EPE's cash working capital, please provide any agreements or contracts that specify the deadline to pay the expense, or if no contracts or agreements are in place, please provide the history of when the expense was incurred and when it was paid within the last three years.	No
1178	**NMSU 4-16**		Joe Weiss		Please provide the results of the lead/lag studies used in EPE's last three rate cases prior to the current case.	No
1179	**NMSU 4-17**		Joe Weiss		For each pay period listed (both active and final) in Mr. Weiss's exhibits, please indicate the balance within each of the Accounts Receivable buckets (0-30 Days, 90+ Days, etc.) that was eventually was written off as uncollectible.	No
1180	**NMSU 4-18**		Steven Sierra		Please provide the number of employee vacancies or open positions included in EPE's revenue requirement. Please also provide a description of each vacancy and/or open position assumed in the test year revenue requirement. In addition, please provide an update on EPE's progress in filling these positions.	No
1181	**NMSU 4-19**		Steven Sierra		Please provide the level of a.) new employee hires and b.) employee attrition (such as retirements, leaving EPE, etc.) by month for the last five years for EPE, so that the net impact of new hires and employee attrition results in EPE's current headcount. Please also provide the number of active employees for June and December for each year for the past 5 years.	No
1182	**NMSU 4-20**		Steven Sierra		For each month of the past five calendar years and for EPE's test year revenue requirement, please indicate the total amount of payroll expense by compensation type.	No
1183	**NMSU 4-21**		Steven Sierra		For each of the past five years, please indicate what level of pay raises were approved for both non-union and union employees separately.	No
1184	**NMSU 4-22**		Steven Sierra		For each of the past five years, please state what percentage of labor cost was capitalized. Please break this level out by union versus non-union.	No
1185	**NMSU 4-23**		Steven Sierra		Please provide what level, if any, of severance costs are included in EPE's revenue requirement. If any severance is included, please provide the date of separation and salary for each employee that was severed.	No
1186	**NMSU 4-24**		Steven Sierra		Please provide EPE's overtime hours and pay for each of the last five years. Please also provide a breakdown of the overtime pay showing the amount charged to expense, and the amount capitalized. Finally, please also provide EPE's test year overtime hours and pay.	No
1187	**NMSU 4-25**		Steven Sierra		Please provide all short-term incentive plan ("STIP") documents that, at a minimum, describe plan funding, payout, performance metrics, and eligibility.	No
1188	**NMSU 4-26**		Steven Sierra		Please provide workpapers, in an electronic format with all formulas intact, supporting the amount of STIP included in EPE's test year revenue requirement and the amount of STIP that was removed.	No
1189	**NMSU 4-27**	**a**	Julissa Reza		Please provide a list of amortizations included in EPE's test year, in an electronic format with all formulas intact, and the following for each: a. Expected expiration date;	No
1190	**NMSU 4-27**	**b**	Julissa Reza		b. Base Period expense;	No
1191	**NMSU 4-27**	**c**	Julissa Reza		c. Historical Test Year expense;	No
1192	**NMSU 4-27**	**d**	Julissa Reza		d. Base Period unamortized balance; and	No
1193	**NMSU 4-27**	**e**	Julissa Reza		e. Historical Test Year unamortized balance.	No
1194	**NMDOJ 3-1**	**a**	Jim Schichtl		Refer to EPE's "VER-LLTC Large Load Transmission Assessment, Phase I" dated September 2024, produced as CLC 01-02 Supplemental Attachments 13 and 14 (Confidential) (the "VER-LLTC Assessment") (a) Please identify the generation resources EPE anticipates would be required to serve the VER-LLTC load above 80 MW, and separately at 140 MW and at 400 MW, including for each the resource type, capacity in MW, and EPE's most recent estimate of capital cost.	No
1195	**NMDOJ 3-1**	**b**	Jim Schichtl		(b) Please state whether EPE has completed the Phase 2 assessment referenced in the VER LLTC Assessment. If so, please produce it. If not, please state the anticipated completion date	No
1196	**NMDOJ 3-1**	**c**	Jim Schichtl		(c) Please provide EPE's estimate of the total capital cost to serve the VER-LLTC load, itemized among generation, transmission, substation, and interconnection, at each of 80 MW, 140 MW, and 400 MW, and the resulting cost per MW at each load level.	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1197	**NMDOJ 3-2**	**a**	Jim Schichtl		For the VER-LLTC customer and for any customer that would take service under proposed Rate No. 50 or Rate No. 51: (a) Please describe how EPE proposes to recover the cost of the generation and transmission capacity committed to serve the load, stated separately for (i) the customer-dedicated substation and interconnection facilities and (ii) the load's share of generation and transmission capacity.	No
1198	**NMDOJ 3-2**	**b**	Manny Carrasco		(b) Please state whether the Facility Charge under the Rate No. 50 and Rate No. 51 tariff recovers the cost of the load's share of generation and transmission capacity, or only the cost of customer-dedicated substation and interconnection facilities.	No
1199	**NMDOJ 3-2**	**c**	Jim Schichtl		(c) If any portion of the committed generation or transmission capacity is not recovered from the customer, please state the amount and identify the customer class or classes from which it would be recovered.	No
1200	**NMDOJ 3-3**		Jim Schichtl		Please state the collateral, credit support, and termination provisions EPE would require of the VER-LLTC customer or of any customer under Rate No. 50 or Rate No. 51, and state, for each, whether it secures (i) the customer-dedicated substation and interconnection facilities and (ii) the load's committed share of generation and transmission capacity. Please provide the amount of any required collateral, expressed per MW of contract or requested demand.	No
1201	**NMDOJ 3-4**		Jim Schichtl		Please state whether "Project Nucleus" and the customer referred to as "VER‑LLTC" are the same customer, site, or project as "BorderPlex Digital-Verde, LLC," whose Precedent Agreement was produced as CLC 01-01 Attachment 01, or a different customer or project. If different, so state, and identify each large-load customer or prospect for which EPE has prepared a Large Load Transmission Assessment or comparable interconnection study.	No
1202	**NMDOJ 3-5**		Omar Gallegos		Please provide EPE's current large-load interconnection pipeline. For each large‑load customer or prospect, including data centers, that has requested electric service or an interconnection or transmission study from EPE, state the requested capacity in MW, the location, the on-site generation (if any), the requested in-service date, and the current status (for example, preliminary assessment, Phase I, Phase II, executed agreement, or assigned queue position).	No
1203	**NMDOJ 3-6**		Manny Carrasco		Please state whether EPE modeled the cost of serving, or the cost-shift to other customer classes from, a large-load customer at the 30 MW Rate No. 50 eligibility threshold, or at any load between 30 MW and 400 MW. If so, please produce the analysis. If not, please explain why the Rate No. 50 and Rate No. 51 cost-of-service study relies on a single hypothetical rate class rather than the range of load sizes EPE's own assessments evaluate (for example, 80 MW to 400 MW in the VER-LLTC Assessment).	No
1204	**NMDOJ 3-7**	**a**	Jim Schichtl	Manny Carrasco	Refer to the VER-LLTC Assessment finding that "the appropriate generation resources to serve the loads above 80 MW for day and night still need to be identified." (a) Please describe how EPE would treat, for ratemaking, the cost of generation capacity that has not yet been identified or placed in service if the customer begins taking service before that generation is in service.	No
1205	**NMDOJ 3-7**	**b**	Manny Carrasco		(b) Please state whether any such cost would be recovered from other customer classes during the interim, and if so, in what amount and by what mechanism	No
1206	**NMDOJ 3-8**		Manny Carrasco		Please state the capital cost EPE assumes, per kilowatt and per MW, for the generation capacity that would be required to serve a large-load customer under Rate No. 50 or Rate No. 51, including the generation needed to serve the VER-LLTC load above 80 MW. Identify the source and the dollar-year (vintage) of that cost assumption, and produce any supporting workpaper. Please also state whether EPE's assumed generation capital cost reflects current market prices for firm generation, for example combined-cycle capacity, entering service in the 2028 to 2030 period. If EPE relies on the U.S. Energy Information Administration Annual Energy Outlook (AEO) overnight capital cost, identify the AEO edition and dollar-year, and describe any adjustment EPE makes to reflect current engineer-procure-construct market costs. Provide any comparison EPE has performed between its assumed generation capital cost and recent market estimates.	No
1207	**NMDOJ 3-9**		Manny Carrasco	Jim Schichtl	For the VER-LLTC customer and for a representative Rate No. 50 and Rate No. 51 customer, please provide EPE's estimate of the annual revenue requirement (return on capital, depreciation, operations and maintenance, and income taxes) for the generation, transmission, substation, and interconnection capacity committed to serve the load, stated per MW of contract or requested demand.	No
1208	**CLC-DAC 3-1**	**a**	Steven Sierra		Operating Expenses. Please reference Response to CLC 2-18 Supplemental Response, Supplemental_Attachment 15 regarding expenses paid to Willis Towers Watson ("WTW"). Regarding Supplemental_Attachment 15 p. 2 of 17, for invoice dated 12/12/2024 in the amount of $127,327: a. Please describe the services performed by WTW and provide further explanation of the Invoice Description "Fee-In Lieu of Commission."	No
1209	**CLC-DAC 3-1**	**b**	Steven Sierra		b. Please indicate how much of this amount is included in operating expense for ratemaking purposes in this case, and how much of that amount is allocated to the New Mexico jurisdiction.	No
1210	**CLC-DAC 3-1**	**c**	Steven Sierra		c. Please explain why these expenses are necessary for the provision of utility service.	No
1211	**CLC-DAC 3-2**	**a**	Steven Sierra		Operating Expenses. Please reference CLC-218 Supplemental_Attachment 15, p. 3 of 17, for invoice dated 8/26/2025 in the amount of $5,890,631.38, for carrier policy period 7/1/2025 – 7/1/2026 and: a. Please provide a detailed explanation of the purpose of this invoice;	No
1212	**CLC-DAC 3-2**	**b**	Steven Sierra		b. Please provide further information regarding the Description "Renewal Business Property‑Swiss Re Fronted Global Program (Primary).	No
1213	**CLC-DAC 3-2**	**c**	Steven Sierra		c. Please provide a breakdown of this total invoice amount to show each FERC account(s) to which a portion of this invoice has been charged or allocated.	No
1214	**CLC-DAC 3-2**	**d**	Steven Sierra		d. Please provide the total amount(s) from this invoice for which the Company seeks recovery in this case and the amount allocated to the New Mexico jurisdiction.	No
1215	**CLC-DAC 3-2**	**e**	Steven Sierra		e. Please identify any adjustments recorded to remove any portions of this invoice from the cost of service.	No
1216	**CLC-DAC 3-2**	**f**	Steven Sierra		f. Please provide the amount(s) paid to WTW for each of the prior five (5) years for this service, fee or policy	No
1217	**CLC-DAC 3-2**	**g**	Steven Sierra		g. Please explain why these expenses are necessary for the provision of utility service.	No
1218	**CLC-DAC 3-3**	**a**	Omar Gallegos		Wood-to-Steel Transmission Pole Replacements. Please reference EPE's Direct Testimony and Exhibits of Omar A. Gallegos, Exhibit OAG-4, p. 5 of 11, identifying the AIP 345 kV Macho Springs–Springerville transmission line and the stated need "to replace with steel structures to avoid failure," and Exhibit OAG-5, p. 1 of 3, including the TL283 and TL282 project descriptions referencing replacement of old wood H-frame structures with new steel structures, and: a. Please identify the number of, duration of, and the number of customers affected by all wildfire-related outages in the last ten (10) years.	No
1219	**CLC-DAC 3-3**	**b**	Omar Gallegos		b. Please provide any cost-benefit analysis or studies conducted regarding EPE's proposed pole replacements.	No
1220	**CLC-DAC 3-3**	**c**	Cindy Prieto		c. Please identify the proposed net rate base impact, as a dollar amount, resulting from EPE's proposed pole replacements.	No

SUPPLEMENTAL DISCOVERY

Line No	(a) Intervenor/ Set	(b) Subpart	(c) Sponsor	(d) Co-Sponsor(s)	(e) Question	(f) Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1221	CLC-DAC 3-4	a	Omar Gallegos		Wood-to-Steel Transmission Pole Replacements. Please reference EPE's Direct Testimony and Exhibits of Omar A. Gallegos, Exhibit OAG-4, p. 5 of 11, identifying the AIP 345 kV Macho Springs–Springerville transmission line and the stated need "to replace with steel structures to avoid failure," and Exhibit OAG-5, p. 1 of 3, including the TL283 and TL282 project descriptions referencing replacement of old wood H-frame structures with new steel structures, and: a. Please provide copies of any analyses or studies that EPE either performed, or had performed, for its use in identifying the specific wooden structures to replace on the Macho Springs-Springerville transmission line.	No
1222	CLC-DAC 3-4	b	Omar Gallegos		b. Please provide copies of any analyses or studies that EPE either performed, or had performed, regarding the timeline and/or prioritization of wooden structure replacements on the Macho Springs-Springerville transmission line.	No
1223	CLC-DAC 3-4	c	Omar Gallegos		c. If EPE has not conducted a cost-benefit analysis, please explain why not.	No
1224	CLC-DAC 3-4	d	Omar Gallegos		d. State if it is EPE's intention, ultimately, to replace all of the wood structures on the Macho Springs-Springerville transmission line with steel structures?	No
1225	CLC-DAC 3-4	e	Omar Gallegos		e. If so, please explain EPE's reasons for doing so, its anticipated time frame, projected budget, and provide copies of all engineering, electrical, and cost-benefit studies concerning that objective.	No
1226	CLC-DAC 3-4	f	Omar Gallegos		f. Explain, in detail, the Company's anticipated usage of the Macho Springs-Springerville transmission line after its purchased power agreement ("PPA") for the Macho Springs solar generation facility expires.	No
1227	CLC-DAC 3-4	g	Omar Gallegos		g. State whether EPE solicited multiple vendors or contractors to bid on the steel structures and related work for the Macho Springs-Springerville transmission line.	No
1228	CLC-DAC 3-4	h	Omar Gallegos		h. If so, please provide the Request for Proposals ("RFP") and a summary of the bids and responses.	No
1229	CLC-DAC 3-4	i	Omar Gallegos		i. If not, please explain why EPE did not use a competitive bidding process.	No
1230	CLC-DAC 3-5	a	Omar Gallegos		Wood-to-Steel Transmission Pole Replacements. Please reference EPE's Direct Testimony and Exhibits of Omar A. Gallegos, Exhibit OAG-4, p. 5 of 11, identifying the AIP 345 kV Macho Springs–Springerville transmission line and the stated need "to replace with steel structures to avoid failure," and Exhibit OAG-5, p. 1 of 3, including the TL283 and TL282 project descriptions referencing replacement of old wood H-frame structures with new steel structures, and: a. To the extent not provided in response to the above, provide copies of any cost-benefit analyses that EPE either performed, or had performed, regarding the replacement of some or all of the wood structures on the Macho Springs-Springerville transmission line.	No
1231	CCAE 5-1	a	Jim Schichtl		Please refer to Supplemental Attachment 03 to the Company's response to CLC 01-02, which provides correspondence between the Company and the Project Nucleus Team. a. Please provide all communication between the Company and the Project Nucleus Team (including, but not limited to, Harvey Powers and lanham@p23.com) regarding EPE's proposed line extension policy, including any communications regarding the development of that proposed policy.	No
1232	CCAE 5-1	b	Jim Schichtl		b. Please provide all communication between the Company and the Project Nucleus Team (including, but not limited to, Harvey Powers and lanham@p23.com) regarding EPE's proposed Rates 50 and 51, including any communications regarding the development of either of those proposed rates.	No
1233	CCAE 5-1	c	Jim Schichtl		c. Please provide all communication between the Company and the Project Nucleus Team (including, but not limited to, Harvey Powers and lanham@p23.com) regarding the connection of "Project Nucleus," "Project Jupiter," or any other potential large load customer to EPE's system.	No
1234	CCAE 5-2		Jim Schichtl		Please again refer to Supplemental Attachment 03 to the Company's supplemental response to CLC 1-02, which provides correspondence between the Company and the Project Nucleus Team. Please also refer to the Company's response to CLC 1-01, which identifies BorderPlex Digital?Verde, LLC as a "potential large load customer with an agreement that would potentially take service in New Mexico under Rates 50 and 51." Please also refer to the Company's response to DAC 4-7, which discusses EPE's financial interests in "Project Jupiter." Please state whether "Project Nucleus," "BorderPlex Digital-Verde, LLC," and "Project Jupiter" refer to the same customer, site, facility, and/or project. If "Project Nucleus," "BorderPlex Digital-Verde, LLC," and "Project Jupiter" refer to different customers, sites, facilities, or projects, please explain the differences between each.	No
1235	CCAE 5-3		Jim Schichtl		Please refer to the VER-LLTC Assessment, which finds that "the appropriate generation resources to serve the loads above 80 MW for day and night still need to be identified. EPE and LLTC shall work together to identify the generation resources." Please provide the status of EPE and LLTC's work to identify those generation resources.	No
1236	CLC 11-1		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, EPE's Vice President David C. Hawkins stated that EPE's summer peak load hour has shifted from 3:00 p.m. to 4:00 p.m. to 5:00 p.m. to 6:00 p.m. Admit: Deny:	No
1237	CLC 11-2		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, EPE's Manager of Energy Resources Jaime Reyes stated that EPE's peak hour is moving toward the hour ending at 6:00 p.m. Admit:_____ Deny:_____	No
1238	CLC 11-3		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, EPE's Vice President David C. Hawkins stated that during the winter, EPE's system load peaks in the evening. Admit:_____ Deny:_____	No
1239	CLC 11-4		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, EPE's Vice President David C. Hawkins stated that during the winter, EPE relies mainly on its gas peaking units to meet the daily peak loads. Admit:_____ Deny:_____	No
1240	CLC 11-5		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, EPE's Vice President David C. Hawkins stated that ELCC [effective load carrying capacity] is used for planning purposes. Admit: Deny:	No
1241	CLC 11-6		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, EPE's Vice President David C. Hawkins stated that EPE does not anticipate using Newman Unit 1 during the summer of 2026. Admit:_____ Deny:_____	No
1242	CLC 11-7		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, EPE's Manager of Energy Resources Jaime Reyes stated under EPE's plan to move to the SPP's Markets+, the Company's planning reserve margin would increase by 70 MW to 80 MW on a Total System basis. Admit:_____ Deny:____	No
1243	CLC 11-8		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, the statements that EPE Vice President David C. Hawkins made were true and accurate as of the time of that presentation. Admit:_____ Deny:_____	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1244	**CLC 11-9**		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, the statements that EPE's Manager of Energy Resources Jaime Reyes made were true and accurate as of the time of that presentation. Admit: Deny:	No
1245	**CLC 11-10**		George Novela		Admit that during the NMPRC special open meeting in NMPRC Case No. 24-0123-UT on April 23, 2026, the statements that EPE's Manager of Energy Resources Jaime Reyes made were true and accurate as of the time of that presentation. Admit:____ Deny:____	No
1246	**CLC 11-11**		George Novela		For each and every Request for Admissions (CLC 8-1 through CLC 8-10) for which your response is anything other than an unqualified admission, please explain in detail the basis for your response; identify any testimonies, exhibits, and/or discovery responses served by EPE in this NMPRC Case No. 25-00038-UT that support your explanation; and provide copies of any other analyses or documents that support your explanation.	No
1247	**CLC 11-12**		George Novela		For each and every Request for Admissions (CLC 8-1 through CLC 8-11) above, identify any statement made therein for which EPE's representatives would have made different statements at the present time and explain in detail the changes in assertions to the NMPRC, the circumstances that have developed that would cause EPE to make different statements, and the reasoning and, if appropriate, the quantification for any such changes.	No
1248	**CLC 11-13**	**a**	Steven Sierra		Please refer to EPE's supplemental response to Request for Production CLC 2-18 and CLC 2-18 Supplemental Attachment_07 and provide the following information and supporting documents: (a) Explain in detail the nature of the services rendered on each invoice in CLC 2-18 Supplemental Attachment_07.	No
1249	**CLC 11-13**	**b**	Steven Sierra		(b) Explain the nature of EPE's contract with Dyopath, LLC during the base period for this rate proceeding.	No
1250	**CLC 11-13**	**c**	Steven Sierra		(c) Explain why CLC 2-18 Supplemental Attachment_07 does not include invoices from Dyopath, LLC for services rendered subsequent to January 2025.	No
1251	**CLC 11-13**	**d**	Steven Sierra		(d) Explain the nature of EPE's contractual relationship with Dyopath, LLC during the remainder of the base period of this rate proceeding.	No
1252	**CLC 11-13**	**e**	Steven Sierra		(e) Explain the nature of EPE's current contractual relationship with Dyopath, LLC, if any.	No
1253	**CLC 11-13**	**f**	Steven Sierra		(f) If EPE currently has a contractual relationship with Dyopath, LLC, provide a copy of the agreement or agreements	No
1254	**CLC 11-13**	**g**	Steven Sierra		(g) Identify where EPE has accounted for costs from Dyopath, LLC that appear to be treated as expenses in the Company's testimony, exhibits, schedules, workpapers, and electronic workpapers produced in discovery. Your answer should identify the specific pages, lines, columns, and/or cells where Dyopath LLC payments are reflected as well as the amount reflected in each such location.	No
1255	**CLC 11-13**	**h**	Cindy Prieto		(h) Identify where EPE has accounted for costs from Dyopath, LLC that appear to be treated as capitalized costs in the Company's testimony, exhibits, schedules, workpapers, and electronic workpapers produced in discovery. Your answer should identify the specific pages, lines, columns, and/or cells where Dyopath LLC payments are reflected as well as the amount reflected in each such location	No
1256	**CLC 11-13**	**i**	Steven Sierra	Cindy Prieto	(i) If any of the services rendered to EPE by Dyopath, LLC were related to implementation of EPE's advanced metering system (in New Mexico or Texas), please further describe the nature of those costs, explain where and in what amounts those costs are reflected in the Company's testimony, exhibits, schedules, workpapers, and electronic workpapers produced in discovery, and in each point in EPE's filings and discovery responses distinguish between amounts that were capitalized and amounts that were expensed.	No
1257	**CLC 11-13**	**j**	Steven Sierra	Manny Carrasco	(j) If any of the services rendered to EPE by Dyopath, LLC were related to implementation of EPE's advanced metering system (in New Mexico or Texas), demonstrate that the costs of those services were not recovered through the AMS Cost Rider in New Mexico and/or are not currently being recovered through the AMS Cost Rider.	No
1258	**CLC 11-14**		Adrian Hernandez		Please refer to Schedule L-01 of the Company's Application, which lists the annual number of customer bills by rate class on Line 28 for the Base Period and Line 31 for the Test Year. Explain why these customer numbers differ significantly from the annual customer bill amounts used to calculate rates under the Company's most recent update to Rate No. 46, the AMS Rider, as shown in Declaration Exhibit 3 attached to the Declaration of Alexis Mesta in Support of EPE's Compliance Advice Notice No. 315, Fourth Revised Rate No. 46 – Advanced Metering System Rider, filed with the Notice of EPE's Compliance Advice Notice Filing in NMPRC Case No. 21-00269-UT on January 30, 2026.	No
1259	**CLC 11-15**	**a**	Adrian Hernandez		Please refer to the Company's response to Staff 01-03, Attachment 1, the executable version of the Company's cost of service study, in the tab labeled DEC - PIS AD and provide the following information: (a) Please explain why any general plant designated with a BUD - Operating Segment identifier (Column I of the spreadsheet) that refers to Generation or Transmission should use a Customer-related DEC Component Allocator. For instance the BUD - Operating Segment identifier 1000: Generation Common includes amounts allocated to Cust-902 Meter Read and Cust-903 Cust Rec & Collections based on the CUSTLABOR DEC Allocator.	No
1260	**CLC 11-15**	**b**	Adrian Hernandez		(b) If the BUD - Operating Segment identifer does not establish the functional character of the associated costs, please explain the meaning of that identifier. In other words, if the identifer refers to a Generation-related function, why are the associated costs not exclusively functionalized as Generation	No
1261	**CLC 11-16**	**a**	Adrian Hernandez		Please refer to the Company's response to Staff 01-03, Attachment 1, the executable version of the Company's cost of service study, in the tab labeled Alloc NM RC - Op Exp. and provide the following information: (a) Are expenses listed in this sheet for Outside Services (FERC Acct 923) classified as demand, energy, or customer-related based on direct assignment according to the nature of the activity, or using a more general method such as a labor allocator? Please explain your answer in the detail necessary to address all of the listed expenses.	No
1262	**CLC 11-16**	**b**	Adrian Hernandez		(b) Please identify the amount, if any, of expenses for Outside Services that the Company can directly attribute to customer-related activities for each customer-related DEC Component listed below. • Customer - 369 Services • Customer - 370 Meters • Customer - 371 Install on Customer Premise • Customer - 902 Meter Reading • Customer - 903 Customer Rec & Collections • Customer - Other	No
1263	**NMSU 5-1**	**a**	Enedina Soto	Adrian Hernandez	Regarding the Direct Testimony of witness Adrian Hernandez, in deriving the plant allocators, 4CP -A&E, 4CP and 12CP-A&E a. Did EPE use the full demand of the university customer in the Rate 26 class, or was it reduced (netted) by the amount of capacity produced by the solar and energy storage facility located on the university campus in each of the CP hours and in the energy component of the A&E allocator?	No

SUPPLEMENTAL DISCOVERY

	(a)	(b)	(c)	(d)	(e)	(f)
Line No	Intervenor/ Set	Subpart	Sponsor	Co-Sponsor(s)	Question	Does this need to be Supplemented based on the Amended Rate Case Filing Package? (Ordering Paragraph E.8)
1264	**NMSU 5-1**	**b**	Enedina Soto	Adrian Hernandez	b. If the full demand was used, please explain why. Does this take into account the fact that the university is paying the entire cost of the solar and energy storage facility and it is not in EPE's rate base?	No
1265	**NMSU 5-1**	**c**	Enedina Soto	Adrian Hernandez	c. Similarly, did EPE use the full energy usage of the university customer in the Rate 26 class, or was it reduced (netted) by the amount of energy produced or delivered by the solar and energy storage facility located on the university campus in determining each of the energy allocators shown on page 41?	No
1266	**NMSU 5-1**	**d**	Enedina Soto	Adrian Hernandez	d. If the full energy usage was used, please explain why.	No
1267	**CCAE 6-1**	**a**	Manny Carrasco		Please refer to Exhibit MC-09 ("Original Rate No. 50 High Load Factor Power Service Rate") and Exhibit MC-10 ("Original Rate No. 51 Large Load Power Service Rate"), attached to Manuel Carrasco's Direct Testimony. a. Please list all riders currently available to EPE customers, and please identify (by each tariff) whether each rider would apply to customers taking service under Rate No. 50 or Rate No. 51. For any rider that does not apply to Rate No. 50 or Rate No. 51 customers, please explain why not.	No
1268	**CCAE 6-1**	**b**	Manny Carrasco		b. Please state whether the efficient use of energy recovery factor (EUERF), the proposed Low-Income Rider (LIR), and any existing or proposed demand-side management riders apply to customers taking service under Rate No. 50 or Rate No. 51? If no, please explain why not.	No
1269	**CCAE 6-2**	**a**	Omar Gallegos		Please provide the following information regarding Section 3(E)(1) ("Dual Feeders") of Exhibit OAG-7 ("Company's Line Extension Policies and Construction Charges"), attached to Omar Gallegos' Direct Testimony. a. How does EPE determine whether a customer makes a "Customer Contribution in the amount of the Estimated Cost of the Primary Voltage Extension (including substation facilities)" or "enter[s] into a written agreement to pay a monthly facilities charge equal to the Company's fixed costs on the alternate Extension"? Please identify the specific criteria that EPE considers and please explain why.	No
1270	**CCAE 6-2**	**b**	Omar Gallegos		b. Please describe in detail the methodology EPE proposes to calculate the monthly facilities charge, including all inputs and formulas used in the calculation. Please provide a worked numerical example of the monthly facilities charge calculation.	No
1271	**CCAE 6-2**	**c**	Omar Gallegos		c. What term length does EPE propose for the facilities charge, and please explain why EPE proposes the term length for the facilities charge. If the term length varies by customer, please explain how EPE will determine the term length.	No
1272	**CCAE 6-2**	**d**	Omar Gallegos		d. Please state and explain whether EPE proposes collateral or an exit fee for customers utilizing a Section 3(E)(1) facilities charge. If EPE does not propose collateral or exit fees for Section 3(E)(1) customers, please explain how EPE protects existing ratepayers if a customer utilizing a facilities charge arrangement terminates service before EPE recovers its investment in the alternate extension.	No
1273	**CCAE 6-3**	**a**	Omar Gallegos		Please provide the following information regarding Section 3(E)(5) ("Load Requests at Distribution Voltage for 30 MW or Greater") of Exhibit OAG-7 ("Company's Line Extension Policies and Construction Charges"), attached to Omar Gallegos' Direct Testimony. a. Has EPE analyzed load requests at the 20 MW level and demonstrated that they do not trigger substation or transmission-level impacts? Please explain why or why not.	No
1274	**CCAE 6-3**	**b**	Omar Gallegos		b. Please explain how EPE proposes to determine the term length for the Infrastructure Capacity Charge. Please provide the specific criteria EPE will use to determine term length and explain why those criteria are appropriate.	No
1275	**CCAE 6-3**	**c.i**	Omar Gallegos		c. Does EPE propose collateral or an exit fee for customers paying a Section 3(E)(5) Infrastructure Capacity Charge? Please explain why or why not. i. If yes, how will EPE calculate the collateral or exit fee?	No
1276	**CCAE 6-3**	**c.ii**	Omar Gallegos		ii. If EPE does not propose collateral or exit fees for Section 3(E)(5) customers, please explain how EPE will protect existing ratepayers if a customer terminates service before EPE recovers its investment in the transmission upgrades and substation facilities constructed to serve that customer.	No
1277	**SF 1-1**	**A**			For each Valuation of the EPE investment by IIF, performed by or for IIF since closing on July 29, 2020 to the present, provide the following information about discount rates used in or reported from the process A. Pre-tax discount rate, post-tax discount rate, levered discount rate, unlevered discount rate and resulting valuation conclusions.	No
1278	**SF 1-1**	**B.a**			B. Produce all workpapers, models and calculation files together with inputs and intermediate results to include: a. Capital structure weights	No
1279	**SF 1-1**	**B.b**			B.b. Cost of debt	No
1280	**SF 1-1**	**B.c**			B.c. Risk free rate	No
1281	**SF 1-1**	**B.d**			B.d. Levered and unlevered Beta	No
1282	**SF 1-1**	**B.e**			B.e. Equity Risk Premium	No
1283	**SF 1-1**	**B.f**			f. Where the cost of equity is levered from or unlevered to an asset basis	No
1284	**SF 1-1**	**B.g**			B.g. The formula used and the input values to the formula	No
1285	**SF 1-1**	**C**			C. Identify the source and measurement date of each input.	No
1286	**SF 1-1**	**D**			D. Identify the methodology by which each discount rate was applied to the projected cash flows.	No
1287	**SF 1-1**	**E**			E. Identify the entity level at which fair value was determined. If a discount rate applied to EPE is a rate applied in common to a class of investments rather than derived specifically for EPE, it is sufficient to identify that rate and the class to which it applies.	No
1288	**SF 1-2**				Produce the note to the audited financial statements of IIF, or of the IIF master partnership holding the EPE investment, for each fiscal year since the 2020 closing to the present, disclosing the significant unobservable inputs used to measure the EPE investment at fair value, together with the statement of the basis on which that investment is measured and reported.	No

		Order Description
A.		The procedural schedule established by the Procedural Order issued on April 27, 2026, including all testimony, prehearing, hearing, and related deadlines established by that Order or any subsequent procedural order, is **VACATED**. Those deadlines shall be reset, as appropriate, by further procedural order.
B		All pending deadlines for motions or responses to motions are **TOLLED** pending further order of the Hearing Examiner.
C		The evidentiary hearing presently scheduled to commence on September 21 , 2026, is **VACATED.**
D		No party shall be required to file testimony or other merits-related submissions until a new procedural schedule is issued. The vacatur and stay of procedural deadlines ordered herein do not toll or extend the statutory suspension period applicable to Advice Notice No. 317.
E		Within **twenty-one calendar days after issuance of this Order**, EPE shall file an Amended Application for Revision of Retail Electric Rates and a complete replacement filing package (collectively "Amended Application"). EPE shall file one integrated and comprehensive Amended Application that supersedes the original Application, the First Errata Notice, the Second Errata Notice, and all prior replacement or supplemental versions of affected documents.
	1)	The Amended Application shall clearly state that it is the single operative version of EPE's affirmative filing in this docket
	2)	EPE shall contemporaneously file a complete set of all testimony, exhibits, schedules, workpapers, cost-of-service studies, models, proposed tariffs, rate calculations, and any other supporting documents upon which it relies, regardless of whether particular documents were previously filed and remain unchanged. EPE shall not incorporate prior versions of affected documents by general reference where doing so would require Staff, intervenors, or the Hearing Examiner to determine which prior version remains operative.
	3)	Before filing the Amended Application, EPE shall conduct a comprehensive review sufficient to ensure, to the extent it can be reasonably known at that time, that the filing does not rely upon future rebuttal testimony, future errata, future replacement exhibits, future workpapers, or anticipated discovery supplementation to establish any foundational component of EPE's affirmative case. The Amended Application shall contain no unresolved ambiguity as to which testimony, exhibit, schedule, workpaper, model, tariff, calculation, or discovery response is operative
	4)	EPE shall file with the Amended Application a comprehensive correction and reconciliation matrix. The matrix shall identify every error, omission, correction, replacement, or supplementation disclosed in the First Errata Notice, the Second Errata Notice, discovery responses, pending motions, party correspondence included in the record, or EPE's further internal review.
	5)	EPE shall file a verification executed by an authorized officer of the Company stating that EPE has undertaken a comprehensive review of the Amended Application and supporting materials and that, to the best of the officer's knowledge after reasonable inquiry, the Amended Application is complete, accurate, internally consistent, and not known, at that time, to require further material correction or supplementation
	6)	EPE shall also file verifications from each sponsoring witness confirming that the witness has reviewed the amended testimony, exhibits, schedules, and workpapers sponsored by that witness and that those materials are complete, accurate, internally consistent, and consistent with the Amended Application.

		Order Description
	7)	EPE shall provide all executable, native-format workpapers and models without technical limitations that would prevent Staff and intervenors from reproducing EPE's calculations.
	8)	EPE shall contemporaneously supplement all discovery responses that are affected by the Amended Application. No prior discovery response shall be treated as current merely because EPE does not expressly withdraw it. EPE bears the responsibility to determine which prior responses are no longer complete, accurate, or consistent with the Amended Application.
F		Within seven **calendar days after EPE files the Amended Application**, Staff shall file a Completeness Report. Staff's report shall state whether the Amended Application and supporting materials are sufficiently complete, coherent, internally consistent, and technically usable to permit the proceeding to continue.
G		In conducting its review, Staff shall consider, at minimum, whether:
	1)	EPE filed all materials required by this Order;
	2)	the Amended Application identifies one authoritative and operative version of EPE's case;
	3)	the correction and reconciliation matrix is complete and usable;
	4)	all identified corrections appear to have been carried through affected materials;
	5)	the amended cost-of-service study and associated models are complete and executable;
	6)	the amended testimony, schedules, workpapers, proposed tariffs, and rate calculations are internally consistent;
	7)	Staff can trace material adjustments and requested amounts through the filing
	8)	the Amended Application resolves the facial inconsistencies and omissions identified in the pending motions and objections
	9)	EPE has adequately supplemented affected discovery responses; and
	10)	additional foundational corrections or supplementation appear necessary before Staff and intervenors can fairly prepare testimony
H.		Staff's review shall be limited to procedural completeness, coherence, internal consistency, and usability. Staff shall provide any advice or commentary on whether EPE 's substantive requests are reasonable, lawful, or supported by the weight of the evidence
I.		Staff may state that particular matters require additional discovery or substantive analysis without treating those matters as completeness defects, provided the operative filing and supporting information are sufficiently clear and complete to permit that discovery or analysis to proceed.
J.		If Staff concludes that the Amended Application is complete, coherent, internally consistent, and sufficiently usable, and the Hearing Examiner agrees, the Hearing Examiner will issue a new procedural order establishing dates that are consistent with the then-applicable statutory suspension period, unless the Commission separately extends that period pursuant to Section 62-8-7(C) NMSA 1978
	1)	The new procedural order will include deadlines and procedures for resolving the CLC Motion to Dismiss, the CLC Motion to Compel, the Joint Objection, and any other pending motions that remain applicable after review of the Amended Application
	2)	All pending motions shall remain under advisement while the procedural deadlines are stayed. No pending motion is denied, granted, or rendered moot by this Order except to the extent expressly stated.
	3)	The parties shall not be required to supplement or re-brief pending motions unless directed by the Hearing Examiner.
	4)	After reviewing the Amended Application, the parties may be required to identify whether each pending motion remains applicable, has been narrowed, requires supplementation, or has become moot.
	5)	Discovery already served and responses already provided shall remain part of the record and shall be preserved.

		Order Description
	6)	Nothing in this Order requires a party to re-serve prior discovery solely because EPE files an Amended Application. The Hearing Examiner may establish procedures in the new procedural order for adopting, supplementing, revising, or renewing prior discovery.
	7)	No party shall be deemed to have waived any discovery objection, request for supplementation, motion to compel, confidentiality claim, or other procedural position by operation of this Order
	8)	The vacatur and stay of procedural deadlines ordered herein do not relieve EPE of its continuing obligation to respond completely and accurately to outstanding discovery or to supplement prior responses as required by Commission rules.
K		This Order affords EPE one opportunity to provide a viable application in this docket. If EPE fails to file the Amended Application within twenty-one days, fails to comply fully with the requirements of this Order, or files an Amended Application and supporting materials that do not provide a complete, coherent, internally consistent, and reviewable basis for further proceedings, the Hearing Examiner will recommend that the Application be dismissed without prejudice, requiring EPE to initiate any renewed request for rate relief in a new docket.
L		Nothing in this Order constitutes a finding concerning the substantive correctness, reasonableness, or lawfulness of any request, calculation, allocation, expense, rate, tariff, or accounting treatment proposed by EPE.
M		This Order is effective immediately.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF THE APPLICATION OF EL PASO ELECTRIC COMPANY FOR REVISION OF ITS RETAIL ELECTRIC RATES PURSUANT TO ADVICE NOTICE NO. 317	)))))	**Case No. 25-00082-UT**

DECLARATION OF JAMES A. SCHICHTL
IN SUPPORT OF THE AMENDED APPLICATION

I, **James A. Schichtl**, pursuant to Rule 1-011 NMRA, state as follows:

1. I affirm in writing under penalty of perjury under the laws of the State of New Mexico that the following statements are true and correct.

2. I am over 18 years of age and have personal knowledge of the facts stated herein. I am employed by El Paso Electric Company ("EPE" or "the Company") as *Vice President of Revenue and Regulatory Strategy*.

3. EPE has undertaken a comprehensive review of EPE's Amended Application and supporting materials, and I confirm, to the best of my knowledge after reasonable inquiry, that the Amended Application and supporting materials, are complete, accurate, internally consistent, and not known, at this time, to require further material correction or supplementation.

4. EPE complied with the requirements of the Sua Sponte Order Vacating Procedural Schedule, Tolling Pending Deadlines, and Requiring the Filing of an Amended Application (issued July 16, 2026) ("Sua Sponte Order") as reflected in Section II of the Amended Application.

5. The changes required by the Sua Sponte Order resulted in very modest adjustments as compared to the original Application. For example, the requested net revenue increase changed from \$70.4 million in the original Application to \$70.5 million in the Amended

Application. For perspective, the proposed New Mexico Jurisdictional base revenue requirement changed from $210,732,936 in the original Application to $210,818,160 in the Amended Application, or by $85,224. This amounts to ***0.04%*** of the original revenue requirement.

6. The foregoing Amended Application, together with all supporting materials attached thereto, is true and accurate based on my knowledge and belief.

7. I submit this Declaration, based upon my personal knowledge and upon information and belief, in support of EPE's ***Amended Application for Revisions of Its Retail Electric Rates Pursuant to Advice Notice No. 317.***

FURTHER, DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 6, 2026.

/s/ James A. Schichtl
JAMES A. SCHICHTL

NEW MEXICO
PUBLIC REGULATION COMMISSION

NOTICE TO EPE CUSTOMERS

El Paso Electric Company ("EPE") has filed an Application with the New Mexico Public Regulation Commission, requesting approval of revised New Mexico retail electric base rates. EPE states that the $70.6 million non-fuel base rate revenue deficiency shown in EPE's proposed cost of service demonstrates the need for a 50.4% base rate base increase, which is offset by a $0.2 million reduction in miscellaneous service revenue, for a net operating revenue increase of $70.4 million in these New Mexico revenues. EPE is requesting an 8.35% weighted cost of capital, a return on equity of 10.7% and an equity to debt capital structure of 55.5% and 45.5%. According to EPE, the increase is required to recover costs for EPE's $408.44 million investment since its 2020 rate case, including investments in distribution, transmission, nuclear production, local generating plants and general plant. EPE is also proposing to include in base rates its Commission approved advanced metering system ("AMS"), and the annual capacity costs associated with Commission approved agreements for three battery energy storage facilities.

NO ACTION IS REQUIRED ON YOUR PART UNLESS YOU WANT TO BECOME A PARTY OR COMMENT ON THE APPLICATION

EPE's proposed revised rates, set forth in Advice Notice No. 317, would, if approved, affect all retail classifications. To moderate the rate impact on certain customer classes, EPE has proposed to voluntarily phase in recovery through a two-part implementation process for base rates for Rate Nos. 01 (Residential), 05 (Irrigation), 10B (Military), 12 (Private Lighting), 25 (Outdoor Lighting), and 26 (State University). EPE proposed that the first phase, expected to take effect on January 1, 2027, represents a system average increase of 26.8% for these rate classes; and the second phase, proposed to take effect on October 1, 2027, reflects an additional 18.6% increase relative to Phase 1.

EPE states that the bill impact of the proposed base rate changes will be offset by an anticipated reduction in Renewable Portfolio Standard ("RPS") costs. The proposed increases will be to both the customer charge and the energy charge rates. For example, EPE projects that a residential customer using an average of 750 kWh during a summer month, would have a combined impact of a bill increase of 22.5% in Phase 1 followed by an additional increase of 28.2% in Phase 2, effectively totaling 57.0%. EPE's proposed increase in non-fuel base rates represents an increase of $24.62 in Phase 1 followed by an additional increase of $30.38 per summer month in Phase 2, totaling $55.00. The combined impact of the proposed base rate changes and the RPS cost reduction for a residential customer using an average of 500 kWh during a winter month will be a bill increase of 14.5% in Phase 1 followed by an additional increase of 28.6% in Phase 2, effectively totaling 47.3%. EPE's proposed increase in non-fuel base rates represents an increase of $10.83 in Phase 1 followed by an additional increase of $17.13 per winter month in Phase 2, totaling $27.96.

EPE is also proposing to implement customer rate options that include: (i) a new Low-Income Rider to qualified households in the Residential Service Rate the credits the customer charge dollar for dollar; (ii) experimental off-peak and time-of-day ("TOD") demand rates designed to further incentivize certain commercial customers to shift load from peak hours; (iii) and a new two-year Peak Time Rebate Pilot Program intended to incentivize Residential Service Rate customers to shift to off-peak usage times by providing pilot participants the opportunity to receive a bill credit for reducing energy consumption during peak periods following a notification from EPE. EPE has also proposed new Large Load Tariff Schedules Rate No. 50 and 51.

Additionally, EPE asks the Commission to:

1. Authorize several design changes to (i) align recovery of demand energy and customer costs with how those costs are incurred, thereby minimizing intra-class subsidization, (ii) provide customers with accurate price signals that convey cost differences between seasonal and non-seasonal time periods to encourage energy conservation and potentially reduce customer contribution to EPE's system peak, (iii) promote stability, and (iv) allow EPE the opportunity to recover the costs of providing safe and reliable service.

2. Authorize the proposed replacement of its Rule No. 8 Line Extension Policy and related revisions to its Rule 13 Increase or Decrease of Connected Load.
3. Authorize the inclusion in base rates the capacity costs already incurred under the Commission-approved Buena Vista 1 Power Purchase Agreement since that resource came online in 2023.

Listed below is a comparison of present and proposed rates for the Residential customer class under Advice Notice No. 317 proposed by EPE.

Rate No.	Rate Description	Current Rate	Phase 1 Rate	Phase 2 Rate
Rate No. 1	RESIDENTIAL SERVICE RATE - STANDARD RATE			
	Customer Charge	$7.00	$14.36	$18.89
	Energy Charge ($/kWh) - First 600 kWh - Summer	$0.07035	$0.09649	$0.13045
	Energy Charge ($/kWh) - All Other kWh - Summer	$0.10876	$0.14469	$0.18118
	Energy Charge ($/kWh) – Non-Summer	$0.05816	$0.07273	$0.09793

These rate comparisons are for informational purposes only and the final rate design may vary the final rates ultimately charged to each class and for each consumption level.

EPE's complete Application and supporting documents is accessible online on EPE's website, https://www.epelectric.com/company/public-notices and the Commission's PRCe360 Docketing System https://e360.prc.nm.gov/portal/public/#/public/nm-prc/en/home under Docket Number 25-00082-UT. The Application is also available at the offices of El Paso Electric, 2820 Las Vegas Ct., Las Cruces, NM 88007, Contact Ricardo F. Gonzales, Reg. VP – Government Affairs – NM.

The major events for public participation in this matter will occur as follows:

- Deadline to file motions to intervene to become a party: June 22, 2026
- Deadline to file intervenors' direct testimony: July 24, 2026
- Deadline to file rebuttal testimony: August 19, 2026

PUBLIC HEARING

A public hearing to hear and receive testimony, exhibits, and legal argument is set for **September 21 – October 2, 2026, commencing at 9:00 a.m. each day.** The hearing will be conducted online and can be viewed via livestream on the Commission's YouTube channel and its website, https://www.prc.nm.gov/public-hearings/. Please contact the Commission for confirmation of the hearing, because hearings are occasionally cancelled or rescheduled.

PUBLIC COMMENT

People who are not associated with a party to this case may make written or oral comment as allowed by Rule 1.2.2.23(F) NMAC. Written comments must refer to Docket Number 25-00082-UT and be submitted before the Commission makes a final decision. Written comments and any other filings should be submitted online through PRCe360 Docketing System. Comments can also be sent via US mail to PRC Records P.O. Box 1269, Santa Fe, NM 87504.

Alternatively, oral public comment is also welcome during Commission open meetings. The open meeting schedule can be found at www.prc.nm.gov/nmprc-open-meeting-agenda/. Email public.comment@prc.nm.gov or call (505) 490-7910 to sign up to comment online or by phone at an open meeting. If the Commission determines a separate hearing should be set for oral comments for this matter, the date, time, and location will be announced on the Commission's website, https://www.prc.nm.gov/.

Instructions to submit written public comment online, to file pleadings and other documents, and to view Commission dockets are found at https://e360.prc.nm.gov/portal/public/#/public/nm-prc/en/home. All filings subject to deadlines must be submitted within regular business hours of the due date to be considered timely filed.

TO BECOME A PARTY

If you wish to appear in this case as a party, you must file a motion for leave to intervene, pursuant to 1.2.2.23 NMAC, on or before **June 22, 2026**. Intervenors must become familiar with the rules regarding practicing before the Commission and all other applicable rules.

The Commission's Rules of Procedure 1.2.2 NMAC apply except as modified by order of the Commission or hearing examiners. These and other rules are available online at https://srca.nm.gov/nmac-home/nmac-titles/.

THE DEADLINES GIVEN ABOVE ARE NOT ALL THE DEADLINES SET FORTH IN THIS MATTER, AND PARTIES AND POTENTIAL INTERVENORS ARE ADVISED TO READ THE COMPLETE

PROCEDURAL ORDER ISSUED ON **APRIL 27, 2026**, FOUND ON THE PRCe360 DOCKETING SYSTEM.

This QR Code will direct you to the other customer class rate tables and other information included in EPE's Application

SCAN TO VIEW
https://www.prc.nm.gov

PEOPLE WITH DISABILITIES WHO, IN ORDER TO ATTEND OR PARTICIPATE IN THE HEARING, REQUIRE A READER, AMPLIFIER, QUALIFIED SIGN LANGUAGE INTERPRETER, OR ANY OTHER FORM OF AUXILIARY AID OR SERVICE OR OTHER TYPE OF ACCESSIBLE FORMAT OF PUBLIC DOCUMENTS, MUST CONTACT THE DIRECTOR OF ADMINISTRATIVE SERVICES OF THE COMMISSION AT (505) 827-8019 AS SOON AS POSSIBLE PRIOR TO THE HEARING.

Any person who desires more information about this case may contact the Commission by phone at (505) 827-4084 or 1-888-427-5772 or by email at Ryan.Jimenez@prc.nm.gov.