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3BEFORE 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

SUPPLEMENTAL DIRECT TESTIMONY

OF

GEORGE NOVELA

ON BEHALF OF

EL PASO ELECTRIC COMPANY

MAY 7, 2026

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I. INTRODUCTION AND QUALIFICATIONS

Q1. PLEASE STATE YOUR NAME, BUSINESS ADDRESS.

A. My name is George Novela. My business address is 100 North Stanton Street,
El Paso, Texas, 79901.

Q2. ON WHOSE BEHALF ARE YOU SUBMITTING THIS TESTIMONY

A. I am filing this testimony on behalf of El Paso Electric Company ("EPE" or "the
Company").

**Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS
PROCEEDING?**

A. Yes. I submitted Direct Testimony in this proceeding on March 27, 2026.

II. PURPOSE OF SUPPLEMENTAL DIRECT TESTIMONY

**Q4. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT
TESTIMONY?**

A. The purpose of my Supplemental Direct Testimony is to: (a) identify each EPE
witness providing supplemental testimony in response to the requirements set forth
in Ordering Paragraph A, of the New Mexico Public Regulation Commission's
("Commission") April 23, 2026 Pre-Hearing Bench Request ("Pre-Hearing Bench

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Request") in this case, as well as the specific paragraph of the Bench Request they respond to; and (b) to respond to Bench Request Paragraph Nos. 9.d,9.e, 9.j.i-9.j.iv, 9.k, 9.l, 9.m, and 9.p.

Q5. WHICH EPE WITNESSES ARE PROVIDING SUPPLEMENTAL TESTIMONY AND WHAT PARAGRAPHS OF THE PRE-HEARING BENCH REQUEST DOES EACH RESPOND TO?

A. The following EPE witnesses provide supplemental direct testimony to the Pre-Hearing Bench Request:

- EPE witness Rene Gonzalez addresses Pre-Hearing Bench Request Paragraph No. 9.a.
- EPE witness Manuel Carrasco addresses Pre-Hearing Bench Request Paragraph Nos. 9.b.i -9.b.ii, 9.f, 9.g, 9.h, and 9.n.
- EPE witness Steven Sierra addresses Pre-Hearing Bench Request Paragraph No. 9.c.
- I address Pre-Hearing Bench Request Paragraph Nos. 9.d, 9.e, 9.j.i, - 9.j.iv, 9.k, 9.l, 9.m, and 9.p in my Supplemental Direct Testimony.
- EPE witness Omar A. Gallegos addresses Pre-Hearing Bench Request Paragraph No. 9.i.

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1 **Q8. WHAT IS EPE’S REQUESTED NON-FUEL REVENUE REQUIREMENT**
2 **IN THIS CASE AND WHERE IS THAT AMOUNT PRESENTED IN EPE’S**
3 **APPLICATION FILED MARCH 27, 2026, SUPPLEMENTED ON APRIL**
4 **15, 2026?**

5 **A.** \$210,818,160. This requested non-fuel revenue requirement is located in several
6 places in this filing. For one example, please see table AH-5 in the direct testimony
7 of EPE witness Hernandez for the non-fuel revenue requirement along with a
8 detailed breakdown of how it was calculated.

9

10 *Rate Case and Litigation Expenses*

11 **Q9. WHAT INFORMATION HAS THE COMMISSION REQUESTED IN**
12 **PARAGRAPHS 9.j.i – 9.j.iv OF THE PRE-HEARING BENCH REQUEST?**

13 **A.** Paragraphs 9.j.i – 9.j.iv of the Pre-Hearing Bench Request requests EPE’s position
14 on the proposed recovery of its rate case and litigation expenses including
15 discussion of the following:

- 16 • Paragraph 9.j.i “Should all or a portion of a utility’s rate case and litigation
17 expenses be approved for recovery?”
- 18 • Paragraph 9.j.ii “Should expenses incurred with appeals of rate case
19 decisions be approved for recovery?”

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- 1 • Paragraph 9.j.iii “Should any portion of rate case expense be included in
2 rate base? If so, should a return be authorized on the expense and what
3 return should be authorized?”
- 4 • Paragraph 9.j.iv “Should rate case expenses and litigation expenses be
5 treated similarly or differently for ratemaking purposes? Provide support
6 for your position.”

7

8 **Q10. IN RESPONSE TO PARAGRAPH 9.j.i., SHOULD ALL OR A PORTION OF**
9 **A UTILITY’S RATE CASE AND LITIGATION EXPENSES BE**
10 **APPROVED FOR RECOVERY?**

- 11 **A.** Yes, all of EPE’s requested rate case and litigation expenses should be approved
12 for recovery. Regulated utilities operate under a regulatory compact: they agree to
13 serve all customers within their territory at rates set by the Commission, and in
14 return, they're permitted to recover their prudently incurred costs. This compact
15 only functions if utilities can recover the costs of participating in the regulatory
16 process itself. Denying recovery of these costs would effectively require
17 shareholders to subsidize the cost of the regulatory process — a process that exists
18 to set rates for the benefit of ratepayers. Since the regulatory compact is a bargain
19 between the utility, its customers, and the state, the costs of maintaining that process
20 should be approved for recovery.

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2 **Q11. IN RESPONSE TO PARAGRAPH 9.j.ii, SHOULD EXPENSES INCURRED**
3 **WITH APPEALS OF RATE CASE DECISIONS BE APPROVED FOR**
4 **RECOVERY?**

5 **A.** Yes. Appeals from regulatory proceedings are a natural and necessary extension of
6 the rate case process itself, and their costs should be recoverable for the same
7 fundamental reasons that underlie recovery of rate case expenses generally.
8 Denying recovery of these costs would effectively penalize a utility for exercising
9 a statutory right, create a chilling effect on legitimate legal challenges to unlawful
10 Commission action, and shift to shareholders the cost of a process that ultimately
11 protects the integrity of rates for all parties. So long as the appeal was pursued in
12 good faith and with a reasonable basis, the costs should be approved for recovery.

13

14 **Q12. IN RESPONSE TO PARAGRAPH 9.j.iii, SHOULD ANY PORTION OF**
15 **RATE CASE EXPENSES BE INCLUDED IN RATE BASE? IF SO, SHOULD**
16 **A RETURN BE AUTHORIZED ON THE EXPENSE AND WHAT RETURN**
17 **SHOULD BE AUTHORIZED?**

18 **A.** EPE is not requesting any portion of rate case expenses to be included in rate base,
19 nor requesting a return on those costs, consistent with the Final Order in its 2020
20 Base Rate Case. EPE's proposed revenue requirement includes estimated rate case

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1 expenses for this proceeding and other prior cases to be recovered over a two-year
2 period.

3
4 **Q13. IN RESPONSE TO PARAGRAPH 9.j.iv, SHOULD RATE CASE EXPENSES**
5 **AND LITIGATION EXPENSES BE TREATED SIMILARLY OR**
6 **DIFFERENTLY FOR RATEMAKING PURPOSES? PROVIDE SUPPORT**
7 **FOR YOUR POSITION.**

8 **A.** Rate case expenses and litigation expenses are functionally indistinguishable for
9 ratemaking purposes and should be treated consistently. Both categories of cost
10 arise directly from the utility's status as a regulated entity. Neither is a voluntary
11 business expenditure, and neither can be avoided without compromising the utility's
12 ability to fulfill its regulatory obligations or protect its legal rights. Treating these
13 expenses differently would create inconsistent ratemaking outcomes without any
14 principled basis for the distinction, undermining the coherence and predictability
15 that regulated utilities and their investors depend upon.

16
17 *Advertising Disclosure*

18 **Q14. WHAT HAS THE COMMISSION REQUESTED IN PARAGRAPHS 9.k OF**
19 **THE PRE-HEARING BENCH REQUEST?**

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1 **A.** Paragraph 9.k of the Pre-Hearing Bench Request requests “EPE’s position on
2 whether it will agree to include a disclosure in its advertising materials (e.g., print,
3 radio, and television) informing the public of who is bearing the costs of the specific
4 advertising (i.e., shareholders, ratepayers, or a combination thereof). If yes, EPE
5 should propose the disclosure it finds reasonable. If no, EPE should explain the
6 basis for its position.”

7
8 **Q15. IN RESPONSE TO PARAGRAPH 9.k, WHAT IS EPE’S POSITION ON**
9 **WHETHER IT WILL AGREE TO INCLUDE A DISCLOSURE IN ITS**
10 **ADVERTISING MATERIALS INFORMING THE PUBLIC OF WHO IS**
11 **BEARING THE COSTS OF THE SPECIFIC ADVERTISING AND**
12 **EXPLAIN THE BASIS FOR EPE’S POSITION.**

13 **A.** EPE is not aware of any other utilities in New Mexico that are required to provide
14 such a disclosure and therefore does not agree. However, EPE is open to
15 participating in a rulemaking regarding disclosures for advertising materials,
16 including requirements for informing the public of who is bearing the costs of the
17 specific advertising. This type of request would best be suited in a rulemaking
18 rather than an individual utility’s rate case proceeding.

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1 *Compliance Requirements Deferred to this Case*

2 **Q16. WHAT HAS THE COMMISSION REQUESTED IN PARAGRAPHS 9.I OF**
3 **THE PRE-HEARING BENCH REQUEST?**

4 **A.** Paragraph 9.I of the Pre-Hearing Bench Request requests “A list of issues and costs
5 previously raised, which the Commission deferred to this rate case and the dockets
6 in which those issues were previously raised.”

7

8 **Q17. IN RESPONSE TO PARAGRAPH 9.I, PROVIDE A LIST OF ISSUES AND**
9 **COSTS PREVIOUSLY RAISED, WHICH THE COMMISSION**
10 **DEFERRED TO THIS RATE CASE AND THE DOCKETS IN WHICH**
11 **THOSE ISSUES WERE PREVIOUSLY RAISED.**

12 **A.** EPE included the requested information in its original filing in this docket. Please
13 see Exhibit GN-1 attached to my Direct Testimony for the requested list.

14

15 *Rule 440 Reports*

16 **Q18. WHAT HAS THE COMMISSION REQUESTED IN PARAGRAPHS 9.m OF**
17 **THE PRE-HEARING BENCH REQUEST?**

18 **A.** Paragraph 9.m of the Pre-Hearing Bench Request requests “A list of the previously
19 filed Rule 440 Reports, which are included in the Application, along with the

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1 associated costs. For each cost, indicate whether it relates to generation,
2 transmission, distribution facilities, or a combination of these categories.”
3

4 **Q19. IN RESPONSE TO PARAGRAPH 9.m, PROVIDE A LIST OF THE**
5 **PREVIOUSLY FILED RULE 440 REPORTS, ALONG WITH THE**
6 **ASSOCIATED COSTS.**

7 **A.** Please see Exhibit GN-1S attached to this Supplemental Direct Testimony for the
8 list of previously filed Rule 440 Reports, the costs of which are included in the
9 Application.
10

11 *New Mexico Renewable Energy Act Costs*

12 **Q20. WHAT HAS THE COMMISSION REQUESTED IN PARAGRAPHS 9.p OF**
13 **THE PRE-HEARING BENCH REQUEST?**

14 **A.** Paragraph 9.p of the Pre-Hearing Bench Request requests EPE to identify whether
15 “... any of the costs EPE proposes to allocate solely to the New Mexico jurisdiction
16 are the result of EPE’s efforts to comply with New Mexico’s Energy Transition
17 Act? If so, what are the costs for ETA compliance for New Mexico retail
18 customers?”
19
20

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Q21. PLEASE PROVIDE CONTEXT TO YOUR RESPONSE TO PARAGRAPH 9.p OF THE PRE-HEARING BENCH REQUEST.

A. For context to this response, I note my understanding that the 2019 amendments to the New Mexico Renewable Energy Act, which are applicable to EPE, were made in the same legislation that enacted New Mexico’s Energy Transition Act (“ETA”). However, because EPE owned no coal generation in its fleet at that time, I understand the ETA does not apply to EPE. For this reason, my response addresses costs EPE proposes to allocate solely to the New Mexico jurisdiction as a result of EPE’s efforts to comply with the New Mexico Renewable Energy Act (“REA”).

Q22. IN RESPONSE TO PARAGRAPH 9.p, AS CLARIFIED ABOVE, ARE ANY OF THE COSTS EPE PROPOSES TO ALLOCATE SOLELY TO THE NEW MEXICO JURISDICTION THE RESULT OF EPE’S EFFORTS TO COMPLY WITH NEW MEXICO’S RENEWABLE ENERGY ACT? IF SO, WHAT ARE THE COSTS FOR REA COMPLIANCE FOR NEW MEXICO RETAIL CUSTOMERS?

A. Yes. EPE proposes to include in rates the annual capacity charges under three Commission-approved agreements for battery energy storage system (“BESS”) components of the BV1, Carne, and Santa Teresa projects. Of these, the Carne and Santa Teresa projects were approved under New Mexico’s Renewable Energy Act.

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1 The direct testimony of EPE witness Martinez provides these capacity costs at
2 pages 16-22.

3

4 **Q23. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT**
5 **TESTIMONY?**

6 **A.** Yes.

440 Report No.	Generation/ Transmission/ Distribution	Project #	Project Name	Filing Date	440 Estimated Amounts	Actual Amount included in Application	Difference between Actual & Estimate	Percent Difference (+/- 20%)	440 Amendment Needed?	440 Amendment File Date
70	TRANSMISSION/ DISTRIBUTION	DN185, DN178, TL254	CONSTRUCTION OF THE TALAVERA DISTRIBUTION SUBSTATION AND RELATED FACILITIES	12/05/2018	\$ 9,810,967.44	\$ 19,972,331	\$ 10,161,363.32	104%	YES	3/23/26
72	DISTRIBUTION	DN145	PROPOSED DISTRIBUTION SUBSTATION, MOONGATE SUBSTATION IN DONA ANA COUNTY	07/03/2019	\$ 8,756,827.98	\$ 14,047,540	\$ 5,290,711.88	60%	YES	3/23/26
73	TRANSMISSION	TS142	NEW 345KV SUBSTATION PROJECT EDDY WINDFARM INTERCNET SUBSTATION	12/23/2020	\$ 17,384,352.28	\$ 15,909,819	\$ (1,474,532.89)	-8%	NO	
74, 76	TRANSMISSION	TL295, TL295	TRANSMISSION LINES RE-ROUTES OTERO 345KV NEW SUBSTATION & TAP	12/23/2020 02/04/2021	\$ 18,040,099.00	\$ 19,657,560.00	\$ 1,617,461.00	9%	NO	
75	TRANSMISSION/ DISTRIBUTION	TL119, DN164	JORNADA-MOONGATE 115 KV TRANSMISSION LINE AND DISTRIBUTION PROJECT	01/15/2021	\$ 12,807,153.00	\$ 16,937,995	\$ 4,130,841.74	32%	YES	3/23/26
77	TRANSMISSION	TL294	NEW 115KV SWITCHING STATION ESCONDIDO 115KV TRANS LINE IMPRVMTS	03/04/2021	\$ 13,492,450.00	\$ 4,021,831	\$ (9,470,618.60)	-70%	NO	
79	DISTRIBUTION	DN069	13.8KV THREE PHASE DISTRIBUTION SERVICE TO BUENA VISTA, AC120 BUENA VISTA PROJECT	08/09/2021	\$ 976,020.41	\$ 969,295	\$ (6,725.60)	-1%	NO	
80	DISTRIBUTION	DN213	REPLACE 345KV CIRCUIT BREAKER AT THE ARROYO SUBSTATION	02/04/2022	\$ 526,978.73	\$ 524,224	\$ (2,754.27)	-1%	NO	
82	TRANSMISSION	TS143	345KV CIRCUIT BREAKER REPLACEMENT AT MACHO SPRINGS SUBSTATION, IN LUNA COUNTY, NEW MEXICO	03/17/2022	\$ 565,405.73	\$ 556,034	\$ (9,371.66)	-2%	NO	
83	TRANSMISSION	TL186	ARROYO-JORNADA 115KV TRANSMISSION LINE UPGRADE IN DONA ANA COUNTY, NM	05/13/2022	\$ 4,417,488.00	\$ 757,954	\$ (3,659,534.43)	-83%	NO	
84	DISTRIBUTION	DN199	LAC 20 TO PIC 22 OFFLOAD PROJECT LAS CRUCES, NM LC Airport Substation Interconnectns	08/02/2022	\$ 655,124	\$ 778,171	\$ 123,046.74	19%	NO	
85	DISTRIBUTION	DT426, DN220	GRID MOD PROJECT TO IMPELCT AN ADVANCED METERING SYSTEM	01/30/2023	\$ 146,000,260.00	\$ 135,139,268	\$ (10,860,992.08)	-7%	NO	
87	TRANSMISSION	TL302	NORTHWEST PORTION OF THE MACHO SPRINGS TO SPRINGERVILLE 345KV TRANSMISSION LINE STRUCTURES REPLACEMENT AIP WOOD TO STEEL STRCTS PHASE ONE	05/25/2023	\$ 50,429,805.00	\$ 41,349,329	\$ (9,080,476.34)	-18%	NO	
88	DISTRIBUTION	DN100	HATCH-20 LINE REBUILD AND RECONDUCT PROJECT	06/28/2023	\$ 4,750,000.00	\$ 1,682,189	\$ (3,067,811.35)	-65%	NO	
89	DISTRIBUTION	DN164	NEW 24KV AND 25KV LINE (MOO 23 - APO 20) FROM MOONGATE SUBSTATION TO APOLLO SUBSTATION PROJECT	08/25/2023	\$ 2,764,000.00	\$ 3,322,304	\$ 558,303.66	20%	NO	
90	GENERATION	GN321	NEWMAN POWER STATION, STEAM TURBINE AND GENERATOR REPAIRS AND UPGRADES Unit 3	12/20/2023	\$ 10,000,000.00	\$ 10,111,278.19	\$ 111,278.19	1%	NO	
91	GENERATION	GN301	NEWMAN POWER STATION , NEWMAN UNIT 2, REPLACEMENT OF THE DISTRIBUTED CONTROL SYSTEM ("DCS") GN301	12/20/2023	\$ 5,000,000.00	\$ 6,846,629	\$ 1,846,629.38	37%	YES	3/23/26
92	TRANSMISSION	TL312	CLINT SUBSTATION TO VALLEY SUBSTATION 69KV TRANSMISSION LINE UPGRADE	12/27/2023	\$ 8,705,798.95	\$ 5,218,346	\$ (3,487,453.06)	-40%	YES	3/23/26
93	TRANSMISSION	TL313	NEW 115KV TRANSMISSION LINE TO EASTLAKE (FE-5) SUBSTATION	12/27/2023	\$ 2,242,420.00	\$ 1,798,646	\$ (443,773.65)	-20%	NO	
94	GENERATION	GR200	RIO GRANDE POWER STATION (RG) UNIT 8 BOILER REPAIR PROJECT	02/27/2024	\$ 2,100,000.00	\$ 2,693,027	\$ 593,027.30	28%	YES	3/23/26
96	DISTRIBUTION	DN226	GRID MODERNIZATION FEEDER RELAY AND METERING REPLACEMENTS - GRID MOD NEW MEXICO SUBS UPGRADES	02/29/2024	\$ 1,900,000.00	\$ 2,098,539	\$ 198,539.32	10%	NO	
97	GENERATION	GN319	NEWMAN POWER STATION POWER BLOCK 4 STEAM TURBINE UNIT 4 MAJOR INSPECTION PROJECT	03/04/2024	\$ 6,006,597.00	\$ 10,830,759	\$ 4,824,161.99	80%	YES	3/23/26
98	GENERATION	GN276, GN269, GN322	NEWMAN POWER STATION POWER BLOCK 4 GAS TURBINE UNIT 1 (GT 1) MAJOR INSPECTION PROJECT	03/04/2024	\$ 2,665,048.00	\$ 24,328,794	\$ 21,663,746.00	813%	YES	3/23/26
99	GENERATION	GN277, GN289, GN323	NEWMAN POWER STATION POWER BLOCK 4 GAS TURBINE UNIT 2 (GT 2) MAJOR INSPECTION PROJECT	03/04/2024	\$ 2,419,626.00	\$ 23,173,801	\$ 20,754,175.00	858%	YES	3/23/26
100	GENERATION	GM151	MONTANA POWER STATION HIGH PRESSURE HOT SECTIO EMERGENCY REPLACEMENT PROJECT	04/23/2024	\$ 4,100,000.00	\$ 4,256,326.29	\$ 156,326.29	4%	NO	
101	TRANSMISSION/ DISTRIBUTION	TS176, DN228	SUBSTATIONS GAUNTLET REPLACEMENT (RELAY SYSTEM) PROJECT	04/29/2024	\$ 2,066,618.00	\$ 1,052,873	\$ (1,013,745.31)	-49%	NO	
103	TRANSMISSION	TL318	GREENLEE-HIDALGO TRANSMISSION LINE-EMERGENCY PROJECT	06/10/2024	\$ 1,200,000.00	\$ 537,802	\$ (662,198.11)	-55%	NO	
104	TRANSMISSION	TL316	LANE SUBSTATION TO WRANGLER SUBSTATION 115KV TRANSMISSION LINE UPGRADE	09/04/2024	\$ 2,047,958.50	\$ 1,187,042	\$ (860,916.87)	-42%	YES	3/23/26
105	GENERATION	GN325	NEWMAN POWER STATION GT3 MAJOR INSPECTION PROJECT	12/20/2024	\$ 4,784,785.00	\$ 5,147,247.29	\$ 362,462.29	8%	NO	
106	GENERATION	GP009	PALO VERDE GENERATION STATION UNIT 1 TS-101 NOZZLE REPLACEMENT PROJECT	03/13/2025	\$ 2,212,000.00	\$ 2,329,350.25	\$ 117,350.25	5%	NO	
107	GENERATION	GP009	PALO VERDE GENERATION STATION UNIT 1 HIGH VOLTAGE SWITCHGEAR OVERHAUL PROJECT	03/24/2025	\$ 1,106,000.00	\$ 995,590.23	\$ (110,409.77)	-10%	NO	
110	TRANSMISSION	TL318, TL290	GREENLEE TO HIDALGO 345KV TRANSMISSION LINE STRUCTURES REPLACEMENT	06/20/2025	\$ 17,892,814.25	\$ 989,106	\$ (16,903,708.11)	-94%	NO	
111	DISTRIBUTION	DN222	MOONGATE-20 DISTRIBUTION LINE 24KV EXTENSION AND REBUILD	06/23/2025	\$ 2,980,865.45	\$ 1,916,185	\$ (1,064,680.24)	-36%	NO	
113	TRANSMISSION	TS179	NEW 115KV SWITCHING STATION (WICKED SUBSTATION) FELINA INTERCONNECTION	07/11/2025	\$ 11,343,000.00	\$ 12,164,429	\$ 821,429.44	7%	NO	
114	TRANSMISSION	TS174	NEW 115KV INTERCONNECTION TO EXISTING DIABLO SUBSTATION	07/11/2025	\$ 3,028,000.00	\$ (186,184)	\$ (3,214,184.09)	-106%	NO	
115	TRANSMISSION	TL243	HORIZON SUBSTATION TO SEABECK SUBSTATION 115KV TRANSMISSION LINE UPGRADE	07/11/2025	\$ 9,245,123.93	\$ 7,865,330	\$ (1,379,794.08)	-15%	NO	
116	TRANSMISSION	TL245	SEABECK SUBSTATION TO SAN FELIPE SUBSTATION NEW 115KV TRANSMISSION LINE	07/11/2025	\$ 27,175,084.19	\$ 23,858,242	\$ (3,316,842.08)	-12%	NO	
117	GENERATION	GP009	PALO VERDE U2 LPFWH - REPLACEMENT PROJECT	07/11/2025	\$ 2,090,656.00	\$ 2,147,127.37	\$ 56,471.37	3%	NO	

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**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 GEORGE NOVELA IN SUPPORT OF THE FOREGOING
AMENDED FILING SUPPLEMENTAL TESTIMONY**

I, ***George Novela***, 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 the *Senior Director of Regulatory Policy and Rates*.

3. I have reviewed the foregoing Amended Filing Supplemental Testimony of George Novela, and the exhibits, schedules, and workpapers sponsored by me and I confirm, to the best of my knowledge, that those materials are complete, accurate, internally consistent, and consistent with the Amended Application.

4. The foregoing Amended Filing Supplemental Testimony of George Novela, together with all exhibits sponsored therein and attached thereto, is true and accurate based on my knowledge and belief.

5. 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*.

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FURTHER, DECLARANT SAYETH NAUGHT.

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

Executed on August 6, 2026.

/s/ George Novela
GEORGE NOVELA