

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

|  |   |                            |
|--|---|----------------------------|
| <b>IN THE MATTER OF EL PASO ELECTRIC</b>     | ) |                            |
| <b>COMPANY'S APPLICATION FOR APPROVAL</b>    | ) |                            |
| <b>OF ITS TRANSPORTATION ELECTRIFICATION</b> | ) |                            |
| <b>PLAN FOR 2024-2026</b>                    | ) |                            |
|  | ) | <b>CASE NO. 23-00__-UT</b> |
|  | ) |                            |
|  | ) |                            |
| <b>EL PASO ELECTRIC COMPANY,</b>             | ) |                            |
| <b>Applicant.</b>                            | ) |                            |
|  | ) |                            |

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**EL PASO ELECTRIC COMPANY'S APPLICATION FOR APPROVAL  
OF ITS TRANSPORTATION ELECTRIFICATION PLAN FOR 2024-2026**

El Paso Electric Company ("EPE" or "Company"), pursuant to Section 62-8-12 of the Public Utility Act ("EV Statute"), and New Mexico Public Regulation Commission ("Commission") Rules 17.1.2.10 and 17.9.574.11 of the New Mexico Administrative Code ("NMAC") ("Rule 574" or "Rule"), hereby files its Application for Approval of its Transportation Electrification Plan for Plan Years 2024-2026 ("TEP" or "Plan") ("Application"). Concurrent with the filing of the Application, EPE filed Advice Notice No. 289 which contains 14<sup>th</sup> Revised Rate No. 01 – Residential Service Rate, 16<sup>th</sup> Revised Rate No. 03 – Small General Service Rate, 16<sup>th</sup> Revised Rate No. 04 – General Service Rate, 13<sup>th</sup> Revised Rate No. 07 – City and County Service Rate, and 13<sup>th</sup> Revised Rate No. 09 – Large Power Service Rate.

EPE's TEP proposes a portfolio of residential and commercial programs, new construction programs, partnership, research and innovations program, rate options, and a Customer Outreach Program, designed to expand transportation electrification in EPE's New Mexico service territory, including among low-income and underserved communities and across multiple electric vehicle ("EV") classes over the 2024-2026 Plan Years. The

measures and strategies presented in this Plan are reasonably expected to accomplish the goals identified in the EV Statute and Rule. EPE reasonably and prudently designed the strategies and measures presented for approval in the TEP based on the current and forecasted EV adoption rate, availability of public charging infrastructure, stakeholders' feedback, and customers' survey responses, as well as State and Federal programs and grants.

In accordance with the EV Statute and Rule, EPE requests approval of its TEP and specifically requests the following authorizations in this Application:

- (1) Authorization for the following new and modified residential programs:
  - a. EV Smart Rewards NM Program,
  - b. Smart Charging Program,
  - c. Home Wiring Program, and
  - d. Electric Bicycle Rebate Program;
- (2) Authorization for the following new and modified commercial programs:
  - a. PowerConnect NM Program;
  - b. EV Charging Equipment Rebate Program;
  - c. EV Charging Installation Rebate Program; and
  - d. Take-Charge NM Program;
- (3) Authorization for the following New Construction Rebate Programs:
  - a. EV-Ready Homes Program; and
  - b. EV-Ready Multi-Unit Dwellings (“MUDs”) Program;
- (4) Approval of EPE’s Partnership, Research, and Innovations Program;
- (5) Approval of EPE’s Customer Outreach Program;

(6) Approval of EPE’s new experimental Demand Adjustment (“DA”) Rider available for Rate Nos. 04 and 09;

(7) Approval of the proposed language changes to the Whole House/Whole Service EV (“WHEV/WSEV”) Rate Rider Incentive Credit provision available for Rate Nos. 01, 03, 04, and 07;

(8) Authorization to recover TEP costs through Rate No. 44 - TEP Cost Rider using the Commission-approved deferred collection methodology;

(9) Authorization of up to 90 days after Commission approval to implement new measures or modify existing measures into business operations;

(10) Authorization to continue approved TEP measures, subject to availability of the approved cost, until the next TEP (to be filed in 2026) is approved by the Commission and implemented by EPE;

(11) As necessary, variance from Commission Rule 17.9.530 NMAC, which prescribes minimum data requirements to be filed in support of a tendered new rate schedule;

(12) Any other approvals, authorizations, and actions that may be required under the Public Utility Act or the EV Statute to implement EPE’s proposed TEP.

The TEP, and the proposed rate schedules, with requested variance, satisfies all requirements of the EV Statute and Rule, is lawful, and is in the public interest. In further support of this Application, EPE states as follows:

**I. DESCRIPTION OF EPE**

1. EPE is certified and authorized to conduct the business of providing public utility service within the State of New Mexico, is a public utility subject to the jurisdiction of the

Commission under the New Mexico Public Utility Act ("PUA"), and is a wholly-owned subsidiary of Sun Jupiter, LLC.

2. EPE generates, transmits, and distributes electricity through an interconnected system to customers in southern New Mexico and Texas. EPE owns, operates, leases, or controls the plant, property, and facilities used by it for the generation, transmission, distribution, sale, or furnishing of electricity to or for the public within both states.

3. EPE's principal business address and telephone number for its New Mexico service area are:

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

## **II. EPE'S TEP**

4. EPE's TEP proposes the following strategies and measures for the Plan Years 2024-2026 to meet the goals and requirements of the EV Statute and Rule:

### **A. Residential Programs**

a. *EV Smart Rewards NM Program*: EPE proposes an incentive program that allows EPE to schedule at least 80% of enrolled residential customers' monthly charging during off-peak periods.

b. *Smart Charging Program*: EPE proposes to continue the Residential Smart Charging Program approved in Case No. 20-00241-UT with modifications. EPE also proposes to continue the Residential Low Income ("LI") Smart Charging Program approved in Case No. 20-00241-UT with modifications:

c. *Home Wiring Program*: EPE proposes a Home Wiring Program designed to offset the cost of installing a dedicated outlet for an EV charging station or the

hardwiring of a charging station to a home's electrical system. The proposed program can be combined with the Smart Charging Program. Additional benefits will be made available to LI residential customers.

d. *Electric Bicycle Rebate Program*: EPE proposes to offer residential customers a rebate toward the purchase of an Electric Bicycle ("e-bike"). This rebate is designed to help offset a portion of the upfront cost of an e-bike. The program will be limited to one rebate per household and the proposed budget is estimated to cover rebates for 110 standard customers and 30 LI customers.

## B. Commercial Programs

a. *PowerConnect NM Program*: EPE proposes a rebate program for commercial customers who are installing EV charging infrastructure on their premises that will help reduce the customer's upfront cost of upgrades or improvements on EPE's distribution system, up to the utility meter.

b. *EV Charging Equipment Rebate Program*: EPE proposes an EV charging equipment rebate program for commercial customers to cover 50% of total equipment costs and up to 70% of total equipment cost for commercial entities located in underserved communities. This program may be combined with PowerConnect NM Program and EV Charging Installation Rebate Program.

c. *EV Charging Installation Rebate Program*: EPE's EV Charging Installation Rebate Program proposes to modify and replace EPE's current Workplace, Public, DCFC and Public Transit and Customer Fleet Smart Charging Programs to provide commercial customers rebates to offset 50% of the installation costs of a qualifying networked charging station on the customer-side of the meter. For charging equipment

located in underserved communities, the rebate amount will cover 70% of total installation costs on customer-side of the meter. This program may be combined with PowerConnect NM Program and EV Charging Equipment Rebate Program.

d. *Take-Charge NM Program*: EPE proposes a charging-as-a-service program that will cover the cost of the infrastructure on both the utility and customer sides of the meter, including EV charging station equipment and installation as well as project management services.

### C. New Construction Programs

a. *EV-Ready Homes Program*: EPE proposes a rebate program for home builders and developers to construct new EV-ready single-family homes. This program will offer a rebate up to \$450 to cover approximately 100% of the costs for installing a 240V NEMA 14-30 or NEMA 14-50 outlet for a new construction home. The Program is limited to one rebate for each single-family home.

b. *EV-Ready MUDs Program*: EPE proposes a rebate program for new construction to support the development of EV-ready MUDs in its NM service territory to cover up to 70% of EV-ready wiring costs with this program. This program can be combined with EV Charging Equipment Rebate Program to cover the cost of charging equipment.

### D. Partnership, Research, and Innovations Program

EPE will work in close collaboration and partnership with external stakeholders to include but not be limited to communities, municipalities, academia, research, and non-profit organizations, to develop new innovative projects that support the expansion of transportation electrification efforts in EPE's NM service territory.

#### E. Customer Outreach Program

The proposed Customer Outreach Program is expected to achieve the goals of the TEP through educational, marketing and outreach initiatives that support the expansion of transportation electrification in EPE's NM service territory across multiple market segments. The educational initiatives are expected to increase customer awareness and understanding of the benefits of electric transportation through hands-on EV demonstrations, community and tabling events, an EV education program, social media, TV, radio and other communication channels. The marketing initiatives are expected to promote available incentives, rate options and programs.

#### F. EV Rates

a. *WHEV/WSEV Rate Rider Incentive Credits*: EPE's WHEV/WSEV Rate Rider Incentive Credit for EPE's Residential Service Rate, Small General Service Rate, General Service Rate, and City and County Service Rate classes, was approved in Case No. 20-00241-UT. The TEP proposes language revisions to this rate rider provision to clarify that the incentive credit shall not cause the customer bill to fall below the Monthly Minimum Charge Provision in the applicable tariffs. The requirement for annual reporting of proof of EV registration by customers is removed.

b. *Demand Adjustment Rider*: EPE proposes a new DA Rider designed to limit the amount of demand billed to a qualifying customer during any billing period in which the actual calculated load factor is less than 15%. This rider would only be available to qualifying separately metered charging stations with more than 50kW of demand and that are taking service under Rate No. 04 – General Service or Rate No. 09 – Large Power Service.

5. The following table shows projected costs of the proposed TEP by proposed measure:

| TEP Measure                                   | Standard Customers     |           | LI and Underserved Communities |           |
|---|------------------------|-----------|--------------------------------|-----------|
|   | Estimated Program Size | Cost      | Estimated Program Size         | Cost      |
| <b>Residential Programs:</b>                  |                        |           |                                |           |
| a. EV Smart Rewards NM Program                | 220                    | \$714,745 | Included                       |           |
| b. Smart Charging Program                     | 260                    | \$136,662 | 70                             | \$44,153  |
| c. Home Wiring Program                        | 260                    | \$355,322 | 70                             | \$132,458 |
| If Panel upgrade is required                  | 40                     | \$183,968 | Included                       |           |
| d. Electric Bicycle Rebate Program            | 110                    | \$104,074 | 30                             | \$40,999  |
| <b>Commercial Programs:</b>                   |                        |           |                                |           |
| a. PowerConnect NM                            | \$1,493,076            |           | \$397,492                      |           |
| b. EV Charging Equipment Rebate Program       | \$1,291,830            |           | \$343,915                      |           |
| c. EV Charging Installation Rebate Program    | \$1,208,948            |           | \$321,850                      |           |
| d. Take-Charge NM                             | \$1,037,117            |           | \$276,105                      |           |
| <b>New Construction Program:</b>              |                        |           |                                |           |
| a. EV-Ready Homes Program                     | 300                    | \$141,919 | Included                       |           |
| b. EV-Ready MUDs Program                      | 6                      | \$157,688 | Included                       |           |
| <b>Partnership, Research, and Innovations</b> | \$3,153,750            |           |                                |           |
| <b>Customer Outreach Program</b>              | \$1,638,060            |           | \$327,612                      |           |
| a. Flex fund                                  | \$98,283               |           |                                |           |
| <b>TEP Administration</b>                     | \$1,055,562            |           |                                |           |
| <b>Plan Year Total</b>                        | <b>\$14,655,588</b>    |           |                                |           |

6. EPE developed the programs and rate options proposed in the TEP after evaluating forecasted EV adoption rates and availability of EV charging infrastructure, engaging with customers and other stakeholder groups to solicit feedback on the initial TEP program and collecting recommendations for measures to be proposed in this filing, as well as by reviewing State and Federal programs and grants.

7. The proposed programs and rate options are designed to support the goals of the EV Statute and Rule to expand transportation electrification to all customers, including low-income users and users in underserved communities and across multiple EV classes.

### **III. COST RECOVERY**

8. In accordance with the EV Statute and Rule, EPE requests Commission authorization to recover TEP costs through EPE's Rate No. 44 – TEP Cost Rider (“Rate No. 44” or “TEP Cost Rider”), originally approved in Case No. 20-00241-UT using the deferred collection methodology approved in that case.

9. Pursuant to that deferred collection methodology, EPE proposes to:

- record TEP costs in a regulatory asset as they occur and apply carrying charges at the Customer Deposit Interest Rate set annually by the Commission;
- reconcile the recorded TEP expenses and TEP Cost Rider revenues monthly and use the net amount to calculate the cumulative balance in the regulatory asset to apply carrying charges monthly; and
- file a compliance advice notice for a revised Rate No. 44 to adjust the TEP Cost Rider factor for the next twelve-month period based upon the balance in the TEP regulatory asset of the prior year.

#### IV. TESTIMONY AND EXHIBITS

10. EPE's TEP is detailed in the Direct Testimonies and Exhibits of George Novela, Angelina Rodriguez, and Brian Turaki.

**EPE Witness George Novela's** testimony introduces the other witnesses in this case; summarizes EPE's Application; provides an overview of EPE and its role in expansion and support of electrification transportation; presents EPE's current and forecasted EV market, expected load impact from EVs, and other Planning Horizon information, and demonstrates EPE's compliance with Rule 574, the EV Statute, and stipulated commitments and other compliance requirements from Case No. 20-00241-UT.

**EPE Witness Angelina Rodriguez's** testimony supports EPE's TEP and estimated costs; addresses the planning design and development of the TEP; and addresses the planning outlook for the Planning Horizon.

**EPE Witness Brian Turaki's** testimony supports EPE's request for authorization for continued recovery of TEP costs through Rate No. 44- TEP Cost Rider using the deferred collection methodology approved in EPE's recent TEP case; and addresses EPE's TEP rate options, namely the WHEV/WSEV Rate Rider Incentive Credits and the Demand Adjustment Rider.

11. EPE's witnesses address the criteria for approval of this Application set forth in Section 62-8-12(B) and the Rule.

12. Service of all notices, pleadings and other documents related to this Application should be made as follows:

Curtis Hutcheson  
Regulatory Case Manager  
El Paso Electric Company  
100 N. Stanton Street  
El Paso, Texas 79901  
(915) 543-5777

Jeffrey J. Wechsler  
Kari E. Olson  
Jocelyn Barrett-Kapin  
Montgomery & Andrews. P.A.  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873

13. Electronic service should be made as follows:

[EPE\\_Reg\\_Mgmt@epelectric.com](mailto:EPE_Reg_Mgmt@epelectric.com);

[nancy.burns@epelectric.com](mailto:nancy.burns@epelectric.com);

[jwechsler@montand.com](mailto:jwechsler@montand.com);

[kolson@montand.com](mailto:kolson@montand.com);

[jbarrettkapin@montand.com](mailto:jbarrettkapin@montand.com);

[tpacheco@montand.com](mailto:tpacheco@montand.com)

[ysandoval@montand.com](mailto:ysandoval@montand.com)

14. A proposed form of Notice is attached as Attachment A.

WHEREFORE, EPE respectfully requests a Commission Order approving the relief requested in this Application and granting such other approvals, authorizations, and actions that may be required by the Commission.

Respectfully submitted,

Nancy B. Burns  
Deputy General Counsel  
New Mexico Bar No. 7538  
El Paso Electric Company  
300 Galisteo Street, Suite 206  
Santa Fe, New Mexico 87501  
Telephone (505) 982-4713  
[nancy.burns@epelectric.com](mailto:nancy.burns@epelectric.com)

**MONTGOMERY & ANDREWS, P.A.**

*/s/ Kari E. Olson*

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Jeffrey J. Wechsler  
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[jbarrettkapin@montand.com](mailto:jbarrettkapin@montand.com)

**ATTORNEYS FOR  
EL PASO ELECTRIC COMPANY**

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF EL PASO ELECTRIC )  
COMPANY'S APPLICATION FOR APPROVAL )  
OF ITS TRANSPORTATION ELECTRIFICATION )  
PLAN FOR 2024-2026 )  
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) )  
**EL PASO ELECTRIC COMPANY, )  
Applicant. )**  

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**CASE NO. 23-00 \_\_\_-UT)**

**FORM OF NOTICE OF PROCEEDING AND HEARING REGARDING EL PASO  
ELECTRIC COMPANY'S TRANSPORTATION ELECTRIFICATION PLAN FOR  
2024-2026**

**NOTICE IS GIVEN BY THE NEW MEXICO PUBLIC REGULATION  
COMMISSION ("NMPRC" or "Commission") of the following:**

1. On June 30, 2023, El Paso Electric Company ("EPE" or "Company") filed its Application for Approval of its Transportation Electrification Plan for Plan Years 2024-2026 ("TEP" or "Plan") ("Application").

2. The Application is made pursuant to NMSA 1978, § 62-8-12 (2019) (the "EV Statute") and 17.9.574 NMAC ("Rule 574" or "Rule") governing applications to expand transportation electrification.

3. EPE's TEP Application asks the Commission to approve the following:

- a. EPE's TEP for Plan Years 2024-2026;
- b. EPE's proposed new experimental Demand Adjustment ("DA") Rider available for Rate No. 04 – General Service Rate and Rate No. 09 – Large Power Service Rate;
- c. EPE's proposed language changes to EPE's Whole House/Whole Service EV

- (“WHEV/WSEV”) Rate Rider Incentive Credit provision for Rate No. 01 – Residential Service Rate, Rate No. 03 – Small General Service Rate, Rate No. 04 – General Service Rate, and Rate No. 07 – City and County Service Rate;
- d. Authorization to recover TEP costs through Rate No. 44 – TEP Cost Rider using the Commission-approved deferred collection methodology;
  - e. Authorization of up to 90 days after Commission approval to implement new measures or modify existing measures into business operations;
  - f. Authorization to continue approved TEP measures, subject to availability of the approved cost, until the next TEP (to be filed in 2026) is approved by the Commission and implemented by EPE;
  - g. As necessary, variance from Commission Rule 17.9.530 NMAC, which prescribes minimum data requirements to be filed in support of a tendered new rate schedule;
  - h. Any other approvals, authorizations, and actions that may be required under the Public Utility Act or the EV Statute to implement EPE’s proposed TEP.
4. EPE’s TEP proposes the following portfolio of measures designed to expand access to electrification across all customer classes including for low-income customers and underserved communities, and across multiple EV classes:
- a. Residential Programs:
    - 1. EV Smart Rewards NM Program
    - 2. Smart Charging Program
    - 3. Home Wiring Program
    - 4. Electric Bicycle Rebate Program
  - b. Commercial Programs:
    - 1. PowerConnect NM Program
    - 2. EV Charging Equipment Rebate Program
    - 3. EV Charging Installation Rebate Program

4. Take-Charge NM Program
  - c. New Construction Rebate Programs:
    1. EV-Ready Homes Program
    2. EV-Ready Multi-Unit Dwellings (“MUDs”) Program
  - d. Partnership, Research, and Innovations Program
  - e. Customer Outreach Program
  - f. Rate Options:
    1. Modified WHEV/WSEV Rate Rider Incentive Credit
    2. New Demand Adjustment Rider
5. The total proposed TEP cost for the three-year plan is \$14,655,588.
6. EPE seeks approval to recover the costs of the TEP through its TEP Cost Rider using the Commission approved deferred collection methodology.

This case has been docketed as Case No. 23-\_\_\_\_-UT, and any inquiries should be referred to that number.

Any interested person may examine EPE's Application and the pre-filed testimonies, exhibits, pleadings and other documents filed in the case online at <http://nmprc/state.nm.us> under "Case Lookup EdoCKET", or by making arrangements for an in-person viewing at the Commission offices by calling 1-505-827-6968 during normal business hours, or at EPE's offices, 201 N. Water, Las Cruces, New Mexico, telephone number (575) 526-5555, or at EPE's website <https://www.epelectric.com/company/regulatory>. All inquiries or written comments concerning this matter should refer to Case No. 23-\_\_\_\_-UT.

The procedural schedule for this case is as follows:

1. Any person desiring to intervene in the proceeding must file a Motion to Intervene pursuant to 1.2.2.23(A) and 1.2.2.23(B) NMAC on or before \_\_\_\_\_, 2023.

2. The Commission's Utility Division Staff shall, and any intervenor may, file direct testimony on or before \_\_\_\_\_, 2023.

3. Any rebuttal testimony shall be filed on or before \_\_\_\_\_, 2023.

4. Any person whose testimony has been filed shall attend the hearing and submit to examination under oath.

5. A public hearing to hear and receive testimony, exhibits, arguments, and any other appropriate matters relevant to this proceeding is set to commence at \_\_\_\_ a.m. MDT on \_\_\_\_\_, 2023, and continue if necessary, through \_\_\_\_\_, 2023. Such hearing may be vacated if deemed not required pursuant to NMSA 1978, Section 62-16-4(H), in which case the Commission will take public comment and dispose of the Application at an Open Meeting. Due to the COVID-19 pandemic, the evidentiary hearing shall be conducted via the Zoom videoconference platform. The Zoom hearing will be livestreamed through YouTube and will be displayed on the Commission's website at <https://www.nm-prc.org>.

Any interested person should contact the Commission by e-mail at [ana.kippenbrock@prc.nm.gov](mailto:ana.kippenbrock@prc.nm.gov) or by phone at (505) 690-4191 for confirmation of the hearing date, time, and place since hearings are occasionally rescheduled.

Interested persons who are not affiliated with a party may submit written or oral comments pursuant to Rule 1.2.2.23(F) NMAC. Oral comments shall be taken at the beginning of the public hearing on \_\_\_\_\_, 2023 and shall be limited to 3 minutes per commenter. Persons wishing to make an oral comment must register in advance no later than 8:30 am MT on \_\_\_\_\_, 2023 by e-mailing Ana Kippenbrock at [Ana.Kippenbrock@prc.nm.gov](mailto:Ana.Kippenbrock@prc.nm.gov). Written comments may also be submitted before the Commission takes final action by sending the comment, which shall reference Case

No. 23-00086-UT, to [prc.records@prc.nm.gov](mailto:prc.records@prc.nm.gov). Pursuant to 1.2.2.23(F) NMAC, written and oral comments shall not be considered evidence.

The Commission's Utility Division Procedures 1.2.2 NMAC apply to this case, except as modified by Order of the Commission or the Hearing Examiner, and they are available online at <http://164.64.110.134/nmac/home>.

Anyone filing pleadings, documents, or testimony in this case shall serve copies thereof on all parties of record and Staff via email. Any such filings shall also be sent to the Hearing Examiner by email at [Angelica.allen@prc.nm.gov](mailto:Angelica.allen@prc.nm.gov). All pleadings shall be emailed on the date they are filed with the Commission.

Any person with a disability requiring special assistance to participate in this proceeding should contact the Commission at 1-888-427-5772 at least 24 hours prior to the hearing.

The procedural dates and requirements provided herein are subject to further order of the Commission or Hearing Examiner.

**I S U E D** at Santa Fe, New Mexico this \_\_\_ day of \_\_\_\_\_, 2023.

**NEW MEXICO PUBLIC REGULATION COMMISSION**

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**HEARING EXAMINER**

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF EL PASO )  
ELECTRIC COMPANY'S APPLICATION )  
FOR APPROVAL OF ITS TRANSPORTATION )  
ELECTRIFICATION PLAN FOR 2024-2026 )  
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 )  
EL PASO ELECTRIC COMPANY, )  
Applicant. )  
\_\_\_\_\_ )**

**CASE NO. 23-00\_\_-UT**

**DIRECT TESTIMONY OF  
GEORGE NOVELA  
ON BEHALF OF  
EL PASO ELECTRIC COMPANY**

**JUNE 30, 2023**

**EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
GEORGE NOVELA**

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EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
GEORGE NOVELA

1                                   **I. INTRODUCTION AND QUALIFICATIONS**

2   **Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

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

5  
6   **Q2. HOW ARE YOU EMPLOYED?**

7   **A.** I am employed by El Paso Electric Company ("EPE" or the "Company") as the  
8       Director of Economic and Rate Research.

9  
10   **Q3. PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL**  
11       **QUALIFICATIONS.**

12   **A.** Prior to working at EPE, I worked as the Research Coordinator for the City of  
13       El Paso's Department of Economic Development from 2007 to 2008. My duties  
14       included calculating incentive packages for new and expanding businesses,  
15       producing impact studies, and coordinating recruitment efforts with various public  
16       and private stakeholders.

17               In 2008, I began working for EPE as a Load Research Specialist, where I  
18       specialized in analyzing EPE's large customers. I was promoted to Senior  
19       Economist in 2011, where my responsibilities included the development of  
20       long-term energy, demand, and customer forecasts utilized for planning purposes.  
21       In 2014, I worked briefly for EPE's Energy Efficiency Department as a Program

**EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
GEORGE NOVELA**

1 Coordinator where I oversaw energy efficiency initiatives for residential  
2 customers in both Texas and New Mexico. In 2014, I was promoted to the  
3 Manager of Economic Research, where I oversaw the Company's long-term  
4 forecasting and load research programs. I was promoted to Director of Economic  
5 and Rate Research in 2021, where I manage and direct the activities of the Load  
6 Research and Data Analytics and Rates Departments.

7 I graduated from The University of Texas at El Paso with a Bachelor of  
8 Business Administration in Economics in 2006, a Master of Science in Economics  
9 in 2008, and a Master of Business Administration in Finance in 2012. I received a  
10 Graduate Certificate in Public Utility Regulation & Economics from New Mexico  
11 State University in 2014.

12 In addition, I occasionally teach undergraduate courses in  
13 Macroeconomics and Microeconomics at El Paso Community College.

14

15 **Q4. PLEASE DESCRIBE YOUR RESPONSIBILITIES WITH EPE.**

16 **A.** I manage and direct the activities of the Load Research and Data Analytics  
17 Department as well as the Rates Department. My responsibilities include the  
18 preparation of long-term customer, energy, and load forecasts, rates functions,  
19 preparation of weather normalization, analysis of load research data, and the  
20 preparation of load research studies and reports.

21

**EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
GEORGE NOVELA**

1 **Q5. HAVE YOU PREVIOUSLY PRESENTED TESTIMONY BEFORE**  
2 **UTILITY REGULATORY BODIES?**

3 **A.** Yes, I have previously filed testimony with the Public Utility Commission of  
4 Texas and the New Mexico Public Regulation Commission ("PRC" or  
5 "Commission").

6

7 **II. PURPOSE OF TESTIMONY**

8 **Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

9 **A.** The purpose of my testimony is to present and support EPE's Application for  
10 Approval of its Transportation Electrification Plan for Plan Years 2024-2026  
11 ("TEP" or "Plan"). After introducing the other witnesses in this case, my  
12 testimony addresses the following subjects:

- 13 • The TEP Application and EPE's request for approvals.
- 14 • Overview of EPE and its role in expansion and support of electrification  
15 transportation.
- 16 • EPE's current and forecasted EV market, expected load impact from EVs, and  
17 other Planning Horizon information.
- 18 • Compliance with 17.9.574 NMAC ("Rule 574" or "Rule"), the EV Statute,  
19 and stipulated commitments and other compliance requirements from Case  
20 No. 20-00241-UT.

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**III. SUMMARY OF APPLICATION**

4

**Q7. PLEASE SUMMARIZE EPE'S APPLICATION AND THE PROPOSED  
THREE-YEAR TEP.**

5

6

**A.** EPE's proposed TEP identifies the strategies and measures EPE is proposing for the Plan Years 2024-2026 to expand transportation electrification in EPE's New Mexico service area. EPE is proposing to continue the Residential Charging Program and EV Charging Installation Rebate Program programs, and EV rate options approved in Case No. 20-00114-UT and 20-00241-UT with modifications. EPE is also proposing several new programs, one new rate option, and an expanded customer education and outreach program.

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EPE proposes to continue to recover its costs of the TEP through Rate No. 44 - TEP Cost Rider using the deferred collection methodology approved in Case No. 21-00241-UT. EPE is not proposing to modify the currently effective TEP Cost Rider tariff as part of this filing. EPE will file a compliance advice notice for a Revised Rate No. 44 to adjust the TEP rider factor for the next twelve-month period, consistent with the methodology approved by the Commission.

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**Q8. WHAT COMMISSION APPROVALS IS EPE SEEKING IN THIS**

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1           **APPLICATION?**

2   **A.**    EPE requests approval of the TEP and specifically requests the following  
3           authorizations in this filing:

4           •   Authorization for the following TEP programs:

5               (a)   Residential Programs:

6                   1.   EV Smart Rewards NM Program

7                   2.   Smart Charging Program

8                   3.   Home Wiring Program

9                   4.   Electric Bicycle Rebate Program

10           (b)   Commercial Programs:

11                   1.   PowerConnect NM Program

12                   2.   EV Charging Equipment Rebate Program

13                   3.   EV Charging Installation Rebate Program

14                   4.   Take-Charge NM Program

15           (c)   New Construction Rebate Programs:

16                   1.   EV-Ready Homes Program

17                   2.   EV-Ready Multi-Unit Dwelling ("MUDs") Program

18           (d)   Partnership, Research, and Innovations ("PRI") Program

19           (e)   Customer Outreach Program

20           •   Approval of the proposed new experimental Demand Adjustment ("DA") Rider

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- 1           available for Rate Nos. 04 – General Service Rate and 09 – Large Power  
2           Service Rate;
- 3           • Approval of the proposed language changes to the Whole House/Whole  
4           Service Electric Vehicle ("WHEV/WSEV") Rate Rider Incentive Credits  
5           provision available for Rate Nos. 01 – Residential Service Rate, 03 – Small  
6           General Service Rate, 04 – General Service Rate, and 07 – City and County  
7           Service Rate;
  - 8           • Authorization to recover TEP costs through Rate No. 44 - TEP Cost Rider  
9           using the Commission approved deferred collection methodology;
  - 10          • Authorization of up to 90 days after Commission approval to implement new  
11          measures or modify existing measures into business operations;
  - 12          • Authorization to continue approved TEP measures, subject to availability of  
13          the approved cost, until the next TEP (to be filed in 2026) is approved by the  
14          Commission and implemented by EPE;
  - 15          • As necessary, variance from Commission Rule 17.9.530 NMAC, which  
16          prescribes minimum data requirements to be filed in support of a tendered new  
17          rate schedule; and
  - 18          • Any other approvals, authorization, and actions that may be required under the  
19          EV Statute, the Public Utility Act, or Commission Rule 574 to implement  
20          EPE's proposed TEP.

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2 **Q9. HAS EPE SUBMITTED A CORRESPONDING ADVICE NOTICE**  
3 **REFLECTING THESE CHANGES?**

4 **A.** Yes. EPE filed Advice Notice No. 289 concurrent with this filing.

5

6 **Q10. WHO ARE THE OTHER WITNESSES TESTIFYING FOR EPE IN THIS**  
7 **CASE?**

8 **A.** EPE employees Angelina Rodriguez and Brian Turaki also provide testimony in  
9 support of EPE's Application. Angelina Rodriguez is the Supervisor of EPE's  
10 Electrification Team. Ms. Rodriguez' testimony describes the measures and  
11 strategies presented in the TEP and associated costs and then addresses in detail  
12 the design, development, and objectives of the TEP.

13 Brian Turaki is a Rates Analyst with EPE's Rates Department. Mr. Turaki  
14 presents and supports EPE's request to recover TEP costs through EPE's Rate  
15 No. 44 - TEP Rate Rider, using the delayed collection methodology approved in  
16 Case No. 20-00241-UT. Mr. Turaki also presents and supports the following rate  
17 options presented in the TEP: proposed language changes to the WHEV/WSEV  
18 Rate Rider Incentive Credits provisions, and the Demand Adjustment Rider.

19

20 **IV. OVERVIEW OF EPE AND ROLE IN ELECTRIFICATION EXPANSION**

21 **Q11. PLEASE PROVIDE A BRIEF DESCRIPTION OF EPE.**

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1   **A.**   EPE is a vertically integrated investor-owned utility providing bundled electric  
2           service to approximately 460,000 retail and wholesale customers in a  
3           10,000 square mile area of the Rio Grande Valley in west Texas and southern  
4           New Mexico. Its service territory extends from Hatch, New Mexico south to  
5           Van Horn, Texas. EPE's principal industrial and large customers include a steel  
6           production facility, an oil refinery, several medical centers, two large universities,  
7           and several U.S. military installations, including White Sands Missile Range and  
8           Holloman Air Force Base in New Mexico and the U.S. Army at Fort Bliss in  
9           Texas. EPE directly employs approximately 1,128 people and is one of the  
10          largest companies headquartered in El Paso, Texas. The Company owns or has  
11          significant ownership interests in several electrical generating facilities providing  
12          it with a net dependable generating capacity of approximately 2,571 MW.

13

14   **Q12. WHAT IS EPE'S ROLE IN EXPANDING TRANSPORTATION**  
15    **ELECTRIFICATION IN ITS NEW MEXICO SERVICE TERRITORY?**

16   **A.**   EPE is responsible for the operation of the electric grid. Early planning is  
17          required to ensure the electric grid will be able to accommodate and support the  
18          increased demand caused as customers shift towards electric vehicles. EPE's role  
19          with regard to the anticipated expansion of transportation electrification is to  
20          (1) expand access to transportation electrification for all of its customers,  
21          including low-income and underserved communities; (2) expand access to

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1 transportation electrification for all EV market segments including light-,  
2 medium- and heavy-duty vehicles and electric bicycles; (3) improve customer  
3 understanding and awareness of EVs; (4) offer customers rate options and load  
4 management programs that may improve utilization of the Company's generation  
5 and grid assets; (5) support federal and state EV initiatives; (6) support customer  
6 choice in EV charging and third-party investment; and (7) conduct early planning  
7 and data collection to ensure the electric grid and system generation will be able  
8 to accommodate increased demand due to customers' EV adoption.

9  
10 **V. EV MARKET, LOAD GROWTH, AND PLANNING OUTLOOK**

11 **Q13. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

12 **A.** The purpose of this section of my testimony is to present EPE's current and  
13 forecasted EV market, expected load impact from EVs, and other Planning  
14 Horizon information. This information informed the design of the TEP programs  
15 presented by EPE witness Rodriguez.

16  
17 **A. EV MARKET**

18 **Q14. HAS EPE DETERMINED THE NUMBER OF EVS IN ITS NEW MEXICO**  
19 **SERVICE TERRITORY?**

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1   **A.**    Yes. There are an estimated 818 light-duty EVs in EPE's New Mexico Service  
2           territory as of December 2022.<sup>1</sup> Thirty five percent (292) of the total light-duty  
3           EV count of 818 were added in 2022. This recent rapid increase of light-duty EVs  
4           clearly shows an acceleration in EV adoption in EPE's service territory.

5

6   **Q15.   WHAT IS THE BASIS FOR THAT ESTIMATE?**

7   **A.**    EPE's Load Research and Data Analytics Department used publicly available EV  
8           registration data from the Electric Vehicles North Texas initiative of the  
9           Dallas-Fort Worth Clean Cities program and the number of customers in EPE's  
10          New Mexico jurisdiction to estimate the number of EVs in EPE's New Mexico  
11          service territory.

12

13   **Q16.   HAS EPE FORECASTED EV MARKET GROWTH IN ITS**  
14          **NEW MEXICO SERVICE TERRITORY OVER THE PLAN YEARS**  
15          **(2024-2026)?**

16   **A.**    Yes. EPE's Load Research and Data Analytics Department produces a yearly  
17          long-term light-duty EV forecast over a 20-year forecast horizon. EPE currently  
18          estimates that there will be 3,182 light-duty EVs in EPE's New Mexico service  
19          territory by the end of 2026.

---

<sup>1</sup> Dallas-Fort Worth Clean Cities Coalition, Electric Vehicles North Texas (EVNT), Electric Vehicles in Texas, January 2023. <<https://www.dfwcleancities.org/evsintexas>>

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2 **Q17. WHAT IS THE BASIS FOR THAT ESTIMATE?**

3 **A.** EPE's long-term light-duty EV forecast uses an S-Curve forecast model  
4 methodology and data from various sources, such as, U.S. Census Bureau, U.S.  
5 Department of Energy-National Renewable Energy Laboratory ("NREL"), U.S.  
6 Energy Information Administration ("EIA"), S&P Global, Energy Innovation:  
7 Policy and Technology LLC, and EPE.

8

9 **Q18. HAS EPE FORECASTED THE NUMBER OF EVS THAT WILL BE**  
10 **OWNED BY CUSTOMERS THAT RESIDE IN MUDS SUCH AS**  
11 **APARTMENTS?**

12 **A.** Yes. EPE's Load Research and Data Analytics Department estimates that there  
13 will be approximately 306 light-duty EVs at MUDs such as apartments, by the  
14 end of 2026.

15

16 **Q19. WHAT IS THE BASIS FOR THAT ESTIMATE?**

17 **A.** EPE's Load Research and Data Analytics Department estimated the number of  
18 customers who own an EV and reside in a MUD, utilizing its light-duty EV  
19 forecast and EV customer housing characteristics. The EV customer housing  
20 characteristics are based on a survey conducted by the Institute of Transportation

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1 Studies at the University of California-Davis<sup>2</sup> and adjusted using data from the  
2 U.S. Census Bureau<sup>3</sup> to better reflect the customers and housing characteristics of  
3 EPE's New Mexico service territory. The distribution of EV customers by housing  
4 type, coupled with the forecasted number of light-duty EVs, indicate the number  
5 of charging ports that will be needed at MUDs to support the forecasted EV  
6 growth.

7  
8 **Q20. FOR INFORMATION PURPOSES, HAS EPE FORECASTED EV**  
9 **MARKET GROWTH IN ITS NEW MEXICO SERVICE TERRITORY**  
10 **OVER THE PLANNING HORIZON (2027-2028)?**

11 **A.** Yes. In addition to light-duty EV forecast, EPE also produces forecasts for  
12 medium- and heavy-duty EVs. The market for medium- and heavy-duty EVs is  
13 still relatively small when compared to light-duty EVs. Early adoption of  
14 medium- and heavy-duty EVs has focused on regional haul, school buses and  
15 urban delivery. The reasons for these specific areas are (1) transportation routes  
16 are shorter requiring lower battery capacity; (2) predefined schedules and routes  
17 allow for optimized charging; and (3) the current high-power charging network  
18 along major long-haul corridors is very limited.

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<sup>2</sup> G. Tal, J.H. Lee, and M.A. Nicholas. Institute of Transportation Studies, UC Davis. Observed Charging Rates in California. September 2018.

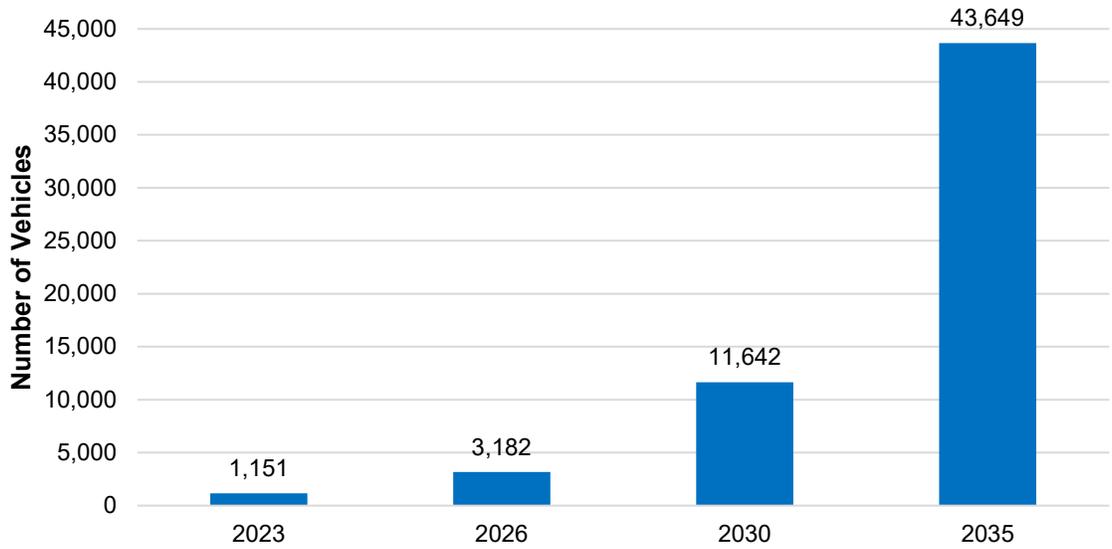
<sup>3</sup> U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates, Selected Housing Characteristics, Dona Ana County, New Mexico.  
<<https://data.census.gov/table?q=DP04&g=050XX00US35013&tid=ACSDP5Y2020.DP04>>



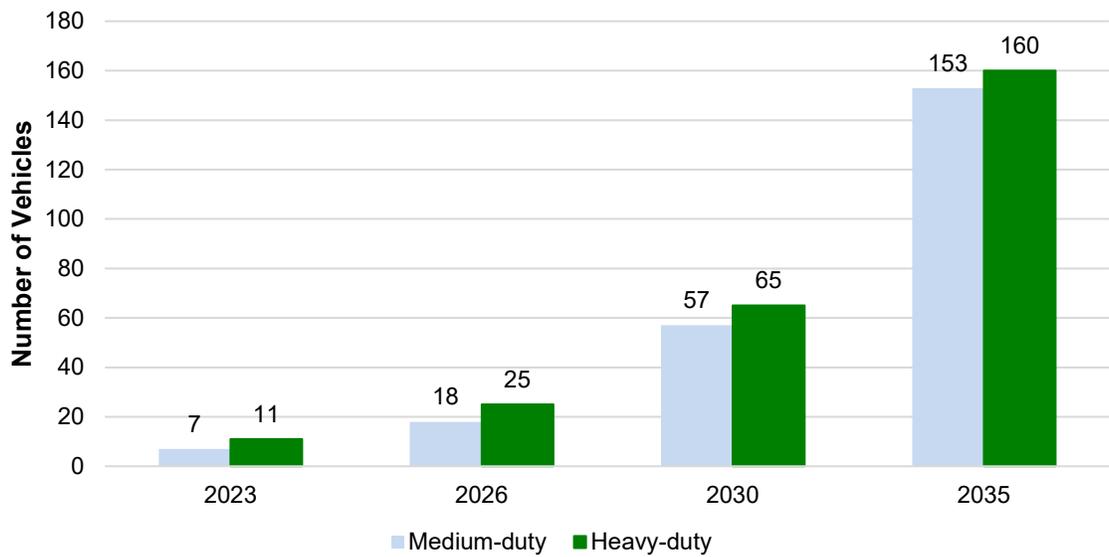
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**Figure 1.** Light-duty EV Forecast 2023-2035.



**Figure 2.** Medium and Heavy-duty EV Forecast 2023-2035.



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1 **Q21. WHAT IS THE BASIS FOR THAT ESTIMATE?**

2 **A.** EPE's long-term light-, medium- and heavy-duty EV forecasts use an S-Curve  
3 forecast model methodology and data from various sources, such as, U.S. Census  
4 Bureau, NREL, EIA, S&P Global, Energy Innovation: Policy and Technology  
5 LLC, and EPE.

6

7

**B. LOAD GROWTH**

8 **Q22. HAS EPE IDENTIFIED THE CHARGING INFRASTRUCTURE**  
9 **ALREADY IN PLACE IN EPE'S SERVICE TERRITORY?**

10 **A.** Yes. Please see the direct testimony of EPE witness Rodriguez for a detailed  
11 discussion of existing charging infrastructure in EPE's New Mexico service area.

12

13 **Q23. HAS EPE FORECASTED THE IMPACT OF EVS ON EPE'S**  
14 **NEW MEXICO NATIVE SYSTEM LOAD?**

15 **A.** Yes. EPE's Load Research and Data Analytics Department has forecasted 2 MW  
16 of additional demand at the time of system peak due to residential light-duty EV  
17 charging in EPE's New Mexico service territory by the end of 2026.

18

19 **Q24. DOES EPE CONSIDER 2 MW TO BE A LARGE IMPACT?**

20 **A.** No, 2 MW is a small value with respect to the native system load, i.e., 2 MW  
21 would be equivalent to 0.090% of the native system load (2,201 MW in 2022).

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1           However, this 2 MW is only the expected New Mexico residential light-duty  
2           electrification load through 2026. Although electrification load is expected to  
3           ramp up at faster pace beyond the year 2026, 2026 is highlighted because that will  
4           cover the approximate duration of the three-year plan. In addition, there will be  
5           other types of electrification load on EPE's system, such as medium and  
6           heavy-duty vehicle load.

7  
8           **Q25. WHAT IS THE BASIS FOR THAT ESTIMATE?**

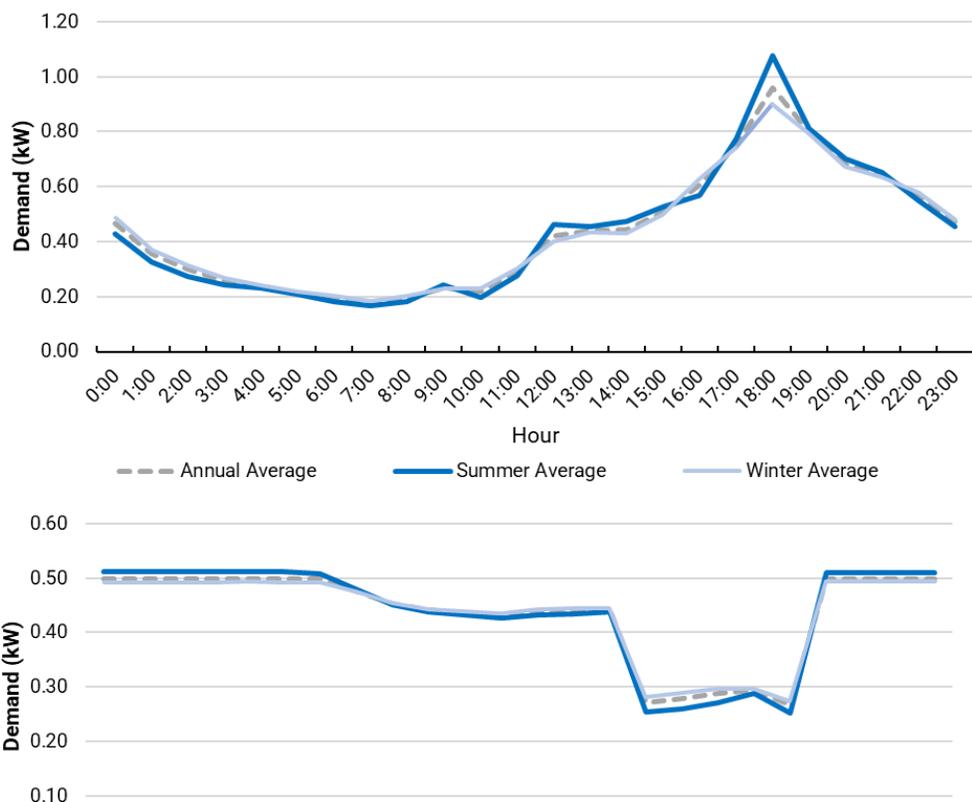
9           **A.** EPE's Load Research and Data Analytics Department used the number of  
10           forecasted light-duty EVs by 2026, and residential (level-1 and level-2) light-duty  
11           EV charging load profiles developed by Energy and Environmental Economics  
12           ("E3") for EPE. Two types of EV charging profiles were developed by E3 for  
13           EPE, non-managed and managed charging. The non-managed charging profile  
14           assumes that drivers are not sensitive to price signals or rate schedules and charge  
15           their vehicles whenever more charge is needed. The managed charging profile  
16           was developed based on driving data from the National Highway Traffic Safety  
17           Administration ("NHTSA") and an assumption that time-of-use pricing or other  
18           programs would be in place to incentivize most customers to shift electric vehicle  
19           charging away from peak load hours.

20                        Figures 3 and 4 show the hourly residential non-managed and managed  
21           charging profiles, respectively. Figures 3 and 4 also show the comparison of the

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1        respective average hourly charging profiles on a yearly basis, for summer and  
 2        winter months. The managed charging profile has a much flatter load profile and  
 3        significantly reduces the impact of EVs on peak demand hours in the late  
 4        afternoon and early evening. Even though the charging demand of a light-duty EV  
 5        can reach maximums between 1.2-1.4kW (level 1) and 3.3-19.2 kW (level 2), the  
 6        actual average demand is lower as there are many hours where the EVs are not  
 7        charging. For EPE's long-term light-duty EV forecast conducted in 2023,  
 8        non-managed charging was assumed as the predominant charging method with a  
 9        year over year share of EV customers transitioning to managed charging moving  
 10       forward. This assumption was made as, over time, it is expected that most of  
 11       EPE's customers that own an EV will enroll in time-varying rates that incentivize  
 12       off-peak charging or other managed charging programs as they become available.

13       **Figure 3. Average Light-Duty EV Residential Non-Managed Charging Profiles.**

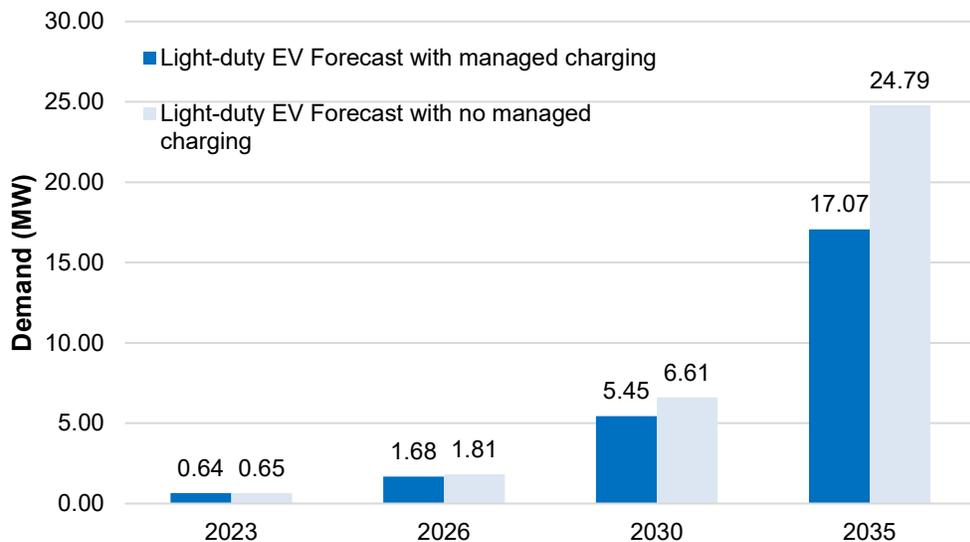


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1 **Q26. HAS EPE ALSO DEVELOPED A LONGER-TERM ENERGY AND**  
2 **DEMAND FORECAST RELATED TO THE POTENTIAL IMPACT OF**  
3 **EVS ON THE EPE SYSTEM?**

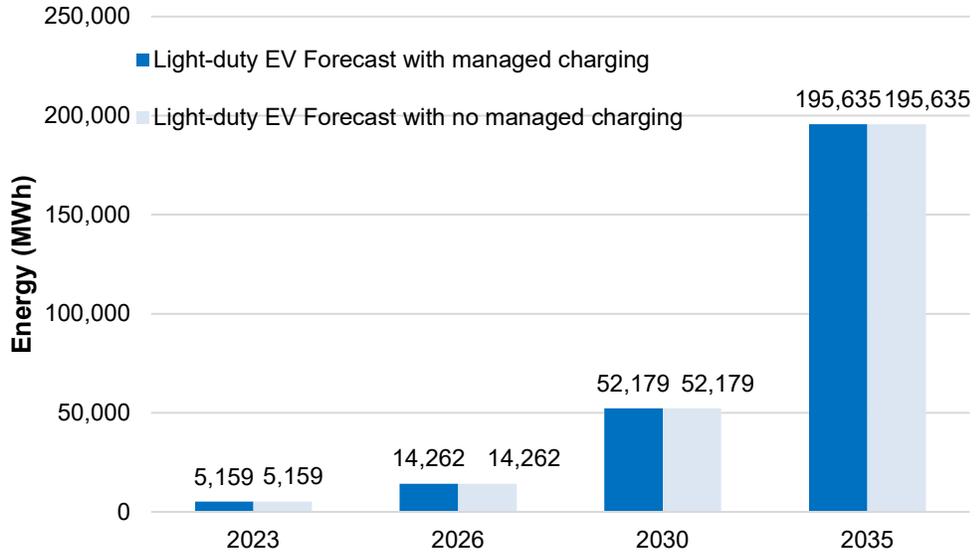
4 **A.** Yes. Figures 5 and 6 show EPE's light-duty EV energy (MWh) and demand  
5 (MW) forecast through 2035. Figure 5 also provides a comparison of EPE's  
6 light-duty EV forecast where unmanaged charging is available. This comparison  
7 is to show the growth of demand if no managed charging is available and the  
8 potential impacts it can have on EPE's system. EPE estimates that on average  
9 each additional light-duty EV consumes approximately 4,482 kWh per year.  
10 Although the transition towards managed charging does not have a significant  
11 impact on total kWh consumption, there is a significant impact on demand. As  
12 seen in Figure 4, the energy requirements are the same for both scenarios;  
13 however, as seen in Figure 3, the magnitude of the demand is substantially greater  
14 for the case where unmanaged charging occurs.

15 **Figure 5. Light-duty EV Demand (MW) Forecast 2023-2035.**



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**Figure 6. Light-duty EV Energy (MWh) Forecast 2023-2035.**



EPE also produces forecasts for medium and heavy-duty EVs in order to account for future load additions to EPE's system. Figures 6 and 7 show the forecasted energy (MWh) and demand (MW) for EPE's NM jurisdiction through 2035, respectively.

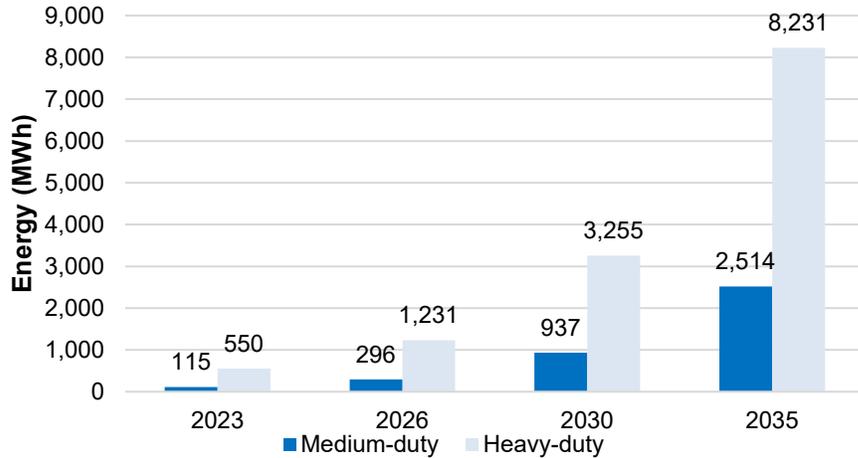
Figures 7 and 8 show that the energy and demand requirements for heavy-duty EVs is greater than medium-duty EVs although the projected number of medium-duty EVs are similar. This is due to the size of the batteries of the vehicles and the duty-cycles for which these are utilized. It is expected that collectively medium and heavy-duty EV will add approximately 0.35 MW at the time of the system peak by 2026.

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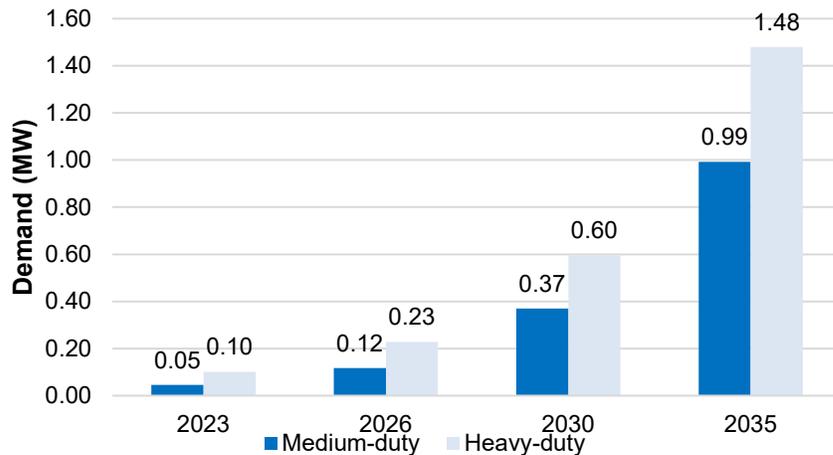
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**Figure 7.** Medium and Heavy-duty EV Energy (MWh) Forecast 2023-2035.



**Figure 8.** Medium and Heavy-duty EV Demand (MW) Forecast 2023-2035.



**Q27. WHAT IS THE BASIS FOR THAT ESTIMATE?**

**A.** EPE's long-term medium and heavy-duty EV forecasts use an S-Curve forecast model methodology and data from various sources, such as, U.S. Census Bureau, NREL, EIA, S&P Global, Energy Innovation: Policy and Technology LLC, and EPE. To estimate demand impacts of medium and heavy-duty EVs, charging

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1 time of commercial EVs were obtained from the California Energy Commission's  
2 California Vehicle Survey<sup>4</sup> and typical electric vehicle supply equipment  
3 charging power are assumed based on the duty cycles of the vehicles, i.e., 25 kW  
4 for medium-duty EVs and 50 kW for heavy-duty EVs.

5

6 **Q28. DOES EPE EMPLOY THESE ELECTRIFICATION FORECASTS FOR**  
7 **ITS NATIVE SYSTEM PLANNING?**

8 **A.** Yes. Currently EPE adjusts its native system load forecast to account for light,  
9 medium and heavy-duty electric vehicles.

10

11 **Q29. DOES EPE ANTICIPATE OTHER TYPES OF ELECTRIFICATION**  
12 **LOAD IN FUTURE YEARS?**

13 **A.** Yes. Electrification load is expected to come from a variety of areas, such as  
14 light-duty, medium-duty, and heavy-duty vehicles. Furthermore, electrification  
15 load may also grow in other sectors, such as manufacturing or in mass  
16 transportation.

17

18 **Q30. WILL THE PROPOSED TEP MEASURES ASSIST EPE IN STUDYING**

---

<sup>4</sup> California Energy Commission, 2019 California Vehicle Survey, Typical Daily Onsite Charging Times for Commercial Plug-in Electric Vehicles. Accessed December 30, 2022. <<https://www.energy.ca.gov/data-reports/surveys/california-vehicle-survey>>

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1           **THE IMPACT OF EVS ON FUTURE EPE RESOURCE PLANNING?**

2    **A.**    The proposed TEP will assist EPE in examining how EV programs affect the  
3            efficiency of system generation resources, analyzing potential demand impacts as  
4            EV adoption increases, evaluating the potential to help improve system  
5            operational flexibility (especially with regard to integration of variable resources),  
6            and improving system generation resource utilization during off-peak hours. For  
7            example, in a technical report prepared by the Pacific Northwest National  
8            Laboratory ("PNNL"), it was found that EV charging load could reduce  
9            renewable curtailments. Furthermore, the PNNL study found that EV managed  
10           charging has significant operational benefits in solar-rich areas where it can  
11           reduce the "duck curve" by reducing the coincident peak and the ramp  
12           requirements in the evening when the sun sets.<sup>5</sup> EPE regularly reviews and  
13           considers studies developed by the U.S. Department of Energy Laboratories such  
14           as the PNNL study in developing its forecasts of loads and resources.

15  
16    **Q31. DOES EPE ANTICIPATE GRID MANAGEMENT REQUIREMENTS**  
17            **AND PEAK LOAD REQUIREMENTS TO RELIABLY ACCOMMODATE**  
18            **EXPANDED TRANSPORTATION ELECTRIFICATION?**

---

<sup>5</sup> Pacific Northwest National Laboratory, Electric Vehicles at Scale – Phase I Analysis: High EV Adoption Impacts on the Western U.S. Power Grid, Technical Report, July 2020. <[https://www.pnnl.gov/sites/default/files/media/file/EV-AT-SCALE\\_1\\_IMPACTS\\_final.pdf](https://www.pnnl.gov/sites/default/files/media/file/EV-AT-SCALE_1_IMPACTS_final.pdf)>

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1    **A.**    Yes. As planned, the additional load requirements caused by EV charging can be  
2           incentivized to shift toward off-peaks periods that in turn will minimize impacts  
3           to generation as well as operation and management of the grid.

4

5    **Q32. HAS EPE EVALUATED WHETHER THESE REQUIREMENTS MAY BE**  
6           **REDUCED BY IMPROVED DISTRIBUTION PLANNING, RATE DESIGN**  
7           **OR OTHER SOLUTIONS?**

8    **A.**    EPE will continuously review how peak load can be reduced with grid  
9           management strategies and by engaging in proactive advisory services with  
10          commercial customers, offering special EV rate options, evaluating data from the  
11          EV Smart Rewards NM Program as well as reviewing the results of programs  
12          conducted through the PRI program.

13

14   **Q33. HAS EPE FORECASTED POTENTIAL FOR MEETING NEW LOAD**  
15          **GROWTH ASSOCIATED WITH EV CHARGING INFRASTRUCTURE**  
16          **WITH RENEWABLE ENERGY?**

17   **A.**    Yes. As part of the latest integrated resource planning process described in EPE's  
18          2021 Integrated Resource Plan ("IRP"), EPE included sensitivities for forecasted  
19          EV load and how EPE is expecting to serve total load requirements. In the IRP  
20          process, EPE models in future renewable resources to be compliant with

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1 New Mexico's renewable portfolio standards, as well as provides energy to satisfy  
2 load requirements from EV load.

3

4 **C. OTHER INFORMATION FOR PLANNING HORIZON**

5 **Q34. HAS EPE EVALUATED LEAD TIMES FOR COORDINATING WITH**  
6 **STAKEHOLDERS FOR PLANNED CONSTRUCTION OR PLANNED**  
7 **DEPLOYMENTS DURING THE PLANNING HORIZON?**

8 **A.** Yes. Please see the direct testimony of EPE witness Rodriguez for a detailed  
9 discussion.

10

11 **Q35. HAS EPE EVALUATED POTENTIAL INTEGRATION OR**  
12 **COORDINATION WITH NEIGHBORING UTILITIES, RURAL**  
13 **ELECTRIC COOPS, TRIBES, OR PUEBLOS?**

14 **A.** Yes. Please see the direct testimony of EPE witness Rodriguez for a description of  
15 EPE's coordination efforts.

16

17 **Q36. DOES EPE ANTICIPATE MAKING REQUESTS FOR OTHER**  
18 **REGULATORY APPROVALS TO CARRY OUT THIS TEP?**

19 **A.** No. Please see the direct testimony of EPE witness Rodriguez.

20

21 **Q37. DOES EPE ANTICIPATE MAKING REQUESTS FOR OTHER**

**EL PASO ELECTRIC COMPANY  
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1           **REGULATORY APPROVALS TO EFFECTUATE A FUTURE TEP IN**  
2           **THE PLANNING HORIZON, TO SUPPORT THE TRANSITION**  
3           **BETWEEN TEPS AND TO COORDINATE WITH STATE AND**  
4           **FEDERAL EV INFRASTRUCTURE PLANNING?**

5    **A.**    No. Please see the direct testimony of EPE witness Rodriguez.

6

7    **Q38. IS EPE AWARE OF EXPECTED OR POTENTIAL POLICY OR**  
8           **STATUTORY ISSUES THAT COULD IMPACT EXPANDED**  
9           **INFRASTRUCTURE OR NETWORK UPGRADES REQUIRED BY**  
10          **EXPANDED TRANSPORTATION ELECTRIFICATION IN EPE'S**  
11          **SERVICE TERRITORY?**

12   **A.**    No. EPE will monitor policy and statutory issues that could impact expanded  
13          infrastructure or network upgrades throughout the proposed TEP Plan Years to  
14          proactively provide feedback on the issues during legislative sessions.

15

16                                   **VI. COMPLIANCE REQUIREMENTS**

17   **Q39. HAS THE COMMISSION ADOPTED A RULE TO IMPLEMENT THE EV**  
18          **STATUTE?**

19   **A.**    Yes. Following approval of EPE's initial TEP in Case No. 20-00241-UT, the  
20          Commission opened Docket No. 22-00085-UT to promulgate a new rule at

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1           17.9.574 NMAC ("Rule 574" or "Rule") to implement the EV Statute. Rule 574  
2           became effective February 14, 2023.

3                       Section 17.9.574.11 of the new Rule addresses electric utility applications  
4           for approval of a proposed three-year plan to expand transportation electrification.  
5           Specifically, Subsections 11(B) and (C) identify the minimum information to be  
6           included in a utility's three-year TEP; Subsection 11(D) identifies additional  
7           information to be presented for informational purposes only in a utility's planning  
8           outlook addressing the two-year period beyond the three-year plan (the "Planning  
9           Horizon"); and Subsection 11(E) identifies information to be included in the  
10          utility's TEP Application.

11  
12   **Q40. DOES EPE'S TEP INCLUDE THE MINIMUM INFORMATION**  
13   **IDENTIFIED IN RULE 574.11(B) AND (C)?**

14   **A.** Yes, please refer to EPE witness Rodriguez's testimony for description of  
15   strategies and measures included in EPE's proposed TEP and the objectives of the  
16   TEP which address the requirements set forth in Rule 574.11(B) and (C).

17  
18   **Q41. DOES THE TEP ALSO INCLUDE A PLANNING OUTLOOK WITH THE**  
19   **INFORMATION IDENTIFIED IN RULE 574.11(D)?**

20   **A.** Yes. I addressed Rule 574.11(D)(1), (5), (6), and (7) related to forecasted EV  
21   market, anticipated grid management requirements, projected peak load, and the

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1 forecasted potential for meeting new load growth in my testimony. EPE witness  
2 Rodriguez addresses Rule 574.11(D)(2), (3), and (4) related to infrastructure  
3 planning, anticipated requests for regulatory approvals to effectuate a future TEP  
4 in the planning horizon, and any expected or potential policy or statutory issues  
5 that could impact expanded infrastructure or network upgrades. Please see the  
6 table below for a breakout of what subparts to Rule 574.11(D) are covered by  
7 which EPE witness.

8  
9 **Table 1.** EPE Witness Assignment of Subparts to Rule 574.11(D).

| <b>EPE Witness</b> | <b>17.9.574.11(D)</b> |
|--------------------|-----------------------|
| George Novela      | 1                     |
| Angelina Rodriguez | 2                     |
| Angelina Rodriguez | 3                     |
| Angelina Rodriguez | 4                     |
| George Novela      | 5                     |
| George Novela      | 6                     |
| George Novela      | 7                     |

10  
11  
12  
13  
14  
15  
16 **Q42. DOES EPE'S APPLICATION COMPLY WITH RULE 574.11(E)?**

17 **A.** Yes. EPE witness Rodriguez's testimony addresses Rule 574.11(E)(1), (2) and (4)  
18 by providing (i) a full explanation of EPE's determination of the Plan Year's  
19 transportation electrification strategies and measures to be undertaken and their  
20 corresponding budgets; (ii) the costs of transportation electrification measures in  
21 the Plan Years and how the cost were determined. EPE witness Turaki addresses

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1 cost recovery in satisfaction of Rule 574.11(E)(3). Finally, both EPE witness  
2 Rodriguez and my testimony address 574.11(E)(5) demonstrating that the TEP is  
3 reasonably and prudently designed and expected to accomplish many of the goals  
4 of the TEP pursuant to Section 62-8-12 (B) of the EV Statute.

5

6 **Q43. DID EPE CONSIDER THE GOALS OF THE EV STATUTE IN DESIGN**  
7 **OF THE 2023 TEP?**

8 **A.** Yes. Please see the direct testimony of EPE witness Rodriguez.

9

10 **Q44. ARE THERE AGREEMENTS IN THE STIPULATION APPROVED BY**  
11 **THE COMMISSION IN CASE NO. 20-00241-UT THAT ARE RELEVANT**  
12 **TO THIS FILING?**

13 **A.** Yes. In addition to modifications to EPE's TEP and corresponding budgets, the  
14 Commission approved Stipulation included the following agreements related to:  
15 **Customer Outreach and Stakeholder Engagement:**

16 ¶ 1.7.3: During the term of this TEP, EPE will: (1) explore opportunities for  
17 hands on EV demonstrations (EV driving experience); (2) engage with the City of  
18 Las Cruces to identify possible ways to support the City's development of an EV  
19 ride sharing program; and (3) explore opportunities to collaborate with  
20 community based organizations regarding education, marketing, and outreach  
21 components of the TEP for LI customers

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1        ¶ 3.2: Upon approval of this TEP, EPE will hold stakeholder meetings no less  
2        than every six months for the duration of this TEP to provide a regular forum for  
3        EPE to present on its TEP implementation and solicit feedback from interested  
4        parties on implementation of this TEP and development of EPE's next TEP

5        **Rate Design and Cost Recovery:**

6        ¶ 2.3.2: EPE will study system loads and resources during the term of this  
7        stipulated agreement to evaluate revising the Super Off-Peak period in a future  
8        TEP filing or rate case.

9        ¶ 3.4: Within its next TEP filing (or before), EPE will propose a new rate designed  
10       to meet the needs of public charging site hosts, particularly those offering DCFC  
11       charging services.

12       ¶ 2.4: Subject to Commission approval of a regulatory asset to record program  
13       costs as they are incurred until the time they are collected through the TEP Rider,  
14       EPE agrees to apply the following deferred collection methodology for its TEP  
15       Cost Rider: (i) EPE will record TEP costs for the first year of the TEP in a  
16       regulatory asset as they occur, and apply carrying charges at the Customer  
17       Deposit Interest Rate set annually by the Commission; (ii) EPE will file a  
18       compliance advice notice for Rate No. 44 no later than thirteen months after the  
19       effective date of EPE's TEP programs to recover the actual TEP costs incurred  
20       during the first twelve months of this TEP; (iii) Starting on the first day of the  
21       thirteenth month of this program, EPE will reconcile the recorded TEP expenses

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1 and TEP Rider revenues on a monthly basis and use the net amount to calculate  
2 the cumulative balance in the regulatory asset to apply carrying charges monthly;  
3 (iv) Thereafter, on an annual basis, EPE will file a compliance advice notice for a  
4 Revised Rate No. 44 to adjust the TEP rider factor for the next twelve-month  
5 period based upon the balance in the TEP regulatory asset of the prior year.

6 **Reporting**

7 ¶ 3.1: EPE will file an annual report in this docket that provides the following  
8 information: (i) For each category of rebate, the total number of rebates that were  
9 requested and approved and the location zip code for each approved rebate; (ii) A  
10 summary of public outreach and education programs; (iii) The number of  
11 customers taking service under EPE's approved EV Rates and usage during on-  
12 peak, off-peak, and super off-peak. EPE's reporting commitment will terminate  
13 once EPE files its next TEP.

14 In addition, the Commission's Final Order, issued on November 10, 2021  
15 ordered EPE to file a detailed outreach plan within three months of the issuance of  
16 the Order.

17  
18 **Q45. HAS EPE COMPLIED WITH THE ABOVE LISTED COMMITMENTS**  
19 **AND COMPLIANCE REQUIREMENTS RELATED TO CUSTOMER**  
20 **OUTREACH AND STAKEHOLDER ENGAGEMENT?**

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1   **A.**    Yes. As reflected in Docket No. 20-00241-UT, EPE filed its Revised Outreach  
2           Plan Pursuant to Order Adopting Corrected Certification of Stipulation with  
3           Modifications on February 10, 2022, less than three months after the Final Order  
4           was issued. EPE's Revised Outreach Plan was approved by Commission Order,  
5           issued May 18, 2022. EPE witness Rodriguez addresses the other stipulated  
6           agreements and commitments related to Customer Outreach and Stakeholder  
7           Engagement during the term of the last TEP.

8

9   **Q46. HAS EPE COMPLIED WITH THE ABOVE LISTED COMMITMENTS**  
10           **AND COMPLIANCE REQUIREMENTS RELATED TO REPORTING?**

11   **A.**    Yes. The Commission granted EPE a variance from the requirement to submit  
12           reports bi-annually from the date of a final order, to instead allow EPE to submit  
13           its first bi-annual report no later than seven months from the implementation date  
14           of its TEP and then to submit subsequent reports every six months thereafter for  
15           the duration of reporting requirements set forth in the Commission Final Order.  
16           Pursuant to that Order, EPE filed its first Bi-Annual Transportation Electrification  
17           Plan Report on August 1, 2022 and filed its second Bi-Annual Transportation  
18           Electrification Plan Report six months later on February 1, 2023.

19

20   **Q47. WHEN WILL EPE FILE ITS NEXT TEP REPORT?**

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1   **A.**   EPE's stipulated reporting commitment terminated with the filing of this TEP,  
2           pursuant to the terms of the Commission approved Stipulation. EPE will file its  
3           first annual progress report by July 1, 2024, pursuant to Rule 574 and will file  
4           annually thereafter by July 1st.

5

6   **Q48. HAS EPE COMPLIED WITH THE ABOVE LISTED COMMITMENTS**  
7           **AND COMPLIANCE REQUIREMENTS RELATED TO COST**  
8           **RECOVERY?**

9   **A.**   Yes. On January 30, 2023, EPE filed Original Rate No. 44 - Transportation  
10          Electrification Plan (TEP) Cost Rider with Advice Notice No. 282 for  
11          implementation of EPE's Cost Rider for recovery of EPE's actual TEP program  
12          costs for 2022. The rate was effective March 1, 2023.

13

14   **Q49. HAS EPE COMPLIED WITH THE ABOVE LISTED COMMITMENTS**  
15          **AND COMPLIANCE REQUIREMENTS RELATED TO RATE DESIGN?**

16   **A.**   Yes. EPE witness Turaki addresses EPE compliance with these commitments.

17

18   **Q50. DOES EPE SEEK ANY VARIANCES?**

19   **A.**   EPE seeks a variance from the minimum data requirements for  
20          17.9.530 ("Rule 530") to the extent required to review and approve its revised

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1 RPS Cost Rider. The extensive data schedules required under Rule 530 are  
2 unnecessary for review and approval of the revised Rider EPE is requesting here.

3

4

**VII. CONCLUSION**

5 **Q50. PLEASE SUMMARIZE YOUR TESTIMONY.**

6 **A.** EPE designed the TEP portfolio to continue to expand access to transportation  
7 electrification for all of its customers, including low-income and underserved  
8 communities, improve customer understanding and awareness of EVs, reduce  
9 charging infrastructure gaps, reduce greenhouse gas emissions and air pollution,  
10 offer rate options that incentive off-peak charging and can potentially improve  
11 electric grid efficiency, system utilization and facilitate future operational  
12 flexibility. In addition, the TEP was designed to continue to support customer  
13 choice in EV charging and third-party investment, support creation of additional  
14 skilled jobs, and assess grid infrastructure adequacy, consistent with statutory  
15 requirements. Thus, the Commission should approve EPE's proposed TEP filing  
16 for Plan Years 2024-2026 and the authorizations requested therein.

17

18 **Q51. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

19 **A.** Yes, it does.

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

|   |   |                            |
|---|---|----------------------------|
| <b>IN THE MATTER OF EL PASO</b>           | ) |                            |
| <b>ELECTRIC COMPANY'S APPLICATION</b>     | ) |                            |
| <b>FOR APPROVAL OF ITS TRANSPORTATION</b> | ) |                            |
| <b>ELECTRIFICATION PLAN FOR 2024-2026</b> | ) |                            |
|   | ) | <b>CASE NO. 23-00__-UT</b> |
|   | ) |                            |
|   | ) |                            |
| <b>EL PASO ELECTRIC COMPANY,</b>          | ) |                            |
| <b>Applicant.</b>                         | ) |                            |
| <hr style="border: 1px solid black;"/>    |   |                            |

**DECLARATION OF GEORGE NOVELA IN SUPPORT OF THE FOREGOING  
DIRECT TESTIMONY OF EL PASO ELECTRIC COMPANY'S APPLICATION FOR  
APPROVAL OF ITS TRANSPORTATION ELECTRIFICATION PLAN FOR 2024-2026**

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 *Director of Economic and Rate Research*

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

4. I submit this Declaration, based upon my personal knowledge and upon information and belief, in support of EPE's *Application for Approval of its Transportation Electrification Plan for 2024-2026*.

FURTHER, DECLARANT SAYETH NAUGHT.

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

Executed on June 30, 2023.

/s/ *George Novela*

GEORGE NOVELA

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF EL PASO )  
ELECTRIC COMPANY'S APPLICATION )  
FOR APPROVAL OF ITS TRANSPORTATION )  
ELECTRIFICATION PLAN FOR 2024-2026 )  
 )  
 )  
 )  
EL PASO ELECTRIC COMPANY, )  
Applicant. )  
\_\_\_\_\_ )**

**CASE NO. 23-00\_\_-UT**

**DIRECT TESTIMONY OF  
ANGELINA RODRIGUEZ  
ON BEHALF OF  
EL PASO ELECTRIC COMPANY**

**JUNE 30, 2023**

**EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
ANGELINA RODRIGUEZ**

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**EXHIBIT**

- Exhibit AR-1 – EPE's Transportation Electrification Plan for Plan Years 2024-2026
- Exhibit AR-2 – TEP Stakeholders
- Exhibit AR-3 – Customer Surveys
- Exhibit AR-4 – Federal and State Programs

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**I. INTRODUCTION AND QUALIFICATIONS**

**Q1. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

**A.** My name is Angelina Rodriguez. My business address is 100 North Stanton Street, El Paso, Texas, 79901.

**Q2. HOW ARE YOU EMPLOYED?**

**A.** I am employed by El Paso Electric Company ("EPE" or the "Company") as the Supervisor of Electrification.

**Q3. PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL QUALIFICATIONS.**

**A.** I have worked in El Paso Electric's Sustainability and Energy Solutions Department (formerly named Corporate Development Department and Renewables and Emergent Technologies Department) since I started with the Company in 2013. I am currently the Supervisor of EPE's Electrification Team and have been in that role since April 2022. Prior to this position, I was a Senior Project Manager in charge of the development and implementation of the Company's transportation electrification projects for approximately two years, including the development and filing of EPE's prior TEP filing.

I started as an Associate Staff where I was responsible for the Company's process improvement initiatives as well as coordination of Distributed Generation

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1 ("DG") interconnection process. Then I was promoted to the role of a Project  
2 Manager where I was responsible for the successful implementation of the Texas  
3 Community Solar Program and EPE's Demand Response Pilot Programs in both  
4 the Texas and New Mexico jurisdictions. In this role, I was also responsible for  
5 keeping track of the Company's Renewable Energy Credits ("RECs") for meeting  
6 New Mexico Renewable Portfolio Standard ("RPS") requirements and assisting  
7 with preparation of the annual RPS report.

8 I was awarded a Master of Business Administration in Finance with Honors  
9 from the University of Texas at El Paso in 2015 and a Graduate Certificate in Public  
10 Utilities Regulation and Economics ("PURE") from New Mexico State University  
11 in 2018. I also earned my Project Management Professional ("PMP") certification  
12 from the Project Management Institute in 2015.

13 I also served as a Director for the National Electric Vehicle Association in  
14 2022, and currently serve as a Vice-President of the Rio Grande Electric Auto  
15 Association.

16  
17 **Q4. PLEASE DESCRIBE YOUR CURRENT RESPONSIBILITIES WITH EPE.**

18 **A.** As the Supervisor of Transportation Electrification, I lead the development of the  
19 Company's transportation electrification strategies, initiatives, and projects. In my  
20 role, I provide oversight and assistance to the EPE Electrification Team related to  
21 pilot program development and implementation, customer outreach initiatives,

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1 technical evaluations, and implementation of new technology solutions in the  
2 Company's business operations.

3

4 **Q5. HAVE YOU PREVIOUSLY PRESENTED TESTIMONY BEFORE**  
5 **UTILITY REGULATORY BODIES?**

6 **A.** Yes, I have submitted testimony before the Public Utility Commission of Texas.

7

8

**II. PURPOSE OF TESTIMONY**

9 **Q6. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 **A.** The purpose of my testimony is to support EPE's Application for Approval of its  
11 Transportation Electrification Plan for Plan Years 2024-2026 ("TEP" or "Plan"). I  
12 also sponsor EPE's TEP which is attached to my Testimony as Exhibit AR-1. In  
13 addition to sponsoring the TEP, my testimony provides a summary of the measures  
14 and strategies presented in the TEP and then addresses the following:

- 15
- 16 • explanation of the design and development of the TEP;
  - 17 • EPE's determination of the transportation electrification expansion measures to  
18 be undertaken, the costs of the transportation electrification measures in the  
19 Plan Years, and how the cost and amount were determined;
  - 20 • demonstration that the proposed TEP is reasonably and prudently designed and  
21 expected to accomplish the goals and objectives of 17.9.574 NMAC  
("Rule 574") and Section 62-8-12 (the "EV Statute"); and



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- 1                   4. Take-Charge NM Program  
2  
3           (c) New Construction Rebate Programs:  
4                   1. EV-Ready Homes Program  
5                   2. EV-Ready Multi-Unit Dwellings ("MUDs") Program  
6  
7           (d) Partnership, Research, and Innovations Program  
8           (e) Customer Outreach Program  
9           (f) Rate Options:  
10                   1. Language changes to the Whole House/Whole Service EV Rate Rider  
11                    Incentive Credit applicable under Rate Nos. 01 – Residential Service  
12                    Rate, 03 – Small General Service Rate, 04 – General Service Rate, and 07  
13                    – City and County Service Rate; and  
14                   2. New Demand Adjustment Rider for Rate Nos. 04 – General Service Rate  
15                    and 09 – Large Power Service Rate.  
16

17                   These proposed TEP measures are described in the TEP attached to my  
18                   testimony as Exhibit AR-1 and addressed in my testimony. EPE witness Turaki  
19                   presents and supports the proposed modified and new rate options. EPE witness  
20                   George Novela presents and supports EPE's current and forecasted EV market,  
21                   expected load impact from EVs, and other Planning Horizon information which  
22                   informed the design of the TEP programs.  
23

24   **Q9.   WHAT IS THE TOTAL PROPOSED COST OF THE TEP?**

25   **A.**   The total proposed cost for the three-year plan is \$14,655,588. A breakdown of the  
26                   projected costs by measure is provided in Table 1 below.

**EL PASO ELECTRIC COMPANY  
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**Table 1: Proposed TEP Cost**

| TEP Component   | Total Cost           |
|---|----------------------|
| <b>Residential Programs</b>                           |                      |
| <b>EV Smart Rewards NM Program</b>                    | \$ 714,745           |
| <b>Smart Charging Program</b>                         | \$ 180,815           |
| <b>Home Wiring Program</b>                            | \$ 487,780           |
| <b>Panel upgrade (if required)</b>                    | \$ 183,968           |
| <b>Electric Bicycle Rebate Program</b>                | \$ 145,073           |
| <b>Commercial Programs</b>                            |                      |
| <b>PowerConnect NM Program</b>                        | \$ 1,890,568         |
| <b>EV Charging Equipment Rebate Program</b>           | \$ 1,635,745         |
| <b>EV Charging Installation Rebate Program</b>        | \$ 1,530,798         |
| <b>Take-Charge NM Program</b>                         | \$ 1,313,222         |
| <b>New Construction Programs</b>                      |                      |
| <b>EV-Ready Homes Program</b>                         | \$ 141,919           |
| <b>EV-Ready MUDs Program</b>                          | \$ 157,688           |
| <b>TEP Expansion Programs</b>                         |                      |
| <b>Partnership, Research, and Innovations Program</b> | \$ 3,153,750         |
| <b>Customer Outreach Program</b>                      | \$ 2,063,955         |
| <b>Administrative</b>                                 | \$ 1,055,562         |
| <b>Total TEP Cost</b>                                 |                      |
| <b>Total</b>  | <b>\$ 14,655,588</b> |

I discuss how the projected costs were developed and determined later in my testimony.

**Q10. ARE THESE ESTIMATED COSTS REASONABLE?**

**A.** Yes, the estimated costs are reasonable based on projected EV adoption rates in EPE's New Mexico service territory.

**EL PASO ELECTRIC COMPANY  
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1 **Q11. HOW IS EPE PROPOSING TO RECOVER THE TEP COSTS?**

2 **A.** EPE proposes to recover these costs to expand electrification of transportation  
3 through its TEP cost rider, as further described in direct testimonies of EPE  
4 witnesses Novela and Turaki.

5

6 **IV. TEP PLANNING AND DEVELOPMENT**

7 **Q12. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

8 **A.** The purpose of this section is to describe EPE's efforts in the planning and  
9 development of the proposed TEP. Specifically, I address the current and forecasted  
10 EV adoption rates and availability of public charging infrastructure that informed  
11 EPE's TEP program design. I also describe how EPE engaged with customers and  
12 other stakeholder groups to solicit feedback on initial TEP programs and  
13 recommendations for measures to be proposed in this filing. Finally, I discuss how  
14 EPE's TEP complements State and Federal programs and grants.

15

16 **A. NM EV MARKET AND PUBLIC CHARGING ASSESSMENT**

17 **Q13. DOES EPE HAVE INFORMATION ON THE NUMBER OF EVS IN ITS  
18 NEW MEXICO SERVICE TERRITORY?**

19 **A.** Yes. EPE witness Novela presents and supports data on the number of EVs in EPE's  
20 New Mexico Service territory, currently, and EPE's forecasted EV market growth

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1 in its New Mexico service territory over the Plan Years (2024-2026) and the  
2 Planning Horizon (2027-2028), for informational purposes.

3  
4 **Q14. PLEASE IDENTIFY AND DESCRIBE THE TYPES OF EV CHARGING.**

5 **A.** The charging options available for EV drivers are Level 1, Level 2, and Level 3.  
6 Level 1 charging is a standard 120-volt outlet that can provide approximately  
7 5 miles of range per hour which allows EV owner to charge the vehicle in 8 hours  
8 to add 40 miles of range<sup>1</sup>. Typical venues for Level 1 charging include homes,  
9 workplaces, commuter lots, and long-term parking at the airports. Level 2 charging  
10 is a 208/240-volt outlet or charging station that can provide approximately 25 miles  
11 of range per hour of charge. Most Level 2 public charging stations are located  
12 within areas where customers are expected to spend a few hours of their time to  
13 charge their vehicles such as malls, gyms, shopping centers, and restaurants.  
14 However, residential customers can upgrade their home outlets to 240-volt and/or  
15 install a Level 2 charging station at their home to charge in a shorter time.

16 Level 3 charging, also referred to as DCFC (direct current fast charging),  
17 uses a 400 to 1,000-volt DC power source and can provide approximately 100 to  
18 200+ miles of range per 30 minutes of charging. Typically, DCFC stations are  
19 located along highways to allow customers to quickly recharge their vehicles. Each

---

<sup>1</sup> U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy:  
[https://afdc.energy.gov/fuels/electricity\\_infrastructure.html](https://afdc.energy.gov/fuels/electricity_infrastructure.html)

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1 charging station may have one or more ports. An EV Charging port provides power  
2 to charge only one vehicle at a time even though it may have multiple connectors  
3 (plugs).<sup>2</sup>  
4

5 **Q15. WHERE DO EV OWNERS TYPICALLY CHARGE THEIR VEHICLES?**

6 **A.** Industry research shows that approximately eighty-four percent (84%) of EV  
7 owners charge their vehicles at home (which includes residential homes and  
8 apartments). However, approximately sixteen percent (16%) of total EV owners  
9 may not have access to home charging and instead rely on public charging stations  
10 to recharge their vehicles<sup>3</sup>.  
11

12 **Q16. PLEASE DESCRIBE THE PUBLIC CHARGING STATIONS THAT ARE**  
13 **CURRENTLY AVAILABLE IN EPE'S NEW MEXICO SERVICE**  
14 **TERRITORY.**

15 **A.** As of March 2023, EPE is aware of approximately 40 public EV charging ports in  
16 EPE's NM service territory. Most of these are Level 2 public charging stations that  
17 are located in Las Cruces and are placed near restaurants, offices, the downtown  
18 plaza, and the Las Cruces Convention Center. There are also two auto dealerships

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<sup>2</sup> Please refer to Alternative Fuels Data Center: Developing Infrastructure to Charge Electric Vehicles: [https://afdc.energy.gov/fuels/electricity\\_infrastructure.html](https://afdc.energy.gov/fuels/electricity_infrastructure.html)

<sup>3</sup> G. Tal, J.H. Lee, and M.A. Nicholas. Institute of Transportation Studies, UC Davis. Observed Charging Rates in California. September 2018. <https://escholarship.org/uc/item/2038613r>

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1           that have public DCFC charging stations available. For more detailed information,  
2           please see Appendix A - Public Charging Stations in EPE's NM Service territory  
3           attached to Exhibit AR-1 to the testimony.

4

5   **Q17. IS THE EXISTING CHARGING INFRASTRUCTURE IN EPE'S**  
6   **NEW MEXICO SERVICE TERRITORY SUFFICIENT TO SUPPORT THE**  
7   **FORECASTED INCREASE IN EV ADOPTION?**

8   **A.**   No. EPE used the Department of Energy ("DOE") Electric Vehicle Infrastructure  
9           Projection ("EVI-Pro") Lite Tool to estimate charging infrastructure needs in EPE's  
10          NM service territory during the Plan Year to meet the projected number of EVs.  
11          The tool is a simplified, web-based version of EVI-Pro which was developed by  
12          the National Renewable Energy Lab ("NREL") in collaboration with the California  
13          Energy Commission to help estimate the EV charging infrastructure needed in a  
14          designated area to meet the projected number of EVs. Based on EPE's forecast of  
15          EVs in its New Mexico service area by the end of 2026, EPE projects that the  
16          charging infrastructure currently available will not be sufficient to meet EV  
17          charging needs in the Plan Year. This is summarized in Table 2 below.

18

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**Table 2: Public Charging Ports Requirements For  
Projected Number Of Light-Duty EVs**

| Types of Charging Ports        | Ports Needed by 2026 | Existing Non-Tesla Ports Available | Existing Tesla Ports Available | Planned Ports | Additional Ports Needed by 2026 |
|--------------------------------|----------------------|------------------------------------|--------------------------------|---------------|---------------------------------|
| <b>Workplace</b>               | 67                   | 3                                  | 6                              | 0             | 58                              |
| <b>Public Level 2</b>          | 57                   | 28                                 | 0                              | 0             | 29                              |
| <b>Public DC Fast Charging</b> | 21                   | 3 <sup>4</sup>                     | N/A                            | 4             | 14                              |

**Q18. IS THERE A PARTICULAR NEED FOR EPE TO SUPPORT THE EXPANSION OF THE CHARGING INFRASTRUCTURE AVAILABLE FOR CUSTOMERS THAT RESIDE IN MUDs?**

**A.** Yes. Research shows that customers that live in apartments, or MUDs, are less likely to have access to home charging than customers in detached single-family housing<sup>5</sup>. Some of the reasons include the challenge of convincing the landlord or property owner to install and facilitate access to charging infrastructure for the tenant, especially due to the relatively low EV adoption rate in today's market and the need for upfront investment in charging infrastructure. As the EV market continues to grow from early adopters (typically customers with high-income and detached homes that have access to off-street parking) to the general public, EPE

<sup>4</sup> Although existing non-Tesla DCFC charging stations have 2 plugs, one CHAdeMO and one CCS, only one plug may be used at a single time.

<sup>5</sup> Please refer to: <https://www.nrel.gov/docs/fy22osti/81065.pdf>

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1           anticipates that there will be an even greater need for charging infrastructure for  
2           customers residing in MUDs.

3

4   **Q19. HAS EPE FORECASTED THE NUMBER OF EVS THAT WILL BE**  
5           **OWNED BY CUSTOMERS THAT RESIDE IN MUDS SUCH AS**  
6           **APARTMENTS?**

7   **A.**   Yes. As described in the direct testimony of Mr. Novela, EPE's Load Research and  
8           Data Analytics Department estimates that 306 light-duty EVs will be owned by  
9           customers residing in MUDs by the end of 2026.

10

11           **B. STAKEHOLDER ENGAGEMENT AND CUSTOMER OUTREACH**

12   **Q20. PLEASE SUMMARIZE EPE'S STIPULATED COMMITMENTS**  
13           **RELEVANT TO STAKEHOLDER ENGAGEMENT AND CUSTOMER**  
14           **OUTREACH OVER THE LAST TEP PLAN TERM**

15   **A.**   As addressed by Mr. Novela in his direct testimony, as part of the  
16           Commission-approved Stipulation in Case No. 20-00241-UT, EPE made the  
17           following commitments related to stakeholder engagement and customer outreach  
18           during the term of the last TEP:

19           (1) exploring opportunities for hands-on EV demonstrations (EV driving  
20           experience);

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- 1           (2) engaging with the City of Las Cruces to identify possible ways to support the  
2           City's development of an EV ride sharing program;
- 3           (3) exploring opportunities to collaborate with community-based organizations  
4           regarding education, marketing, and outreach components of the TEP for  
5           low-income ("LI") customers; and,
- 6           (4) Hold stakeholder meetings no less than every six months for the duration of  
7           this TEP to provide a regular forum for EPE to present on its TEP  
8           implementation and solicit feedback from interested parties on the  
9           implementation of this TEP and the development of EPE's next TEP.

10

11   **Q21. DID EPE EXPLORE OPPORTUNITIES FOR HANDS-ON EV**  
12   **DEMONSTRATIONS?**

- 13   **A.**   Yes, EPE organized a variety of events which, in part, provided customers a  
14   hands-on experience with EVs and electric bicycles. These outreach events are  
15   described in EPE's Bi-Annual TEP Reports filed on August 1, 2022, and on  
16   February 1, 2023. As part of this TEP 's Customer Outreach Plan, EPE proposes to  
17   continue providing hands-on opportunities at EV showcase events and Rides and  
18   Drives.

19

20   **Q22. DID EPE ENGAGE WITH THE CITY OF LAS CRUCES TO IDENTIFY**  
21   **POSSIBLE WAYS TO SUPPORT THE CITY'S DEVELOPMENT OF AN**

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1           **EV RIDE SHARING PROGRAM?**

2    **A.**    Yes, EPE is participating in ongoing discussions with the City of Las Cruces on the  
3           potential development of a car-sharing program. This is one of the potential projects  
4           described in the proposed Partnership, Research, and Innovations Program.

5

6    **Q23. DID EPE EXPLORE OPPORTUNITIES TO COLLABORATE WITH**  
7           **COMMUNITY-BASED ORGANIZATIONS REGARDING EDUCATION,**  
8           **MARKETING, AND OUTREACH COMPONENTS OF THE TEP FOR LI**  
9           **CUSTOMERS?**

10   **A.**    Yes, EPE collaborated with local community-based organizations, including  
11           Casa de Peregrinos, United Way of Southern New Mexico, and Community Action  
12           Agency regarding LI customer EV education, marketing, and outreach. These  
13           collaborations are further detailed in EPE's Bi-Annual TEP Report, filed on  
14           February 1, 2023.

15

16   **Q24. DID EPE HOLD STAKEHOLDER MEETINGS EVERY SIX MONTHS**  
17           **DURING THE TERM OF THE LAST TEP?**

18   **A.**    Yes. EPE held a formal stakeholder meeting in a hybrid format at Las Cruces City  
19           Hall on July 26, 2022, and its second formal stakeholder meeting during the  
20           PowerUp EXPO event at the Las Cruces Convention Center on January 20, 2023.

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1           During both meetings, EPE solicited feedback on the ongoing TEP and asked for  
2           recommendations for the development of its next TEP.

3

4   **Q25. DID EPE OFFER ADDITIONAL OPPORTUNITIES FOR**  
5   **STAKEHOLDERS TO PROVIDE INPUT INTO THE DEVELOPMENT OF**  
6   **THIS TEP?**

7   **A.**   Yes. After EPE launched its Commission-approved TEP on January 1, 2022, EPE  
8           began gathering stakeholder feedback on the proposed, expanded Customer  
9           Outreach Plan, which was filed on February 10, 2023, and approved by the  
10          Commission on May 18, 2022. EPE continued stakeholder engagement during the  
11          Drive Electric Earth Day, Thomas Branigan Memorial Library EV event, and the  
12          National Drive Electric Week events by discussing its TEP implementation and  
13          soliciting feedback on the ideas for the development of EPE's next TEP. EPE  
14          continued to engage with many stakeholders and provided fleet advisory services  
15          to the City of Las Cruces, Las Cruces Public Schools, Roadrunner Transit,  
16          Doña Ana County, and South-Central Regional Transit District. EPE also provided  
17          several of its customers with technical evaluations and letters of support for their  
18          grant applications. Several local entities received grant awards for their fleet  
19          electrification efforts.

20                 In early 2023, EPE began informal meetings with stakeholders for EPE's  
21                 consideration in the development of the next TEP. EPE engaged with the City of

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1 Las Cruces, Doña Ana County, transit, and school entities that are electrifying their  
2 fleet, as well as other stakeholders listed in Exhibit AR-2 TEP Stakeholders,  
3 attached to my testimony. The initial draft of the TEP document was shared with  
4 participating stakeholders on June 2, 2023, for additional feedback.

5

6 **Q26. DID EPE CONSIDER FEEDBACK FROM STAKEHOLDERS IN THE**  
7 **DEVELOPMENT OF THIS TEP?**

8 **A.** Yes. EPE carefully considered all the feedback received from TEP stakeholders  
9 during TEP planning and development processes. EPE incorporated ideas and  
10 suggestions that meet the objectives of the TEP rulemaking and provide the most  
11 value for EPE's customers and the electric grid. The final version of this plan was  
12 prepared as a result of the stakeholder engagement process, in conjunction with  
13 reviewing federal, and state policies and local initiatives to ensure EPE's proposed  
14 TEP complements existing programs and incorporates customer feedback received  
15 about the proposed programs through a survey process.

16

17 **Q27. DID EPE SOLICIT FEEDBACK FROM CUSTOMERS ON THE INITIAL**  
18 **TEP?**

19 **A.** Yes. First, customers were able to provide feedback on the initial TEP and  
20 recommendations for future TEP measures through the stakeholder engagement  
21 meetings as described previously. EPE also solicited feedback from customers

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1 through customer surveys issued via e-mail to both standard residential customers  
2 and low-income customers.

3

4 **Q28. PLEASE SUMMARIZE THE RESULTS OF EPE'S CUSTOMER SURVEY.**

5 **A.** EPE's customer survey was completed by 747 customers in EPE's NM service  
6 territory. The survey consisted of (a) customer awareness, (b) receptiveness to  
7 EPE's proposed TEP measures, and (c) customer demographics. EPE also  
8 conducted a customer survey focused on low-income customers that was completed  
9 by 119 customers. The survey provided information on (a) customer awareness,  
10 (b) EV-owner demographics, and (c) interest in ownership. Please refer to my  
11 Exhibit AR-3 for a summary of customer responses to both customer surveys.

12

13 **Q29. DID EPE CONSIDER THAT FEEDBACK IN DEVELOPING THIS PLAN?**

14 **A.** Yes, EPE considered and incorporated feedback from customers in the plan  
15 development. For example, a number of customers expressed concern over the lack  
16 of public charging infrastructure in southern NM as well as the cost of installing a  
17 home charging station. EPE's TEP addresses these concerns by offering stackable  
18 incentive programs that are designed to assist residential customers with the costs  
19 of both a home charging station and installation as well as by offering commercial  
20 entities incentives to help develop more public charging stations within EPE's NM  
21 service territory.

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1

2 **Q30. DID EPE CONSIDER CUSTOMER PARTICIPATION IN THE PRIOR TEP**  
3 **PROGRAMS IN DEVELOPMENT OF THIS PLAN?**

4 **A.** Yes. Customer participation in previously approved TEP rebate programs was  
5 lower than anticipated due to the lack of local EV availability, a limited selection  
6 of EV models, lack of customer awareness and understanding of EVs, no incentives  
7 offered for home wiring (except for LI customers) or new construction, no  
8 incentives for make-ready infrastructure on utility-side of the meter (except for  
9 Public Transit and Customer Fleet program) as well as no incentives offered to  
10 commercial customers for procurement of charging equipment. EPE's decision to  
11 expand the residential and commercial programs as well as propose new measures  
12 and strategies in this proposed TEP filing, are designed to increase residential and  
13 commercial customer participation in the Plan Years.

14

15 **Q31. WAS EPE ABLE TO IDENTIFY CUSTOMER BARRIERS TO EV**  
16 **ADOPTION BASED ON THESE ACTIONS?**

17 **A.** Yes. EPE determined that the greatest barriers for residential customers include,  
18 but are not limited to, the cost of EVs, lack of charging infrastructure, and a variety  
19 of misconceptions about EVs. In addition, after reviewing the federal and state  
20 programs, as well as conducting stakeholder engagement meetings, EPE  
21 determined that the greatest barriers for commercial entities may be a need for

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1 advisory services; the cost of charging infrastructure installation at customer  
2 facilities, including the cost of utility infrastructure upgrades, the cost of EV  
3 charging equipment and installation on customer-side of the meter; as well as  
4 charging station providers concerns about potentially high demand charges applied  
5 to commercial charging stations with low utilization rate due to developing EV  
6 adoption rate.

7  
8 **C. STATE AND FEDERAL PROGRAMS AND GRANTS**

9 **Q32. WHAT STATE PROGRAMS AND GRANTS ARE CURRENTLY**  
10 **AVAILABLE TO SUPPORT THE EXPANSION OF TRANSPORTATION**  
11 **ELECTRIFICATION IN NEW MEXICO??**

12 Yes. EPE considered the New Mexico Sustainable Building Tax Credit and the  
13 New Mexico Clean Car Rule in the development of the plan. Please refer to  
14 Exhibit AR-4 – Federal and State Programs for more detail.

15  
16 **Q33. HOW DOES EPE'S TEP COMPLEMENT THESE STATE PROGRAMS?**

17 **A.** EPE's TEP complements the NM Sustainability building tax credit by offering  
18 homebuilders and developers incentives for building strictly EV-ready homes and  
19 MUDs. Currently, available tax credits are not available to home builders unless  
20 they pursue other home efficiency ratings as listed in AR-4. EPE's proposed TEP  
21 also complements the NM Clean Car Rule by offering incentives to dealerships,

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1           amongst other commercial entities, for the development of additional charging  
2           infrastructure needed to support greater availability of EV models in EPE's NM  
3           service territory.

4

5   **Q34. WHAT FEDERAL PROGRAMS AND GRANTS ARE CURRENTLY**  
6   **AVAILABLE TO SUPPORT THE EXPANSION OF TRANSPORTATION**  
7   **ELECTRIFICATION IN NEW MEXICO?**

8   **A.**   EPE is aware of the following Federal Programs and Grants:

- 9           • Infrastructure Investment and Jobs Act,
- 10          • National Electric Vehicle Infrastructure Formula Program,
- 11          • Clean School Bus Program,
- 12          • Low or No Emission Vehicle Program,
- 13          • Inflation Reduction Act, and
- 14          • Charging and Fueling Infrastructure Discretionary Grant.

15

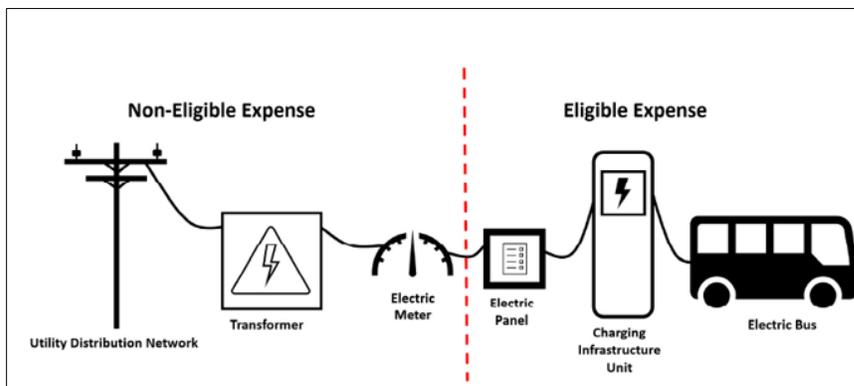
16   **Q35. DOES EPE'S TEP COMPLEMENT THESE FEDERAL PROGRAMS?**

17   **A.**   Yes. For example, EPE discovered that the Clean School Bus Program does not  
18           cover any utility-side-of-the-meter upgrades that may be needed to support the  
19           installation of charging stations for school districts that are looking to electrify their  
20           school buses. Please see Figure 1 below. EPE's proposed PowerConnect NM

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1 Program is designed to close this gap in federal funding by offering incentives for  
2 utility-side of the meter upgrades.

3 **Figure 1. 2022 Clean School Bus Program With EPA<sup>6</sup>**



10 **V. DESCRIPTION OF TEP MEASURES AND COSTS**

11 **A. RESIDENTIAL PROGRAMS**

12 **Q36. PLEASE SUMMARIZE THE RESIDENTIAL PROGRAMS**

13 **A.** EPE is proposing four residential programs: the EV Smart Rewards NM Program;  
14 the Smart Charging Program; the Home Wiring Program; and the Electric Bicycle  
15 Rebate Program. The purpose of these programs is to offer incentives to residential  
16 customers to help offset the cost of charging equipment and installation, incentivize  
17 off-peak charging or charging during the times of the day when EPE's system  
18 resources are available, and help customers offset the purchase price of a qualifying  
19 electric bicycle.

<sup>6</sup> <https://www.epa.gov/cleanschoolbus>

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1

2 **Q37. ARE THE PROPOSED RESIDENTIAL PROGRAMS EXPECTED TO**  
3 **ACCOMPLISH THE GOALS OF THE TEP?**

4 **A.** Yes. The residential programs are expected to help increase light-duty EV adoption  
5 which would also provide environmental benefits to the region. In addition, the  
6 proposed programs will help test customers' acceptance of an actively managed  
7 charging program to ensure transportation electrification develops in a way that  
8 benefits the electric grid. The proposed Electric Bicycle Rebate Program is  
9 expected to expand transportation electrification by introducing customers to a  
10 different mode of electric transportation to provide an affordable and sustainable  
11 mobility option while helping reduce local greenhouse gas emissions.

12

13 **Q38. HOW DID EPE DETERMINE THE SIZE OF THE RESIDENTIAL**  
14 **PROGRAMS?**

15 **A.** The EV Smart Rewards NM Program will be available to 220 residential customers.  
16 Based on reported managed charging enrollment rate, EPE anticipates that  
17 approximately 10% of projected EV owners in EPE's New Mexico service territory  
18 will sign up for the EV Smart Rewards NM Program by the end of 2025<sup>7</sup>.

---

<sup>7</sup> Smart Electric Power Alliance "Managed Charging Programs: Maximizing Customer Satisfaction and Grid Benefits" white paper says that technology providers reported a 10% enrollment rate based on several years' worth of data. <https://sepapower.org/resource/managed-charging-programs-maximizing-customer-satisfaction-and-grid-benefits/>

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1           There are 330 customer rebates available (260 standard customers and 70 LI  
2 customers) for the Smart Charging and Home Wiring Programs. The program sizes  
3 were calculated based on the projected number of EVs that will be in EPE's  
4 New Mexico service territory by 2026 (3,182) minus the estimated number EVs in  
5 EPE's NM service territory in 2023 (1,151) and the assumption that 82% of  
6 residential customers will charge their vehicles at home. To refine the program size  
7 calculations, EPE utilized the results of the customer survey that showed 56.89%  
8 of customers would consider applying for EPE's rebates. In addition, EPE  
9 subtracted the number of NM customers living in apartments, 306, because those  
10 customers will not be charging at a single-family residence. EPE, therefore,  
11 designed the program to cover 50% of the remaining customers. Based on the  
12 gathered stakeholder input, EPE anticipates that 20% of customers will need a panel  
13 upgrade.

14           There will be 140 customer rebates available for the Electric Bicycle Rebate  
15 Program (110 for standard customers and 30 for LI customers). EPE determined  
16 the program size based on a 5-year statistics report from 2016-2020 provided by  
17 DATAUSA: Las Cruces, NM<sup>8</sup>, that showed that on average, 585 households used  
18 a bicycle as a mode of transportation. To support customers' transition to electric

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<sup>8</sup> [https://datausa.io/profile/geo/las-cruces-nm/#commute\\_time](https://datausa.io/profile/geo/las-cruces-nm/#commute_time)

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1 transportation, EPE is targeting 25% of customers using bicycles for daily  
2 commuting to switch to electric bicycles, totaling approximately 140.

3

4 **Q39. WHAT IS THE ESTIMATED TOTAL COST OF THE RESIDENTIAL**  
5 **PROGRAMS?**

6 **A.** The projected total cost of the residential programs is \$1,712,381 over the Plan  
7 Years. The cost breakdown by measure is proved in Table 1 above and also in  
8 Table 12 of my Exhibit AR-1.

9

10 **Q40. HOW WERE THE RESIDENTIAL PROGRAM COSTS DETERMINED?**

11 **A.** The estimated cost of the EV Smart Rewards NM Program is based on the cost of  
12 the customer incentives and software. EPE estimated the cost for the residential  
13 rebate programs (Home Wiring Program, Smart Charging Program, and Electric  
14 Bicycle Rebate Program) by multiplying the total number of rebates available by  
15 the total rebate amount.

16

17 **B. COMMERCIAL PROGRAMS**

18 **Q41. PLEASE SUMMARIZE THE COMMERCIAL PROGRAMS**

19 **A.** EPE is proposing four commercial programs: PowerConnect NM Program; EV  
20 Charging Equipment Rebate Program; EV Charging Installation Rebate Program;  
21 and Take-Charge NM Program. The purpose of these programs is to offer

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1 incentives to commercial customers to encourage the development of EV charging  
2 infrastructure that will be necessary to support the projected number of EVs through  
3 2026.

4  
5 **Q42. ARE THE COMMERCIAL PROGRAMS EXPECTED TO ACHIEVE THE**  
6 **GOALS OF THE TEP?**

7 **A.** Yes. The commercial programs are expected to help expand the electrification of  
8 light-duty, medium-duty, and heavy-duty vehicles which will provide  
9 environmental and economic development benefits to the region. The commercial  
10 programs were also designed to expand access to electric transportation for LI  
11 customers and underserved communities and support and manage to charge  
12 infrastructure in a way that uses the power grid efficiently and increases access to  
13 the benefits of transportation electrification for customers.

14 • PowerConnect NM Program will offer a rebate credit to commercial customers  
15 who are installing EV charging equipment to help reduce the customer's upfront  
16 cost of upgrades or improvements on EPE's distribution system, up to the utility  
17 meter.

18 • The EV Charging Equipment Rebate Program will offer incentives to  
19 commercial customers to help reduce the cost of EV charging equipment.  
20 Rebate amounts are expected to cover 70% of the total equipment cost for

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1 commercial entities located in underserved communities and 50% of the total  
2 equipment costs for commercial customers located in other communities within  
3 EPE's NM service territory, up to the maximum rebate amounts listed in Table 7  
4 of Exhibit AR-1.

- 5 • The EV Charging Installation Rebate Program will provide commercial  
6 customers with a rebate to help reduce the installation costs of qualifying  
7 charging equipment on the customer side of the meter. The rebates will help  
8 offset 70% of the total installation costs for charging equipment located in  
9 underserved communities and up to 50% of the total installation costs for  
10 charging equipment located in other communities within EPE's NM service  
11 territory, up to the maximum rebate amount per site listed in Table 8 of  
12 Exhibit AR-1.

- 13 • Take-Charge NM Program will provide a turn-key solution for EV  
14 infrastructure with no direct costs to commercial customers and is designed to  
15 cover the cost of the infrastructure on both the utility and customer sides of the  
16 meter. Priority will be given to multi-unit dwellings, EV fleets, and public  
17 charging stations in underserved communities.

18  
19 **Q43. HOW DID EPE DETERMINE THE SIZE OF THE COMMERCIAL**  
20 **PROGRAMS?**

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1    **A.**    The commercial program size was determined based on the estimated charging  
2            infrastructure needed to support the growing EV adoption rate through 2026 as  
3            listed in Table 2.

4

5    **Q44. WHAT IS THE ESTIMATED COST OF THE COMMERCIAL**  
6            **PROGRAMS OVER THE PLAN YEARS?**

7    **A.**    The total projected cost of the commercial programs is \$6,370,333. The cost  
8            breakdown by measure is proved in Table 1 above and also in Table 12 of my  
9            Exhibit AR-1.

10           • The PowerConnect NM program cost is estimated to be \$1,890,568. The  
11            program cost was estimated based on the required number of EV ports needed  
12            to support EV adoption rate (as listed in Table 2 above) to be located on  
13            workplace, public, fleet, MUDs, and DCFC charging site locations multiplied  
14            by the proposed rebate amounts listed in Table 6 of Exhibit AR-1.

15           • The EV Charging Equipment Rebate Program is estimated at \$1,635,745. The  
16            program cost was determined based on the required number of EV ports needed  
17            to support EV adoption rate (as listed in Table 2 above) and the highest potential  
18            rebate amount as listed in Table 7 of Exhibit AR-1.

19           • The EV Charging Installation Rebate Program is estimated at \$1,530,798. The  
20            program cost was determined based on the required number of EV ports needed

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1           to support EV adoption rate (as listed in Table 2 above) and the highest potential  
2           rebate amount per site listed in Table 8 of Exhibit AR-1.

- 3           • Take-Charge NM Program is estimated at \$1,313,222. The program cost was  
4           determined based on the estimated total turnkey project cost per site for several  
5           MUDs, public and fleet site locations.

6

7   **Q45. HOW WERE THE COMMERCIAL PROGRAM COSTS DETERMINED?**

- 8   A.   The cost was determined by multiplying the expected commercial customer  
9       participation rate times the maximum proposed rebate amounts for each  
10      commercial program.

11

12                                   **C. NEW CONSTRUCTION PROGRAMS**

13   **Q46. PLEASE SUMMARIZE THE NEW CONSTRUCTION PROGRAMS**

- 14   A.   EPE is proposing two new construction programs: EV-Ready Homes Program and  
15       EV-Ready MUDs Program. The purpose of these programs is to incentivize  
16       builders and developers to install a dedicated electrical circuit for EV charging  
17       during new construction of single-family homes or MUDs, which is typically much  
18       more cost-effective than future retrofits.

19

20   **Q47. HOW ARE THE NEW CONSTRUCTION PROGRAMS EXPECTED TO**

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1           **ACHIEVE THE GOALS OF THE TEP?**

2    **A.**    The new construction programs are expected to expand transportation  
3            electrification by supporting the development of EV-ready single-family homes  
4            and multi-unit dwellings helping customers in EPE's service territory to transition  
5            to EVs.

6

7    **Q48. HOW DID EPE DETERMINE THE NEW CONSTRUCTION PROGRAM**  
8            **SIZE?**

9    **A.**    There will be 300 rebates for single family homes and additional rebates available  
10           for approximately six MUDs. EPE based the program size on estimates obtained  
11           from local homebuilders on the projected new construction projects per year for  
12           single-family homes and MUDs.

13

14   **Q49. WHAT IS THE ESTIMATED COST OF THE NEW CONSTRUCTION**  
15           **PROGRAMS?**

16   **A.**    The estimated cost of the New Construction Programs is \$299,607. The cost  
17           breakdown by measure is proved in Table 1 above and also in Table 12 of my  
18           Exhibit AR-1.

19

20   **Q50. HOW WERE THE NEW CONSTRUCTION PROGRAM COSTS**  
21           **DETERMINED?**

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1    **A.**    EPE calculated the costs of the new construction programs based on the projected  
2           annual number of homes and MUDs that home builders are estimating to build  
3           during the Plan Years multiplied by the proposed TEP rebate amounts.

4           •    The EV-Ready Homes Program cost was determined based on an estimated  
5                average of 100 new single-family homes per year multiplied by the proposed  
6                rebate amount \$450.

7           •    The EV-Ready MUDs Program cost was determined by multiplying the  
8                estimated number of new MUD sites per year (with each MUD installing up to  
9                10 EV-Ready outlets and up to 2 Level 2 charging stations) by the  
10             corresponding rebate amount found in Table 10 of Exhibit AR-1.

11

12           **D. PARTNERSHIP, RESEARCH, AND INNOVATIONS PROGRAM**

13    **Q51. PLEASE SUMMARIZE THE PARTNERSHIP, RESEARCH, AND**  
14           **INNOVATIONS PROGRAM.**

15    **A.**    EPE's proposed Partnership, Research and Innovations Program ("PRI") will focus  
16           on projects stemming from EPE's research and experience as well as from the  
17           stakeholder engagement process. The PRI program will focus on the innovative  
18           technologies and solutions that evolve in the market that may improve customer  
19           access to EV infrastructure, especially for LI customers and underserved  
20           communities, and/or provide benefits to the electric grid.

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1

2 **Q52. IS THE PRI PROGRAM EXPECTED TO ACHIEVE THE GOALS OF THE**  
3 **TEP?**

4 **A.** Yes. EPE's proposed PRI is expected to achieve the goals of the TEP by bringing  
5 innovative projects, in close coordination with stakeholders, to (a) increase and  
6 broaden equitable access to EVs through car and/or bike sharing programs; and  
7 (b) improve understanding of the opportunities for increasing grid efficiency  
8 through the vehicle to everything (V2X), vehicle to grid (V2G) projects, energy  
9 storage solutions for fleet charging optimization, or other technologies and  
10 programs that may provide benefits to customers and the electric grid.

11

12 **Q53. HAS EPE CONSIDERED THE TYPES OF PROJECTS THAT MAY BE**  
13 **FUNDED BY THE PRI PROGRAM?**

14 **A.** A number of innovative projects have been raised through the Company's  
15 stakeholder engagement process, including car and/or bike sharing programs,  
16 vehicle to everything (V2X), vehicle-to-grid (V2G) projects, and energy storage  
17 solutions for fleet charging optimization. EPE is currently in preliminary  
18 discussions with stakeholders regarding the development of these ideas.

19

20 **Q54. WHAT IS THE ESTIMATED COST OF THE PARTNERSHIP,**  
21 **RESEARCH, AND INNOVATIONS PROGRAM OVER THE PLAN YEAR?**

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1    **A.**    EPE anticipates spending up to \$3,153,750 over the three-year TEP to support  
2           several innovative community-oriented projects.

3  
4    **Q55. HOW WAS THAT COST DETERMINED?**

5    **A.**    The cost was determined by estimating the budget to be spent on the example  
6           projects from the proposed program, including contingency. The example projects  
7           may include but not be limited to car and/or bike sharing, V2G and/or V2X, energy  
8           storage solutions for fleet charging optimization, and other technologies and  
9           programs that evolve in the market that may improve the customer access to EV  
10          infrastructure and provide benefits to the electric grid.

11  
12   **Q56. ARE THERE ANY OTHER PROJECTED COSTS ASSOCIATED WITH**  
13       **THE PRI PROGRAM?**

14   **A.**    Yes, the implementation of the PRI program is contingent upon approval of the TEP  
15          administrative cost for new dedicated EPE staff to research, develop and implement  
16          the example innovative projects mentioned above with local stakeholders.

17  
18                                   **E. CUSTOMER OUTREACH PROGRAM**

19   **Q57. PLEASE SUMMARIZE THE CUSTOMER OUTREACH PROGRAM.**

20   **A.**    EPE proposes a multi-faceted Customer Outreach Program that includes education,  
21          marketing and outreach initiatives which are crucial to the successful

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1 implementation of TEP. This program includes educational initiatives designed to  
2 inform customers and provide tools and resources about the benefits of driving EVs,  
3 available incentives, programs, and rate options. The program will also provide an  
4 educational experience for students aimed to drive away common EV  
5 misconceptions and promote future EV advocacy. For program marketing, EPE  
6 will use, including but not limited to, search engine marketing, banners, social  
7 media, newsletters, television, community events and other communication  
8 channels to promote TEP programs and incentives. For customer outreach, EPE  
9 will coordinate with external stakeholders including, but not limited to, low-income  
10 organizations, auto dealerships, businesses, school districts, and universities to  
11 provide advisory services and promote transportation electrification through  
12 community events, tabling events, rides and drives, and other events.

13

14 **Q58. HOW IS THE CUSTOMER OUTREACH PROGRAM EXPECTED TO**  
15 **ACHIEVE THE GOALS OF THE TEP?**

16 **A.** The proposed Customer Outreach Program is expected to achieve the goals of the  
17 TEP through educational, marketing, and outreach initiatives that support the  
18 expansion of transportation electrification in EPE's NM service territory across  
19 multiple market segments. The educational initiatives are expected to increase  
20 customer awareness and understanding of the benefits of electric transportation and  
21 the importance of managing EV charging times through hands-on EV

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1           demonstrations, community and tabling events, an EV education program<sup>9</sup>, social  
2           media, TV, radio, and other communication channels. The marketing initiatives are  
3           expected to promote available incentives, rate options, and programs. The outreach  
4           initiatives are expected to strengthen EPE's coordination with external stakeholders  
5           to support the development of EV-ready infrastructure, collaborate on customer  
6           education efforts and promotion of TEP programs and rates, and offer advisory  
7           services to commercial customers. The program will include customized messaging  
8           for LI customers and underserved communities, as well as commercial customers.  
9

10   **Q59. WHAT IS THE EXPECTED COST OF THE OUTREACH PROGRAM?**

11   **A.**    The expected cost of the Customer Outreach Program is \$2,063,955.  
12

13   **Q60. HOW WAS THAT COST DETERMINED?**

14   **A.**    The cost was determined by obtaining cost estimates from a local marketing  
15           agency, a non-profit educational organization, a local university, Ride and Drive  
16           events, and estimating the costs of EV-ready homes signage, customer advisory  
17           services, and partnering with community organizations that can help extend  
18           outreach to LI customers and customers in underserved communities.  
19

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<sup>9</sup> <https://nefl.org/rev/>

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**F. ADMINISTRATIVE COSTS**

1

2 **Q61. PLEASE EXPLAIN THE ADMINISTRATION COST ESTIMATE?**

3 **A.** Administration costs include the cost of new dedicated EPE staff members as well  
4 as professional development costs and third-party services for rebate payment  
5 processing. EPE's staff costs include internal labor costs to implement and manage  
6 TEP strategies and measures, track KPIs, prepare annual progress reports, and to  
7 continue stakeholder engagement efforts during the Plan Years.

8

9 **Q62. HOW WAS THAT COST DETERMINED?**

10 **A.** Dedicated employee cost estimates were based on existing market rates for similar  
11 positions. The professional development costs were estimated based on the average  
12 EV conference attendee's expenses. The third-party service fees are based on the  
13 third-party rebate processing fees.

14

15 **Q63. IS THE ADMINISTRATIVE COST REASONABLE?**

16 **A.** Yes. The administrative cost is seven percent of the overall proposed TEP budget  
17 which is necessary to manage the TEP strategies and measures.

18

19

**VI. TEP OBJECTIVES**

20 **Q64. PLEASE SUMMARIZE THE OBJECTIVES OF THE TEP?**

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1    **A.**    The goal of the TEP is to expand transportation electrification across multiple EV  
2           classes including personal and commercial light-, medium-, heavy-duty vehicles  
3           and electric bicycles in EPE's New Mexico Service territory to bring economic  
4           development opportunities as well as environmental, customer, and electric grid  
5           benefits. The TEP was designed to expand access to electric transportation for LI  
6           customers and underserved communities, reduce greenhouse gas emissions  
7           associated with the transportation sector, and support and manage to charge  
8           infrastructure in a way that uses the power grid efficiently and increases access to  
9           the benefits of transportation electrification for all customers. In addition, the  
10          proposed TEP describes strategies for coordinating with State and Federal EV  
11          infrastructure planning efforts, as well as existing business locations that sell and  
12          dispense transportation fuel to the public.

13

14                   **A.    LOW INCOME AND UNDERSERVED COMMUNITIES**

15    **Q65.   HOW DOES EPE DETERMINE THE UNDERSERVED COMMUNITIES**  
16           **IN ITS SERVICE TERRITORIES?**

17    **A.**    EPE will use an EPA's Environmental Justice Screening and Mapping Tool<sup>10</sup> to  
18           identify and qualify underserved communities based on geographic areas with  
19           low-income populations of 70-80 percentile or greater.

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<sup>10</sup> EPA's Environmental Justice Screening and Mapping Tool <https://ejscreen.epa.gov/mapper/>

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1

2 **Q66. HOW DOES EPE DETERMINE LOW-INCOME CUSTOMERS?**

3 **A.** Low-income customers self-certify by completing and submitting a  
4 self-certification form of income eligibility to demonstrate household adjusted  
5 gross income, as defined in the Income Tax Act, of equal to or less than 200% of  
6 the federal poverty level.

7

8 **Q67. ARE EPE'S TEP MEASURES REASONABLY DESIGNED TO EXPAND**  
9 **TRANSPORTATION ELECTRIFICATION AMONG LOW-INCOME**  
10 **CUSTOMERS AND UNDERSERVED COMMUNITIES?**

11 **A.** Yes. EPE's TEP includes a variety of measures for expanding transportation  
12 electrification among LI customers and underserved communities starting from  
13 customer outreach initiatives, residential incentives for home wiring, EV charging  
14 equipment and electric bicycles followed by additional incentives and programs  
15 designed to support the development of charging infrastructure in underserved  
16 communities, as well as opportunities for the development of a car sharing and/or  
17 bike sharing program.

18

19 **Q68. ARE ALL PUBLIC-FACING TEP MATERIALS MADE AVAILABLE TO**  
20 **CUSTOMERS IN ENGLISH AND SPANISH?**

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1   **A.**    Yes, all public-facing TEP materials will be made available to customers in English  
2           and Spanish.

3

4   **Q69. ARE INCENTIVES MADE AVAILABLE TO LOW-INCOME**  
5           **CUSTOMERS PRIOR TO OR AT THE TIME OF ANY PURCHASE?**

6   **A.**    Smart Charging and Home Wiring Program rebates will be made available prior to  
7           the time of purchase if the customer arranges installation through a contractor that  
8           submits a Contractor Letter of Intent and Residential TEP Application to EPE. For  
9           the Electric Bicycle program, EPE is planning to engage with local bicycle shops  
10          to arrange for the shop to offer a rebate at the time of the bicycle purchase and bill  
11          EPE for the rebate amount after the purchase.

12

13 **Q70. WHAT IS THE PERCENTAGE BUDGETARY CARVEOUT FOR**  
14 **MEASURES AIMED AT INCREASING EV AWARENESS AND EV**  
15 **ADOPTION AMONG LOW-INCOME CUSTOMERS AND IN**  
16 **UNDERSERVED COMMUNITIES?**

17 **A.**    Twenty percent of the TEP Customer Outreach Program budget was allocated  
18          towards increasing EV awareness among LI customers and underserved  
19          communities.

20

21 **Q71. WHAT ARE EPE'S OUTREACH AND MARKETING STRATEGIES AND**

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1           **MEASURES           FOR           EXPANDING           TRANSPORTATION**  
2           **ELECTRIFICATION AMONG LOW-INCOME CUSTOMERS AND IN**  
3           **UNDERSERVED COMMUNITIES?**

4    **A.**    EPE will partner with trusted community organizations, conduct tabling  
5           community events, Ride and Drives, and provide information in the newspapers,  
6           TV, and Radio channels to educate, market, and conduct outreach activities to LI  
7           customers and underserved communities to help improve customers understanding  
8           of the benefits of driving electric vehicles and riding electric bicycles within the  
9           community.

10

11   **Q72. DOES THE TEP INCLUDE STRATEGIES AND MEASURES FOR MASS**  
12   **TRANSIT OPERATIONS?**

13   **A.**    Yes. EPE's Customer Outreach Program and the administrative budget includes  
14           advisory services to mass transit fleet operators. In addition, EPE's proposed  
15           commercial programs will offer rebates for charging infrastructure equipment,  
16           installation, and any necessary utility infrastructure upgrades. Furthermore, EPE  
17           will offer special EV rate options that are designed to help transit operators save  
18           money on the electric bill while ensuring vehicles are charged during off-peak  
19           hours. Also, one of the proposed PRI programs includes a proposed collaboration  
20           with a mass transit operator in Las Cruces.

21

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1 **Q73. DOES THE TEP INCLUDE STRATEGIES AND MEASURES FOR**  
2 **RIDE-SHARING PROGRAMS?**

3 **A.** Yes. The proposed TEP includes a strategy and measures for the development of a  
4 car-sharing and/or a bicycle-sharing program under the proposed PRI portfolio.  
5

6 **Q74. DOES THE TEP INCLUDE STRATEGIES AND MEASURES FOR**  
7 **MULTI-FAMILY DWELLING UNITS IN EPE'S SERVICE AREA THAT**  
8 **SERVE LOW-INCOME CUSTOMERS AND UNDERSERVED**  
9 **COMMUNITIES?**

10 **A.** Yes. The proposed Customer Outreach Program, commercial programs, and new  
11 construction programs include strategies and measures for MUDs that serve LI  
12 customers and underserved communities.  
13

14 **B. OTHER TEP OBJECTIVES**

15 **Q75. DOES THE TEP INCLUDE STRATEGIES AND MEASURES FOR**  
16 **EXPANDING TRANSPORTATION ELECTRIFICATION ACROSS**  
17 **MULTIPLE EV CLASSES?**

18 **A.** Yes, EPE's proposed TEP programs include strategies and measures for expanding  
19 transportation electrification in its NM service territory across light-duty,  
20 medium-duty, heavy-duty vehicle classes, as well as electric bicycles. For example,  
21 light-duty vehicle adoption is incentivized through both residential and commercial

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1 programs, and a potential car-sharing program is included in the PRI program as an  
2 example, as well as through Customer Outreach Program. Medium- and heavy-duty  
3 adoption is incentivized through the proposed commercial programs, special EV  
4 rates, PRI Program, and Customer Outreach Program. Electric bicycle adoption is  
5 incentivized through Electric Bicycle Rebate Program and Customer Outreach  
6 Program.

7  
8 **Q76. DOES THE TEP INCLUDE STRATEGIES AND MEASURES FOR**  
9 **SERVICING MULTIPLE MARKET SEGMENTS?**

10 **A.** Yes, EPE's proposed residential, commercial, PRI, new construction, and customer  
11 outreach programs include strategies and measures for servicing multiple market  
12 segments, including commercial businesses, multi-unit dwellings, single-family  
13 homes, ride-sharing, and public transit programs.

14  
15 **Q77. DOES THE TEP ADDRESS COORDINATION WITH STATE OR**  
16 **FEDERAL EV INFRASTRUCTURE PLANNING?**

17 **A.** Yes. EPE's proposed Customer Outreach Program, commercial programs, and TEP  
18 administrative budget include strategies for coordination with state and federal EV  
19 infrastructure planning. EPE is currently a part of the Edison Electric Institute  
20 ("EEI") National Electric Highway Coalition, which includes over

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1           50 investor-owned electric companies, working on coordination efforts with state  
2           and federal agencies.

3

4   **Q78. DOES THE TEP INCLUDE STRATEGIES AND MEASURES FOR**  
5           **COORDINATING WITH EXISTING BUSINESS LOCATIONS THAT**  
6           **SELL AND DISPENSE TRANSPORTATION FUEL TO THE PUBLIC?**

7   **A.**   Yes. EPE's proposed Customer Outreach Program, commercial programs and  
8           administration budget include strategies and measures for coordinating with  
9           existing business locations that sell and dispense transportation fuel to the public.

10

11   **Q79. WHAT ARE THE KEY PERFORMANCE INDICATORS FOR PROGRAM**  
12           **SUCCESS?**

13   **A.**   EPE's Key Performance Indicators ("KPIs") will include full subscriptions of each  
14           of the proposed residential, commercial and new construction programs, a  
15           successful implementation of PRI programs, effective Customer Outreach  
16           Initiatives with continuously increasing customer participation, increased customer  
17           participation in available EV rate options, and positive stakeholder feedback  
18           throughout program implementation.

19

20   **Q80. HOW ARE THESE INDICATORS UTILIZED TO FURTHER THE**  
21           **SUCCESS OF EPE'S TEP?**

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1    **A.**    EPE will continuously evaluate TEP programs performance throughout the Plan  
2            Years to adjust the company's long-term strategies based on community needs,  
3            customer participation, technological advancements, and federal, state, and local  
4            policies.

5

6    **Q81. IS THE TEP DESIGNED TO ACCOMPLISH ANY OF THE GOALS OF**  
7            **THE EV STATUTE?**

8    **A.**    Yes. The proposed TEP is reasonably expected to increase access to the use of  
9            electricity as a transportation fuel, with consideration given to increasing such  
10           access to low-income users and users in underserved communities accomplishing  
11           the goals of the EV Statute, 62-8-12 (B)(2). In addition, EPE's TEP measures and  
12           strategies are reasonably expected to support increased consumer choices in EV  
13           charging, allow for private capital investments, and provide customer information  
14           and education. All commercial rebate programs have station qualification criteria  
15           instead of tying the rebate to a specific charging station vendor, as listed in  
16           Appendix B to my testimony Exhibit AR-1. All residential programs also provide  
17           the consumer with a choice of selecting a charging station or an electric bicycle that  
18           meets program qualification criteria. EPE anticipates that the proposed TEP  
19           programs will encourage third-party investment in charging infrastructure and  
20           additional skilled jobs. EPE's Customer Outreach Program is focused on improving

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1 customer understanding of EVs, the benefits of driving electric vehicles, the  
2 availability of incentives, and charging infrastructure.

3

4

**VII. PLANNING OUTLOOK**

5 **Q82. HAS EPE EVALUATED LEAD TIMES FOR COORDINATING WITH**  
6 **STAKEHOLDERS FOR PLANNED CONSTRUCTION OR PLANNED**  
7 **DEPLOYMENTS DURING THE PLANNING HORIZON?**

8 **A.** EPE's TEP team will continue to be very engaged and responsive to all stakeholders  
9 involved in the EV infrastructure planning process, where EPE strives to respond  
10 to general stakeholder questions within two business days, where possible, to allow  
11 for prompt exchange of information. Lead times for interconnecting EV charging  
12 infrastructure to the grid will depend on the proposed site location, existing  
13 electrical infrastructure, the size of the project, the availability of equipment (which  
14 is impacted by existing supply chain issues), and the queue of existing projects.

15

16 **Q83. WHAT ARE EPE'S NEIGHBORING UTILITIES, RURAL ELECTRIC**  
17 **COOPS, TRIBES, OR PUEBLOS?**

18 **A.** EPE's service territory includes Otero County and Luna County which include two  
19 Federally recognized tribes (Mescalero Apache and Fort Sill Apache); however,

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1 EPE does not provide electric service to these tribes<sup>11</sup>. EPE does not provide  
2 electric service to any NM pueblos. EPE borders Otero Electric Cooperative  
3 northeast of its NM service territory and Sierra Electric Cooperative north of its  
4 NM service territory. EPE also borders Columbus Electric Cooperative west of its  
5 NM service territory.

6  
7 **Q84. HAS EPE EVALUATED POTENTIAL INTEGRATION OR**  
8 **COORDINATION WITH THESE NEIGHBORING UTILITIES, RURAL**  
9 **ELECTRIC COOPS, TRIBES, OR PUEBLOS?**

10 **A.** Yes, EPE is and will continue to coordinate with neighboring utilities through open  
11 communication channels, and by being a part of the Edison Electric Institute's  
12 ("EEI's") National Electric Highway Coalition. To attest to that, on April 21, 2023,  
13 EPE spent a full day with PNM and SPS reviewing the details of the proposed TEP  
14 strategies and measures to ensure cross-jurisdictional coordination of efforts. In  
15 addition, EPE will continue to be a part of EEI's National Electric Highway  
16 Coalition which includes over 50 investor-owned electric companies, working on  
17 coordination efforts with state and federal agencies. EPE is open to and may  
18 explore opportunities for coordinating with neighboring utilities, rural coops, tribes,  
19 and pueblos that border EPE's NM service territory, as a part of coordination efforts

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<sup>11</sup> [https://edac.unm.edu/nm\\_native\\_lands/](https://edac.unm.edu/nm_native_lands/)

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1 with state and federal agencies.

2

3 **Q85. DOES EPE ANTICIPATE MAKING REQUESTS FOR OTHER**  
4 **REGULATORY APPROVALS TO CARRY OUT THIS TEP?**

5 **A.** No. EPE is not currently contemplating other regulatory approvals to carry out this  
6 TEP.

7

8 **Q86. DOES EPE ANTICIPATE MAKING REQUESTS FOR OTHER**  
9 **REGULATORY APPROVALS TO EFFECTUATE A FUTURE TEP IN THE**  
10 **PLANNING HORIZON, TO SUPPORT THE TRANSITION BETWEEN**  
11 **TEPS, AND TO COORDINATE WITH STATE AND FEDERAL EV**  
12 **INFRASTRUCTURE PLANNING?**

13 **A.** No. EPE is not currently contemplating other regulatory approvals to effectuate a  
14 future TEP.

15 EPE will continue to be engaged with NM Department of Transportation  
16 and other State and Federal agencies to support the development of charging  
17 infrastructure in EPE's NM service territory.

18

19 **Q87. PLEASE ADDRESS EPE'S REQUESTED AUTHORIZATION OF UP TO**  
20 **90 DAYS AFTER COMMISSION APPROVAL OF THE TEP TO**

**EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
ANGELINA RODRIGUEZ**

1           **IMPLEMENT NEW MEASURES OR MODIFY EXISTING MEASURES**  
2           **INTO BUSINESS OPERATIONS.**

3    **A.**    EPE will initiate implementation of new TEP measures, or modification of existing  
4           measures, into business operations after issuance of a Commission Final Order in  
5           this case. This request simply recognizes that it may take EPE several weeks to  
6           implement Commission-authorized changes and seeks Commission authorization  
7           of up to 90 days to do so.

8

9    **Q88. PLEASE ADDRESS EPE'S REQUEST FOR AUTHORIZATION TO**  
10           **CONTINUE APPROVED TEP MEASURES, SUBJECT TO**  
11           **AVAILABILITY OF APPROVED TEP COSTS, UNTIL THE NEXT TEP**  
12           **PLAN (FILED IN 2026) IS APPROVED BY THE COMMISSION AND**  
13           **IMPLEMENTED BY EPE?**

14   **A.**    Based on prior experiences, EPE anticipates that a timing interval may exist  
15           between the end of the TEP's 2026 Plan Year and the approval date of EPE's next  
16           TEP which EPE plans to file in 2026 for the 2027-2029 Plan Years. For this reason,  
17           EPE seeks authorization to continue TEP measures, subject to the availability of  
18           the approved cost, until the next TEP (to be filed in 2026) is approved by the  
19           Commission and implemented by EPE.

20

**EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
ANGELINA RODRIGUEZ**

1

**VIII. CONCLUSION**

2 **Q89. PLEASE SUMMARIZE YOUR TESTIMONY.**

3 **A.** EPE designed the TEP portfolio to expand access to transportation electrification  
4 for all of its customers, including low-income customers and underserved  
5 communities, and address all EV market segments including light-, medium- and  
6 heavy-duty EVs, as well as electric bicycles. TEP was also designed to improve  
7 customer understanding and awareness of EVs, reduce charging infrastructure  
8 gaps, reduce greenhouse gas emissions, and air pollution, offer rate options, and  
9 actively managed charging programs that incentivize off-peak charging which can  
10 potentially improve electric grid efficiency, system utilization, and facilitate future  
11 operational flexibility. In addition, the TEP was designed to support customer  
12 choice in EV charging and third-party investment and support the creation of  
13 additional skilled jobs, consistent with statutory requirements. Thus, the  
14 commission should approve EPE's proposed TEP, including the proposed portfolio  
15 of incentive programs, customer outreach programs, and rate options and budgets.

16

17 **Q90. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

18 **A.** Yes, it does.



# 2024-2026 TRANSPORTATION ELECTRIFICATION PLAN



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## 1. INTRODUCTION

El Paso Electric Company ("EPE") presents this Transportation Electrification Plan for the three calendar years from 2024 through 2026 (the "Plan Years") ("TEP" or "Plan") pursuant to Section 62-8-13 of the Public Utility Act ("TEP Statute"), and 17.9.574.11 NMAC ("Rule 574" or "Rule").

EPE's TEP proposes the following measures which are designed to accomplish the TEP goals to expand transportation electrification in EPE's New Mexico service territory, including among low-income and underserved communities and across multiple electric vehicle ("EV") classes over the Plan Years:

- (a) New and Modified Residential Programs:
  - 1. EV Smart Rewards NM Program
  - 2. Smart Charging Program
  - 3. Home Wiring Program
  - 4. Electric Bicycle Rebate Program
- (b) New and Modified Commercial Programs:
  - 1. PowerConnect NM Program
  - 2. EV Charging Equipment Rebate Program
  - 3. EV Charging Installation Rebate Program
  - 4. Take-Charge NM Program
- (c) New Construction Rebate Programs:
  - 1. EV-Ready Homes Program
  - 2. EV-Ready Multi-Unit Dwellings ("MUDs") Program
- (d) Partnership, Research, and Innovations Program
- (e) Customer Outreach Program
- (f) Rate Options:
  - 1. Modified Whole House/Whole Service EV Rate Rider ("WHEV/WSEV Rate Rider") Incentive Credit
  - 2. New Demand Adjustment Rider
  - 3. Rate No. 42

EPE reasonably and prudently designed the strategies and measures presented for approval in the TEP based on EPE's assessment of current and forecasted EV adoption rate and availability of public charging infrastructure in its New Mexico service territory; feedback and recommendations from customers and other stakeholder groups; and available State and Federal programs and grants relevant to expansion of transportation electrification.

The total projected cost of the TEP is **\$14,655,588**. More than \$10 million, or 74% of the total proposed cost will go directly to customers for purchase and installation of qualifying EV charging

equipment, supporting infrastructure, and electric bicycles. EPE proposes to recover these TEP costs through EPE’s Rate No. 44-TEP Cost Rider, approved in Case No. 20-00241-UT.

## 2. OVERVIEW OF TRANSPORTATION ELECTRIFICATION IN EPE’S NM SERVICE TERRITORY

### 2.1 Current and Forecasted EV Market

EPE estimates that as of December 2022, there were 818 light-duty EVs (which includes battery electric vehicles and plug-in hybrid vehicles) in EPE’s New Mexico service territory.

Table 1 below presents EPE’s forecasted EV adoption in EPE’s New Mexico (“NM”) service territory over the next 10 years<sup>1</sup>.

**Table 1. Forecasted Light-, Medium-, Heavy-Duty EVs in EPE's NM Service Territory**

| Year | Light-Duty | Medium-Duty | Heavy-Duty CBEV | Heavy-Duty EBUS |
|------|------------|-------------|-----------------|-----------------|
| 2022 | 818        | 0           | 0               | 0               |
| 2023 | 1,151      | 7           | 1               | 10              |
| 2024 | 1,619      | 9           | 1               | 14              |
| 2025 | 2,273      | 13          | 1               | 18              |
| 2026 | 3,182      | 18          | 2               | 23              |
| 2027 | 4,441      | 24          | 2               | 29              |
| 2028 | 6,168      | 33          | 3               | 38              |
| 2029 | 8,511      | 44          | 4               | 47              |
| 2030 | 11,642     | 57          | 6               | 59              |
| 2031 | 15,742     | 74          | 8               | 73              |
| 2032 | 20,972     | 92          | 10              | 88              |

Industry and technological developments; federal, state, and municipal policy initiatives; and the new TEP programs proposed in this filing are expected to increase EV adoption in EPE’s NM service territory. EPE projects that at the conclusion of this plan (2026) there will be approximately 3,182 light-duty, 18 medium-duty, 2 heavy-duty Commercial Battery Electric Vehicles (“CBEV”), and 23 heavy-duty Electric Buses (“EBUS”) in EPE’s New Mexico service territory.

### 2.2 Public Charging Infrastructure Assessment

As of March 2023, there were approximately 40 public EV charging ports<sup>2</sup> in EPE’s NM service territory. The locations of these charging ports is provided in APPENDIX A- PUBLIC CHARGING STATIONS IN EPE’S NM SERVICE TERRITORY.

<sup>1</sup> Economic Research Department, El Paso Electric, Electric Vehicles Impact Analysis. January 2020. EPE notes that this forecast may be adversely impacted by the ongoing supply chain issues.

<sup>2</sup> An EV charging port provides power to charge one vehicle at a time even though it may have multiple connectors: [https://afdc.energy.gov/fuels/electricity\\_infrastructure.html](https://afdc.energy.gov/fuels/electricity_infrastructure.html)

New Mexico Department of Transportation (“NM DOT”) has five planned locations in EPE’s NM service territory under consideration for DC Fast Charging (“DCFC”) infrastructure. NM DOT will be issuing a request for proposal seeking third-party ownership and operation of the stations in one or several of the proposed locations. EPE has also been in discussions with third party entities that are interested in the installation and operation of additional DCFC stations in EPE’s NM service territory.

EPE used the Department of Energy (“DOE”) Electric Vehicle Infrastructure Projection Tool (“EVI-Pro”) Lite<sup>3</sup> to estimate charging infrastructure needs in EPE’s NM service territory during the Plan Years to serve the projected number of EVs. The tool is a simplified, web-based version of EVI-Pro which was developed by National Renewable Energy Lab (“NREL”) in collaboration with the California Energy Commission to help estimate the EV charging infrastructure needed in a designated area to serve the projected number of EVs. Based on EPE’s estimate of EVs in the service area by the end of 2026 (provided in Table 1 above), EPE projects that the charging infrastructure currently available is not sufficient to meet EV charging needs in the Plan Years. This is summarized in Table 2 below.

**Table 2 Public Charging Port Requirements for Projected Number of Light-Duty EVs**

| Types of Charging Ports        | Ports Needed by 2026 | Existing Non-Tesla Ports Available | Existing Tesla Ports Available | Planned Ports | Additional Ports Needed by 2026 |
|--------------------------------|----------------------|------------------------------------|--------------------------------|---------------|---------------------------------|
| <b>Workplace</b>               | 67                   | 3                                  | 6                              | 0             | 58                              |
| <b>Public Level 2</b>          | 57                   | 28                                 | 0                              | 0             | 29                              |
| <b>Public DC Fast Charging</b> | 21                   | 3 <sup>4</sup>                     | N/A                            | 4             | 14                              |

As of April 2023, DOE’s EVI-Pro tool did not provide estimates for private EV charging ports such as those needed at MUDs. Through a separate MUD analysis, EPE estimates that there will be approximately 306 light-duty EVs at MUDs by the end of 2026 which will require additional EV charging infrastructure support.

### 3. PROPOSED TEP MEASURES

EPE’s TEP proposes the following strategies and measures for expanding transportation electrification in EPE’s NM service territory during the Plan Years:

- Residential Programs;
- Commercial Programs;
- New Construction Rebate Programs;
- Partnership, Research, and Innovations Program;

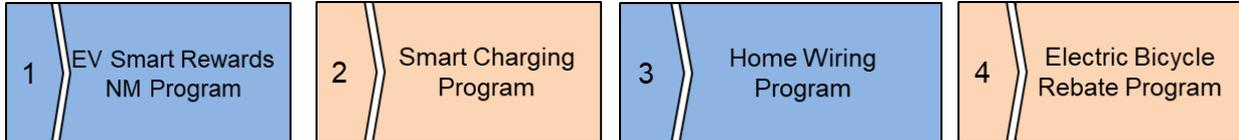
<sup>3</sup> <https://afdc.energy.gov/evi-pro-lite>.

<sup>4</sup> Although existing non-Tesla DCFC charging stations have 2 plugs, one CHAdeMO and one CCS, only one plug may be used at a single time.

- Customer Outreach Program; and
- EV rate options.

### 3.1 Residential Programs

EPE’s TEP includes the following four measures available to residential customers in EPE’s NM service territory:



#### 3.1.1 EV Smart Rewards NM Program

Summary of Program:

EPE proposes a new EV Smart Rewards NM Program that offers an opportunity for EPE New Mexico Customers to earn incentives for authorizing EPE to remotely connect to the enrolled Customer’s EV or EV charging station at Customer’s service location within EPE’s New Mexico Service Territory to schedule charging during the times most beneficial for efficient operation of the Company’s electrical grid. Customers earn a one-time enrollment incentive of \$125 and an additional annual incentive of \$50 for participating in the program. Enrolled customers can also earn an additional incentive of \$1 per event, up to a maximum of \$5 per month, by participating in low carbon or other demand response events.

The proposed EV Smart Rewards NM Program will be limited to 220<sup>5</sup> customers. The program is designed to enable EPE to evaluate customers’ acceptance and the efficacy of utility-managed EV charging program. The program will help EPE evaluate how managed charging can help reduce EV grid impacts, to optimize use of existing infrastructure, and to minimize required investment in additional infrastructure.

Qualifications:

To qualify for the incentive, the customer must meet the following criteria:

- Have an account in EPE’s NM service territory under Residential Rate 01<sup>6</sup>;
- Have a qualifying vehicle with active vehicle telematics subscription<sup>7</sup> or have any EV with a qualifying networked charging station.

<sup>5</sup> Smart Electric Power Alliance “Managed Charging Programs: Maximizing Customer Satisfaction and Grid Benefits” white paper says that technology providers reported a 10% enrollment rate based on several years’ worth of data. <https://sepapower.org/resource/managed-charging-programs-maximizing-customer-satisfaction-and-grid-benefits/>

<sup>6</sup> Customer will maintain an active account in good standing and all terms and conditions of the Customer’s applicable retail rate schedule will continue to apply. The Customer will be billed for their monthly energy usage for EV charging under their applicable retail rate schedule

<sup>7</sup> While some OEMs offer telematics as included in the sale of the vehicle, others may require their customers to purchase a subscription after a limited free-trial period. Some dealerships may offer free telematics to support sales and therefore not all customers will be subject to subscription costs. For more information, customers are encouraged to reach out to the dealership or OEM.

- a) Customers interested in participating in the program using active vehicle telematics subscription, must have a qualifying vehicle which currently includes EVs manufactured by the following companies.
    - ✓ Audi
    - ✓ BMW
    - ✓ Chevrolet
    - ✓ Ford
    - ✓ Jaguar
    - ✓ Land Rover
    - ✓ Tesla
    - ✓ Toyota
    - ✓ Volkswagen
  - b) Customers who do not own a qualifying EV listed above, may still participate using one of the qualifying networked charging stations supported for this program which currently includes stations manufactured by the following companies.
    - ✓ ChargePoint
    - ✓ Siemens
    - ✓ Smartenlt
    - ✓ EnelX
- Customer must complete 12 consecutive months in the program and allow the Company to schedule at least 80% of their charging in each month to qualify for the additional annual incentive.
  - Customer can manually opt out of a Company-scheduled EV charging session at any time. A customer will not qualify for the additional annual incentive amount if the Customer opts out of or charges outside of scheduled charging more than 20% of the time of the Company-scheduled charging sessions during a consecutive 12-month period.

If the customer does not meet the above qualifications, the customer can email EPE at [ev@epelectric.com](mailto:ev@epelectric.com) for further review.

Estimated Plan Cost:

The estimated cost of the EV Smart Rewards NM Program for the Plan Years (2024-2026) is \$714,745.

### **3.1.2. Smart Charging Program**

Summary of Program:

EPE proposes to continue the Smart Charging Program approved in Case No. 20-00241-UT and provide qualifying residential customers a \$500 rebate toward the purchase of a qualifying networked Level 2 charging station. The program is limited to two rebates per service address.

EPE also proposes to continue the Residential Low Income (“LI”) Smart Charging Program approved in Case No. 20-00241-UT with the following modifications.

- Increase the rebate amount available to low-income customers from \$500 to \$600 to further reduce out-of-pocket expenses for the purchase of a Level 2 charging station.
- Eliminate the additional rebate of up to \$1,800 to offset cost of installation because the new “Home Wiring Program” described below provides similar rebates for installation costs.

This Smart Charging Program can be combined with the new Home Wiring Program described below.

**Table 3 Smart Charging Program**

|                                 | Standard Customer | Low-Income Customer |
|---------------------------------|-------------------|---------------------|
| <b>Level 2 charging station</b> | Up to \$500       | Up to \$600         |

Qualifications:

To qualify for the program, the customer must meet the following criteria:

- Have an account in EPE’s NM service territory under Residential Rate 01;
- Have an EV that is registered with the New Mexico Motor Vehicle Division using the service address listed on EPE’s residential account;
- **Low-Income customers** must submit a self-certification of income eligibility form to demonstrate household adjusted gross income, as defined in the Income Tax Act, of equal to or less than 200% of the federal poverty level;
- Enroll in EV Smart Rewards NM Program or WHEV rate rider and have a qualifying charging station purchased after the TEP implementation date:
  - a) Enroll in EV Smart Rewards NM Program for a minimum of 18 months using Wi-Fi enabled stations from the following brands:
    - ChargePoint,
    - Siemens,
    - SmartenIt,
    - EnelX; OR
  - b) Enroll in WHEV Rate Rider and purchase the station that meets the following criteria:
    - Is certified and listed under a Nationally Recognized Testing Laboratory (NRTL); including but not limited to Underwriters Laboratories (UL) or Electrical Testing Laboratories (ETL);
    - Has Wi-Fi or cellular capabilities:
      - Low-income customers who do not have Wi-Fi in their home are not required to obtain Wi-Fi to qualify for the incentive;
    - Has smart charging capabilities to program charging schedule and respond to external signals through either Open Automated Demand Response (“OpenADR”)<sup>8</sup> or Open Charge Point Protocol (“OCPP”)<sup>9</sup> communications protocol; and

<sup>8</sup> <https://www.openadr.org/faq#3>

<sup>9</sup> <https://www.openchargealliance.org/protocols/ocpp-201/>

- Agree to share charging data with EPE (through a charging station vendor that has a data sharing agreement with EPE).

If the customer does not meet the above qualifications, the customer can email EPE at [ev@epelectric.com](mailto:ev@epelectric.com) for further review.

Estimated Plan Cost:

The estimated cost of the Smart Charging Program for the Plan Years (2024-2026) is \$180,815.

### 3.1.3 Home Wiring Program

Summary of Program:

EPE proposes to offer residential customers a rebate of up to \$1,300 for the installation of a new 240 V outlet dedicated to EV charging. The proposed rebate is designed to offset the cost of installing a dedicated outlet for an EV charging station. The proposed rebate can be used for the installation of a NEMA 14-30 and NEMA 14-50 outlet or the hardwiring of a charging station to a home’s electrical system.<sup>10</sup> If a panel update is required, EPE will provide an additional rebate amount of up to \$2,500.<sup>11</sup> The Home Wiring Program can be combined with the Smart Charging Program.

The following additional benefits will be made available to LI residential customers:

- increased rebate amount of up to \$1800; and
- ability to arrange installation up to the total incentive amount, without an up-front payment by arranging the installation through a contractor that submits a Contractor Letter of Intent and Residential TEP Application to EPE.

**Table 4 Home Wiring Program**

|                                    | Standard Customer Amount | Low-Income Customer Amount |
|------------------------------------|--------------------------|----------------------------|
| <b>Home Wiring</b>                 | Up to \$1,300            | Up to \$1,800              |
| <b>Panel Upgrade (if required)</b> | Up to \$2,500            |                            |

Qualifications:

To qualify for the program, the customer must meet the following criteria:

- Have an account in EPE’s NM service territory under Residential Rate 01;
- Own or rent a single-family home (homeowner permission required if renting home)
- Own or lease an EV that is registered with the New Mexico Motor Vehicle Division using the service address listed on EPE’s residential account.

<sup>10</sup> For NEMA reference chart, please see <https://www.stayonline.com/product-resources/nema-straight-blade-reference-chart.asp>

<sup>11</sup> EPE estimates that 20% of residential customers will require panel upgrades.

- Provide proof of installation of qualifying NEMA outlets or the hardwiring of a charging station to a home’s electrical system after the TEP implementation date with receipts;
- Provide a proof of passing City inspection; and
- Enroll and commit to participate in EV Smart Rewards NM Program for a minimum of 18 months (if customer has a qualifying EV or charging station). Customers who do not have a qualifying vehicle or charging station, will only be required to participate in WHEV rate rider<sup>12</sup>;
- **Low-income customers** must submit a Self-Certification of income eligibility form to demonstrate household adjusted gross income, as defined in the Income Tax Act, of equal to or less than 200% of the federal poverty level.
- Rebates shall not exceed 100 percent of the costs paid by the customer.

If the customer does not meet the above qualifications, the customer can email EPE at [ev@epelectric.com](mailto:ev@epelectric.com) for further review.

Estimated Plan Cost:

The estimated cost of the Home Wiring Program for the Plan Years (2024-2026) is \$487,780 with an additional \$183,968 allocated specifically for residential customers that may require a panel upgrade.

**3.1.4 Electric Bicycle Rebate Program**

Summary of Program:

EPE proposes to offer residential customers a rebate toward the purchase of an Electric Bicycle (“e-bike”). This rebate is designed to help offset a portion of the upfront cost of an e-bike. The program will provide an affordable eco-friendly transportation option that allows ease of travel throughout the community, helps reduce greenhouse gas emissions, introduces customers to electric transportation and helps customers reduce transportation costs. The program will be limited to one rebate per household and the proposed budget is estimated to cover rebates for 110 standard customers and 30 LI customers.

**Table 5 Electric Bicycle Rebate Program**

|                      | Standard Customer           | Low-Income Customer           |
|----------------------|-----------------------------|-------------------------------|
| <b>e-bike rebate</b> | 50% of the cost up to \$900 | 70% of the cost up to \$1,300 |

Qualifications:

To qualify for the rebate, the customer must meet the following criteria:

- Purchase an electric bicycle that is of class 1, 2, or 3, or an electric tricycle (“e-trike”) that:
  - Has an electric motor powered by a battery that can be charged with an external charger;
  - Includes pedals that can propel it under human power;

<sup>12</sup> Customers that participate in the EV Smart Rewards NM Program are not required but may also participate in the Whole House Electric Vehicle Rate Rider.

- Provide proof of purchase to EPE after the TEP implementation date;
- Have an existing electric account in EPE’s NM service territory under Residential Rate No. 01; and
- The primary use for the E-bike should be for transportation needs in order offset vehicle miles.
- **Low-Income customers** must submit a Self-Certification of income eligibility form to demonstrate household adjusted gross income, as defined in the Income Tax Act, of equal to or less than 200% of the federal poverty level.

EPE will work with local bicycle shops to provide an instant rebate for customers, where possible.

If the customer does not meet the above qualifications, the customer can email EPE at [ev@epelectric.com](mailto:ev@epelectric.com) for further review.

Estimated Plan Cost:

The estimated cost of the Electric Bicycle Rebate Program for the Plan Years (2024-2026) is \$145,073.

**3.2 Commercial Programs**

EPE’s TEP includes the following four measures available to commercial customers in EPE’s NM service territory:



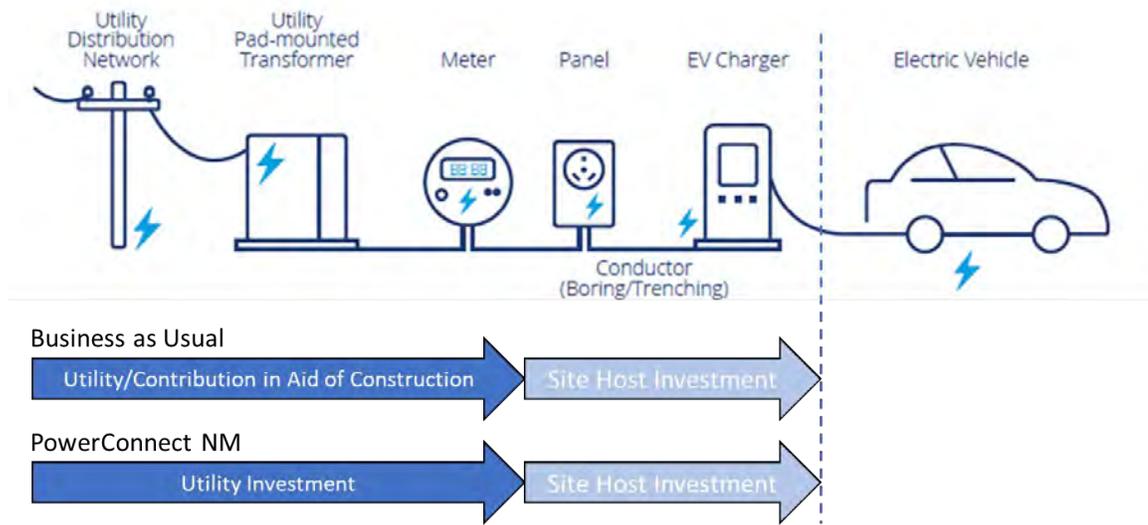
**3.2.1 PowerConnect NM Program**

Summary of Program:

EPE proposes a rebate program for commercial customers who are installing EV charging infrastructure on their premises that will help reduce the customer’s upfront cost of upgrades or improvements on EPE’s distribution system, up to the utility meter. Please refer to Table 6 for the proposed maximum rebate amounts.

**Table 6 PowerConnect NM Program**

|                            | Standard Customer Amount (per site) | Underserved Community Customer Amount (per site) <sup>13</sup> |
|----------------------------|-------------------------------------|--|
| <b>Workplace</b>           | Up to \$20,000                      | Up to \$30,000   |
| <b>Public</b>              | Up to \$20,000                      | Up to \$30,000   |
| <b>Public-DCFC</b>         | Up to \$150,000                     | Up to \$200,000  |
| <b>Fleet</b>               | Up to \$100,000                     | Up to \$150,000  |
| <b>Multi-Unit Dwelling</b> | Up to \$20,000                      | Up to \$30,000   |



**Figure 1 PowerConnect NM Program**

Qualifications:

To qualify for the program, customers must meet the requirements found in APPENDIX B-COMMERCIAL PROGRAMS REQUIREMENTS and meet the following criteria:

- Have a site that requires upgrades or improvements to EPE’s distribution system or new service for installation of EV charging infrastructure; and
- Request utility infrastructure upgrades through EPE’s Line Extension Policy, Rule No. 8.<sup>14</sup>

Estimated Plan Cost:

The estimated cost of the PowerConnect NM Program for the Plan Years (2024-2026) is \$1,890,568.

<sup>13</sup> Underserved communities are defined as an area in the state, including a county, municipality or neighborhood, or subject of such area where the median income of the area is low-income and will be determined using EPA’s Environmental Justice Screening and Mapping Tool <https://ejscreen.epa.gov/mapper/>.

<sup>14</sup> For reference, please see EPE’s website: [Electricity for West Texas and Southern New Mexico | El Paso Electric | New Line Extension Guide \(epelectric.com\)](https://www.epelectric.com)

### 3.2.2 EV Charging Equipment Rebate Program

Summary of Program:

EPE proposes an EV charging equipment rebate program for commercial customers in its NM service territory. The rebate amounts are designed to cover 50% of total equipment costs or 70% of total equipment cost for commercial entities located in underserved communities up to the maximum rebate amounts listed in Table 7. This program may be combined with PowerConnect NM Program and EV Charging Installation Rebate Program.

**Table 7 EV Charging Equipment Rebate Program**

| Charging Equipment            | Output (kW)   | Max Rebate Amount per Charging Equipment | Max rebate amount per Charging Equipment in Underserved Communities |
|-------------------------------|---------------|--|---|
| <b>240V Outlet</b>            | 1.4 to 4      | Up to \$200                              | Up to \$280   |
| <b>AC-1 charging stations</b> | 6.2 to 19.9   | Up to \$6,000                            | Up to \$8,400   |
| <b>AC-2 charging stations</b> | 20 and above  | Up to \$6,500                            | Up to \$9,100   |
| <b>DC-1 charging stations</b> | 20 to 99.9    | Up to \$33,000                           | Up to \$46,000  |
| <b>DC-2 charging stations</b> | 100 and above | Up to \$74,000                           | Up to \$104,000   |

Qualifications:

The requirements to qualify for the TEP commercial programs are provided in APPENDIX B-COMMERCIAL PROGRAMS REQUIREMENTS.

Estimated Plan Cost:

The estimated cost of the EV Charging Equipment Rebate Program for the Plan Years (2024-2026) is \$1,635,745.

### 3.2.3 EV Charging Installation Rebate Program

Summary of Program:

EPE's proposes to modify its current Workplace, Public, DCFC and Public Transit and Customer Fleet Smart Charging Programs to provide commercial customers rebates to offset 50% of the installation costs of a qualifying networked charging station on the customer-side of the meter, up to the maximum rebate amount per site listed in Table 8 below.

For charging equipment located in underserved communities, the rebate amount will cover 70% of total installation costs on customer-side of the meter up to maximum rebate amount listed in

Table 8. This program may be combined with PowerConnect NM Program and EV Charging Equipment Rebate Program.

**Table 8 EV Charging Installation Rebate Program**

| Charging Equipment                  | Max Rebate Amount per site | Max rebate amount per site in Underserved Communities |
|-------------------------------------|----------------------------|---|
| <b>240V Outlet</b>                  | Up to \$1,500              | Up to \$2,100   |
| <b>AC charging stations</b>         | Up to \$7,500              | Up to \$10,500  |
| <b>AC/DC fast charging stations</b> | Up to \$53,100             | Up to \$74,380  |

Qualifications:

To qualify for the program customers must meet the Commercial Program Requirements described in APPENDIX B- COMMERCIAL PROGRAMS REQUIREMENTS.

Estimated Cost:

The estimated cost of the EV Charging Installation Rebate Program for the Plan Years (2024-2026) is \$1,530,798.

**3.2.4 Take-Charge NM Program**

Summary of Program:

EPE proposes a charging-as-a-service program that will provide a turn-key solution for EV infrastructure with no direct cost to commercial customers in EPE’s NM service territory. This program is designed to cover the cost of the infrastructure on both the utility and customer sides of the meter, including EV charging station equipment and installation as well as project management services.

Qualifications:

To qualify for the program, the applying entity must agree that the EV outlets and/or level 2 charging stations installed at the parking lots will be exclusively used for EV charging only. Priority will be given to charging stations for multi-unit dwellings, EV fleets, and public charging stations located in underserved communities.

Estimated Plan Cost

The estimated cost of the NM Take Charge Program for the Plan Years (2024-2026) is \$1,313,221.

**3.3 New Construction Programs**

EPE proposes to offer two programs to help buildout of EV-ready single-family homes and MUDs.

### 3.3.1 EV-Ready Homes Program

Summary of Program:

EPE proposes a rebate program for home builders and developers to construct new EV-ready single-family homes. This program will offer a rebate up to \$450 to cover approximately 100% of the costs for installing a 240V NEMA 14-30 or NEMA 14-50 outlet for a new construction home. The Program is limited to one rebate for each new construction single-family home.

**Table 9 EV-Ready Homes Program**

| Max Rebate Amount Per Outlet    |             |
|---------------------------------|-------------|
| <b>NEMA Outlet installation</b> | Up to \$450 |

Qualifications:

To qualify for the program rebate, home builders must meet the following criteria:

- Have a new construction home within EPE’s NM service territory connected to EPE’s grid;
- Provide a proof of installation of qualifying NEMA outlet after the TEP implementation date;
- Pre-install conduit, designate enough space and capacity on the main electrical panel or garage subpanel for at least a 30 amp, 240V dedicated branch circuit linking the electrical panel to the EV-ready outlet;
- Wire an EV-ready outlet (a 240V grounded alternating current receptacle); and
- Install EPE-provided signage for EV-ready outlet.

The future homeowner may be eligible for EPE’s Smart Charging Program, but the service address will not be eligible for Home Wiring Rebate Program.

Estimated Cost:

The estimated cost of the EV-Ready Homes Program for the Plan Years (2024-2026) is \$141,919.

### 3.3.2 EV-Ready MUDs Program

Summary of Program:

EPE proposes a rebate program for builders and developers to construct new EV-ready MUDs in its NM service territory. EPE proposes to cover up to 70% of EV-ready wiring costs with this program. This program can be combined with EV Charging Equipment Rebate Program to cover the cost of charging equipment.

**Table 10 EV-Ready MUDs Program**

| Maximum New Construction MUD rebate Per Port         |               |
|--|---------------|
| <b>L2 EV-Ready outlet installation</b>               | Up to \$1,500 |
| <b>L2 charging station up to 19.2kW installation</b> | Up to \$5,000 |

Qualifications:

To qualify for the program, MUD builders/developers must meet the following criteria:

- Have a new construction MUD within EPE’s NM service territory connected to EPE’s grid;
- Provide proof of installation after the TEP implementation date;
- Pre-install conduit, designate enough space and capacity on the main electrical panel or garage subpanel for dedicated branch circuit linking the electrical panel to the EV-ready outlet or charging station;
- Install EV-ready outlet or charging station;
  - EV-ready outlet should have means of payment including but not limited to a Quick Response (“QR”) code; and
- Install signage.

Estimated Plan Cost

The estimated cost of the EV-Ready MUD Program for the Plan Years (2024-2026) is \$157,688.

**3.4 Partnership, Research, and Innovations Program**

Summary of Program:

EPE anticipates spending up to \$3,153,750 for the Plan Years for the development of new innovative projects that support the expansion of transportation electrification in collaboration and partnership with external stakeholders in its NM service territory such communities, municipalities, academia, research, and non-profit organizations. The Program will focus on innovative technologies and solutions that evolve in the market that may improve customer access to EV infrastructure and/or provide benefits to the electric grid.

Examples of qualifying projects:

Examples of possible PRI projects stemming from our research and experience and stakeholder engagement meetings include but will not be limited to, car and/or bike sharing programs, vehicle to everything (V2X) projects, vehicle to grid (V2G) projects, energy storage solutions for fleet charging optimization. EPE is focused on projects that include commercially available technologies. EPE will evaluate and consider other technologies and programs that evolve in the market that may improve the customer access to EV infrastructure, especially for LI customers and underserved communities, and/or provide benefits to the electric grid.

Estimated Cost:

The estimated cost of the Partnership, Research, and Innovations Program for the Plan Years (2024-2026) is \$3,153,750.

**3.5 Customer Outreach Program**

Summary of Program:

EPE proposes a multi-faceted Customer Outreach Program that combines the educational, marketing and outreach initiatives described below to support the expansion of transportation electrification in EPE’s NM service territory across multiple market segments.

The Program will include customized messaging for LI customers and underserved communities, as well as commercial customers. EPE will employ industry best practices to guide and deploy the Program as described below.

**3.5.1 Education Initiatives**

EPE will provide educational messaging and materials, use social media, digital, print, television, and radio to:

- Expand customers’ awareness and knowledge of the benefits of transportation electrification; available EV models, charging and rate options; and available rebates and incentives to reduce upfront and long-term costs of EV ownership.
- Provide tools and resources to help customers acquire EVs and install EV charging stations; and take advantage of available incentives, rebates, rate options and programs.
- Provide an educational experience through interactive rEV presentations and engagement for high school and middle school students. The curriculum will dispel common misconceptions and promote future EV advocacy. The program will help students understand the economic, environmental, and societal benefits of buying an EV.



LI engagement will be accomplished in partnership with trusted low-income organizations.



**Figure 2 E-bikes and EVs showcase at the Branigan Memorial Library event**



**Figure 3 rEV Educational Presentation**

### **3.5.2 Marketing Initiatives**

EPE will use search engine marketing, banners, social media, newsletter, digital, print, television, and radio, as well as community events and presentations to promote TEP programs to residential, LI and commercial customers including available charging rebates, incentives, rate options and programs.



Figure 4 Samples of Creative Campaign

### 3.5.3 Outreach Initiatives

EPE will coordinate with external stakeholders including, but not limited to, local low-income organizations, home builders, electricians, apartment associations, auto dealerships, businesses, utilities, municipalities, fleet owners, school districts, and universities to:

- Provide advisory services on electrification opportunities and provide contact information on EPE website,
- Identify and assess opportunities for development of EV-ready infrastructure;
- Promote and support the development of EV-ready infrastructure;
- Connect customers to TEP Program incentives and rebates;

- Coordinate events including but not limited to, Drive Electric Earth Day, National Drive Electric Week, PowerUp Expo, car shows, and library events.



**Figure 5 Example of EV Showcase and Education at PowerUp Expo Event**

- Provide presentations, including but not limited to electricians, home builders, fleets, school districts and community organizations regarding charging and rate options, available rebates, and incentives to reduce upfront and long-term costs of EV ownership, tools, and resources to install EV charging stations;
- Provide ride and drive events; and
- Provide community tabling events at locations including but not limited to schools, grocery stores, businesses, and restaurants.



**Figure 6 EV Education at Las Cruces Farmers & Crafts Market and Anthony Elementary**

These customer education, marketing, and outreach initiatives will be critical to the successful expansion of transportation electrification in EPE’s NM service territory and the success of EPE’s TEP.

Estimated Cost:

The estimated cost of the Customer Outreach Program for the Plan Years (2024-2026) is \$2,063,955. Table 11 summarizes the projected costs of the TEP Program components during the Plan Years (2024-2026) including Flex Funds of 5% to account for inflation.

**Table 11 Customer Outreach Forecasted Budget Summary**

| AREAS OF FOCUS           | TOTAL              |
|--------------------------|--------------------|
| <b>Education</b>         | \$205,940          |
| <b>Marketing</b>         | \$83,410           |
| <b>Outreach</b>          | \$1,083,574        |
| <b>Production/ Media</b> | \$592,747          |
| <b>Flex Funds</b>        | \$98,284           |
| <b>GRAND TOTAL</b>       | <b>\$2,063,955</b> |

### 3.6 Rate Options

#### 3.6.1 Continuation of Whole House/Whole Service EV Rate Riders Incentive Credit

EPE's Whole House/Whole Service EV Rate Rider Incentive Credit was approved in Case No. 20-00241-UT and is applicable to the following rate schedules:

- Rate No. 1- Residential Service Rate,
- Rate No. 3 Small General Service Rate,
- Rate No. 4- General Service Rate, and
- Rate No. 7- City and County Service Rate classes.

To qualify for this rate rider, a customer must have a qualifying plug-in EV that is registered with the New Mexico Motor Vehicle Division using the same service address as the EPE residential or commercial account. The WHEV/WSEV Rate Rider provides an incentive, in the form of a credit \$/kWh, to energy usage during the super off-peak hours. EPE is proposing to continue offering the WHEV/WSEV Rate Rider without any modifications to the incentive credit rate.

The WHEV/WSEV Rate Rider provides EV owner-customers the opportunity for an incentive without the added cost for installation of a second meter which is required to take service under Rate No. 42. No additional monthly charges are tied to these rate riders. However, the incentive credit may be limited to meet the Monthly Minimum Charge provision in each applicable tariff.

#### 3.6.2 Demand Adjustment Rider

Due to the lessened control of when public EV charging may occur, attaining electricity cost savings will require some innovation on behalf of the charging station owner. To encourage investment in public charging, EPE is proposing a new Demand Adjustment Rider designed to meet the needs of separately metered public charging site hosts, particularly those offering DCFC services. This rider will only be available to qualifying separately metered charging stations with more than 50kW of demand and that are taking service under Rates 04 – General Service and 09 – Large Power Service. The rider will limit the amount of demand billed to a qualifying customer during any billing period in which the actual calculated load factor is less than 15%.

### 3.6.3 Rate No. 42- Experimental EV Charging Rate.

Rate No. 42 – Experimental Electric Vehicle Charging Rate was approved by final order in NMPRC Case No. 20-00104-UT (the "2020 Rate Case") and is currently available to residential and commercial customers for EV charging through a separate meter at voltages up to 480 volts. The current rate includes a monthly meter charge, offers low energy rates for EV charging during summer off-peak and non-summer months, and a very low energy charge during the super off-peak hours. Rate No. 42 is designed to incentivize customers to charge during super off-peak hours, between midnight and early morning, thereby increasing the efficient utilization of the grid.

If standalone EV metering is not a viable option for the customer, EPE offers a time-varying rate option for all the rate schedules that residential and commercial customers take service under. The off-peak energy charges in those rate options provide customers an opportunity to save on the electricity cost for charging their vehicles.

## 4. COST SUMMARY (574.11(E)(2))

Table 12 provides the estimated TEP costs for the Plan Years (2024-2026).

**Table 12 TEP Cost Estimate**

| TEP Measure                             | Standard Customers     |           | LI and Underserved Communities |           |
|---|------------------------|-----------|--------------------------------|-----------|
|   | Estimated Program Size | Cost      | Estimated Program Size         | Cost      |
| <b>Residential Programs:</b>            |                        |           |                                |           |
| a) EV Smart Rewards NM Program          | 220                    | \$714,745 | Included                       |           |
| b) Smart Charging Program               | 260                    | \$136,662 | 70                             | \$44,153  |
| c) Home Wiring Program                  | 260                    | \$355,322 | 70                             | \$132,458 |
| If Panel upgrade is required            | 70                     | \$183,968 | Included                       |           |
| d) Electric Bicycle Rebate Program      | 110                    | \$104,074 | 30                             | \$40,999  |
| <b>Commercial Programs:</b>             |                        |           |                                |           |
| a) PowerConnect NM                      | \$1,493,076            |           | \$397,492                      |           |
| b) EV Charging Equipment Rebate Program | \$1,291,830            |           | \$343,915                      |           |

| TEP Measure                                   | Standard Customers     |             | LI and Underserved Communities |                     |
|---|------------------------|-------------|--------------------------------|---------------------|
|   | Estimated Program Size | Cost        | Estimated Program Size         | Cost                |
| c) EV Charging Installation Rebate Program    |                        | \$1,208,948 |                                | \$321,850           |
| d) Take-Charge NM                             |                        | \$1,037,117 |                                | \$276,105           |
| <b>New Construction Program:</b>              |                        |             |                                |                     |
| a) EV-Ready Homes Program                     | 300                    | \$141,919   |                                | Included            |
| b) EV-Ready MUDs Program                      | 6                      | \$157,688   |                                | Included            |
| <b>Partnership, Research, and Innovations</b> |                        |             |                                | \$3,153,750         |
| <b>Customer Outreach Program</b>              |                        | \$1,638,060 |                                | \$327,612           |
| a) Flex fund                                  |                        |             |                                | \$98,283            |
| <b>TEP Administration</b>                     |                        |             |                                | \$1,055,562         |
| <b>Plan Year Total</b>                        |                        |             |                                | <b>\$14,655,588</b> |

## 5. CONCLUSION

EPE designed the TEP measures to support and expand access to transportation electrification for all of its customers, including low-income customers and underserved communities, and address all EV market segments including light-, medium- and heavy-duty EVs, as well as electric bicycles. The TEP also includes a robust Outreach Program designed to address customer barriers to EV adoption including to improve customer understanding and awareness of EVs, reduce charging infrastructure gaps, reduce greenhouse gas emissions, and air pollution, offer rate options and active managed charging programs that incentivize off-peak charging which can potentially improve electric grid efficiency, system utilization and facilitate future operational flexibility. In addition, the TEP was designed to support customer choice in EV charging and third-party investment, and support creation of additional skilled jobs, consistent with statutory requirements.



## 6. APPENDIX A- PUBLIC CHARGING STATIONS IN EPE'S NM SERVICE TERRITORY

Table 13 EV Charging Ports as of March 03, 2023

| Station Name                 | Street Address       | City       | State | ZIP   | Level 2-Non-Tesla charging port | Level 2-Tesla Ports | DCFC-Non-Tesla Charging Port | DCFC-Tesla Charging Port | Total Ports |
|------------------------------|----------------------|------------|-------|-------|---------------------------------|---------------------|------------------------------|--------------------------|-------------|
| Sage Café                    | 6121 Reynolds Dr     | Las Cruces | NM    | 88011 | 2                               |                     |                              |                          | 2           |
| Staybridge Suites            | 2651 E. Northrise Dr | Las Cruces | NM    | 88011 | 2                               |                     |                              |                          | 2           |
| The Green Offices Building   | 166 Roadrunner Pkwy  | Las Cruces | NM    | 88011 | 1                               | 6                   |                              |                          | 7           |
| Comfort Suites               | 236 N Telshor Blvd   | Las Cruces | NM    | 88011 | 4                               |                     |                              |                          | 4           |
| Chick-fil-A                  | 2091 E Lohman        | Las Cruces | NM    | 88011 | 4                               |                     |                              |                          | 4           |
| Castañeda Building           | 1501 E Hadley Ave    | Las Cruces | NM    | 88001 | 2                               |                     |                              |                          | 2           |
| Las Cruces City Hall         | 700 N Main St        | Las Cruces | NM    | 88001 | 2                               |                     |                              |                          | 2           |
| Museum of Nature and Science | 411 N Downtown Mall  | Las Cruces | NM    | 88001 | 2                               |                     |                              |                          | 2           |
| Las Cruces Downtown Plaza    | 101 E Organ Ave      | Las Cruces | NM    | 88001 | 2                               |                     |                              |                          | 2           |
| La Llorona Park              | 3479 W Picacho Ave   | Las Cruces | NM    | 88007 | 2                               |                     |                              |                          | 2           |
| Sisbarro Buick GMC           | 1775 S Valley Dr     | Las Cruces | NM    | 88005 |                                 |                     | 1                            |                          | 2           |



| Station Name                        | Street Address       | City         | State | ZIP   | Level 2-Non-Tesla charging port | Level 2-Tesla Ports | DCFC-Non-Tesla Charging Port | DCFC-Tesla Charging Port | Total Ports |
|-------------------------------------|----------------------|--------------|-------|-------|---------------------------------|---------------------|------------------------------|--------------------------|-------------|
| <b>Borman Hyundai</b>               | 280 W Boutz Rd       | Las Cruces   | NM    | 88005 |                                 |                     | 2 <sup>15</sup>              |                          | 4           |
| <b>Courtyard Las Cruces NMSU</b>    | 456 E University Ave | Las Cruces   | NM    | 88005 | 2                               |                     |                              |                          | 2           |
| <b>Las Cruces Convention Center</b> | 680 E University Ave | Las Cruces   | NM    | 88001 | 4                               |                     |                              |                          | 4           |
| <b>Solar Smart Living LLC</b>       | 108 Ray Ward Pl      | Santa Teresa | NM    | 88008 | 2                               |                     |                              |                          | 2           |
| <b>Totals</b>                       |                      |              |       |       | <b>31</b>                       | <b>6</b>            | <b>3</b>                     |                          | <b>40</b>   |

<sup>15</sup> Although existing non-Tesla DCFC charging stations have 2 plugs, one CHAdeMO and one CCS, only one plug may be used at a single time

## 7. APPENDIX B- COMMERCIAL PROGRAMS REQUIREMENTS

To qualify, customers must:

- Have a new or existing electric account in EPE’s NM service territory;
- Purchase a 240V outlet, Level 2 or AC/DC fast charging station/s after the TEP implementation date that meet the following requirements:
  - Certified and listed under a Nationally Recognized Testing Laboratory (NRTL); including but not limited to Underwriters Laboratories (UL) or Electrical Testing Laboratories (ETL);
  - Includes smart charging capabilities to program charging schedule and respond to external signals through either OpenADR or OCPP communications protocol;
  - Wi-Fi or cellular capable;
  - Includes available non-proprietary charging plugs (J1771, CSS, CHAdEMO, or North American Charging Standard if it is open to multiple EV brands)
  - NEMA outlets should have means of payment including but not limited to a Quick Response (“QR”) code;
- Have EV charging equipment or distribution grid be tied to El Paso Electric’s grid;
- Share charging data with EPE (Military entities may be excluded from this requirement);
- Provide proof of installation completed after the TEP implementation date; and
- Provide a proof of passing City inspection.

In order to not exceed project costs, external grant and incentives will be considered when issuing program rebate amounts.

For projects to qualify for underserved community program incentives, the charging equipment must be located in the area identified as underserved using EPA’s Environmental Justice Screening and Mapping Tool<sup>16</sup>.

For charging stations that do not meet qualification criteria specified above, customers can email at [ev@epelectric.com](mailto:ev@epelectric.com)

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<sup>16</sup> EPA’s Environmental Justice Screening and Mapping Tool <https://ejscreen.epa.gov/mapper/>

## **TEP STAKEHOLDERS**

In early 2023, EPE began informal meetings to hear customers' for EPE's consideration in the development of the next TEP. The following entities participated in these discussions:

- City of Las Cruces
- Doña Ana County
- South-Central Regional Transit District
- Las Cruces Public Schools
- Roadrunner Transit
- New Mexico State University
- Las Cruces Home Builders
- ChargePoint
- Solar Smart Living
- Prosperity Works
- Western Resource Advocates
- New Mexico Department of Transportation
- Mesilla Valley Metropolitan Planning Organization
- KT Homes
- Red Cliff Homes.

## CUSTOMER SURVEYS

### 1. Standard Residential Customer Survey

EPE's standard residential customer survey was completed by 747 customers in EPE's NM service territory.

(a) Customer awareness:

EPE's public customer survey indicated that surveyed consumers are somewhat familiar with EV technology and the benefits EVs can provide. Specifically, EPE's survey results indicated, a) over 80% of respondents know the difference between an all-electric vehicle and a plug-in hybrid and b) over 50% are aware that you can charge an EV at home and that c) the average range of an EV is 250 miles.

(b) Receptiveness to EPE's proposed TEP programs:

- 48.6% of surveyed customers would enroll in a special rate that could help them save money by charging at night and 22.9% were unsure.
- 50.5% of surveyed customers would allow EPE to schedule their home charging at night or during times of excess renewable generation with 20.8% were unsure
- 56.9% of surveyed customers would consider purchasing an EV, if EPE offered rebates for the installation of a 240V outlet in their garage.
- Over 50% of surveyed customers support EPE ownership and operation of public EV charging stations.

(c) Surveyed customers had the following demographics:

- The majority were over 56;
- Most have some college or a bachelor's degree;
- 72% report having an income of \$56k or higher;
- 67.3% report owning a home.

The public survey results showed a positive perception to EPE's proposed Plan Year TEP programs.

### 2. Low-Income Customer Survey:

The online survey was completed by 119 low-income customers located in EPE's NM Service territory. The survey provided information about (a) customer awareness, (b) EV-owner demographics, and (c) interest in ownership.

(a) Customer awareness:

EPE's LI customer survey revealed that consumers are somewhat familiar with EV technology and EPE's programs but were largely unfamiliar with other available

incentives and additional benefits EVs can provide. Specifically, EPE's survey indicated that out of all customers that completed the survey: a) almost 75% knew the difference between an all-electric vehicle and a plug-in hybrid vehicle; b) 25% of respondents indicated that they were aware of El Paso Electric's rebate program for charging stations and home installations; c) over half of respondents were not aware of the available Federal Tax Credit for the purchase of electric or plug-in hybrid vehicles; d) over 70% of respondents did not know that fueling a vehicle with electricity is cheaper than with gasoline.

To evaluate general perceptions about EVs, survey participants were asked open-ended questions. The most common responses were that EVs are too expensive, and available charging stations are sparse, with many respondents being concerned about the longevity of the battery and potential maintenance issues.

When asked what is currently preventing customers from purchasing an electric car, most of the respondents said the high price of an EV, that the technology may not be ready, and other factors such as credit, and a potential increase to the electric bill.

(b) Surveyed customer demographics:

EPE's LI customer survey showed that less than 1% of the survey respondents owned an EV. Survey respondents had the following characteristics:

- The majority fall between the ages of 56 to 65;
- The majority of respondents indicated they live in an apartment or rent a home;
- Most have some college or a bachelor's degree;
- Majority of respondents reported having income of \$24k or less, with only 13% of respondents making \$40k and above;
- Over 90% reported not having solar panels on their roof.

(c) Interest in Ownership:

Participants were also asked if they are in the market to purchase a new or used vehicle. Approximately 80% of customers reported that they are not in the market to purchase a vehicle, and approximately 60% of participants responded that they would consider purchasing an EV and were willing to purchase from an online dealer but would not make the purchase without test driving the vehicle. The most important factors when purchasing an EV identified by participants were as follows:

- The initial purchase cost;
- The number of charging stations available locally;
- The long-term cost of maintenance;
- The amount of time the car needs to recharge before it can be driven;
- The fuel savings; and
- The car's performance.

When asked about charging location preferences, approximately 70% of survey participants indicated that they expect to charge at home most of the time, approximately 20% expect to charge in public places, and the remaining participants reported they expect to charge at work. Customers were also surveyed regarding interest in incentive programs with approximately 1/3 of respondents interested in the tax credit on EVs and approximately 1/3 interested in rebates on a home charging station and installation as well as special EV rates.

These responses are consistent with industry-wide research identifying:

- (a) high upfront costs;
- (b) lack of charging infrastructure; and
- (c) low awareness and understanding of electricity as a transportation fuel as existing customer barriers to EV adoption.<sup>1</sup>

Through its market research, current TEP, stakeholder and customer engagement, EPE determined that the proposed TEP Plan Year programs are reasonable steps to continue expanding transportation electrification over the next three years.

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<sup>1</sup> <https://www.transportation.gov/rural/ev/toolkit/ev-benefits-and-challenges/challenges-and-evolving-solutions>

## **FEDERAL AND STATE PROGRAMS**

### **1. FEDERAL PROGRAMS AND GRANTS**

#### **1.1 Infrastructure Investment and Jobs Act**

In November 2021, the Federal Infrastructure Investment and Jobs Act ("IIJA")<sup>1</sup> was enacted, increasing the U.S. commitment to the electrification of the transportation sector with \$7.5 billion for a nationwide network of EV charging stations and an additional \$5 billion for low-carbon and zero-emission school buses.

#### **1.2 National Electric Vehicle Infrastructure**

Under the IIJA, the U.S. Department of Transportation's Federal Highway Administration ("FHWA") allocated funding to states to enhance their publicly accessible EV charging infrastructure through the National Electric Vehicle Infrastructure ("NEVI") Formula Program. Pursuant to the NEVI Formula Program, the NM DOT developed the New Mexico Electric Vehicle Infrastructure Deployment Plan,<sup>2</sup> which was approved by the FHWA in 2022. The multi-year plan will focus on interstate routes first, with off-interstate routes and urban areas to be addressed in the following years. NM DOT expects to receive approximately \$38 million from this program between 2022-2026. The first target of the plan is to deploy publicly accessible Direct Charging Fast Charging ("DCFC") stations along Interstate corridors over the next two years (by Fall 2024). In years 3-5, NM DOT will use the remaining NEVI funds to maximize equity, economic development, EV adoption, and local air quality by deploying EV charging in community and corridor locations that best meet the needs of EV drivers in the state.

Prior to developing the NEVI Formula Program, NM DOT also had funding for planning, engineering, design, and installation of EV DCFC infrastructure in rural communities and low and moderate-income areas of the state through its American Rescue Plan Act ("ARPA") program<sup>3</sup>. However, communities within EPE's NM service territory were not selected for this grant award<sup>4</sup>.

#### **1.3 Clean School Bus Program**

As a result of IIJA, another program that was created was a 5-year Clean School Bus Program<sup>5</sup> administered by the Environmental Protection Agency ("EPA") which launched in 2022. This program offers funding to school districts for electrification of their bus fleet and provides incentives for buses and charging infrastructure on the customer side of the meter. This program does not cover any utility-side of the meter upgrades that may be needed to support the installation

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<sup>1</sup> For a copy of the act, please see <https://www.congress.gov/bill/117th-congress/house-bill/3684>.

<sup>2</sup> For a copy of the NM DOT NEVI deployment plan, please see <https://www.dot.nm.gov/nevi/>

<sup>3</sup> For a press release on ARPA funding, please see <https://www.dot.nm.gov/event/dc-fast-ev-charging-grant-program/>

<sup>4</sup> For ARPA grant press release, please see: <https://www.dot.nm.gov/blog/2022/11/08/nmdot-announces-recipients-of-5-1-million-ev-charging-station-grant/>

<sup>5</sup> For a description of the program, please see <https://www.epa.gov/cleanschoolbus>

of charging stations. In 2022, Las Cruces Public Schools, located in EPE's New Mexico service territory, were awarded a grant for five all-electric school buses<sup>6</sup>.

#### **1.4 Low or No Emission Vehicle Program**

In addition, Federal Transit Administration currently offers a Low or No Emission Vehicle Program<sup>7</sup> to states and local governmental authorities for the purchase or lease of zero-emission and low-emission buses as well as acquisition, construction, and leasing of required supporting facilities. In 2022, two transit agencies within EPE's NM service territory were awarded this grant for purchases of all-electric transit buses, which include Roadrunner Transit and South Central Regional Transit District.

#### **1.5 Inflation Reduction Act**

In August 2022, the federal Inflation Reduction Act<sup>8</sup> was enacted, under which federal tax credits are available not only for new EVs but also for used EVs. Additionally, the act extended tax credits for new light-duty EVs through 2032. Commercial EVs will also be eligible for federal tax credits for the first time ever, up to 30% of the sales price up to \$7,500 for vehicles with a Gross Vehicle Weight Rating ("GVWR") of less than 14,000 pounds and up to \$40,000 for GVWR of 14,000 pounds or greater. The law allocates \$3 billion for electrifying the United States Postal Service fleet, including vehicles, and charging infrastructure, and \$1 billion to states, municipalities, Indian tribes, or non-profit school transportation associations to replace certain heavy-duty vehicles with clean EVs. The law also includes provisions of support for EV manufacturing and supply chains.

As part of the Alternative Fuel Infrastructure Tax Credit, beginning January 01, 2023, fueling equipment for electricity is eligible for a tax credit of 30% of the cost or 6% in the case of property subject to depreciation, not to exceed \$100,000. A 30% tax credit may be received for those projects that meet prevailing wage and apprenticeship requirements.<sup>9</sup>

#### **1.6 Charging and Fueling Infrastructure Discretionary Grant**

In 2023, Charging and Fueling Infrastructure ("CFI") Discretionary Grant Program<sup>10</sup> was established by the IIJA that was designed to accelerate an electrified and alternative fuel transportation system that is convenient, affordable, reliable, equitable, accessible, and safe. The program will help put the U.S. on a path to a nationwide network of at least 500,000 EV charging stations by 2030 and improve networks for vehicles. The CFI program will complement existing Federal programs, facilitate broad public access to a national infrastructure network to accelerate adoption of zero emission vehicles, and implement Justice40 objectives, lower transportation

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<sup>6</sup> For a list of EPA's Clean School Bus Program awards, please see <https://www.epa.gov/cleanschoolbus/awarded-clean-school-bus-program-rebates>

<sup>7</sup> For a description of Federal Transit Administration Low or No Emission Vehicle Program, please see <https://www.transit.dot.gov/lowno>

<sup>8</sup> For a copy of the act, please see <https://www.congress.gov/bill/117th-congress/house-bill/5376/text>.

<sup>9</sup> Prevailing wage and apprenticeship initial guide; <https://www.federalregister.gov/documents/2022/11/30/2022-26108/prevailing-wage-and-apprenticeship-initial-guidance-under-section-45b6bii-and-other-substantially>

<sup>10</sup> CFI Grant Program; <https://www.fhwa.dot.gov/environment/cfi/>

costs, and increase economic opportunity. CFI provides two funding opportunities (a) Community Charging and Fueling Grants which are expected to expand or fill gaps in access to charging or alternative fueling infrastructure, and (b) Alternative Fuel Corridor Grants, which are expected to support the buildout of charging or other alternative fueling infrastructure along alternative fuel corridors. Eligible entities include states, MPOs, units of local government, special purpose districts and other entities.

## **2. STATE PROGRAMS AND GRANTS**

### **2.1 New Mexico Sustainable Building Tax Credit**

In 2021, New Mexico Energy and Natural Resources Department launched the Sustainable Building Tax Credit<sup>11</sup> with the intention of incentivizing cutting-edge sustainable building practices, as well as the use of energy-efficient products. This building credit, includes provisions and credits for EV-readiness, however, in order for new construction homes to qualify for these credits, home builders must have these homes be rated Build Green New Mexico ("BGNM") gold or emerald or Leadership in Energy and Environmental Design ("LEED") gold or platinum and be 30% to 40% better than 2018 NM Energy Conservation Code built home, thus making this credit unavailable to home builders looking to build strictly EV-ready homes and multi-unit dwellings without pursuing other home efficiency ratings.

### **2.2 New Mexico Clean Car Rule**

Further, on July 1, 2022, the Environmental Improvement Board and the Albuquerque-Bernalillo County Air Quality Control Board adopted the Clean Car Rule<sup>12</sup>. The rule sets stricter low-emission and zero-emission standards for new vehicles offered for sale in New Mexico. This rule applies to new motor vehicles including passenger cars, light-duty trucks, medium-duty passenger vehicles, and other vehicles with the registered model year of 2026 or subsequent model year which can only be sold, leased, received, and registered if the vehicle is certified to the California vehicle emission standards, as incorporated by reference pursuant to 20.11.104 New Mexico Administrative Code ("NMAC").

---

<sup>11</sup> SBTC guidance; <https://www.emnrd.nm.gov/ecmd/tax-incentives/sustainable-building-tax-credit-sbtc/>

<sup>12</sup> For a copy of the Clean Car rule, please see <https://www.cabq.gov/airquality/documents/final-clean-car-rule-20-11-104-nmac.pdf>

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF EL PASO  
ELECTRIC COMPANY'S APPLICATION  
FOR APPROVAL OF ITS TRANSPORTATION  
ELECTRIFICATION PLAN FOR 2024-2026**

**CASE NO. 23-00\_\_-UT**

**EL PASO ELECTRIC COMPANY,  
Applicant.**

---

**DECLARATION OF ANGELINA RODRIGUEZ IN SUPPORT OF THE FOREGOING  
DIRECT TESTIMONY OF EL PASO ELECTRIC COMPANY'S APPLICATION FOR  
APPROVAL OF ITS TRANSPORTATION ELECTRIFICATION PLAN FOR 2024-2026**

I Angelina Rodriguez, 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 a *Supervisor of Electrification*.

3. The foregoing Direct Testimony of Angelina Rodriguez together with all exhibits sponsored therein and attached thereto, is true and accurate based on my knowledge and belief.

4. I submit this Declaration, based upon my personal knowledge and upon information and belief, in support of EPE's *Application for Approval of its Transportation Electrification Plan for 2024-2026*.

FURTHER, DECLARANT SAYETH NAUGHT.

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

Executed on June 30, 2023.

/s/ Angelina Rodriguez  
ANGELINA RODRIGUEZ

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

**IN THE MATTER OF EL PASO )  
ELECTRIC COMPANY'S APPLICATION )  
FOR APPROVAL OF ITS TRANSPORTATION )  
ELECTRIFICATION PLAN FOR 2024-2026 )  
 ) CASE NO. 23-00 \_\_\_-UT  
 )  
EL PASO ELECTRIC COMPANY, )  
Applicant. )  
\_\_\_\_\_ )**

**DIRECT TESTIMONY  
OF  
BRIAN TURAKI  
ON BEHALF OF  
EL PASO ELECTRIC COMPANY**

**JUNE 30, 2023**

**EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
BRIAN TURAKI**

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**EXHIBITS**

Exhibit BT-1 – Illustrative TEP Cost Calculation for 2025  
Exhibit BT-2 – TEP Cost Rider Residential Bill Impact  
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**EL PASO ELECTRIC COMPANY  
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1                                   **I.       INTRODUCTION AND QUALIFICATIONS**

2   **Q1.   PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3   **A.**   My name is Brian Turaki. My business address is 100 North Stanton Street,  
4       El Paso, Texas, 79901.

5

6   **Q2.   HOW ARE YOU EMPLOYED?**

7   **A.**   I am employed by El Paso Electric Company ("EPE" or the "Company") as a Rate  
8       Analyst.

9

10 **Q3.   PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL**  
11 **QUALIFICATIONS.**

12 **A.**   I have worked as a Rate Analyst at EPE since 2022. Prior to working at EPE, I  
13       worked as Regulatory and Rate Strategy Analyst at Entergy Corporation in  
14       New Orleans, Louisiana from 2019 to 2022 and as a Budget Analyst at the City of  
15       Las Cruces Offices of Budget and Management from 2018 to 2019. At Entergy, I  
16       was responsible for providing research, support, and strategy on various regulatory  
17       matters and policy issues related to ratemaking and emerging technologies  
18       including smart grid, energy efficiency, demand response, distributed energy  
19       resources and electric vehicles. As a Budget Analyst with the City of Las Cruces,  
20       my responsibilities included preparing regular and special budget reports, analyzing

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1           monthly department budget to maintain expenditure controls, summarizing budget  
2           and submitting recommendations for the City Council approval.

3                       I graduated from New Mexico State University with a Bachelor of Business  
4           Administration in Project and Supply Chain Management in 2015, and a Master of  
5           Art in Economics, with a concentration in Public Utility Analysis and Regulation  
6           in 2018.

7

8   **Q4.   PLEASE DESCRIBE YOUR RESPONSIBILITIES WITH EPE.**

9   **A.**   I began working for EPE as a Rate Analyst in 2022. As a Rate Analyst in the Rates  
10           and Regulatory Affairs Department, my responsibilities are to perform or assist in the  
11           preparation of economic, statistical, cost, and rate design studies; to develop models  
12           and methodologies for cost of service, profitability, and pricing studies; and to  
13           perform annualization and cost of service studies, rate design, and revenue forecasts.

14

15   **Q5.   HAVE YOU PREVIOUSLY PRESENTED TESTIMONY BEFORE**  
16           **UTILITY REGULATORY BODIES?**

17   **A.**   No.

18

19                       **II.   PURPOSE OF TESTIMONY**

20   **Q6.   WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

21   **A.**   The purpose of my testimony is to support EPE's Application for Approval of its

**EL PASO ELECTRIC COMPANY  
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1 Transportation Electrification Plan for Plan Years 2024-2026 ("TEP" or "Plan").  
2 Specifically, my testimony supports EPE's request to recover TEP costs through  
3 EPE's Rate No. 44 – Transportation Electrification Plan ("TEP") Cost Rider ("Rate  
4 No. 44" or "TEP Cost Rider"), originally approved in Case No. 20-00241-UT using  
5 the deferred collection methodology approved in that case. I also support the  
6 proposed new and modified rate options presented in Section 3.6 of the TEP  
7 provided as Exhibit AR-1 to the Direct Testimony of EPE witness Angelina  
8 Rodriguez:

- 9 (1) EPE's proposed language revisions to the Whole House/Whole Service  
10 Electric Vehicle ("EV") ("WHEV/WSEV") Rate Rider Incentive Credits  
11 available for Rate Nos. 01 – Residential Service Rate, 03 – Small General  
12 Service Rate, 04 – General Service Rate, and 07 – City and County Service  
13 Rate; and  
14 (2) EPE's proposed new experimental Demand Adjustment ("DA") Rider  
15 available for Rate Nos. 04 – General Service Rate and 09 – Large Power  
16 Service Rate.

17  
18 **Q7. ARE YOU SPONSORING ANY EXHIBITS IN YOUR TESTIMONY?**

19 **A.** Yes. I am sponsoring the following exhibits, which are attached to this testimony:

- 20 • Exhibit BT-1 – Illustrative TEP Cost Calculation for 2025;



**EL PASO ELECTRIC COMPANY  
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1           2023.

2

3   **Q11. HAS THE COMMISSION PREVIOUSLY APPROVED A DEFERRED**  
4           **COLLECTION METHODOLOGY FOR APPROVED TEP COSTS**  
5           **THROUGH THE TEP COST RIDER?**

6   **A.**   Yes.   The Commission Final Order in Case No. 20-00241-UT approved a  
7           regulatory asset for EPE to record TEP costs as they are incurred until the time,  
8           they are collected through the TEP Cost Rider, and to apply carrying charges at the  
9           Customer Deposit Interest Rate set annually by the Commission. In that same Final  
10          Order, the Commission also approved the following deferred collection  
11          methodology for EPE's TEP Cost Rider:

- 12          •   EPE will record TEP costs for the first year of the TEP in a regulatory asset as  
13              they occur and apply carrying charges at the Customer Deposit Interest Rate set  
14              annually by the Commission.
- 15          •   EPE will file a compliance advice notice for Rate No. 44 no later than thirteen  
16              months after the effective date of EPE's TEP programs to recover the actual  
17              TEP costs incurred during the first twelve months of this TEP.
- 18          •   Starting on the first day of the thirteenth month of this program, EPE will  
19              reconcile the recorded TEP expenses and TEP Cost Rider revenues monthly

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1           and use the net amount to calculate the cumulative balance in the regulatory  
2           asset to apply carrying charges monthly.

- 3           • Thereafter, on an annual basis, EPE will file a compliance advice notice for a  
4           revised Rate No. 44 to adjust the TEP Cost Rider factor for the next  
5           twelve-month period based upon the balance in the TEP regulatory asset of the  
6           prior year.

7

8   **Q12. IS EPE PROPOSING TO CONTINUE THE DEFERRED COLLECTION**  
9   **METHODOLOGY FOR EPE'S TEP COST RIDER THAT WAS**  
10 **APPROVED IN CASE NO. 20-00241-UT?**

11 **A.** Yes. EPE is proposing to continue the deferred collection methodology approved  
12 in Case No. 20-00241-UT.

13

14 **Q13. HAS EPE CALCULATED AN ILLUSTRATIVE TEP COST RIDER**  
15 **FACTOR BASED ON THE PROPOSED TEP COST?**

16 **A.** Yes. EPE calculated the proposed TEP Cost Rider factor by dividing the forecasted  
17 TEP costs for the Plan Years (2024-2026), by the total forecasted energy (kWh) for  
18 the same time period, excluding projected annual sales for lighting service  
19 customers. The resulting estimated \$0.001076 per kWh factor would be applied to

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1 all customers (except lighting customers) on a monthly basis.<sup>1</sup> Exhibit BT-1  
2 provides the calculation for this illustrative TEP Cost Rider factor.

3  
4 **Q14. HAS EPE ESTIMATED THE BILL IMPACT OF THE ILLUSTRATIVE**  
5 **TEP COST RIDER TO THE TYPICAL RESIDENTIAL CUSTOMER'S**  
6 **MONTHLY BILL?**

7 **A.** Yes. Because of the deferred collection methodology, the costs for the TEP Plan  
8 Year 1 (2024) would be collected through the TEP Cost Rider starting in 2025. For  
9 that year, EPE estimated that the impact to a typical residential customer's  
10 year-round average monthly bill would be \$0.62 or 1.2%. Exhibit BT-2 provides  
11 the illustrative bill impact details.

12  
13 **IV. RATE OPTIONS FOR EV CHARGING**

14 **Q15. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

15 **A.** In this section of my testimony, I address and support EPE's proposed new and  
16 modified Rate Options for EV charging:

17 (1) continuation of EPE's WHEV/WSEV Rate Rider Incentive Credits with  
18 language additions to clarify the monthly minimum charge; and

19 (2) EPE's request for a new experimental DA Rider, to mitigate the bill

---

<sup>1</sup> The applicable TEP Cost Rider may include an adjustment for over/under-collection from a prior TEP Cost Rider.

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1           uncertainty for customers installing separately metered public charging  
2           equipment with low utilization rates and high demand.

3           Additionally, I describe EPE's Rate No. 42 – Experimental Electric Vehicle  
4           Charging Rate, which is an existing EV rate option EPE does not seek to modify in  
5           this Application.

6

7   **A. CONTINUATION OF WHEV/WSEV RATE RIDER INCENTIVE CREDITS**

8   **Q16. PLEASE SUMMARIZE THE WHEV/WSEV RATE RIDER INCENTIVE**  
9   **CREDITS APPROVED IN CASE NO. 20-00241-UT.**

10 **A.**   The WHEV/WSEV Rate Rider Incentive Credits approved in Case  
11       No. 20-00241-UT are applicable to the following retail rate schedules: Rate  
12       No. 01 - Residential Service Rate, Rate No. 03 - Small General Service Rate, Rate  
13       No. 04 - General Service Rate, and Rate No. 07 - City and County Service Rate  
14       classes. To qualify for this rate rider, a customer must have a qualifying plug-in  
15       EV that is registered with the New Mexico Motor Vehicle Division using the same  
16       service address as the EPE residential or commercial account.

17               The WHEV/WSEV Rate Rider provides an incentive, in the form of a  
18       \$/kWh credit, to energy usage during the super off-peak hours. It provides EV  
19       owner-customers the opportunity for an incentive without the added cost for  
20       installation of a second meter which is required to take service under Rate No. 42.  
21       No additional monthly charges are tied to this rate rider.

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1

2 **Q17. IS EPE PROPOSING TARIFF LANGUAGE CHANGES TO CLARIFY**  
3 **HOW THE MONTHLY MINIMUM CHARGE PROVISION OF THE**  
4 **UNDERLYING RATES IS APPLIED TO WHEV/WSEV CUSTOMERS?**

5 **A.** Yes. EPE is proposing to add the following language to the WHEV/WSEV Rate  
6 Rider Incentive Credit provisions:

7           LIMITATION: The incentive credit shall not cause the customer bill to fall  
8           below the Monthly Minimum Charge Provision applicable on this rate,  
9           excluding Purchase Power and Fuel (FPPCAC).

10

11 This provision in Rate Nos. 01, 03, 04 and 07 is to clarify that the incentive credit  
12 shall not cause the customer bill to fall below the Monthly Minimum Charge  
13 Provision in the applicable tariffs. The provision ensures that monthly billed service  
14 reflects no less than the customer charge, other applicable riders, and a tax adjustment  
15 on those amounts. To comply with that provision, it is necessary in some instances  
16 for an adjustment to limit the monthly charges and credits in a bill to no less than the  
17 sum of components defined in the Monthly Minimum Charge provision.

18

19 **Q18. IS EPE PROPOSING TO CHANGE THE WHEV/WSEV RATE RIDER**  
20 **INCENTIVE CREDIT RATE?**

21 **A.** No. EPE is proposing to continue offering the WHEV/WSEV Rate Rider without  
22 any modifications to the incentive credit rate.

23

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1 **Q19. ARE THERE ANY OTHER REVISIONS TO THE WHEV/WSEV RATE**  
2 **RIDER PROVISION LANGUAGE?**

3 **A.** Yes. The term "annually" in this provision's phrase "Qualifying accounts must  
4 provide proof of EV registration annually," is proposed for deletion. A recent  
5 survey in the EV charging industry showed that 90% of EV owners do not go back  
6 to gasoline fueled vehicles. Removing this term will reduce costs to EPE and the  
7 burden to EV owner of complying with this tariffed requirement.

8

9 **Q20. IS EPE PROPOSING REVISED TARIFFS WITH THE REVISION TO THE**  
10 **WHEV/WSEV RATE RIDER PROVISION LANGUAGE?**

11 **A.** Yes. The revised retail rate schedules with the proposed language revisions to the  
12 WHEV/WSEV rate rider provision are included with my testimony as  
13 Exhibit BT-3.

14

15 **B. NEW DEMAND ADJUSTMENT RIDER**

16 **Q21. WHAT ARE CHALLENGES FOR PUBLIC EV CHARGING DURING THE**  
17 **EARLY ADOPTION OF EVS?**

18 **A.** Public EV charging using DCFC equipment is often characterized by high levels of  
19 demand kW ("kilowatt"), but relatively low energy utilization (kWh), especially in  
20 the early EV adoption period. It is not uncommon for demand charges incurred by

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1 EV charging stations that are separately metered to represent a significant share of  
2 the electric bill, particularly at very low utilization levels.

3

4 **Q22. WHAT ARE DEMAND CHARGES?**

5 A. Demand charges are a rate component of the NMPRC's approved non-residential  
6 rate schedules that are used to reflect the cost-causation of operating a public  
7 utility's electrical system more accurately. For billing purposes under these rate  
8 schedules, a customer's demand is measured as the highest thirty-minutes of  
9 demand in kW registered during a month subject to certain provisions in the rate  
10 schedule. The billing demand is the highest of this measured demand, a ratcheted  
11 demand based on historical measured demands, or a specified minimum demand.

12

13 **Q23. WHAT ARE THE POTENTIAL PEAK DEMANDS OF PUBLIC EV**  
14 **CHARGERS?**

15 A. There are three (3) basic levels of EV chargers ranging from Level 1, which would  
16 use a standard 120-volt outlet, and Level 2 electric load between 1.2-1.4 kW to  
17 Level 3 DCFC that uses 400-to-1,000-volt DC power source and can have  
18 significant electric loads in the hundreds of kW per site. Tesla, for example, has  
19 built an extensive network in the U.S. for its vehicles that relies upon DCFC. Some  
20 businesses have installed Level 2 chargers that require 208/240Volt outlet and  
21 typically operate with peak electric loads in the range of 3.3-19.2 kW. A more

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1 recent entrant to EV-charging are the heavy-vehicles, such as transport equipment  
2 commonly known as "18-wheelers" which require significant amounts of power to  
3 charge using Level 3 chargers.

4  
5 **Q24. WHAT IS THE IMPACT OF DEMAND CHARGES ON PUBLIC EV**  
6 **CHARGING SITE HOSTS?**

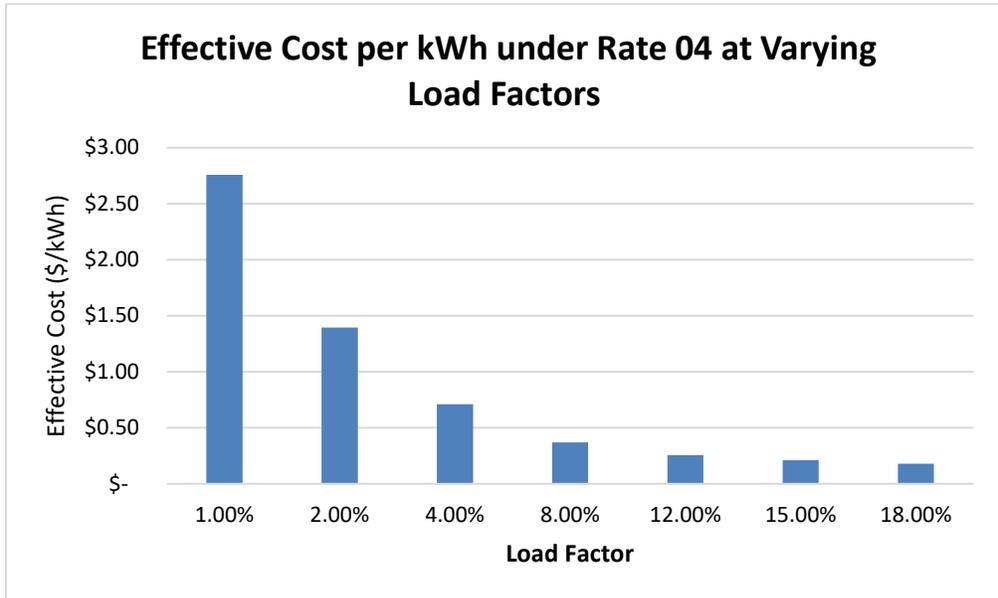
7 **A.** Demand rates in standard electric utility tariffs pose a distinct challenge to the  
8 economics of separately metered public charging stations. A customer's demand  
9 (sometimes referred to as "load") can be evaluated by the ratio of the utilization of  
10 electrical energy during a given period to the maximum energy that would have  
11 been utilized in that period based on the customer's demand ("load factor"). For  
12 example, a customer will have a 100% daily load factor if the customer has 10 kW  
13 of demand and consumes 240 kWh of energy over 24 hours.

14 As illustrated in Figure 1, at low levels of utilization, the electricity bills  
15 incurred at these stations result in an uneconomic effective cost per kWh, as high  
16 demand charges are spread over a relatively low volume of energy sales. While this  
17 issue is alleviated at stations with higher utilization (and therefore greater load  
18 factors), it creates a barrier to entry during the early years of EV market  
19 development, as electricity costs for new separately metered charging stations often  
20 exceed the amount of revenue they can expect to generate from users.

21

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Figure 1



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21

**Q25. IS EPE PROPOSING A NEW RATE RIDER TO MEET THE NEEDS OF PUBLIC CHARGING SITE HOSTS?**

**A.** Yes. In line with EPE's commitment reflected in Paragraph 3.4 of the Commission approved Stipulation in Case No. 20-00241-UT, EPE is proposing a DA Rider to mitigate the effect of high demand charges for customers installing separately metered public charging equipment with low utilization. This rider would only be available to qualifying, separately metered Transportation Electrification ("TE") charging equipment, with more than 50kW of demand, regardless of whether the equipment is owned by EPE or the customer.

**Q26. PLEASE EXPLAIN HOW EPE'S PROPOSED DA RIDER WAS**

**EL PASO ELECTRIC COMPANY  
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1           **DEVELOPED.**

2   **A.**    Illustratively, the DA Rider is developed to limit the billing demand of a qualifying  
3           customer during any billing period in which the actual calculated load factor is less  
4           than 15%. With the DA Rider applied, the amount of demand billed to EV charging  
5           stations will be the lesser of:

- 6           a.   the measured demand (kW), as conventionally determined, or
- 7           b.   the adjusted demand (kW), as calculated based on actual usage (kWh) and a  
8           minimum 15% monthly load factor.

9

10   **Q27. HOW WILL THE BILLING DEMAND THAT THE DA RIDER IS**  
11       **APPLICABLE TO BE DETERMINED?**

12   **A.**    EPE is proposing to use the Maximum Demand for each billing month as the billing  
13           demand that the DA Rider is subject to. For example, under Rate No. 04, the billing  
14           demand is also determined by subjecting the Maximum Demand to a 65% ratchet  
15           and a 50 kW minimum demand. However, the Determination of the Billing  
16           Demand provision will not be applicable to customers eligible under the DA Rider.  
17           As public charging site's load factor improves to a load factor of 15% and above,  
18           the Determination of Billing Demand provision will apply.

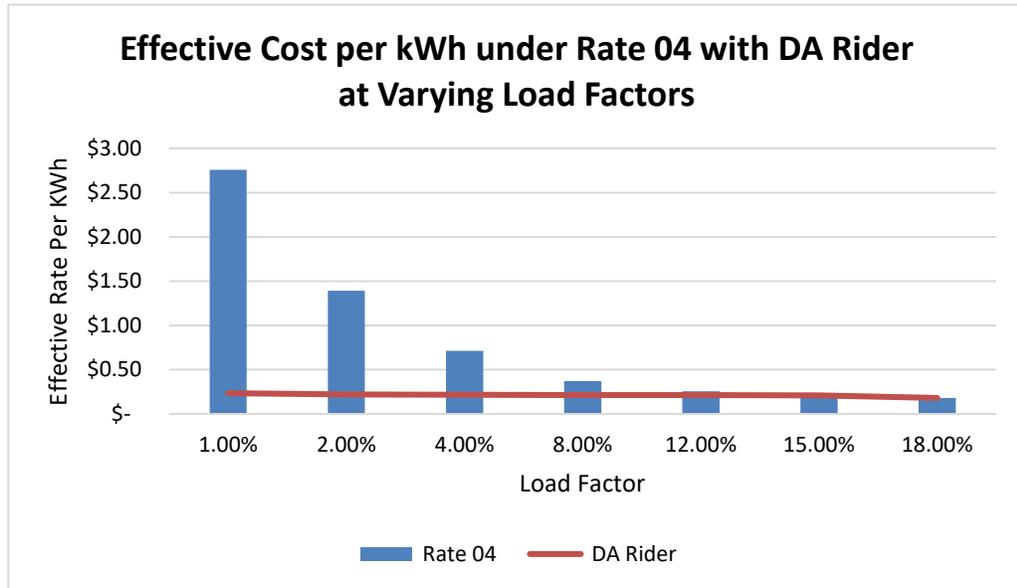
19

20   **Q28. HOW WILL THE DA RIDER LIMIT THE IMPACT OF DEMAND**  
21       **CHARGES DURING THE EARLY EV ADOPTION PERIOD?**

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1    **A.**    To illustrate, under Rate No. 04, the effective cost per kWh for secondary voltage  
2           EV charging is between \$0.18 to \$2.76 during summer months, from high load  
3           factor charging stations to low load factor charging stations, based on current rates,  
4           excluding riders and any applicable taxes and fees. The DA Rider has the effect of  
5           limiting the effective cost per kWh under Rate No. 04 secondary voltage to a band  
6           between \$0.18 to \$0.23 per kWh during summer months as illustrated in Figure 2.

**Figure 2**



17           While the proposed DA Rider would reduce Billing Demand (kW) for lower  
18           utilization EV chargers, the Billing Demand for these customers would  
19           automatically revert to being the highest of the maximum demand, the 65%  
20           ratcheted demand, or the 50kW minimum demand if station utilization increased  
21           above the monthly 15% floor on load factor. In this way, the DA Rider is

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1 self-correcting over time and is expected to "phase out" on its own as EV adoption  
2 increases in the coming years and EV charging becomes more prevalent. Other  
3 than the DA Rider changing the amount of Billing Demand (kW), all other rates  
4 and charges under the Rate No. 04 will be the same.

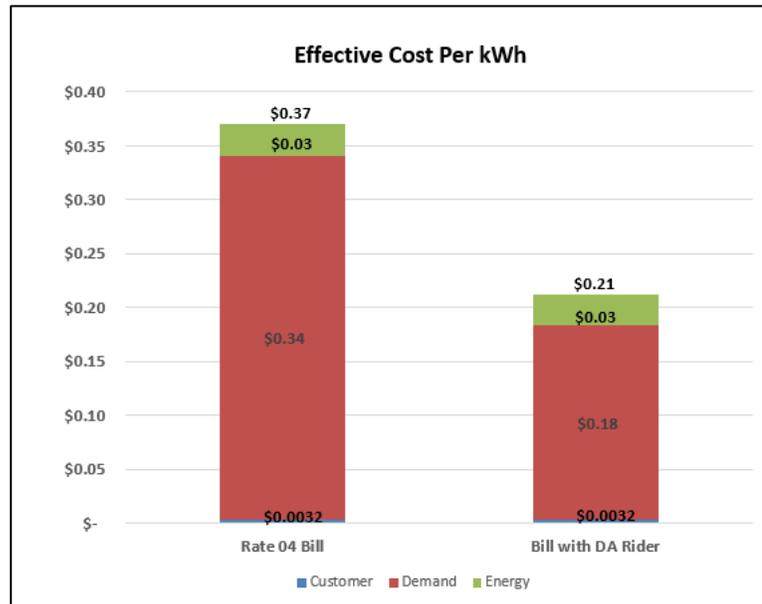
5  
6 **Q29. PLEASE EXPLAIN WHY THE DA RIDER ONLY IMPACTS DEMAND**  
7 **CHARGES.**

8 **A.** The proposed DA Rider provides targeted demand charge relief only where and  
9 when it is needed (i.e., to new separately metered accounts serving only EV  
10 chargers with lower initial utilization). As adjusted by the monthly 15% floor on  
11 load factor, the billed amount of demand (kW) is only limited to public EV charging  
12 site with a load factor lower than 15% and only for the month in question. As the  
13 site's utilization improves over time with increased adoption of EVs, demand  
14 charges billed will automatically adjust. The example below illustrates the intended  
15 effect of the proposed DA Rider. A host customer installs ten Level 2 EV chargers  
16 with a demand of 140 kW, if all ten chargers are used at the same time, the Figure 3  
17 displays the effective cost per kWh assuming the equipment has a load factor of  
18 8%. Under Rate No. 04 secondary voltage during a summer month, the customer  
19 would be billed for their 8,176 kWh of energy and 140 kW of demand, resulting in  
20 an effective cost of approximately \$0.37 per kWh. If the load factor were less than  
21 8%, the effective cost per kWh would be significantly higher even though the bill

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1 itself would decline. Under the proposed DA Rider, the billed demand would be  
2 adjusted to 75 kW for that month based on the actual usage of 8,176 kWh adjusted  
3 to reflect the minimum 15% monthly load factor. The reduction of the billed  
4 demand from 140 kW to 75 kW would result in an effective cost of approximately  
5 \$0.21 per kWh, as shown in the Figure 3 below.

**Figure 3**



17 **Q30. WHY DID EPE CHOOSE 15% FOR THE MONTHLY MINIMUM LOAD**  
18 **FACTOR?**

19 **A.** EPE recommends that the DA Rider use a minimum load factor of 15% to address  
20 demand charge challenges experienced in the early EV adoption period. While this  
21 minimum load factor could be set at different levels, a minimum monthly load

**EL PASO ELECTRIC COMPANY  
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1 factor of 15% reasonably balances facilitating the development of EV charging  
2 infrastructure, especially for public use, and minimizing any impact on other  
3 customers. As reported in EPE's most recent Bi-annual Transportation  
4 Electrification Report compliance filing,<sup>2</sup> there are no separately metered public  
5 DCFC stations in EPE's New Mexico's service territory. Due to lack of public fast  
6 charging data in EPE's New Mexico service territory, the company learned from  
7 the charging profile of a high utilization and low utilization public fast charging  
8 station sites in its El Paso Service territory. The result shows that the lowest load  
9 factor for the high utilization station in 2022 was 17.72% in January, with the  
10 highest at 31.28% in July. For the low utilization charging station site, the lowest  
11 load factor was 7.75% in April, with the highest at 17.52% in July.

12

13 **Q31. WHICH CUSTOMERS AND RATE SCHEDULES WILL BE ELIGIBLE**  
14 **FOR THE DA RIDER?**

15 **A.** EPE is proposing that the DA Rider be available only to nonresidential customers  
16 taking new separately metered electric service under Rate Nos. 04 and 09  
17 exclusively for the purpose of transportation electrification ("TE"). Customers with  
18 existing electric service unrelated to TE that add TE equipment behind their meter

---

<sup>2</sup> El Paso Electric Company's Bi-Annual Transportation Electrification Plan Report NMPRC Case No. 20-00241-UT – Compliance Filing

**EL PASO ELECTRIC COMPANY  
DIRECT TESTIMONY OF  
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1           would not be eligible for the DA Rider, nor would the mechanism be necessary  
2           given the customer's other existing electric loads.

3

4   **Q32. HOW WILL EPE ADDRESS ANY POTENTIAL IMPACT OF THE DA**  
5   **RIDER ON OTHER NON-PARTICIPATING CUSTOMERS?**

6   **A.**   To mitigate any impact on other customers, EPE is proposing that DA rider  
7           terminate at the end of this TEP. The Company also plans to track the cost  
8           associated with the DA Rider over the Plan Years (2024-2026) to evaluate  
9           continuation of the rider and possible future cost recovery.

10

11   **Q33. IS THE DA RIDER REASONABLE AND IN THE PUBLIC INTEREST?**

12   **A.**   Yes. Demand based rate structures are used to reflect the cost causation of operating  
13           a public utility's electrical system more accurately, and charging stations are not the  
14           only facilities that require high amount of power for short periods of time, yet those  
15           facilities are billed demand charges. EPE is sensitive to the impact of demand  
16           charges in the developmental phases of TE in its service territory and believes that  
17           the proposed DA Rider mechanisms balances the cost causation principle and the  
18           need to expand transportation electrification under 17.9.574 NMAC.

19

20   **Q34. ARE YOU AWARE OF SIMILAR RIDERS OR MECHANISMS THAT**  
21   **HAVE BEEN APPROVED FOR OTHER ELECTRIC UTILITIES?**

**EL PASO ELECTRIC COMPANY  
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BRIAN TURAKI**

1   **A.**   Yes. EPE's proposed DA Rider is similar to the mechanism that regulators have  
2           approved for use by Florida Power and Light.<sup>3</sup> Also, Entergy Texas,<sup>4</sup> requested for  
3           approval from its Texas regulators to implement a similar mechanism, which at this  
4           time is still pending.

5

6   **Q35. IS EPE INCLUDING PROPOSED REVISED TARIFFS WITH THIS RIDER?**

7   **A.**   Yes. A proposed Sixteenth Revised Rate No. 04, and Thirteenth Revised Rate  
8           No. 09, with the proposed new DA Rider provision are included with my testimony  
9           as Exhibit BT-3.

10

11 **Q36. PLEASE SUMMARIZE EPE'S RATE NO. 42 – EXPERIMENTAL**  
12 **ELECTRIC VEHICLE CHARGING RATE APPROVED IN EPE'S LAST**  
13 **RATE CASE.**

14 **A.**   Rate No. 42 – Experimental Electric Vehicle Charging ("EEVC") Rate was  
15           approved by final order in NMPRC Case No. 20 00104 UT (the "2020 Rate Case")  
16           and is currently available to residential and commercial customers that have a  
17           facility dedicated solely for the charging of EVs. Charging activity operating at  
18           120 volts (V) and up to 480 V are eligible for service under this rate schedule. All  
19           service must be taken at one point of delivery, designated by the Company and

---

<sup>3</sup> FPL Petition for Approval of Optional EV Public Charging Pilot Tariffs Docket No. 20200170-EI

<sup>4</sup> Application of Entergy Texas, Inc. for Authorization to Change Rates Docket Number 53719

**EL PASO ELECTRIC COMPANY  
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BRIAN TURAKI**

1           dedicated solely for the charging of an EV. The rate structure consists of a monthly  
2           customer charge and TOD energy charges, including a super off-peak energy charge.

3

4   **Q37. IS RATE NO. 42 AVAILABLE TO PUBLIC CHARGING STATIONS?**

5   **A.**    Yes.

6

7   **Q38. DID EPE EVALUATE REVISING THE SUPER OFF-PEAK PERIOD IN  
8           THIS TEP FILING?**

9   **A.**    No. EPE will evaluate this in a future filing.

10

11   **Q39. IS EPE PROPOSING ANY MODIFICATIONS TO RATE NO. 42 IN THIS  
12           FILING?**

13   **A.**    No. EPE is not proposing any modifications to Rate 42 at this time.

14

15   **Q40. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

16   **A.**    Yes, it does.

El Paso Electric Company  
2024-2026 Transportation Electrification Plan (TEP) Filing  
TEP Cost Rider Calculation

| Line No. | (a)<br>Description                                 | (b)<br>Reference       | (c)<br>2026          |
|----------|--|------------------------|----------------------|
| 1        | TEP Program Cost                                   | AR Dir. Test., Table 1 | \$ 4,885,196         |
| 2        | (Over)/Under Collection                            |                        | \$ -                 |
| 3        | Net TEP Program Cost                               |                        | <u>\$ 4,885,196</u>  |
| 4        | Net Forecasted New Mexico Jurisdictional kWh Sales | Exhibit BT-1 pg 2      | <u>4,540,129,955</u> |
| 5        | TEP Cost Rider, per kWh                            | Line 3 / Line 4        | <u>\$ 0.001076</u>   |

El Paso Electric Company  
2024-2026 Transportation Electrification Plan (TEP) Filing  
Forecasted Energy (KWh) Sales

| Line No. | (a)<br>Description                                    | (b)<br>Reference | (c)<br>2024   | (d)<br>2025   | (e)<br>2026   | (f)<br>Total  |
|----------|---|------------------|---------------|---------------|---------------|---------------|
| 1        | Forecasted New Mexico Jurisdictional Energy Sales     | See Note (1)     | 1,507,400,758 | 1,523,507,326 | 1,533,560,459 | 4,564,468,542 |
| 2        | Lighting Class Energy Sales                           | See Note (1)     | 7,962,694     | 8,109,910     | 8,265,984     | 24,338,588    |
| 3        | Net Forecasted New Mexico Jurisdictional Energy Sales | Line 1 - Line 2  | 1,499,438,064 | 1,515,397,416 | 1,525,294,475 | 4,540,129,955 |

Notes:

(1) EPE's New Mexico jurisdictional retail energy sales are based on EPE's 2023 Long-Term Forecast.

El Paso Electric Company  
2024-2026 Transportation Electrification Plan (TEP) Filing  
TEP Cost Rider Residential Bill Impact

| Line No. | (a)<br>Description                                    | (b)<br>kWh | (c)<br>Current | (d) Typical Residential Bill - Summer*<br>(June - September) |                  |                 | (f)<br>% Change |
|----------|---|------------|----------------|--|------------------|-----------------|-----------------|
|          |   |            |                | (e)<br>Proposed  | (e)<br>\$ Change | (e)<br>% Change |                 |
| 1        | Customer Charge                                       | -----      | \$ 7.00        | \$ 7.00  | \$ -             | 0.0%            |                 |
| 2        | Energy Charge (\$/kWh) First 600 kWh Summer (May-Oct) | 600        | \$ 41.99       | \$ 41.99   | \$ -             | 0.0%            |                 |
| 3        | Energy Charge (\$/kWh) All other kWh Summer (May-Oct) | 180        | \$ 19.51       | \$ 19.51   | \$ -             | 0.0%            |                 |
| 4        | Subtotal - Non-Fuel Base Charges                      |            | \$ 68.50       | \$ 68.50   | \$ -             | 0.0%            |                 |
| 5        | Fuel Charge   | 780        | \$ (16.73)     | \$ (16.73)   | \$ -             | 0.0%            |                 |
| 6        | RPS Cost Rider  | 780        | \$ 5.69        | \$ 5.69  | \$ -             | 0.0%            |                 |
| 7        | TEP Cost Rider  | 780        | \$ 0.10        | \$ 0.84  | \$ 0.74          | 740.0%          |                 |
| 8        | Federal Tax Credit                                    |            | \$ (0.48)      | \$ (0.48)  | \$ -             | 0.0%            |                 |
| 9        | EUERF   |            | \$ 2.49        | \$ 2.52  | \$ 0.03          | 1.2%            |                 |
| 10       | Total Bill @ 780 kWh                                  |            | \$ 59.57       | \$ 60.34   | \$ 0.77          | 1.3%            |                 |

|    | (g)                              | (h)   | (i) Typical Residential Bill - Winter*<br>(October- May) |                |                 | (k)<br>% Change |
|----|----------------------------------|-------|--|----------------|-----------------|-----------------|
|    |                                  |       | (j)<br>kWh   | (j)<br>Current | (j)<br>Proposed |                 |
| 11 | Customer Charge                  | ----- | \$ 7.00  | \$ 7.00        | \$ -            | 0.0%            |
| 12 | Energy Charge (\$/kWh) Winter    | 554   | \$ 32.03   | \$ 32.03       | \$ -            | 0.0%            |
| 13 | Subtotal - Non-Fuel Base Charges |       | \$ 39.03   | \$ 39.03       | \$ -            | 0.0%            |
| 14 | Fuel Charge                      | 554   | \$ 3.00  | \$ 3.00        | \$ -            | 0.0%            |
| 15 | RPS Cost Rider                   | 554   | \$ 4.04  | \$ 4.04        | \$ -            | 0.0%            |
| 16 | TEP Cost Rider                   | 554   | \$ 0.07  | \$ 0.60        | \$ 0.53         | 757.1%          |
| 17 | Federal Tax Credit               |       | \$ (0.27)  | \$ (0.27)      | \$ -            | 0.0%            |
| 18 | EUERF                            |       | \$ 2.00  | \$ 2.02        | \$ 0.02         | 1.0%            |
| 19 | Total Bill @ 554 kWh             |       | \$ 47.87   | \$ 48.42       | \$ 0.55         | 1.2%            |
| 20 | Year-round Average Monthly Bill  | 667   | \$ 51.77   | \$ 52.39       | \$ 0.62         | 1.2%            |

\*Bill Impact excludes Franchise Fees and Taxes

**EL PASO ELECTRIC COMPANY**

**FOURTEENTH REVISED RATE NO. 01  
CANCELLING THIRTEENTH REVISED RATE NO. 01**

X  
X

**RESIDENTIAL SERVICE RATE**

Page 1 of 4

**APPLICABILITY**

This rate schedule is available for electric service used in single family residences or individually metered apartments for primarily domestic or home use, and other non-commercial uses located on the same property and used in connection with the main residence.

For customers currently taking service under the time of day (TOD) rates of this schedule, the TOD rates will be applicable beginning the first billing cycle after re-programing of the customer meter for the TOD period ordered in NMPRC Case No. 20-00104-UT Final Order.

**TERRITORY**

Areas served by the Company in Doña Ana, Sierra, Otero and Luna Counties.

**TYPE OF SERVICE**

Service available under this rate schedule will normally be 120/240 volt, single phase, supplied at a single point of delivery designated by the Company. Electric energy will be measured by a single meter, or other measuring device, of each kind needed.

Single phase or three phase motor operation is permitted under this service when the size of the individual motor does not exceed 10 horse power (HP). Single or three phase motors shall not exceed 10 HP of capacity without the written approval of the Company.

**MONTHLY RATES**

**STANDARD SERVICE RATE**

|                                       |   |  |
|---------------------------------------|---|--|
| Customer Charge (per meter per month) | \$7.00                                    |  |
| <b>Energy Charge Per kWh</b>          | <b>Summer</b><br>(June through September) | <b>Non-Summer</b><br>(October through May) |
| Tier 1: 0 - 600 kWh                   | \$0.06999                                 | -----                                      |
| Tier 2: All Other kWh                 | \$0.10840                                 | -----                                      |
| All kWh                               | -----                                     | \$0.05782                                  |

Advice Notice No. 289

Signature/Title /s/ James Schichtl

**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**FOURTEENTH REVISED RATE NO. 01  
CANCELLING THIRTEENTH REVISED RATE NO. 01**

X  
X

**RESIDENTIAL SERVICE RATE**

TIME OF DAY (TOD) RATE

|  |        |
|--|--------|
| Customer Charge (per meter per month): | \$7.00 |
|--|--------|

| <b>Energy Charge Per kWh</b> | <b>Summer</b><br>(June through September) | <b>Non-Summer</b><br>(October through May) |
|------------------------------|---|--|
| On-Peak Period               | \$0.22016                                 | -----                                      |
| Off-Peak Period              | \$0.05504                                 | \$0.05782                                  |

The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, for the Summer months. There is no On-Peak Period for the Non-Summer months. The Off-Peak Period shall be all other hours not covered in the On-Peak Period. For Distributed Generation (DG) customers, the net energy metering provision will be applied by TOD period.

The Customer that elects to take service under the Time-Of-Day (TOD) Rate, must do so for a minimum of twelve (12) months. For all customers that enroll, if, at the conclusion of that initial twelve (12) month period of service under the TOD Rate, the total billings for the 12-month period exceed billings for the same period under the Standard Service Rate, the Company will credit the customer for the difference in billings and the Customer may opt to revert to the Standard Service Rate.

**MONTHLY MINIMUM CHARGE**

The Customer Charge, Other Applicable Riders, and Tax Adjustment.

**FUEL AND PURCHASED POWER COST ADJUSTMENT CLAUSE (FPPCAC)**

All service taken under this rate schedule is subject to the provisions of the Company's Rate No. 18 (FPPCAC).

**OTHER APPLICABLE RIDERS**

All service taken under this rate schedule is subject to the provisions of other Company riders that may apply to this rate schedule and shall be billed pursuant to the provisions of those riders.

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**FOURTEENTH REVISED RATE NO. 01  
CANCELLING THIRTEENTH REVISED RATE NO. 01**

X  
X

**RESIDENTIAL SERVICE RATE**

**TAX ADJUSTMENT**

Billings under this rate schedule may be increased by an amount equal to the sum of taxes payable under the Gross Receipts and Compensating Tax Act and of all other taxes, fees or charges (exclusive of ad valorem, state and federal income taxes) payable by the utility and levied or assessed by any governmental authority on the public utility service rendered, or on the right or privilege of rendering the service, or on any object or event incidental to the rendition of the service.

**VOLUNTARY RENEWABLE ENERGY (VRE)**

This rate schedule is subject to the provisions of the Company's Rate No. 32 (VRE).

**WHOLE HOUSE ELECTRIC VEHICLE (WHEV) RATE RIDER INCENTIVE CREDIT**

INCENTIVE CREDIT: \$0.04740 / kWh

SUPER OFF-PEAK HOURS: 12:00 am to 8:00 am, Monday – Sunday, Year Round

PROGRAM DESCRIPTION: Energy usage during the hours listed above will be multiplied by the Incentive Credit rate to calculate the incentive credit presented on the monthly bill. Energy usage for all hours will be charged at the applicable Rate No. 01 rate.

RATE QUALIFICATIONS: Customers must have a qualifying plug-in electric vehicle that is registered with the New Mexico Motor Vehicle Division using the same service address as the EPE residential account. Qualifying accounts must provide proof of EV registration.

X

LIMITATION: The incentive credit shall not cause the customer bill to fall below the Monthly Minimum Charge Provision applicable on this rate, excluding Purchase Power and Fuel (FPPCAC).

X  
X  
X

**TERMS OF PAYMENT**

All bills under this rate schedule are due and payable when rendered and become delinquent twenty (20) calendar days thereafter. If the twentieth day falls on a holiday or weekend, the next Company business day will apply.

Advice Notice No. 289

Signature/Title /s/ James Schichtl

**James Schichtl  
Vice President – Regulatory and  
Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**FOURTEENTH REVISED RATE NO. 01  
CANCELLING THIRTEENTH REVISED RATE NO. 01**

X  
X

**RESIDENTIAL SERVICE RATE**

**TERMS AND CONDITIONS**

Service supplied under this rate schedule is subject to the Company's Rules and Regulations on file with the New Mexico Public Regulation Commission and available for inspection at Company offices.

This rate schedule is available under the following conditions:

1. When it is evident, either visually or electrically, that activity of a business or professional character is being conducted in the residence, service will be supplied on the appropriate non-residential rate schedule; however, the portion used as living quarters may be wired and metered separately and served on this rate schedule.
2. For separately metered living quarters recognized as single-family living quarters for domestic home use.
3. Single-phase and three-phase motors shall not exceed 10 (HP) of capacity without prior written approval of the Company. The use of all single or three-phase motors over 5 HP must be approved by the Company concerning the motor's lock rotor amperes.
4. If three-phase service is supplied, motor size and other loads will be subject to Company approval. Three-phase service is only available from lines existing at the location or if the Company determines it is economically feasible to bring service to the location.
5. Wiring may be extended from the residence circuit to private garages, barns and similar structures and/or wells which are located on the same property as the residence and used exclusively for domestic purposes in connection with the residence.
6. For residences where rooms are rented or meals are served to boarders if this is incidental to the maintenance of a private residence.

**PRORATION ADJUSTMENTS**

Charges for service supplied under this rate schedule, except the Customer Charge, are subject to proration adjustments.

**Advice Notice No.** \_\_\_\_\_ **289**

**Signature/Title** \_\_\_\_\_ */s/ James Schichtl*

**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 03  
CANCELLING FIFTEENTH REVISED RATE NO. 03**

X  
X

**SMALL GENERAL SERVICE RATE**

Page 1 of 6

**APPLICABILITY**

This rate schedule is available to all Customers for lighting, power, and heating service and where facilities of adequate capacity and suitable voltage are adjacent to the premises to be served. Service under this rate schedule shall be limited to Customers who otherwise do not qualify for service under the Company's other rate schedules and whose Maximum Demand for any two (2) consecutive months during the current month and previous eleven (11) month period did not exceed 50 kilowatts (kW).

For customers currently taking service under the time of day (TOD) rates of this schedule, the TOD rates will be applicable beginning the first billing cycle after re-programing of the customer meter for the TOD period ordered in NMPRC Case No. 20-00104-UT Final Order.

**TERRITORY**

Areas served by the Company in Doña Ana, Sierra, Otero and Luna Counties.

**TYPE OF SERVICE**

Service available under this rate schedule will be determined by the Company and will either be single or three phase at the option of the Company and at a standard Company approved voltage. All service will be taken at a single point of delivery designated by the Company. Electric energy will be measured by a single meter, or measuring device, of each kind needed.

**MONTHLY RATES**

**STANDARD SERVICE RATE (Maximum Demand equal to or greater than 15 kW in all months)**

|                                       |   |  |
|---------------------------------------|---|--|
| Customer Charge (per meter per month) | \$14.00                                   |  |
| <b>Demand and Energy Charges</b>      | <b>Summer</b><br>(June through September) | <b>Non-Summer</b><br>(October through May) |
| Demand Charge per Billing kW          | \$18.63                                   | \$13.93                                    |
| Energy Charge per kWh                 | \$0.03963                                 | \$0.01152                                  |

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Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 03  
CANCELLING FIFTEENTH REVISED RATE NO. 03**

X  
X

**SMALL GENERAL SERVICE RATE**

Page 2 of 6

STANDARD TIME OF DAY (TOD) RATE (Maximum Demand equal to or greater than 15 kW in all months)

|                                       |   |  |
|---------------------------------------|---|--|
| Customer Charge (per meter per month) | \$14.00                                   |  |
| <b>Demand and Energy Charges</b>      | <b>Summer</b><br>(June through September) | <b>Non-Summer</b><br>(October through May) |
| Demand Charge per Billing kW          | \$17.70                                   | \$13.23                                    |
| Energy Charge per kWh                 |   |  |
| On-Peak Period                        | \$0.19675                                 | -----                                      |
| Off-Peak Period                       | \$0.01238                                 | \$0.01345                                  |

The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, for the Summer months. There is no On-Peak Period for the Non-Summer months. The Off-Peak Period shall be all other hours not covered in the On-Peak Period. For Distributed Generation (DG) customers, the net energy metering provision will be applied by TOD period.

ALTERNATIVE SERVICE RATE (Maximum demand below 15 kW in all months)

|                                       |   |  |
|---------------------------------------|---|--|
| Customer Charge (per meter per month) | \$14.00                                   |  |
| <b>Energy Charge Per kWh</b>          | <b>Summer</b><br>(June through September) | <b>Non-Summer</b><br>(October through May) |
| All kWh                               | \$0.10941                                 | \$0.07441                                  |

If a Customer on the Alternative Service Rate meets or exceeds 7,000 kWh or 15 kW during any billing month, the Customer will immediately be transferred to and remain in the Standard Service Rate and shall not be eligible for service under the Alternative Service Rate for a period of twelve (12) consecutive months thereafter.

ALTERNATIVE TIME OF DAY (TOD) RATE (Maximum Demand below 15 kW in all months)

|                                       |   |  |
|---------------------------------------|---|--|
| Customer Charge (per meter per month) | \$14.00                                   |  |
| <b>Energy Charge Per kWh</b>          | <b>Summer</b><br>(June through September) | <b>Non-Summer</b><br>(October through May) |
| On-Peak Period                        | \$0.32207                                 | -----                                      |

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Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
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**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 03  
CANCELLING FIFTEENTH REVISED RATE NO. 03**

X  
X

**SMALL GENERAL SERVICE RATE**

|                 |           |           |
|-----------------|-----------|-----------|
| Off-Peak Period | \$0.06846 | \$0.07441 |
|-----------------|-----------|-----------|

The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, for the Summer months. There is no On-Peak Period for the Non-Summer months. The Off-Peak Period shall be all other hours not covered in the On-Peak Period. For Distributed Generation (DG) customers, the net energy metering provision will be applied by TOD period.

If a Customer on the Alternative TOD Rate meets or exceeds 7,000 kWh or 15 kW during any billing month, the Customer will immediately be transferred to and remain in the Standard TOD Rate and shall not be eligible for service under the Alternative TOD Rate for a period of twelve (12) consecutive months thereafter.

The Customer that elects to take service under a TOD rate, must do so for a minimum of twelve (12) consecutive months. For all customers that enroll, if, at the conclusion of that initial twelve (12) month period of service under the TOD rate, the total billings for the 12-month period exceed billings for the same period under the corresponding non-TOD rate, the Company will credit the customer for the difference in billings and the Customer may opt to revert to the corresponding non-TOD rate.

**MONTHLY MINIMUM CHARGE**

The Customer Charge plus Demand Charge (if applicable), Other Applicable Riders, and Tax Adjustment.

**DETERMINATION OF BILLING DEMAND**

Maximum Demand is defined as the highest measured thirty (30) minute average kW load.

The billing demand (in kW) will be the highest of:

- (a) the Maximum Demand; or
- (b) the demand ratchet of 60% of the Maximum Demand established during the billing months of June through September in the preceding twelve (12) month period; or
- (c) 15 kW.

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 03  
CANCELLING FIFTEENTH REVISED RATE NO. 03**

X  
X

**SMALL GENERAL SERVICE RATE**

Page 4 of 6

The Company will reset the demand ratchet for customers installing Distributed Generation (DG) and/or storage following interconnection of the DG and/or storage, restarting the historical demand used for purposes of applying (b) above.

**FUEL AND PURCHASED POWER COST ADJUSTMENT CLAUSE (FPPCAC)**

All service taken under this rate schedule is subject to the provisions of the Company's Rate No. 18 (FPPCAC).

**OTHER APPLICABLE RIDERS**

All service taken under this rate schedule is subject to the provisions of the other Company riders that may apply to this rate schedule and shall be billed pursuant to the provisions of those riders.

**TAX ADJUSTMENT**

Billings under this rate schedule may be increased by an amount equal to the sum of taxes payable under the Gross Receipts and Compensating Tax Act and of all other taxes, fees or charges (exclusive of ad valorem, state and federal income taxes) payable by the utility and levied or assessed by any governmental authority on the public utility service rendered, or on the right or privilege of rendering the service, or on any object or event incidental to the rendition of the service.

**VOLUNTARY RENEWABLE ENERGY (VRE):**

This rate schedule is subject to the provisions of the Company's Rate No. 32 (VRE).

**WHOLE SERVICE ELECTRIC VEHICLE (WSEV) RATE RIDER INCENTIVE CREDIT**

STANDARD SERVICE INCENTIVE CREDIT: \$0.00267 / kWh

ALTERNATIVE SERVICE INCENTIVE CREDIT: \$0.05875 / kWh

SUPER OFF-PEAK HOURS: 12:00 am to 8:00 am, Monday – Sunday, Year Round

X  
X  
X

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 03  
CANCELLING FIFTEENTH REVISED RATE NO. 03**

X  
X

**SMALL GENERAL SERVICE RATE**

Page 5 of 6

PROGRAM DESCRIPTION: Energy usage during the hours listed above will be multiplied by the Incentive Credit rate to calculate the incentive credit presented on the monthly bill. Energy usage for all hours will be charged at the applicable Rate No. 03 rate.

RATE QUALIFICATIONS: Customers must have a qualifying plug-in electric vehicle that is registered with the New Mexico Motor Vehicle Division using the same service address as the EPE residential or commercial account. Qualifying accounts must provide proof of EV registration.

X  
X

LIMITATION: The incentive credit shall not cause the customer bill to fall below the Monthly Minimum Charge Provision applicable on this rate, excluding Purchase Power and Fuel (FPPCAC).

X  
X  
X

**TERMS OF PAYMENT**

All bills under this rate schedule are due and payable when rendered and become delinquent twenty (20) calendar days thereafter. If the twentieth day falls on a holiday or weekend, the next Company business day will apply.

**TERMS AND CONDITIONS**

Service supplied under this rate schedule is subject to the Company's Rules and Regulations on file with the New Mexico Public Regulation Commission and available for inspection at Company offices.

The Company at its option shall install metering equipment to measure the customer's Maximum Demand for purposes of determining the applicable rate schedule.

The Customer and the Company will determine whether a new Customer qualifies for this rate schedule.

If the Customer's Maximum Demand exceeds 50 kW in any two (2) consecutive months during the current month and previous eleven (11) month period, the Customer shall no longer be eligible for service under this rate schedule and shall be placed on Rate No. 04 – General Service or Rate No. 09 – Large Power Service, as applicable, for a minimum of twelve (12) consecutive months. Upon completion of the minimum twelve (12) consecutive month period, a determination will be made by the Company for the Customer's applicable rate schedule.

**Advice Notice No. \_\_\_\_\_ 289 \_\_\_\_\_**

**Signature/Title /s/ James Schichtl  
James Schichtl  
Vice President – Regulatory and  
Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 03  
CANCELLING FIFTEENTH REVISED RATE NO. 03**

X  
X

**SMALL GENERAL SERVICE RATE**

Any new Customer that has not established a prior service history with the Company shall be classified under the appropriate rate schedule in accordance with a Maximum Demand estimate performed by the Company.

**PRORATION ADJUSTMENTS**

Charges for service supplied under this rate schedule, except the Customer Charge, are subject to proration adjustments.

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 04  
CANCELLING FIFTEENTH REVISED RATE NO. 04**

X  
X

**GENERAL SERVICE RATE**

**APPLICABILITY**

This rate schedule is available to all Customers for lighting, power, and heating service and where facilities of adequate capacity and suitable voltage are adjacent to the premises to be served. Service under this rate schedule shall be limited to Customers who otherwise do not qualify for service under the Company’s other rate schedules and whose Maximum Demand for any two (2) consecutive months during the current month and previous eleven (11) month period was (i) not less than 50 kilowatts (kW) and (ii) did not exceed 799 kW.

For customers currently taking service under the time of day (TOD) rates of this schedule, the TOD rates will be applicable beginning the first billing cycle after re-programing of the customer meter for the TOD period ordered in NMPRC Case No. 20-00104-UT Final Order.

**TERRITORY**

Areas served by the Company in Doña Ana, Sierra, Otero and Luna Counties.

**TYPE OF SERVICE**

Service available under this rate schedule will be determined by the Company and will either be single or three phase at the option of the Company and at a standard Company approved voltage. All service will be taken at a single point of delivery designated by the Company. Electric energy will be measured by a single meter, or measuring device, of each kind needed.

**MONTHLY RATES**

**STANDARD SERVICE RATE**

|                                       |               |                   |
|---------------------------------------|---------------|-------------------|
| Customer Charge (per meter per month) | \$26.00       |                   |
| <b>Secondary Voltage</b>              | <b>Summer</b> | <b>Non-Summer</b> |
| Demand Charge per Billing kW          | \$19.74       | \$13.11           |
| Energy Charge per kWh                 | \$0.02897     | \$0.00960         |
| <b>Primary Voltage</b>                | <b>Summer</b> | <b>Non-Summer</b> |
| Demand Charge per Billing kW          | \$18.65       | \$11.97           |
| Energy Charge per kWh                 | \$0.02897     | \$0.00960         |

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
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**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 04  
CANCELLING FIFTEENTH REVISED RATE NO. 04**

X  
X

**GENERAL SERVICE RATE**

| <b>Transmission Voltage</b>  | <b>Summer</b> | <b>Non-Summer</b> |
|------------------------------|---------------|-------------------|
| Demand Charge per Billing kW | \$13.95       | \$7.94            |
| Energy Charge per kWh        | \$0.02897     | \$0.00960         |

The Summer period shall be the months of June through September. The Non-Summer period shall be all other months.

TIME-OF-DAY (TOD) RATE

|                                       |         |
|---------------------------------------|---------|
| Customer Charge (per meter per month) | \$26.00 |
|---------------------------------------|---------|

| <b>Secondary Voltage</b>     | <b>Summer</b> | <b>Non-Summer</b> |
|------------------------------|---------------|-------------------|
| Demand Charge per Billing kW | \$18.75       | \$12.46           |
| Energy Charge per kWh        |               |                   |
| On-Peak Period               | \$0.15104     | -----             |
| Off-Peak Period              | \$0.01009     | \$0.01096         |

| <b>Primary Voltage</b>       | <b>Summer</b> | <b>Non-Summer</b> |
|------------------------------|---------------|-------------------|
| Demand Charge per Billing kW | \$17.72       | \$11.37           |
| Energy Charge per kWh        |               |                   |
| On-Peak Period               | \$0.15001     | -----             |
| Off-Peak Period              | \$0.00979     | \$0.01064         |

| <b>Transmission Voltage</b>  | <b>Summer</b> | <b>Non-Summer</b> |
|------------------------------|---------------|-------------------|
| Demand Charge per Billing kW | \$13.25       | \$7.54            |
| Energy Charge per kWh        |               |                   |
| On-Peak                      | \$0.14908     | -----             |
| Off-Peak                     | \$0.00947     | \$0.01029         |

The Summer period shall be the months of June through September. The Non-Summer period shall be all other months. The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, for the Summer months. There is no On-Peak Period for the Non-Summer months. The Off-Peak Period shall be all other hours not covered in the On-Peak Period. For Distributed Generation (DG) customers, the net energy metering provision will be applied by TOD period.

The Customer that elects or that is required to take service under the TOD Rate, must do so for a minimum of twelve (12) consecutive months. For all customers that elect the TOD Rate, if, at

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
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**Vice President – Regulatory and**  
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**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 04  
CANCELLING FIFTEENTH REVISED RATE NO. 04**

X  
X

**GENERAL SERVICE RATE**

the conclusion of that initial twelve (12) month period of service under the TOD Rate, the total billings for the 12-month period exceed billings for the same period under the Standard Service Rate, the Company will credit the customer for the difference in billings and the Customer may opt to revert to the Standard Service Rate.

**MONTHLY MINIMUM CHARGE**

The Customer Charge plus Demand Charge, Other Applicable Riders, and Tax Adjustment.

**DETERMINATION OF BILLING DEMAND**

Maximum Demand is defined as the highest measured thirty (30) minute average kW load.

The billing demand (in kW) will be the highest of:

- (a) the Maximum Demand, adjusted by the Meter Voltage Adjustment, if applicable; or
- (b) the demand ratchet of 65% of the Maximum Demand established during the billing months of June through September in the preceding twelve (12) month period; or
- (c) 50 kW.

The Company will reset the demand ratchet for customers installing Distributed Generation (DG) and/or storage following interconnection of the DG and/or storage, restarting the historical demand used for purposes of applying (b) above. This Determination of Billing Demand is not applicable to customers eligible under the Demand Adjustment Rider of this rate schedule.

X  
X

**DEMAND ADJUSTMENT RIDER**

X

This rider is available to qualifying separately metered Transportation Electrification (TE) Public Charging sites and is an adjustment to the billing demand. In the event the Maximum Demand for the billing period results in a load factor (LF) less than a 15%, based on the same billing period's energy consumption (kWh), the billing demand (kW) for the billing period will be calculated as follows:

BD = kWh / (LF \* 24 \* Days)  
 Where,  
 BD = Billing Demand  
 kWh = Monthly energy consumption

**Advice Notice No.** \_\_\_\_\_ **289** \_\_\_\_\_

**Signature/Title** /s/ James Schichtl  
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**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 04  
CANCELLING FIFTEENTH REVISED RATE NO. 04**

X  
X

**GENERAL SERVICE RATE**

LF = 15%  
24 = Hours in a day  
Days = Days in billing period

If the Maximum Demand for the billing month results in a LF equal to or greater than 15%, based on the same billing month's energy consumption (kWh), the billing demand (kW) will be calculated pursuant to the Determination of Billing Demand.

**POWER FACTOR ADJUSTMENT**

For Maximum Demands of 250 kW and above, if the power factor at the time of Maximum Demand is below 90% lagging, a power factor adjustment shall be calculated as follows:

ADJ = ((kW x .95 / PF) – kW) x DC, where  
ADJ = Increase to applicable Demand Charge,  
kW = Maximum Demand,  
PF = Monthly measured Power Factor, and  
DC = Demand Charge.

**METER VOLTAGE ADJUSTMENT**

If electric service is delivered on the high voltage side of a Customer-supplied transformer and is metered on the low voltage side of the transformer, the following meter adjustments shall be made:

Adjusted Maximum Demand = Maximum Demand multiplied by 1.013  
Billing kilowatt-hours = Metered kilowatt-hours multiplied by 1.022

If electric service is delivered on the low voltage side of a Company-owned transformer and is metered on the high voltage side of the transformer, the following meter adjustments shall be made:

Adjusted Maximum Demand = Maximum Demand divided by 1.013  
Billing kilowatt-hours = Metered kilowatt-hours divided by 1.022

**FUEL AND PURCHASED POWER COST ADJUSTMENT CLAUSE (FPPCAC)**

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 04  
CANCELLING FIFTEENTH REVISED RATE NO. 04**

X  
X

**GENERAL SERVICE RATE**

All service taken under this rate schedule is subject to the provisions of the Company's Rate No. 18 (FPPCAC).

**OTHER APPLICABLE RIDERS**

All service taken under this rate schedule is subject to the provisions of other Company riders that may apply to this rate schedule and shall be billed pursuant to the provisions of those riders.

**TAX ADJUSTMENT**

Billings under this rate schedule may be increased by an amount equal to the sum of taxes payable under the Gross Receipts and Compensating Tax Act and of all other taxes, fees or charges (exclusive of ad valorem, state and federal income taxes) payable by the utility and levied or assessed by any governmental authority on the public utility service rendered, or on the right or privilege of rendering the service, or on any object or event incidental to the rendition of the service.

**VOLUNTARY RENEWABLE ENERGY (VRE)**

This rate schedule is subject to the provisions of the Company's Rate No. 32 (VRE).

**WHOLE SERVICE ELECTRIC VEHICLE (WSEV) RATE RIDER INCENTIVE CREDIT**

STANDARD SERVICE INCENTIVE CREDIT: \$0.00176 / kWh

SUPER OFF-PEAK HOURS: 12:00 am to 8:00 am, Monday – Sunday, Year Round

PROGRAM DESCRIPTION: Energy usage during the hours listed above will be multiplied by the Incentive Credit rate to calculate the incentive credit presented on the monthly bill. Energy usage for all hours will be charged at the applicable Rate No. 04 rate.

RATE QUALIFICATIONS: Customers must have a qualifying plug-in electric vehicle that is registered with the New Mexico Motor Vehicle Division using the same service address as the EPE residential or commercial account. Qualifying accounts must provide proof of EV registration.

X  
X

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
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**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 04  
CANCELLING FIFTEENTH REVISED RATE NO. 04**

X  
X

**GENERAL SERVICE RATE**

LIMITATION: The incentive credit shall not cause the customer bill to fall below the Monthly Minimum Charge Provision applicable on this rate, excluding Purchase Power and Fuel (FPPCAC). X  
X  
X

**TERMS OF PAYMENT**

All bills under this rate schedule are due and payable when rendered and become delinquent twenty (20) calendar days thereafter. If the twentieth day falls on a holiday or weekend, the next Company business day will apply.

**TERMS AND CONDITIONS**

Service supplied under this rate schedule is subject to the Company's Rules and Regulations on file with the New Mexico Public Regulation Commission and available for inspection at Company offices.

The Customer and the Company will determine whether a new Customer qualifies under this rate schedule.

If the Customer's Maximum Demand exceeds 799 kW in any two (2) consecutive months during the current month and previous eleven (11) month period, the Customer shall no longer be eligible for service under this rate schedule and shall be placed on Rate No. 09 – Large Power Service for a minimum of twelve (12) consecutive months. Upon completion of the minimum twelve (12) consecutive month period, a determination will be made by the Company for the Customer's applicable rate schedule.

If the Customer's Maximum Demand falls below 50 kW in any two (2) consecutive months during the current month and previous eleven (11) month period, the Customer shall no longer be eligible for service under this rate schedule and shall be placed on Rate No. 03 – Small General Service Rate. Should the Customer's Maximum Demand exceed 50 kW in any two (2) consecutive months thereafter, the Customer shall be returned to Rate No. 04 – General Service.

Any new Customer that has not established a prior service history with the Company shall be classified under the appropriate rate schedule in accordance with a demand estimate performed by the Company.

**PRORATION ADJUSTMENTS**

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**SIXTEENTH REVISED RATE NO. 04  
CANCELLING FIFTEENTH REVISED RATE NO. 04**

X  
X

**GENERAL SERVICE RATE**

Charges for service supplied under this rate schedule, except the Customer Charge, are subject to proration adjustments.

**THERMAL ENERGY STORAGE (TES) RIDER**

This rider is available to Customers with separately metered TES Systems whose Maximum Demand does not exceed the Maximum Demand of the building after completion of the necessary contract arrangements and installation of the necessary metering equipment. The billing demand for this separately metered load will be the Maximum Demand established during the On-Peak Period.

The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, June through September. The Off-Peak Period shall be all other hours not covered in the On-Peak Period.

No other options or riders are applicable to consumption covered under this rider. Both separately metered TES systems and total building loads must be served under this rate.

The Company reserves the right to close this rider to additional customers if, in the Company's judgment, system load characteristics no longer warrant such a rider.

**Advice Notice No.** \_\_\_\_\_ **289** \_\_\_\_\_

**Signature/Title** /s/ James Schichtl  
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**Vice President – Regulatory and**  
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**EL PASO ELECTRIC COMPANY  
THIRTEENTH REVISED RATE NO. 07  
CANCELLING TWELFTH REVISED RATE NO. 07**

X  
X

**CITY AND COUNTY SERVICE RATE**

**APPLICABILITY**

This rate schedule is closed to all new service applications.

The rate schedule is limited to public schools, and to the municipal and county customer service points currently taking service under this rate schedule. No reconnections of existing service points, new customers, or new service points shall be allowed to take service under this rate schedule.

**TERRITORY**

Areas served by the Company in Doña Ana, Sierra, Otero and Luna Counties.

**TYPE OF SERVICE**

Service available under this rate schedule will be determined by the Company and will either be single or three phase at the option of the Company and at a standard Company approved voltage. All service will be taken at a single point of delivery designated by the Company. Electric energy will be measured by a single meter, or other measuring device, of each kind needed.

**MONTHLY RATES**

**STANDARD SERVICE RATE**

|                                       |   |  |
|---------------------------------------|---|--|
| Customer Charge (per month per Meter) | \$17.50                                   |  |
| <b>Demand and Energy Charges</b>      | <b>Summer</b><br>(June through September) | <b>Non-Summer</b><br>(October through May) |
| Demand Charge per Billing kW          | \$14.69                                   | \$9.91                                     |
| Energy Charge per kWh                 | \$0.03640                                 | \$0.02157                                  |

**TIME OF DAY (TOD) RATE**

|                                       |   |  |
|---------------------------------------|---|--|
| Customer Charge (per meter per month) | \$17.50                                   |  |
| <b>Demand and Energy Charges</b>      | <b>Summer</b><br>(June through September) | <b>Non-Summer</b><br>(October through May) |
| Demand Charge                         | \$13.96                                   | \$9.41                                     |
| Energy Charge per kWh                 |   |  |

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY  
THIRTEENTH REVISED RATE NO. 07  
CANCELLING TWELFTH REVISED RATE NO. 07**

X  
X

**CITY AND COUNTY SERVICE RATE**

|                 |           |           |
|-----------------|-----------|-----------|
| On-Peak Period  | \$0.15042 | -----     |
| Off-Peak Period | \$0.02107 | \$0.02290 |

The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, for the Summer months. There is no On-Peak Period for the Non-Summer months. The Off-Peak Period shall be all other hours not covered in the On-Peak Period. For Distributed Generation (DG) customers, the net energy metering provision will be applied by TOD period.

The Customer that elects to take service under the TOD Rate, must do so for a minimum of twelve (12) consecutive months. For all customers that elect the TOD Rate, if, at the conclusion of that initial twelve (12) month period of service under the TOD Rate, the total billings for the 12-month period exceed billings for the same period under the Standard Service Rate, the Company will credit the customer for the difference in billings and the Customer may opt to revert to the Standard Service Rate.

**MONTHLY MINIMUM CHARGE**

The Customer Charge plus Demand Charge, Other Applicable Riders, and Tax Adjustment.

**DETERMINATION OF BILLING DEMAND**

Maximum Demand is defined as the highest measured thirty (30) minute average kW load.

The billing demand (in kW) will be the highest of:

- (a) the Maximum Demand; or
- (b) the demand ratchet of 65 % of the Maximum Demand established during the billing months of June through September in the preceding twelve (12) month period.

The Company will reset the demand ratchet for customers installing Distributed Generation (DG) and/or storage following interconnection of the DG and/or storage, restarting the historical demand used for purposes of applying (b) above.

**FUEL AND PURCHASED POWER COST ADJUSTMENT CLAUSE (FPPCAC)**

All service taken under this rate schedule is subject to the provisions of the Company's Rate No. 18 (FPPCAC).

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY  
THIRTEENTH REVISED RATE NO. 07  
CANCELLING TWELFTH REVISED RATE NO. 07**

X  
X

**CITY AND COUNTY SERVICE RATE**

**OTHER APPLICABLE RIDERS**

All service taken under this rate schedule is subject to the provisions of other Company riders that may apply to this rate schedule and shall be billed pursuant to the provisions of those riders.

**TAX ADJUSTMENT**

Billings under this rate schedule may be increased by an amount equal to the sum of taxes payable under the Gross Receipts and Compensating Tax Act and of all other taxes, fees or charges (exclusive of ad valorem, state and federal income taxes) payable by the utility and levied or assessed by any governmental authority on the public utility service rendered, or on the right or privilege of rendering the service, or on any object or event incidental to the rendition of the service.

**WHOLE SERVICE ELECTRIC VEHICLE (WSEV) RATE RIDER INCENTIVE CREDIT**

STANDARD SERVICE INCENTIVE CREDIT: \$0.01266 / kWh

SUPER OFF-PEAK HOURS: 12:00 am to 8:00 am, Monday – Sunday, Year Round

PROGRAM DESCRIPTION: Energy usage during the hours listed above will be multiplied by the Incentive Credit rate to calculate the incentive credit presented on the monthly bill. Energy usage for all hours will be charged at the applicable Rate No. 07 rate.

RATE QUALIFICATIONS: Customers must have a qualifying plug-in electric vehicle that is registered with the New Mexico Motor Vehicle Division using the same service address as the EPE residential or commercial account. Qualifying accounts must provide proof of EV registration.

X  
X

LIMITATION: The incentive credit shall not cause the customer bill to fall below the Monthly Minimum Charge Provision applicable on this rate, excluding Purchase Power and Fuel (FPPCAC).

X  
X  
X

**TERMS OF PAYMENT**

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY  
THIRTEENTH REVISED RATE NO. 07  
CANCELLING TWELFTH REVISED RATE NO. 07**

**CITY AND COUNTY SERVICE RATE**

All bills under this rate schedule are due and payable when rendered and become delinquent twenty (20) calendar days thereafter. If the twentieth day falls on a holiday or weekend, the next Company business day will apply.

**TERMS AND CONDITIONS**

Service supplied under this rate schedule is subject to the Company's Rules and Regulations on file with the New Mexico Public Regulation Commission and available for inspection at Company offices

**PRORATION ADJUSTMENTS**

Charges for service supplied under this rate schedule, except the Customer Charge, are subject to proration adjustments.

**THERMAL ENERGY STORAGE (TES) RIDER**

This rider is available to Customers with existing, separately metered TES Systems whose Maximum Demand does not exceed the Maximum Demand of the building after completion of the necessary contract arrangements and installation of the necessary metering equipment. The billing demand for this separately metered load will be the Maximum Demand established during the On-Peak Period.

The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, June through September. The Off-Peak period shall be all other hours not covered in the on-peak Period.

No other options or riders are applicable to consumption covered under this rider. Both separately metered TES systems and total building loads must be served under this rate schedule.

The Company reserves the right to close this rider to additional Customers if, in the Company's judgment, system load characteristics no longer warrant such a rider.

**Advice Notice No.** \_\_\_\_\_ **289**

**Signature/Title** /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**THIRTEENTH REVISED RATE NO. 09  
CANCELLING TWELFTH REVISED RATE NO. 09**

X  
X

**LARGE POWER SERVICE RATE**

Page 1 of 5

**APPLICABILITY**

This rate schedule is available to all Customers for lighting, power, and heating service and where facilities of adequate capacity and suitable voltage are adjacent to the premises to be served. Service under this rate schedule shall be limited to Customers who otherwise do not qualify for service under the Company's other rate schedules and whose Maximum Demand for any two (2) consecutive months during the current month and previous eleven (11) month period was not less than 800 kilowatts (kW).

For customers currently taking service under the time of day (TOD) rates of this schedule, the TOD rates will be applicable beginning the first billing cycle after re-programing of the customer meter for the TOD period ordered in NMPRC Case No. 21-00104-UT Final Order.

**TERRITORY**

Areas served by the Company in Doña Ana, Sierra, Otero and Luna Counties.

**TYPE OF SERVICE**

Service available under this rate schedule will be determined by the Company and will either be single or three phase at the option of the Company and at a standard Company approved voltage. All service will be taken at a single point of delivery designated by the Company. Electric energy will be measured by a single meter, or other measuring device, of each kind needed.

**MONTHLY RATES**

|                                       |               |                   |
|---------------------------------------|---------------|-------------------|
| Customer Charge (per meter per month) |               | \$127.00          |
| <b>Secondary Voltage</b>              | <b>Summer</b> | <b>Non-Summer</b> |
| Demand Charge per Billing kW          | \$23.30       | \$11.30           |
| Energy Charge per kWh                 |               |                   |
| On-Peak Period                        | \$0.15067     | -----             |
| Off-Peak Period                       | \$0.00622     | \$0.00622         |
| <b>Primary Voltage</b>                | <b>Summer</b> | <b>Non-Summer</b> |
| Demand Charge per Billing kW          | \$23.01       | \$11.03           |
| Energy Charge per kWh                 |               |                   |
| On-Peak Period                        | \$0.15067     | -----             |
| Off-Peak Period                       | \$0.00622     | \$0.00622         |

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**THIRTEENTH REVISED RATE NO. 09  
CANCELLING TWELFTH REVISED RATE NO. 09**

X  
X

**LARGE POWER SERVICE RATE**

| <b>Transmission Voltage</b>  | <b>Summer</b> | <b>Non-Summer</b> |
|------------------------------|---------------|-------------------|
| Demand Charge per Billing kW | \$20.36       | \$9.02            |
| <b>Energy Charge per kWh</b> |               |                   |
| On-Peak Period               | \$0.15067     | -----             |
| Off-Peak Period              | \$0.00622     | \$0.00622         |

The Summer period shall be the months of June through September. The Non-Summer period shall be all other months. The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, for the Summer months. There is no On-Peak Period for the Non-Summer months. The Off-Peak Period shall be all other hours not covered in the On-Peak Period. For Distributed Generation (DG) customers, the net energy metering provision will be applied by TOD period.

**MONTHLY MINIMUM CHARGE**

The Customer Charge plus Demand Charge, Other Applicable Riders, and Tax Adjustment.

**DETERMINATION OF BILLING DEMAND**

Maximum Demand is defined as the highest measured thirty (30) minute average kW load.

The billing demand (in kW) will be the highest of:

- (a) the Maximum Demand, adjusted by the Meter Voltage Adjustment, if applicable; or
- (b) the demand ratchet of 65% of the Maximum Demand established during the billing months of June through September in the preceding twelve (12) month period; or
- (c) 800 kW.

The Company will reset the demand ratchet for customers installing Distributed Generation (DG) and/or storage following interconnection of the DG and/or storage, restarting the historical demand used for purposes of applying (b) above. This Determination of Billing Demand is not applicable to customers eligible under the Demand Adjustment Rider of this rate schedule.

X  
X

**DEMAND ADJUSTMENT RIDER**

X

This rider is available to qualifying separately metered Transportation Electrification (TE) Public Charging sites and is an adjustment to the billing demand. In the event the Maximum Demand for the billing period results in a load factor (LF) less than a 15%, based on the same billing

**Advice Notice No.** 289

**Signature/Title** /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and Governmental Affairs**

**EL PASO ELECTRIC COMPANY**

**THIRTEENTH REVISED RATE NO. 09  
CANCELLING TWELFTH REVISED RATE NO. 09**

X  
X

**LARGE POWER SERVICE RATE**

period's energy consumption (kWh), the billing demand (kW) for the billing period will be calculated as follows:

- BD = kWh / (LF \* 24 \* Days)
- Where,
- BD = Billing Demand
- kWh = Monthly energy consumption
- LF = 15%
- 24 = Hours in a day
- Days = Days in billing period

If the Maximum Demand for the billing month results in a LF equal to or greater than 15%, based on the same billing month's energy consumption (kWh), the billing demand (kW) will be calculated pursuant to the Determination of Billing Demand.

**POWER FACTOR ADJUSTMENT**

If the power factor at the time of Maximum Demand is below 90% lagging, a power factor adjustment shall be calculated as follows:

- ADJ = ((kW x .95 / PF) – kW) x DC, where
- ADJ = Increase to applicable Demand Charge,
- kW = Maximum Demand,
- PF = Monthly measured Power Factor, and
- DC = Demand Charge.

**METER VOLTAGE ADJUSTMENT**

If electric service is delivered on the high voltage side of a Customer-supplied transformer and is metered on the low voltage side of the transformer, the following meter adjustments shall be made:

- Adjusted Maximum Demand = Maximum Demand multiplied by 1.013
- Billing kilowatt-hours = Metered kilowatt-hours multiplied by 1.022

If electric service is delivered on the low voltage side of a Company-owned transformer and is metered on the high voltage side of the transformer, the following meter adjustments shall be made:

**Advice Notice No. \_\_\_\_\_ 289 \_\_\_\_\_**

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Vice President – Regulatory and  
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**LARGE POWER SERVICE RATE**

Adjusted Maximum Demand = Maximum Demand divided by 1.013  
Billing kilowatt-hours = Metered kilowatt-hours divided by 1.022

**FUEL AND PURCHASED POWER COST ADJUSTMENT CLAUSE (FPPCAC)**

All service taken under this rate schedule is subject to the provisions of the Company's Rate No. 18 (FPPCAC).

**OTHER APPLICABLE RIDERS**

All service taken under this rate schedule is subject to the provisions of other Company riders that may apply to this rate schedule and shall be billed pursuant to provisions of those riders.

**TAX ADJUSTMENT**

Billings under this rate schedule may be increased by an amount equal to the sum of taxes payable under the Gross Receipts and Compensating Tax Act and of all other taxes, fees or charges (exclusive of ad valorem, state and federal income taxes) payable by the utility and levied or assessed by any governmental authority on the public utility service rendered, or on the right or privilege of rendering the service, or on any object or event incidental to the rendition of the service.

**VOLUNTARY RENEWABLE ENERGY (VRE)**

This rate schedule is subject to the provisions of the Company's Rate No. 32 (VRE).

**TERMS OF PAYMENT**

All bills under this rate schedule are due and payable when rendered and become delinquent twenty (20) calendar days thereafter. If the twentieth day falls on a holiday or weekend, the next Company business day will apply.

**TERMS AND CONDITIONS**

Service supplied under this rate schedule is subject to the Company's Rules and Regulations on file with the New Mexico Public Regulation Commission and available for inspection at Company offices. Any contract provisions shall also apply to service under this rate schedule.

Advice Notice No. 289

Signature/Title /s/ James Schichtl  
**James Schichtl**  
**Vice President – Regulatory and**  
**Governmental Affairs**

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X  
X

**LARGE POWER SERVICE RATE**

The Customer and the Company will determine whether a new Customer qualifies for this rate schedule.

If the Customer's Maximum Demand falls below 800 kW in any two (2) consecutive months during the current month and previous eleven (11) month period, the Customer shall no longer be eligible for service under this rate schedule and shall be placed on Rate No. 04 – General Service Rate or Rate No. 03 – Small General Service, as applicable. Should the Customer's Maximum Demand exceed 799 kW in any two (2) consecutive months thereafter, the Customer shall be returned to Rate No. 09 – Large Power Service.

Any new Customer that has not established a prior service history with the Company shall be classified under the appropriate rate schedule in accordance with a demand estimate performed by the Company.

**PRORATION ADJUSTMENTS**

Charges for service supplied under this rate schedule, except the Customer Charge, are subject to proration adjustments.

**THERMAL ENERGY STORAGE (TES) RIDER**

This rider is available to Customers with separately metered TES Systems whose Maximum Demand does not exceed the Maximum Demand of the building after completion of the necessary contract arrangements and installation of the necessary metering equipment. The billing demand for this separately metered load will be the Maximum Demand established during the On-Peak Period.

The On-Peak Period shall be from 3:00 P.M. to 7:00 P.M., Mountain Daylight Time, Monday through Friday, June through September. The Off-Peak period shall be all other hours not covered in the On-Peak Period.

No other options or riders are applicable to consumption covered under this rider. Both separately metered TES and total building loads must be served under this rate schedule.

The Company reserves the right to close this rider to additional customers if, in the Company's judgment, system load characteristics no longer warrant such a rider.

**Advice Notice No. \_\_\_\_\_ 289 \_\_\_\_\_**

**Signature/Title /s/ James Schichtl  
James Schichtl  
Vice President – Regulatory and  
Governmental Affairs**

El Paso Electric Company  
2024-2026 Transportation Electrification Plan (TEP) Filing  
Demand Adjustment Rider Calculation

|          | (a)       | (b)       | (c)   | (d)         | (e)      | (f)        | (g)       | (h)         | (i)     |
|----------|-----------|-----------|-------|-------------|----------|------------|-----------|-------------|---------|
|          | Rate 04   |           |       |             |          |            |           |             |         |
| Line No. | Actual kW | Billed kW | kWh   | Load Factor | Customer | Demand     | Energy    | Base (\$)   | \$/kWh  |
| 1        | 140       | 140       | 1022  | 1.00%       | \$ 26.00 | \$2,763.60 | \$ 29.61  | \$ 2,819.21 | \$ 2.76 |
| 2        | 140       | 140       | 2044  | 2.00%       | \$ 26.00 | \$2,763.60 | \$ 59.21  | \$ 2,848.81 | \$ 1.39 |
| 3        | 140       | 140       | 4088  | 4.00%       | \$ 26.00 | \$2,763.60 | \$ 118.43 | \$ 2,908.03 | \$ 0.71 |
| 4        | 140       | 140       | 8176  | 8.00%       | \$ 26.00 | \$2,763.60 | \$ 236.86 | \$ 3,026.46 | \$ 0.37 |
| 5        | 140       | 140       | 12264 | 12.00%      | \$ 26.00 | \$2,763.60 | \$ 355.29 | \$ 3,144.89 | \$ 0.26 |
| 6        | 140       | 140       | 15330 | 15.00%      | \$ 26.00 | \$2,763.60 | \$ 444.11 | \$ 3,233.71 | \$ 0.21 |
| 7        | 140       | 140       | 18396 | 18.00%      | \$ 26.00 | \$2,763.60 | \$ 532.93 | \$ 3,322.53 | \$ 0.18 |
|          | (j)       | (k)       | (l)   | (m)         | (n)      | (o)        | (p)       | (q)         | (r)     |
|          | DA Rider  |           |       |             |          |            |           |             |         |
| 8        | 140       | 9         | 1022  | 15.00%      | \$ 26.00 | \$ 184.24  | \$ 29.61  | \$ 239.85   | \$ 0.23 |
| 9        | 140       | 19        | 2044  | 15.00%      | \$ 26.00 | \$ 368.48  | \$ 59.21  | \$ 453.69   | \$ 0.22 |
| 10       | 140       | 37        | 4088  | 15.00%      | \$ 26.00 | \$ 736.96  | \$ 118.43 | \$ 881.39   | \$ 0.22 |
| 11       | 140       | 75        | 8176  | 15.00%      | \$ 26.00 | \$1,473.92 | \$ 236.86 | \$ 1,736.78 | \$ 0.21 |
| 12       | 140       | 112       | 12264 | 15.00%      | \$ 26.00 | \$2,210.88 | \$ 355.29 | \$ 2,592.17 | \$ 0.21 |
| 13       | 140       | 140       | 15330 | 15.00%      | \$ 26.00 | \$2,763.60 | \$ 444.11 | \$ 3,233.71 | \$ 0.21 |
| 14       | 140       | 140       | 18396 | 18.00%      | \$ 26.00 | \$2,763.60 | \$ 532.93 | \$ 3,322.53 | \$ 0.18 |



FURTHER, DECLARANT SAYETH NAUGHT.

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

Executed on June 30, 2023.

/s/ Brian Turaki

BRIAN TURAKI

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

IN THE MATTER OF EL PASO ELECTRIC )  
COMPANY'S APPLICATION FOR APPROVAL )  
OF ITS TRANSPORTATION ELECTRIFICATION )  
PLAN FOR 2024-2026 )  
) )  
) )  
) )  
) )  
EL PASO ELECTRIC COMPANY, )  
Applicant. )  
) )  
\_\_\_\_\_ )

CASE NO. 23-00\_\_\_-UT

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 30, 2023 El Paso Electric Company's  
Application for Approval of its Transportation Electrification Plan for Plan Years 2024-  
2026 was emailed to each of the following:

|                       |  |
|-----------------------|--|
| Nancy Burns           | <a href="mailto:nancy.burns@epelectric.com">nancy.burns@epelectric.com</a> ;                   |
| EPE Regulatory        | <a href="mailto:EPE_Reg_Mgmt@epelectric.com">EPE_Reg_Mgmt@epelectric.com</a> ;                 |
| Jeffrey Wechsler      | <a href="mailto:jwechsler@montand.com">jwechsler@montand.com</a> ;                             |
| Kari Olson            | <a href="mailto:kolson@montand.com">kolson@montand.com</a> ;                                   |
| Jocelyn Barrett-Kapin | <a href="mailto:jbarrettkapin@montand.com">jbarrettkapin@montand.com</a> ;                     |
| Teresa Pacheco        | <a href="mailto:tpacheco@montand.com">tpacheco@montand.com</a> ;                               |
| Diana Luna            | <a href="mailto:dluna@montand.com">dluna@montand.com</a> ;                                     |
| Yolanda Sandoval      | <a href="mailto:ysandoval@montand.com">ysandoval@montand.com</a> ;                             |
| Anastasia Stevens     | <a href="mailto:astevens.law@gmail.com">astevens.law@gmail.com</a> ;                           |
| Jocelyn Garrison      | <a href="mailto:jgarrison@lascruces.gov">jgarrison@lascruces.gov</a> ;                         |
| Adrienne Widmer       | <a href="mailto:awidmer@lascruces.gov">awidmer@lascruces.gov</a> ;                             |
| NMAG                  | <a href="mailto:utilityfilings@nmag.gov">utilityfilings@nmag.gov</a> ;                         |
| Gideon Elliot         | <a href="mailto:gelliot@nmag.gov">gelliot@nmag.gov</a> ;                                       |
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| Andrea Crane          | <a href="mailto:ctcolumbia@aol.com">ctcolumbia@aol.com</a> ;                                   |
| Philip Simpson        | <a href="mailto:philipbsimpson@comcast.net">philipbsimpson@comcast.net</a> ;                   |
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| Merrie Lee Soules     | <a href="mailto:mlsoules@hotmail.com">mlsoules@hotmail.com</a> ;                               |
| Joan Drake            | <a href="mailto:jdrake@modrall.com">jdrake@modrall.com</a> ;                                   |
| Cydney Beadles        | <a href="mailto:cydney.beadles@westernresources.org">cydney.beadles@westernresources.org</a> ; |
| Allen Downs           | <a href="mailto:biz@lifeisgood2.com">biz@lifeisgood2.com</a> ;                                 |

Cara Lynch  
Bradford Borman  
David Black  
Gloria Regensberg  
Ed Rilkoff  
Elizabeth Ramirez

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[elizabeth.ramirez@prc.nm.us](mailto:elizabeth.ramirez@prc.nm.us);

**DATED** this June 30, 2023

*/s/ Kari E. Olson*

Kari E. Olson