

AUSTIN ENERGY'S TARIFF PACKAGE: §
UPDATE OF THE 2009 COST OF §
SERVICE STUDY AND PROPOSAL TO §
CHANGE BASE ELECTRIC RATES § **BEFORE THE CITY OF AUSTIN**
IMPARTIAL HEARING EXAMINER

SETON HEALTHCARE FAMILY'S MOTION TO INTERVENE

This Motion to Intervene ("Motion") is being filed by Seton Healthcare Family (the "Party"). The Party is an Austin Energy customer and is entitled to be an intervenor in this proceeding.

The Party has reviewed Austin Energy's Tariff Package and believes that the Impartial Hearing Examiner should address the following issues:

(1) The Seton Healthcare Family (Seton) is a commercial customer of Austin Energy (AE). Seton Main (38th Street) is served on AE's Primary 3 tariff and the other four (4) hospitals in the service area are served on the Secondary 3 tariffs. These hospitals are University Medical Center Brackenridge, Dell Children's Medical Center, Seton Northwest, and Seton Shoal Creek.

Hospitals are unique operations. Seton hospitals must stay open 24 hours 7days a week, 365 days a year. Seton hospitals are required by law to serve everyone who appears in their emergency rooms, regardless of ability to pay, and most Federal programs that provide some payments like Medicare and Medicaid do not reimburse the full costs. In 2014, Seton provided \$481 million in charitable care in Central Texas, with most of that provided in Travis County and Austin. Since 2005, Seton has provided care, including services not reimbursed through Medicaid, at a cost of almost \$2.9 billion. No one is ever turned away from Seton due to the inability to pay for care.

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The Seton Healthcare Family takes a leading advocacy role and serves as the primary healthcare provider for the safety net population in our region. Seton, in partnership with Central Health, participates and helps fund the Community Care Collaborative (CCC) in Travis County. In 2015, the CCC contracted with local providers to deliver more than \$70 million in direct patient care for primary and specialty care, especially to the poor and vulnerable. In addition, Seton is a partner for the new Dell Medical School at the University of Texas at Austin, and currently funds the costs for faculty and residents for graduate medical education in Austin, which it has done since 2004. For this current year, the cost is over \$36 million plus additional dollars for medical research activities.

Seton is a not-for-profit healthcare system, and we are proud to meet the calling of our mission in providing this care in our community and to help build and create academic medicine in our community. Seton is the largest provider of care to the safety net population in our community, and we believe our alliance with the medical school, Central Health and the Community Care Collaborative will provide benefits and opportunities to this vulnerable population as well as the community as a whole for generations to come.

We are committed to continuing to provide these services for long into the future, and hope to remain a large and attractive customer for Austin Energy. It is, therefore, very important that the Revenue Requirements, Community Benefit Charge, Regulatory Charge and Power Supply Adjustment be thoroughly discussed and be as low as possible while still maintaining a viable electric utility. Seton Healthcare Family sees these as the primary issues to be vetted in the hearing process.

This Party is representing other Austin Energy customers who are a part of the Seton Healthcare Family network of hospitals, including the following:


- (1) Seton Medical Center Austin
- (2) University Medical Center Brackenridge
- (3) Seton Northwest
- (4) Dell Children's Medical Center, and
- (5) Seton Shoal Creek

All documents related to this proceeding should be emailed to the Party at the following email address: bdunkerley1@austin.rr.com.
(Insert the email address you want to use to receive information about this proceeding)


(Signature of Party or Party's Authorized Representative)

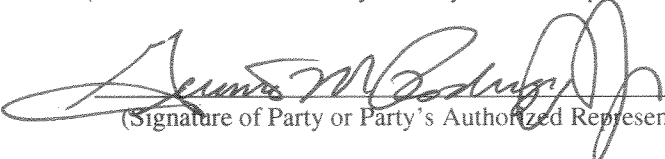
Betty Dunkerley _____
(Printed Name of Party or Party's Authorized Representative)

Not applicable _____
(State Bar Number if Party or Party's Auth. Rep. is an attorney)


(Signature of Party or Party's Authorized Representative)

Greg Hartman, President, External Affairs _____
(Printed Name of Party or Party's Authorized Representative)

Not applicable _____
(State Bar Number if Party or Party's Auth. Rep. is an attorney)


(Signature of Party or Party's Authorized Representative)

Geronimo Rodriguez, Vice President, Advocacy _____
(Printed Name of Party or Party's Authorized Representative)

Texas State Bar Number 00798468 _____
(State Bar Number if Party or Party's Auth. Rep. is an attorney)

February 3, 2016 _____
(Date Submitted)