AUSTIN ENERGY'S TARIFF PACKAGE: 2015 COST OF SERVICE STUDY AND PROPOSAL TO CHANGE BASE ELECTRIC RATES	**§ § § §**	**BEFORE THE CITY OF AUSTIN IMPARTIAL HEARINGS EXAMINER**

AE LOW INCOME CUSTOMERS' 1ST SET OF REQUESTS FOR INFORMATION TO AUSTIN ENERGY

COMES NOW, Texas Legal Services Center ("TLSC") on behalf of AE Low Income Customers, requesting Austin Energy to respond to the following 1st set of Requests for Information set forth below relating to this case. Austin Energy is requested to serve its response to these Requests for Information on the attorney listed below no later than ten days after AE receives this request.

Definitions

As used in this introduction and in these questions,

1. "Communication" means any disclosure, transfer, or exchange of information, whether oral or written, of every kind including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item.
2. "Austin Energy", the "utility," "AE", and "Applicant" refer to Austin Energy.
3. "You," "yours," and "your" refer to Austin Energy (as defined above), including its General Manager, managers, officers, employees, consultants, agents and attorneys.
4. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form. A draft or non-identical copy is a separate document.
5. "Identify" has the following meanings depending on the context:
    a. "Identify" when used with a natural person means to supply his or her name, last known residential and business addresses, last known residential and business telephone numbers, his or her present position, and his or her prior connection or association with any party to this proceeding. If the above information is unavailable, provide some other means of identifying the person and his or her present location.

b. "Identify" when used with an entity means to provide its name, manner of organization (e.g., corporation, partnership, joint venture, etc.), address and telephone number.
c. "Identify" when used with a documents means to supply (i) the nature of the document (e.g., letter, memorandum, corporate minutes), (ii) the date, if any, appearing on the document, (iii) the date, if known, on which the document was prepared, (iv) the title of the document, including any jurisdictional styles and docketing numbers, if applicable, (v) the general subject matter of the document, (vi) the number of pages comprising the document, (vii) the identity of each person who signed or initialed the document, (viii) the identity of each person to whom the document was addressed, (ix) the identity of each person who received the document or reviewed it, (x) the location of the document and (xi) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of CenterPoint or in the custody of its attorneys or other representatives or agents.
d. "Identify" when used with any other thing or matter means to provide a description with detail sufficient to allow a party to this action to identify it and determine its present location.

6. "FY" means fiscal year as utilized by AE and the City of Austin for budgeting purposes and for the council setting of AE electric rates that occur annually.
7. "Council" or "City" means the Austin City Council.
8. "Person" means any natural person. The term also means, whether formally organized or ad hoc, any business, organization, legal entity, or governmental entity.
9. "Representative" means a general manager, officer,, employee, agent, spokesperson, or attorney of a person.
10. The words "and" and "or" are to be construed conjunctively or disjunctively as necessary to give each request its broadest scope.
11. The singular form of a word also refers to the plural, unless the context requires otherwise.

Instructions

1. Please answer the questions and sub-questions under oath and in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession,

custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

6. If any question appears confusing, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and type at the top of the page, the question that is being answered.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has subparts, please identify the person or persons by subpart. Please also state the name of the witness or witnesses in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has subparts, please identify the witness or witnesses by subpart.
9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, description of document, subject matter of the document, and the basis upon which such privilege is claimed.
14. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
15. If you are asked to identify a document and you do not include a copy of the document with your response, please provide the following information (if applicable) about the document:
    a. The identity of the person who signed it;
    b. The identity of the person or persons to whom it was addressed;
    c. The identity of the persons who prepared it;
    d. The title and substance of the document with enough detail to identify the document;
    e. The date of the document;

f. The date the document was executed or prepared, if different from the date it bears; and
g. If the document, or a copy of it, is not in your custody or control, the identity of the person who has control or custody of it or a copy of it.
h. If the person to be identified is not a natural person (e.g. a corporation) give its name and address and principal business activity.

Request for Information

The definitions and instructions set out in this Request for Information apply to these questions. Unless specified otherwise in the RFI, these RFIs refer to the rate-filing package AE filed on January 25, 2016, including page (both section and Bates Stamp) references.

1-1. Please identify each witness Austin Energy is intending to call at the hearing before the Impartial Hearing Examiner for direct examination.

1-2. For each witness identified or referenced in RFI No. 1-1, please provide the following:
  a) the location(s) of the rate filing package the witness is sponsoring (please identify the portions by bate stamp and by named reference);
  b) a resume of the witness which includes business address, including telephone contact information; list of testimonies presented that includes the jurisdiction and reference number of proceedings (such as docket number or case number filing), the date the testimony was presented, the nature of the testimony (such as testimony addressed cost of service, or reserves, etc.); the experience and training of the witness; the education of the witness; a list of publications the witness issued either individually or in partnership with other individuals that includes the jurisdiction, any reference number of proceeding, if any, the nature of the publication, the date of the publication;
  c) copies of any communications between the witness and Austin Energy, its other witnesses, its rate consultants, employees (including general manager, managers, and officials), and agents relating to the substantive matters in the rate filing package since AE determined that a rate case would be filed.

1-3. Excluding secretarial, administrative, and such other support individuals, please identify each person that participated in the preparation of the rate filing package.

1-4. For each person identified or referenced in RFI No. 1-3, please provide the following:
  a) The business address, including phone number, for that person;
  b) The portions of the rate filing package the person participated in preparing;
  c) A resume providing the same information requested in RFI NO. 1-2(b), or if an AE employee, the job classification and job description for that person.

1-5. AE originally announced that it would file its rate filing package on January 11, 2016, but then on January 11, 2016 announced delaying the filing stating "The rate filing package will not be released until later next next week due to some administrative timelines that can't be changed. We intend to release it by January 22nd. ". Please explain what the administrative timelines were that could not be changed.

1-6. On January 22, 1016, AE announced a further filing delay stating "During a quality control review of Austin Energy's Tariff Package, an error was discovered in the cost of service model that warrants correction prior to publication. Austin Energy expects to release the Tariff Package on Monday January 25, 2016." Please identify the error that was discovered, where the error was located in the rate filing package (including named references and bates stamp numbers), what the error was, what was the original data or information included in the cost of service model that needed to be corrected and what are the corrected data or information that was included.

1-7. Please explain why the differing rate time periods for the Load Shifting Voltage Discount Rider do not match the corresponding Time of Use On-Peak and off-Peak differing rate time periods for all other customers. In your explanation, please provide an economic justification for the difference. Please also provide the amount of discount AE is providing to these customers. (Ref. Bates Stamp pp. 711, 717,725, 742 of rate filing package)

1-8. Please list each consultant AE has worked with in developing its rate filing package. If the consultant is considered a business, please identify the person(s) who worked with Austin Energy (Ref. p. 2-, Bates Stamp p. 013).

1-9. For each consultant and person listed in No. 1-8, please provide the following:
   a) The name, business address, and phone number of the person;
   b) The name, address and phone number of the business, if any, the person works for or with or serves as an officer in;
   c) A resume of the person that includes the information requested in No. 1-2(b) above;
   d) The parts of the rate filing package the person worked on or the subject matter of rate issues that are addressed in the rate filing package;
   e) Any communications between the consultant and person and Austin Energy, its employees, agents, consultants, general manager, manager, and officers;

1-10. Please provide the data set out in Figure 2.1 of your "Overview of Rates Report to Council" at p. 2-10 of your rate filing package but subtract out all the costs and revenues that are not associated with AE's base rates. (Reference Bates Stamp p. 022).

1-11. Please provide the data set out in Figure 2.2 of your "Overview of Rates Report to Council" at p. 2-11 of your rate filing package but subtract out all the costs and revenues that are not associated with AE's base rates. (Reference Bates Stamp p. 023).

1-12. Please explain why the difference between the residential Total Cost of Service (column 1) and residential Existing Base Rates and Test Year Pass-through rates (column 2) in Figure 2.2 referred to in RFI No. 1-11 above is the same as the data published for the residential Excess/(Deficient) Revenue (column 3) in Fig. 2.2 when column 3 is supposed to only be addressing base rates but the first two columns in Fig. 2.2 address costs and revenues from base rate costs and revenues as well as pass-through rates and underlying costs. (Reference: Bates Stamp p. 023)

1-13. Where has AE offset the costs for the revenues AE realizes from Decker Creek Power Station that are realized from the plant's black generation function in its cost of service? Please identify the location of these revenue offsets in the cost of service by reference name and bate stamp. (reference: p 3-34, Bates Stamp p. 063)

1-14. Please identify each type of meter owned, maintained and operated by AE for residential customers including meters to measure a customer's usage for charging electric vehicles and meters that can either measure usage from the grid and usage from solar distributed energy to the grid or measure usage from solar distributed energy, and meters to measure usage to the customer from the grid.

1-15. For each type of meter identified in RFI No. 1-14, please provide the following:

a. The average cost of the meter; and
b. The number of meters included in the cost of service

1-16. Does AE include any reserve fund costs in its Transmission cost of service used to set its transmission rates before the Texas Public Utility Commission? If so, please list each such reserve fund included in the TCOS, provide a short explanation of that reserve fund and how it is calculated.

1-17. Please explain why the margin data for item #26 (non-electric expenses) in Figure 4.3 on p. 4-63 (Reference Bate Stamp p. 092) was not negative for purposes of deriving the adjustment to AE's revenue requirement to remove non-electric service expenses from the COS. In your explanation please explain why the non-electric expenses were actually reduced by the margin data.

1-18. Did AE include as expenses to its non-electric operations any costs relating to reserve funds. If the answer is yes, please identify each reserve fund and the corresponding costs for each such fund that were included as non-electric expenses.

1-19. What was the dollar level of uncollectible accounts AE incurred in FY 2015?

1-20. What was the dollar level of budgeted uncollectible accounts relied upon by AE for its FY 2016 budgeted operations approved by the Austin City Council?

1-21. Is AE's operating balance included in any of the reserve fund revenues identified in Figure 4.4, p. 4-68 (reference Bates Stamp p. 097)? If so, please identify each such reserve fund and the amount of AE's operating balance included in the reserve.

1-22. What is the amount of AE's operating balance (both beginning and ending) for the test year; and what portion, if any, was included in any of its reserve funds?

1-23. How much of the economic development costs identified in Figure 5.7, p. 5-1- (Bates page 113) has been allocated to the residential customer class in the cost of service?

1-24. Using weather normalization adjustments to electrical usage, and for each fiscal year, what was the monthly average residential usage for AE for FY 2012, FY 2013, FY 2014 and FY 2015?

1-25. At App. E, E-1 (Bates Stamp p. 372) AE references "three-phase electric service" for residential customers. Could you please explain what the term "three-phase electric service" is and how it is different from a residential customer receiving traditional electric service?

1-26. At p. 4-64 (Bates Stamp p. 093) of your rate filing package, you state that AE is requesting that annual expenditures increase to add $19.4 for non-nuclear decommissioning. Please provide all workpapers, including the non-redacted portions underlying this calculation.

1-27. What is the level of the non-nuclear decommissioning reserve for the test year (without the known and measureable adjustments); for FY 2015; and that was assumed in AE's FY 2016 operating budget approved by the Council?

1-28. Over how many years is AE intending to recover its non-nuclear decommissioning costs using $19.4 million per annual contribution? (Reference Bates Stamp p. 093)

1-29. At p, 2 of New Gen's Summary of AE's Reserves located at App.I (Bates Stamp p. 432), $8,138,072 is listed in AE's non-nuclear decommissioning reserve for FY 2014. Where is this amount identified in AE's COS. Please identify the location by reference name and Bate Stamp. If this amount is not included in AE's COS, please explain why it is not included and what, if any, of that amount is included and where in the COS it is located?

1-30. What are the retirement dates (referred to as "expected plant closure" at App. D, P.D-4, Bates Stamp P. 371) for the Decker Creek Units 1 and 2, the Sandhill Energy Center and the Fayette Power Project plants? Please provide the dates by plant retirement.

1-31. Please identify the source documents New Gen Strategies & Solutions relied upon in its review of the historical balance of each of AE's reserves as well as the sources of funding and "use of funds over time ." (Ref. App. I, I-17, Bates Stamp p. 443).

1-32. Please provide a copy of all New Gen Strategies & Solutions' workpapers, including non-redacted portions to its report on AE reserve funding. (Reference App. I, I-17, Bates Stamp page 443).

1-33. Since FY 2012 AE's non-nuclear decommissioning reserve has decreased from $15,433,540 to $8,138,077 in FY 2014. Please explain what happened to the approximate $7,295,463 representing the monetary decline in the non-nuclear decommissioning reserve funding. (See App. I, P. I-30, Bates Stamp p. 456). In your explanation, please itemize the expenditures by categorical spending for each fiscal year.

1-34. Please provide the level of non-nuclear decommissioning reserve for FY 2015, audited if available; unaudited, if unavailable.

1-35. What level of funding did AE include in its non-nuclear decommissioning reserves in its FY 2016 operating budget approved by the Council.

1-36. Please provide the amount of revenues AE transferred into the non-nuclear decommissioning reserves for FY 2009; for FY 2010; For FY 2011; for FY 2012; for FY 2013; FY 2014; and FY 2015.

Respectfully Submitted

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CERTIFICATE OF SERVICE

The undersigned certifies that TLSC has served a copy of the attached document upon all known parties of record by email and to the Impartial Hearing Examiner on the 10th day of February 2016

Lanetta M. Cooper