

AUSTIN ENERGY'S TARIFF PACKAGE: §  
2015 COST OF SERVICE STUDY §  
AND PROPOSAL TO CHANGE BASE §  
ELECTRIC RATES §

AUSTIN ENERGY  
2016 MAR -2 AM 11:54  
BEFORE THE CITY OF AUSTIN  
IMPARTIAL HEARING EXAMINER

**INDEPENDENT CONSUMER ADVOCATE'S  
FIRST REQUEST FOR INFORMATION FROM AUSTIN ENERGY**

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The Independent Consumer Advocate ("ICA") hereby propounds its first Request for Information ("RFI") to Austin Energy ("AE"), with the expectation that responses to this RFI is due within 10 days and governed by the terms of Chapter G of the City of Austin Procedural Rules for the Initial Review of Austin Energy's Energy Rates ("Procedural Rules") as issued by the Independent Hearing Examiner.

**GENERAL INSTRUCTIONS**

The following General Instructions apply to each of the ICA's RFI requests, which are attached below:

1. For each responsive answer, please identify the individual(s) responsible for its preparation, and the witness sponsoring the answer provided.
2. In the event any document requested in this request is unavailable, describe in detail the reasons the document is unavailable.
3. When producing documents pursuant to these RFIs, designate on the document or group of documents the RFI(s) in response to which the document(s) are produced.
4. If, in answering any of these RFIs, there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact John B. Coffman at:

Email: [john@johncoffman.net](mailto:john@johncoffman.net)

Austin Energy may also contact Clarence Johnson at:

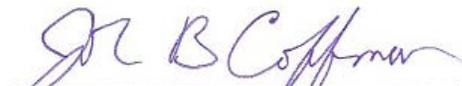
Email: [cienergyconsult@att.net](mailto:cienergyconsult@att.net)

5. These data requests are continuing in nature and require supplemental

responses when further or different information with respect to any of them is obtained.

6. Use of the singular or plural word form in a data request is not to be interpreted to exclude information or documents from the scope or intent of the specific request.
7. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these requests any information or documents which might otherwise be considered to be beyond their scope.
8. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner
  - (a) the reason for withholding;
  - (b) the date of the document;
  - (c) a brief description of the document;
  - (d) the name of each author or preparer;
  - (e) the name of each person who received the document; and
  - (f) a statement constituting the basis for withholding the document.
9. Please provide data responses as they become available.

Respectfully submitted,

A handwritten signature in blue ink that reads "John B. Coffman". The signature is written in a cursive style and is positioned above a horizontal line.

John B. Coffman  
Independent Consumer Advocate

Submitted this date: March 2, 2016

## ICA's First Request for Information to Austin Energy

1. Provide a capacity-demand-reserve margin (CDR) table for each year, 2014 – 2016 (projected). To the extent possible, please provide this data in functioning excel spreadsheet format.
2. Provide a forecasted CDR table for the next five years. To the extent possible, please provide this data in functioning excel spreadsheet format.
3. Identify power supply additions and retirements (MW) by year for the period 2014 – 2020.
4. Provide monthly reserve margins for each of the past five years. To the extent possible, please provide this data in functioning excel spreadsheet format.
5. For each power plant owned by the City of Austin, and each multi-year firm power supply contract, provide the following information: (a) Max. dependable output or capacity (MW); (b) average annual capacity factor; (c) energy output by month during the test period; (d) capacity factor for each month during the test period; (e) Expected remaining life (years and retirement date); (f) fixed O&M cost (cents/kWh); (g) variable O&M cost (cents/kWh); (f) expected fuel cost (cents/kWh); (g) year of initial in-service; (h) original cost of plant investment (installed \$/kW); (i) original cost of installed capital additions in excess of \$1 million; and (j) marginal cost. To the extent possible, please provide this data in functioning excel spreadsheet format.
6. With respect to the enactment of federal energy efficiency standards for utility transformers, please provide Austin Energy's estimate of the percentage increase in the procurement costs of transformers as a result of the requirement.
7. Provide evidence to support the statement that House of Worship ("HOW") discounts have been discontinued around the state because of concerns about the constitutionality of the tariffs.
8. Provide the results of any load research studies comprised of customers receiving the HOW discount.
9. Provide the total base revenue (with and without the discount) for HOW customers by rate class.
10. Provide a bill frequency table for customers which receive the HOW discount.
11. Provide the number of Key Account customers, and associated revenues, by customer class.
12. Provide O&M expense associated with Key Account customer service personnel by FERC Account.
13. Please describe the method of allocating FERC Account 912 expenses among customer classes.
14. Are call center calls tabulated on the basis of the customer class which originated the call? If yes, provide the data regarding the number of calls originated by each customer class.
15. Provide a tabulation of the number of call center calls by subject matter (i.e., outage report, bill inquiry, bill payment, safety issue, non-electric utility matter, service starts / terminations, etc.)

16. Please explain how the cost of 311 call service is allocated / assigned among services, departments, and customer classes.
17. Please provide on a test year monthly basis (similar to PUC Rate Filing Package Schedule O format): the “@ source” customer class energy, CP demands, NCP demands. Please provide this data in excel spreadsheet format.
18. Please provide a spreadsheet which shows the development of each production demand allocation methodology tested in the class cost of service study.
19. Please identify, by FERC account, all software costs required to read and utilize IDR meters.
20. With respect to smart meters installed for each customer class, what percentage are capable of interval data recording? What percentage by class are actually utilized to provide time interval measurement?
21. Do meter reading personnel require more time to record and capture data, and reset demand meters as opposed to meters serving energy only customers? Please provide the best estimate of the meter reading cost impact.
22. (a) Has the residential inclining block rate structure produced any evidence that the rate design has reduced energy use per meter? (b) Please provide any such evidence. (c) Provide any price elasticity estimates which Austin Energy has derived from the rate structure. (d) Provide any residential price elasticity estimates which Austin Energy utilizes in designing the rate structure.
23. Please provide analyses and workpapers which support the allocation of customer accounting, customer service, and customer billing among utility functions (e.g., electric service vs. water and wastewater, trash and recycling pick up, street cleaning, etc.).
24. Please identify each FERC account or sub-account which Austin Energy proposes to change from reconcilable to non-reconcilable, or vice versa, with a brief description of the reason for the change.
25. Are any substations dedicated to a single customer? If yes, provide full details (including annual costs) of the method of cost recovery for that substation in particular, and for the allocation of substations, generally, to that customer.
26. Please provide any cost-basis which exists for the inside/outside city customer rate differential.
27. With respect to reconcilable energy charges, is the reconciliation performed on a monthly class-by-class basis as set out in the PUC’s fuel reconciliation rule? As an illustration, provide an example of a reconciliation to classes for a 12 month period.
28. Do the demand allocation factors in the class cost of service study include a weather normalization adjustment? If yes, provide a detailed explanation, with accompanying workpapers, of the method utilized to weather normalize CP and NCP data.