

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

AUSTIN CITY CLERK  
RECEIVED  
2016 MAR 15 PM 3 07

**BETHANY UNITED METHODIST CHURCH'S FIRST REQUEST FOR INFORMATION  
FROM AUSTIN ENERGY**

Bethany United Methodist Church (BUMC) requests that Austin Energy (AE) respond to the following Request for Information (RFI) set forth below relating to this case. Austin Energy is requested to serve its responses to this Request for Information on the authorized representative(s) listed below no later than ten days after AE receives this request and are 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<sup>4</sup> Hearing Examiner.

**GENERAL INSTRUCTIONS**

The following General Instructions apply to each of BUMC'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 RFI's, 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 RFI's there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact Clifford G. Wells at:

Email: [cliff.wells@bethany-umc.org](mailto:cliff.wells@bethany-umc.org)

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.

#### DEFINITIONS

For the purposes for these requests, the following terms mean:

- a. "Communication" means any disclosure, transfer, or exchange of information, whether Oral or written, of any kind including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item.
- b. "Austin Energy", the "utility", "AE", and "Applicant" rerfer to Austin Energy.
- c. "Person" means natural persons (e.g. human beings), corporations, partnerships, sole proprietorships, unions, associations, or federal or any other kind of governmental entity.
- d. "Document" means any printed, typewritten, handwritten, mechanically or otherwise recorded matter of whatever character, including but without limitation, letters, purchase orders, memoranda, telegrams, notes, inter- or intra-office communications, statements, investigative reports, announcements, depositions, pleadings, judgments, newspaper articles, photographs, tape recordings, motion pictures and any carbon or photographic copies of any such material if you do not have custody or control of the original.

If any document requested to be identified was, but is no longer, in your possession or control, or no longer exists, state whether the document is:

- 1. Missing or lost;
  - 2. Destroyed;
  - 3. Transferred voluntarily or involuntarily to others and, if so, to whom or
  - 4. Otherwise disposed of; and in each instance explain the circumstances surrounding an authorization of such disposition thereof, state the approximate date thereof and describe its contents.
- c. "You" and "your" shall mean the party to whom these questions are directed as well as agents, employees, attorneys, investigators and all other "persons" acting for you.

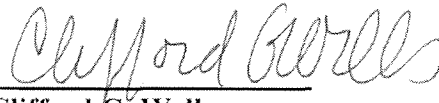
#### REQUESTS FOR INFORMATION

- 1. How many facilities/building are classified as HOW's?
- 2. What was the total income classified as HOW discount that was credited in 2014 and 2015?

This was in part answered on the **Independent Consumer Advocate's First RFI** item ICA 1-9 in the chart, but further clarification is needed

- a. Please define "Base Revenue". Is this the revenue before the discount is taken? Is it the value of the discount?
  - b. Column 1 "Class" is clear; Column 2 On Bills receiving a discount is clear depending on what "Base Revenue" means. Column 3 On bills not receiving a discount is not clear. Are these other bills assessed to a location/church customer? For example at Bethany we have one building classifies as a HOW, but five other buildings and a parking lot with other meters. Are places like that included in column 3?
3. What was the income to Austin Energy from those classified as HOW's in 2014 and 2015 in both dollars and percent of the total income to Austin Energy? (see reference to ICA RFI 1-9)
  4. Referring again to the **Independent Consumer Advocate's First RFI** and item ICA 1-10. Define what is a bill frequency table is and it's significance? Inside the chart, what is the significance of the Load Factor Boundary %?
  5. Why are you proposing dropping the HOW Discount? Note Key Factors leading to the decision.
  6. What discounts make up the HOW Discount that Austin Energy proposes dropping? Is one discount a composite rate cap? Is the other waiving the Demand charges on Saturday and Sunday which are low demand times for the overall utility? .
  7. How is the HOW discount cap calculated?
  8. Do you plan to retain the weekend waiving of Demand Charges?
  9. In addressing the Fairness and Reasonable nature of this action, was consideration given to HOW's who provide tangible benefits to the community, even those who assist Austin Energy in their Plus 1 program validation and distribution or to those HOW's who assist Austin Energy clients pay energy bills?

Respectfully submitted,



Clifford G. Wells

Administrative Executive

Bethany United Methodist Church

10010 Anderson Mill Rd.

Austin, Texas 78750-2199

512-258-6017 512-997-8917 (cell)

Submitted this date: March 15, 2016

PERSON(S) RESPONSIBLE FOR ANSWER: