

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

BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARING EXAMINER

AUSTIN CITY CLERK
RECEIVED

FEBRUARY 18 PM 2 32

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

The Independent Consumer Advocate ("ICA") hereby propounds its **third** Request for Information ("RFI") upon Austin Energy ("AE"), with the expectation that responses to this RFI are 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

Austin Energy may also contact Clarence Johnson at:

Email: cjenergyconsult@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,



John B. Coffman
Independent Consumer Advocate

Submitted this date: March 18, 2016

CERTIFICATE OF SERVICE

The forgoing filing has been served upon all of the email addresses contained in the Official Service List for this proceeding as found on the website for the Office of the City Clerk's website on this 18th day of March, 2016.



ICA's Third Round of Requests for Information from Austin Energy

- 3-1. (a) Please provide the average cost/kW demand savings for Austin Energy's energy efficiency programs. (b) Please provide the average cost/kWh energy savings for Austin Energy's energy efficiency programs. For the answer to 'a' and 'b,' please state whether the stated value is per year or over the life of the energy efficiency investment. (c) Please provide the average capacity factor (or load factor) for Austin Energy's energy efficiency programs. (d) Please provide the average life for Austin Energy's energy efficiency programs. (e) Please state Austin Energy's goals or objectives with respect to energy efficiency programs as a percentage of future capacity or energy supply additions. (f) Explain in detail how energy efficiency program costs are allocated among customer classes.
- 3-2. With respect to the answer to ICA 1-15: (a) Please describe the "products and services" in the last item of this answer; (b) Please describe what "e-Business" means, including examples. (c) Does the call center provide information regarding potential energy efficiency programs which can reduce a customer's bill? What category of this answer includes discussion of potential energy efficiency programs for the customer? (d) What is the average call time for each category of this answer.
- 3-3. With respect to the answer to ICA 1-6: (a) What percent of total transformer cost is comprised of vault mount transformers? (b) The answer states that the remaining Austin Energy transformers already met Department of Energy transformer energy efficiency standards. Please explain the policy or criteria which led Austin Energy to install energy efficient transformers before they were required by DOE regulation. Did Austin Energy perform cost-benefit analyses regarding the energy savings associated with reduction in transformer losses? (c) Provide any cost-benefit studies performed by Austin Energy which considered the lifetime cost impact of transformer investments.
- 3-4. Please provide the analysis supporting the size of the summer / winter differential in the power supply adjustment.
- 3-5. For residential and S1 and S2 classes, provide a comparison between the dollar difference per average bill for the current base rate summer/winter differential and the proposed power supply adjustment summer / winter differential. As an example, the answer could be expressed in the following form: "The annual average residential customer bill is ____ kWh, and a monthly kWh of that amount would result in a summer/winter bill difference of \$ ____ under current rates. For the power supply

adjustment, the proposed summer / winter bill difference for that monthly kWh would be \$_____."

- 3-6. Does the proposed summer / winter differential for the power supply adjustment affect inter-class allocation of power supply costs? If yes, please quantify the magnitude of the inter-class allocation impact on residential and other rate classes.
- 3-7. Please provide a step-by-step calculation of the annual base revenue requirement necessary to recover non-nuclear decommissioning costs. Include an explanation of all assumptions required for the calculation, such as cost escalation rates, revenue growth rates, interest rates, future value amounts, discount rates, etc. Explain whether the method of recovery is sinking fund, straight line, or other methodology.
- 3-8. For the residential class, S1 class, and S2 class, provide the estimated installed cost for mechanical meters vs. the smart meters currently used by Austin Energy. Please show the costs in comparable (same year) dollars.
- 3-9. With respect to secondary commercial customers, provide the average kW size for customers in the following intervals: <20% load factor, 20%-30% load factor, 30%-50% load factor, >50% load factor.
- 3-10. How many electric accounts are associated with data server farms or internet storage facilities? Provide: (a) the number of accounts by customer class; (b) average or typical monthly demand and energy use; (c) special costs incurred for these customers, such as enhanced reliability or quality of power; and (d) an explanation and quantification of compensation for costs incurred for 'c.'
- 3-11. (a) With respect to total number of telecommunications and cable provider pole attachments, please provide the percentages for secondary, primary, and transmission poles. (b) Provide the amount of rental revenues, separately stated for telecommunications and cable providers.
- 3-12. Has Austin Energy paid any penalties to ERCOT? For purposes of this request, penalty refers to any special fees or payments required by ERCOT that are caused by failure to comply with protocols, including scheduling errors, failure to comply with ancillary service deployment, excessive offer prices, etc. If yes, please identify and explain each such instance, the amount of payment or penalty, and the rates which recovered the cost.

- 3-13. (a) With respect to the lighting bulb count shown on Schedule G-8, how often is the number of working bulbs determined? (b) When did Austin Energy verify the bulb count shown for the test year? Is it an end of year or annual average number? (c) How does Austin Energy ensure that non-working bulbs are not included in determining costs incurred for street lighting?
- 3-14. Why are the adjustment rates not applied to high voltage customers? Is the power supply, community benefit, and regulatory charges for those customers a fixed amount each year? How was that amount determined? Provide the calculation used to set the amount.
- 3-15. With respect to WP-E.5.1.2, please explain how AE determines the portion of revenues on this workpaper which are associated with contract customers (as indicated on footnote 1)? Provide the calculation supporting this known and measurable adjustment.
- 3-16. With respect to WP-E-4.3: (a) please provide a narrative description or itemization of the cause(s) of insurance proceeds, and explain why the amount is removed. (b) Provide insurance proceeds received by Austin Energy for each year 2011 – 2014. (c) Please provide a narrative description of column (F) and the reason that the amounts are removed.
- 3-17. Does Austin Energy make any contributions or dues to organizations involved in advocacy or media relations for nuclear power, nuclear waste, or coal generation? If yes, identify the organizations, amounts, nature of activities, and whether the costs are excluded in cost of service.
- 3-18. Provide detail for the amounts shown on WP-D-2.1. If Austin Energy prepared a report or memorandum determining direct assignments of A&G expense which supports this workpaper, provide the document.
- 3-19. With respect to WP-D.1.2.1, please provide a breakdown or itemization (separately stated by year) of the repair activities included for each of the three years used to calculate the STP O&M known and measurable adjustment. Indicate the years in which refueling occurred.
- 3-20. Did any of the costs in ICA 3-19, above, result from an inspection and enforcement activity by the U.S. Nuclear Regulatory Commission? If yes, identify the costs, the year, and the associated NRC activity.

- 3-21. Please explain the reason for the gas cost reclassification shown on WP-D.1.2.3.
- 3-22. Please provide a narrative explanation for each known and measureable adjustment set out on WP-D.1.2.4.
- 3-23. What is the Energy Efficiency Services budget for 2015? Quantify and explain any deviations from the \$22.8 million amount shown on WP-D.1.2.7.
- 3-24. What is the Green Building budget for 2015? Quantify and explain any deviations from the \$3.27 million amount shown on WP-D.1.2.7.
- 3-25. Please explain what "Plus 1" is, as the term is used on WP-D.1.2.12.
- 3-26. At the January 25, 2016 meeting of the City Council Electric Utility Oversight Committee, Mark Dreyfus, in response to a question from Council Member Troxclair, said that the cost to house of worship customers of the elimination of the discount for these customers was about \$1 million. Please provide the analysis that Austin Energy relied on for this conclusion.