

AUSTIN ENERGY 2016 RATE REVIEW

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

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NXP Semiconductors and Samsung Austin Semiconductor, LLCs' Fifth Request for Information to Austin Energy

COMES NOW NXP Semiconductor, Inc. ("NXP") and Samsung Austin Semiconductor, LLC, ("Samsung") (collectively, "Customers"), each on its own behalf, by and through its attorneys of record, and requests that Austin Energy ("Austin Energy" or "you") provide information and answer the attached questions under oath pursuant to Procedural Rule § 7.3. It is further requested that the questions be answered in the order in which they are asked with as much detail so as to fully present all of the relevant facts.

INSTRUCTIONS

Please answer the attached questions on separate pages and copy the question immediately above the answer to each question. Following each answer, please identify the witness or witnesses or other individual(s) who will sponsor each of your answers at the hearing. These questions are continuing in nature and, should there be a change in circumstances which would modify or change any of your answers, then, in such case, please change or modify each answer and submit such changed answer as a supplement to the original answer within three (3) business days of your discovery that such change or modification is appropriate, pursuant to Procedural Rule § 7.3(i).

In answering this request for information, you are requested to furnish such information as is available to you, including information which you are able to obtain by due diligence from your present or former attorneys, accountants, investigators, consultants, employees, agents, and persons acting on your behalf.

If you are unable to answer any request fully and completely after exercising the due diligence to make inquiry and to secure information, you are to answer such request as fully and completely as you can and to specify the portions which you are unable to answer in such request. In addition to specifying those portions, you are to state with regard to each portion:

1. The fact on which you base the contention that you are unable to answer that portion;
2. The knowledge, information, and belief you have concerning that portion; and
3. The acts done and inquiries made by you in attempting to answer such request.

The singular includes the plural and the plural includes the singular.

Masculine, feminine, or neuter pronouns do not exclude the other genders.

The words “document” and “documents” have the broadest meaning that can be ascribed to them pursuant to the Texas Rules of Civil Procedure. Among other things, the words “document” and “documents” mean the final form and all drafts and revisions of any kind of written or graphic mater, original or reproduced copy, however produced or reproduced, of any kind and of every kind, and all copies there from which are different in any way from the original regardless of whether designated “confidential,” “privileged,” or otherwise restricted. Without limiting the generality of the foregoing, the words “document” and “documents” also include information stored or maintained on, or which could be reproduced from, film, microfilm, computer printout, disk or diskette, magnetic tape, cassette, phonographic disc, videotape or similar means.

The words “and” and “or” shall be construed conjunctively or disjunctively as necessary to bring within each request all documents which might otherwise be construed as outside its scope.

The words “communication” and “communications” include, without limitation of their generality, both written and oral: statements, representations, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia. These words include, without limitation of their generality, both communications and statements which are face-to-face and those which are transmitted by any writing or document or by media such as intercoms, telephones, email, television or radio.

The words “identify” and “identification,” when used with respect to a natural person or persons, mean to state the name, address(es) and telephone number(s) of each such person. If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “identification,” when used in reference to a person other than a natural person, mean to set forth its:

- (1) full name or title;
- (2) nature or organization, including the state under which the same was organized or incorporated;
- (3) address and telephone number (with area code prefix); and
- (4) principal line of business.

If any of the foregoing information is not available, state any other available means of identifying such person.

The words “identify” and “describe,” when used in reference to a fact, mean to state not only the fact itself, but also:

- (1) its date, time and place
- (2) the name, address and telephone number of each person with knowledge of the fact;
- (3) whether the act is supported by an oral communication, a document, or other event;
and
- (4) any other evidence which supports such fact.

The words “identify” and “identification,” when used in reference to a document, mean to state:

- (1) its date;
- (2) its author;
- (3) its addressee;
- (4) the type of document (e.g., letter, memorandum, receipt, invoice, schedule, report, telegram, chart, photograph, etc.); and
- (5) its present location and identity of its custodian. If any document was, but is no longer, in your possession, custody, or control, or is no longer in existence, explain why.

If any of the foregoing information is not available, state any other available means of identifying such document. If a document is one of a series of pages contained in a book, pamphlet, binder, folder, microfilm (or other storage device), include in your identification of such document(s) any available numerical reference (or other aid) to the pages and line or other portion thereof at which the information referred to can be found. A true and correct copy of any document may be produced and filed with your Answers hereto in lieu of the above information.

The words “identify” and “describe,” when used with respect to an oral communication mean:

- (1) to state the substance of each such oral communication;
- (2) to state the exact words used by each person participating in the oral communication;
- (3) to identify each speaker;
- (4) to identify each person present at the making or reception of such oral communication;
- (5) to specify the date, time and place of each oral communication;
- (6) to identify each person repeating such oral communication;
- (7) to identify every document which records, memorializes, or relates to all or part of such communication; and
- (8) to identify the mode of such communication (e.g., telephone, face-to-face, etc.)

The words “person” and “persons” as used herein, mean all individuals and entities, and shall be deemed to include natural persons, firms, partnerships, associations, organizations, joint ventures, corporations, and any other entities, including without limitation, any electric utility, cogenerator, independent power producer, qualifying facility, or any other entity which generates electricity.

The words “regarding,” “relate,” “related,” “relates” and “relating,” as used herein, mean involving, relating to, referring to, having any relationship to, pertaining to, evidencing or constituting evidence of, in whole or in part.

If you withhold any requested information from disclosure because you contend that it is "confidential" or otherwise subject to exemptions from disclosure in this proceeding under the Texas Public Information Act, Tex. Gov't Code Ch. 552, or otherwise, please consider this to constitute a formal Request under the Public Information Act. Please also submit a Privilege Index pursuant to and consistent with Procedural Rule § 7.3(d)(2).

If you have any question concerning the attached Questions or any of these instructions, please contact the undersigned.

Respectfully submitted,

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**ATTORNEYS FOR NXP SEMICONDUCTORS AND
SAMSUNG AUSTIN SEMICONDUCTOR, LLC**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading has been forwarded by fax, U.S. first class mail, hand-delivery, or by courier service to Austin Energy and filed with the City Clerk on the 11 day of March, 2016.

Maria Faconti
Maria C. Faconti

**NXP Semiconductors and Samsung Austin Semiconductor, LLC Fifth Request for
Information to Austin Energy**

- 5-1. Please reconcile the cash contribution to Construction shown on Workpaper C-3.4.1 to the amount shown in the Austin Energy Fund Summary, Approved Budget 2015-2016, page 680, for the years 2012-13, 2013-14, and estimated 2016-2015.
- 5-2. Please restate debt service amounts shown on C-3.1.1 (Accrual Basis) to the budget basis for the years 2012-13, 2013-14, and estimated 2016-2015.
- 5-3. Please provide the calculation of Debt Service Coverage that is used in Bond Official Statements using the data from the test year.
- 5-4. Please provide the calculations used to arrive at coverage shown in Figure 4.1, Bates number 087 of AE's filing.
- 5-5. Please provide Council's specific authorization to begin work on the additional 500 megawatt combined cycle gas turbine at Decker Power Plant that is referenced in the FY 2015-16 CIP Work Plan. (page 53)
- 5-6. Please provide the amount included in the spending plan for the new Decker turbine.
- 5-7. Please explain why \$60,516,761 of Fuel recorded in FERC Account 501 was reclassified to FERC Account 547.
- 5-8. Is Account 547 included in the PSA calculation?
- 5-9. Refer to Schedule G-6. Of the 37 costs items allocated on this schedule, Austin Energy's cost of service model only allows Austin Energy's pre-selected allocation factor alternatives for the seven Production Demand Related costs of service. Please provide a working version of the model in which all allocation factors available in Exhibit G-6, lines 3-9 (Excel rows 9-15) are available for each and every cost on Schedule G-6 (that is, for all other costs allocated on this schedule).
- 5-10. Refer to Schedule F-6. Please "unhide" the amounts set forth in Excel cells T7:AF58. These amounts and the calculation of allocation factors cannot be verified with the amounts in these cells hidden.
- 5-11. Refer to Schedule F-6. Please provide additional allocation factors for Primary and Secondary service customer classes calculated using Summer NCP demands (i.e., the sum of NCP demands in the months of June through September).
- 5-12. Refer to WP F-6.2. Please expand this workpaper to provide the development of the Summer NCP demand allocation factors for Primary and Secondary voltages referred to in the above question.
- 5-13. Refer to WP F-6.1., cell D8. The cell reference provided for the allocation of Green Choice on this workpaper is to WP H-5.xx. Please provide the correct cell reference.
- 5-14. Refer to WP F-6.1.2.1, footnote 4, which reads "GSU's results are categorized by the high side voltage, all other transformer results are categorized by low side voltage."
 - a. What specific cells is this footnote referencing?
 - b. Please fully explain the reference to "GSU".

- c. If GSU refers to another electric utility (for example, Gulf States Utility), does the categorization of results for the high and low side voltages apply to Austin Energy?
- 5-15. Refer to WP F-6.3. Please provide the supporting documentation for the Average Meter Cost set forth on line 6 (Excel row 11) of this workpaper.
- 5-16. Refer to Schedule G-1, line 112 (Excel row 119). Please explain why Meter Expenses in account 586 were functionalized as Distribution related costs rather than as Customer related costs.
- 5-17. Refer to Schedule G-1, line 113 (Excel row 120). Please explain why Customer Installation Expenses in account 587 were functionalized as Distribution related costs rather than as Customer related costs.
- 5-18. Refer to Schedule G-1, line 126 (Excel row 133). Please explain why Maintenance of Meters in account 597 were functionalized as Distribution related costs rather than as Customer related costs.
- 5-19. Please reclassify Meter Expenses in account 586, Customer Installation Expenses in account 587, and Maintenance of Meters in account 597 as customer related costs and provide the resulting G and H schedules showing the impact of this classification.
- 5-20. Refer to Schedule G-6. Provide an unlocked version of Austin Energy's cost of service spreadsheet that allows any allocation factor set for on Schedule F-6 to be used to allocate costs.
- 5-21. Refer to Schedule G-7, line 8 (Excel row 14), Service Area Street Lighting.
- a. Please explain the reference to "Col. (L)" in cell C14.
- b. Please explain why Service Area Street Lighting has negative recoverable fuel and purchased power costs.
- 5-22. Refer to Schedule G-7, line 24 (Excel row 30). Please provide a full and complete explanation of the use of the allocation factor "NEFL" to allocate ERCOT Administration Fees. Include in the explanation a discussion as to why the 4CP-ERCOT Peak is not the appropriate allocation factor for this cost.
- 5-23. Refer to Schedule G-7, lines 40 and 41 (Excel rows 46 and 47). Please provide each and every reason why it is fair and reasonable and cost based to allocate the costs of Service Area Street Lighting and Energy Efficiency Programs on the basis of "Rev Req x COA Lights".
- 5-24. Refer to Schedule G-10. All data sources for the amounts set forth on this schedule are hidden from view. Please provide a version of AE's model with the underlying formulas, links to other cells, and values set forth on Schedule G-10 are not hidden.
- 5-25. Refer to WP G-10.1. All data sources for the amounts set forth on this workpaper are hidden from view. Please provide a version of Austin Energy's model with the underlying formulas, links to other cells, and values set forth on WP G-10.1 are not hidden.

- 5-26. Refer to WP G-10.1.1. All data sources for the amounts set forth on this workpaper are hidden from view. Please provide a version of Austin Energy's model with the underlying formulas, links to other cells, and values set forth on WP G-10.1.1 are not hidden.
- 5-27. Refer to WP G-10.2. All data sources for the amounts set forth on this workpaper are hidden from view. Please provide a version of Austin Energy's model with the underlying formulas, links to other cells, and values set forth on WP G-10.2 are not hidden.
- 5-28. Refer to WP G-10.1 and WP G-10.1.1. Please provide a complete explanation and a full and complete reconciliation of "Base Rate Revenue" set forth in WP G-10.1 with "FY14 Actual Base Revenue" set forth on WP G-10.1.1.
- 5-29. Please provide a listing of all distribution substations and provide the date and time of the maximum peak demand of each substation during the test year.
- 5-30. Please clarify Austin Energy's response to NXP/Samsungs' RFI 1-31. RFI 1-32 requested AE to identify the timing of all alerts or rotating blackouts affecting ERCOT in the test year and the five previous years. Austin Energy responded that "the requested information is publicly available at http://www.ercot.com/services/comm/mkt_notices/notices/2014/01," however, the requested information is not provided at the referenced website. Please provide the precise location where the data may be found, including the specific URL which links to the necessary documents.