

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

AUSTIN ENERGY  
2016 APR -1 PM 12:37  
BEFORE THE CITY OF AUSTIN  
IMPARTIAL HEARING EXAMINER

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

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The Independent Consumer Advocate ("ICA") hereby propounds its **fifth** 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](mailto:john@johncoffman.net)

Austin Energy may also contact Clarence Johnson at:

Email: [cjenergyconsult@att.net](mailto: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 31, 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 31<sup>st</sup> day of March, 2016.



## **ICA's Fifth Round of Requests for Information from Austin Energy**

- 5-1. Please provide the password to the Class Cost of Service model workbook. If AE cannot provide the password, please provide revisions to the model workbook which unlock sufficient lines and cells: to enable users to add a reasonable number of allocation methods and factors other than those included as options in the model, sufficient to allow users unrestricted investigation of alternative allocators; and to insert cell formulae in a manner which permits users to combine inputs to the model. ICA understands that AE currently plans to revise the model workbook to address users' ability to modify model results. If those changes satisfy ICA's requirements, ICA will withdraw this request.
- 5-2. Based on residential load research samples, provide coincident peak load factors by average monthly usage for various increments of energy use or customer profiles. Provide information regarding diversity factor for those increments of energy use or various customer profiles.
- 5-3. Please provide load data (average coincident peak load factor and diversity factor, average energy use, etc.) for residential customers with various types of electric appliances or end uses, such as central air, window air conditioning, central heating, resistance heating, electric car charging, electric cooking, wifi and HD screens, etc.
- 5-4. Recently the city council was briefed by consultant Mark Beauchamp on utility rate making issues. (a) Was his presentation sponsored by Austin Energy? Is he a consultant to Austin Energy? (b) He addressed mandatory residential demand charges and mandatory time of day rates, among other topics. Is Austin Energy considering the implementation of mandatory demand charges or mandatory time of day rates within the residential class? (c) With respect to the answer to 'b,' if the answer is "yes," please state the rationale and potential time frame for such action. (d) Provide any supporting white papers or other internal memoranda for the answer to 'c.' (e) Is AE aware of any Texas electric utilities which require residential customers to pay demand charges or time of day rates? If yes, identify the entities.

- 5-5. Regarding the “*Austin Shines*” *Sustainable and Holistic Integration of Energy Storage and Solar PV* presentation by Dan Smith to the March 25, 2016 meeting of the Austin Energy Utility Oversight Committee, is the \$1,360,000 FY 16 funding of the budget shown in slide 11 included in the pending rate request? If so, please identify where the costs are allocated.
- 5-6. Provide full copies of the surveys, methodologies, and results referenced in the response to ICA 2-1 for FY 14 and FY 15.
- 5-7. Regarding the response to ICA 2-18, has Austin Energy awarded a contract for Solicitation No. DMD0002? If so, on what date was the contract signed? Has the work under the project commenced, and if so, on what date? Has Austin Energy increased the project budget above the \$57,999 shown in the attachments?
- 5-8. Regarding the power point presentations in Attachment 4 of the response to ICA 2-18B, identify the audience for each presentation.
- 5-9. Regarding the response to ICA 2-18C, is it Austin Energy’s response that the City Council received no other briefings on the pilots other than in the budget documents?
- 5-10. Regarding the pilot projects referenced in ICA 2-18, were any presentations or briefings made to the Electric Utility Commission (EUC) on the proposed pilots? If so, please provide the dates and any materials provided to the EUC.
- 5-11. Regarding the response to ICA 2-18, please describe the data and analysis in Attachment 1.
- 5-12. With regard to AE’s Objections to ICA 3-21 (Energy Efficiency), to ICA 3-23 (Energy Efficiency Services), and to ICA 3-24 (Green Building), is AE stating that none of the direct or indirect costs related to these programs are included in the utility’s currently pending request to change base rates? Do any employees in AE’s customer service offices have part of their time assigned to these projects?