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

**AE LOW INCOME CUSTOMERS' 8th SET OF REQUESTS FOR INFORMATION TO
AUSTIN ENERGY**

COMES NOW, Texas Legal Services Center ("TLSC") on behalf of AE Low Income Customers, requesting Austin Energy to respond to the following 8th set of Requests for Information set forth below relating to this case. Austin Energy is requested to serve its response to these Requests for Information on the attorney listed below no later than ten days after AE receives this request.

Definitions

As used in this introduction and in these questions,

1. "Communication" means any disclosure, transfer, or exchange of information, whether oral or written, of every kind including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item.
2. "Austin Energy", the "utility," "AE", and "Applicant" refer to Austin Energy.
3. "You," "yours," and "your" refer to Austin Energy (as defined above), including its General Manager, managers, officers, employees, consultants, agents and attorneys.
4. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals; appointment calendars, records and recordings of oral conversations, work papers observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form. A draft or non-identical copy is a separate document.
5. "Identify" has the following meanings depending on the context:
 - a. "Identify" when used with a natural person means to supply his or her name, last known residential and business addresses, last known residential and business telephone numbers, his or her present position, and his or her prior connection or association with any party to this proceeding. If the above information is unavailable, provide some other means of identifying the person and his or her present location.

- b. "Identify" when used with an entity means to provide its name, manner of organization (e.g., corporation, partnership, joint venture, etc.), address and telephone number.
 - c. "Identify" when used with a documents means to supply (i) the nature of the document (e.g., letter, memorandum, corporate minutes), (ii) the date, if any, appearing on the document, (iii) the date, if known, on which the document was prepared, (iv) the title of the document, including any jurisdictional styles and docketing numbers, if applicable, (v) the general subject matter of the document, (vi) the number of pages comprising the document, (vii) the identity of each person who signed or initialed the document, (viii) the identity of each person to whom the document was addressed, (ix) the identity of each person who received the document or reviewed it, (x) the location of the document and (xi) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of CenterPoint or in the custody of its attorneys or other representatives or agents.
 - d. "Identify" when used with any other thing or matter means to provide a description with detail sufficient to allow a party to this action to identify it and determine its present location.
6. "FY" means fiscal year as utilized by AE and the City of Austin for budgeting purposes and for the council setting of AE electric rates that occur annually.
 7. "Council" or "City" means the Austin City Council.
 8. "Person" means any natural person. The term also means, whether formally organized or ad hoc, any business, organization, legal entity, or governmental entity.
 9. "Representative" means a general manager, officer,, employee, agent, spokesperson, or attorney of a person.
 10. The words "and" and "or" are to be construed conjunctively or disjunctively as necessary to give each request its broadest scope.
 11. The singular form of a word also refers to the plural, unless the context requires otherwise.
 12. "COS" means cost of service study AE presented as part of its rate case filing in this case.
 13. "TY" means test year and represents the time period AE relied upon in developing its cost of service study presented in this rate filing.

Instructions

1. Please answer the questions and sub-questions under oath and in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.
2. In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.
3. Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.
4. If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy

of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.

5. If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.
6. If any question appears confusing, please request clarification from the undersigned counsel.
7. In providing your responses, please start each response on a separate page and type at the top of the page, the question that is being answered.
8. As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has subparts, please identify the person or persons by subpart. Please also state the name of the witness or witnesses in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has subparts, please identify the witness or witnesses by subpart.
9. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
10. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.
11. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.
12. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
13. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, description of document, subject matter of the document, and the basis upon which such privilege is claimed.
14. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.
15. If you are asked to identify a document and you do not include a copy of the document with your response, please provide the following information (if applicable) about the document:
 - a. The identity of the person who signed it;
 - b. The identity of the person or persons to whom it was addressed;
 - c. The identity of the persons who prepared it;

- d. The title and substance of the document with enough detail to identify the document;
- e. The date of the document;
- f. The date the document was executed or prepared, if different from the date it bears; and
- g. If the document, or a copy of it, is not in your custody or control, the identity of the person who has control or custody of it or a copy of it.
- h. If the person to be identified is not a natural person (e.g. a corporation) give its name and address and principal business activity.

Request for Information

The definitions and instructions set out in this Request for Information apply to these questions. Unless specified otherwise in the RFI, these RFIs refer to the rate-filing package AE filed on January 25, 2016, including page (both section and Bates Stamp) references. Please include the Bates Stamp page number reference to any references to the rate filing package AE makes in responding to these RFIs.

8-1. Please provide a breakdown of the \$5.75 million discount for outside city residential customers by rate and rider (also referred to as "pass throughs") including but not limited to:

- a) Base rates
- b) Street area lighting
- c) Customer assistance program

(Reference: AE's Response to NXP/Samsun RFI No. 1-23, Attachment 1, p. 38 of 238. If \$5.75 million is not the correct numerical value, please provide the correct numerical value and provide the breakdown as requested in this RFI)

8-2. Please explain how AE derived/calculated the \$5.75 million discount for outside city residential customers. In your explanation please include the underlying workpapers to your calculations. (Reference: AE's Response to NXP/Samsung RFI No. 1-23, Attachment 1, p. 38 of 238. If this is not the correct numerical value, please provide the correct numerical value and provide the explanation as requested in this RFI).

8-3. Has AE and/or its consultants or agents been discussing rate case issues such as rate design, cost of service, and revenue requirement with members of the Austin City Council and/or their aides in public meetings and/or in private meetings or in communications with member(s) of the city council and/or their aides since the filing of its rate filing package?

8-4. If the answer to RFI No. 8-3 is yes please list each such contact and for each contact provide the following:

- a) The date of the contact;
- b) The time spent in the contact (such as three hours at a work session; one hour with Councilmember "X".)

- c) The identification of AE employees that attended the meeting or made the contact
- d) The substance of the meeting and/or contact
- e) The name of the council member(s) and/or aide(s) that was contacted;
- f) Copies of any written communications including reports, studies, power point presentations, emails, memos, and such other written information provided to member(s) of the City Council and/or their aides by AE and/or its consultants or agents at that contact or arising from that contact;
- g) The identity of any consultant(s) relied upon by AE, including the consultant's business address and phone number. (Please also include a copy of any contract AE entered into with the consultant as well as the amount AE paid the consultant, including transportation and such other remuneration for the communication with the member(s) of the City Council and/or their aides);.

8-5. Did AE include its coal cars, coal car leases, and/or its coal contracts in its decommissioning cost study(ies) and/or estimates relied upon in its recommended level of funding for decommissioning costs of the Fayette Power Project? If so, please identify in the rate filing package where these items were addressed.

8-6. Please provide the number of AE residential customers whose household incomes are at or below 200% Federal Poverty Guidelines. (To the extent, AE does not have the exact demographic data, please use its best estimate(s) that it has relied upon in providing demographic data to the City Council, City Commissions, City Task Forces, other City departments, and/or to the public). In the event AE relied upon some income indicator other than Federal Poverty Guidelines, such as percentages of median household income, AE may utilize the other income indicator and explain how it relates to Federal Poverty Guidelines.

8-7. Please provide a copy of each study, report, memo, and such other communications AE has prepared directly or indirectly through a consultant and/or agent that addresses the demographics of its residential customer base since 2008. (Demographics are to be interpreted in its broadest meaning and include household income and household size, if available).

8-8. Please provide the number of AE residential customers whose household incomes are between 201 and 250% Federal Poverty Guidelines. (To the extent, AE does not have the exact demographic data, please use its best estimate(s) that it has relied upon in providing demographic data to the City Council, City Commissions, City Task Forces, other City departments, and/or to the public). In the event AE relied upon some income indicator other than Federal Poverty Guidelines, such as percentages of median household income, AE may utilize the other income indicator and explain how it relates to Federal Poverty Guidelines.

8-9. Please provide the number of AE residential customers whose household incomes are between 251 and 300% Federal Poverty Guidelines. (To the extent, AE does not have the exact demographic data, please use its best estimate(s) that it has relied upon in providing demographic data to the City Council, City Commissions, City Task Forces, other City departments, and/or to the public). In the event AE relied upon some income indicator other than Federal Poverty Guidelines, such as percentages of median household income, AE may utilize the other income indicator and explain how it relates to Federal Poverty Guidelines.

8-10. Please provide the number of AE residential customers whose household incomes are between 301 and 350% Federal Poverty Guidelines. (To the extent, AE does not have the exact demographic data, please use its best estimate(s) that it has relied upon in providing demographic data to the City Council, City Commissions, City Task Forces, other City departments, and/or to

the public). In the event AE relied upon some income indicator other than Federal Poverty Guidelines, such as percentages of median household income, AE may utilize the other income indicator and explain how it relates to Federal Poverty Guidelines.

8-11. Please provide the number of AE residential customers whose household incomes are between 351 and 400% Federal Poverty Guidelines. To the extent, AE does not have the exact demographic data, please use its best estimate(s) that it has relied upon in providing demographic data to the City Council, City Commissions, City Task Forces, other City departments, and/or to the public). In the event AE relied upon some income indicator other than Federal Poverty Guidelines, such as percentages of median household income, AE may utilize the other income indicator and explain how it relates to Federal Poverty Guidelines.

8-12. Please provide the following documents:

- a) Memorandum to Low Income Consumer Advisory Task Force from Liz Jambor, EdD, Manager, 01/05/15.
- b) GDS Associates, Inc., "Weatherization Assistance Program Evaluation of Austin Energy's ARRA-supported Weatherization Assistance Program ("WAP") FINAL REPORT, p. 40 (January 30, 2015)("GDS Report").
- c) 2014 Comprehensive Housing Market Analysis City of Austin Final Report, July 31, 2014 Prepared for City of Austin Neighborhood Housing and Community Development, 1000 E 11 St. Memorandum to Low Income Consumer Advisory Task Force from Liz Jambor, EdD, Manager, Austin, TX 78702 by BBC Research and Consulting, 1999 Broadway, Suite 2200, Denver, Colorado 80202-9750.
- d) Memorandum to Low income Consumer Advisory Task force from Liz Jambor, EdD, DABI, March 24, 2015, Survey Demographics and Satisfaction Levels.
- e) AE Weatherization Program job status as of September 1, 2015 provided at September 4, 2015 Low-Income Consumer Advisory Task Force meeting

8-13. In AE response to NXP/Samsung RFI No. 1-24, AE stated it would provide the "EGRSO" expenditures by program activity from FY 2009 to FY 2014. FY 2014 program expenditures were missing from AE's response. Please provide the FY 2014 program expenditures in the same format AE utilized for the expenditures by program activity from FY 2009 to FY 2013.

8-14. Were the revenues collected for late payment penalties credited to (i.e. subtracted from) the customer costs in the COS such as reflected in Figure 5.7, p.5-10, Bates Stamp P. 113? (Reference: AE response to NXP/Samsung RFI No. 1-71). If not, how were these revenues addressed in the COS? Please identify where these revenues were addressed in the COS by named reference and column(s) identification and by Bates Stamp page(s).

8-15. Please explain the 5% late payment penalty fee charged residential customers. In your explanation please address whether the penalty fee is cost based and include any cost studies or analyses relied upon by AE in deriving the 5% late payment penalty fee. Also please include in your explanation the identification of any costs AE incurs that is reimbursed by the late payment penalty fee.

8-16. Were the revenues collected for new service connections credited to (i.e. subtracted from) the customer costs in the COS such as reflected in Figure 5.7, p. 5-10, Bates Stamp P. 113? (Reference: AE response to NXP/Samsung RFI No. 1-71). If not, how were these revenues addressed in the COS? Please

identify where these revenues were addressed in the COS by named reference and column(s) identification and by Bates Stamp page(s).

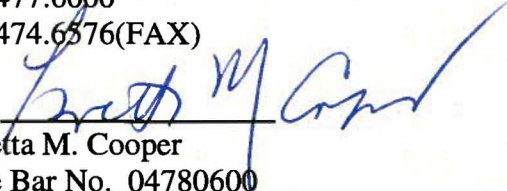
8-17. Has AE received or obtained any studies, reports, or analyses that provide demographic data on its residential customers since TY 2009, the test year that supported its last rate case?

8-18. If the answer is yes to RFI No. 8-17, please identify and provide a copy of each such study, report, and/or analysis.

8-19. Mark Dreyfus spoke at a March 29, 2016 meeting involving the House of Worship rates. In response to a question relating to electric cars, Mr. Dreyfus states that infrastructure costs are affected and will be affected with AE customers' uses of electric cars. Does AE agree with that statement? If so, please explain. In your explanation please address how the infrastructure is or is anticipated to be affected and address how the components of the infrastructure such as meters and transformers, production and transmission facilities are affected; and, also, how AE's costs are or are anticipated to be impacted.

Respectfully Submitted,

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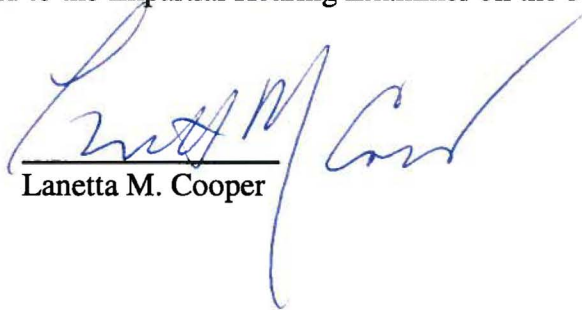
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CERTIFICATE OF SERVICE

The undersigned certifies that TLSC has served a copy of the attached document upon all known parties of record by email and to the Impartial Hearing Examiner on the 5th day of April 2016



Lanetta M. Cooper