

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	§	

**CROWN CASTLE'S SECOND REQUEST FOR INFORMATION**

**FROM AUSTIN ENERGY**

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Crown Castle presents its second Request for Information ("RFI") to Austin Energy.

You must answer each request separately, fully and in writing within 10 days of receiving these requests.

In answering the requests, you must provide all information available to you, including information in the possession of your authorized representative and all other persons acting on your behalf. If you cannot answer the request in full after exercising due diligence to find the information, you should specifically state that in your answer and should, to the extent possible, answer with whatever information or knowledge you have.

The requests are to be considered continuing, and you are requested to supplement your answers when you, or anyone acting on your behalf, gets new information which is relevant to your answer. You should file and serve any such supplement response as soon as you receive the new information.

AUSTIN ENERGY  
2016 APR -8 PM 1:01

## **DEFINITIONS**

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

- a. "Person" means natural persons (e.g. human beings), corporations, partnerships, sole proprietorships, unions, associations, or federal or any other kind of governmental entity.
- b. "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**

- 2-1. For all valid, executed attachment agreements identified and provided in in response to Crown Castle's First RFI, please provide the number of attachments granted each of the last three (3) calendar years (2013, 2014, 2015).
- 2-2. For all valid, executed attachment agreements identified and provided in 1-1 and 1-2 of Crown Castle's First RFI, please provide the annual attachment fees billed by Austin Energy in each of the last three (3) calendar years (2013, 2014, 2015).

Questions or responses may be sent to: **Maureen.Whitfield@crowncastle.com**.



(Signature of Party or Party's Authorized Representative)

MAUREEN WHITFIELD

(Printed Name of Party or Party's Authorized Representative)

(State Bar Number if Party or Party's Auth. Rep. is an attorney)

4/8/2016

(Date Submitted)

### **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 21st day of March, 2016.

