

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

AUSTIN ENERGY
2016 APR 12 AM 8:50
BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARING EXAMINER

**BETHANY UNITED METHODIST CHURCH'S SECOND REQUEST FOR INFORMATION
FROM AUSTIN ENERGY**

Bethany United Methodist Church (BUMC) requests that Austin Energy (AE) respond to the following Request for Information (RFI) set forth below relating to this case. Austin Energy is requested to serve its responses to this Request for Information on the authorized representative(s) listed below no later than ten days after AE receives this request and are 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 Independent⁴ Hearing Examiner.

GENERAL INSTRUCTIONS

The following General Instructions apply to each of BUMC'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 RFI's, 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 RFI's there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact Clifford G. Wells at:

Email: cliff.wells@bethany-umc.org

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.

DEFINITIONS

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

- a. "Communication" means any disclosure, transfer, or exchange of information, whether Oral or written, of any kind including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item.
- b. "Austin Energy", the "utility", "AE", and "Applicant" refer to Austin Energy.
- c. "Person" means natural persons (e.g. human beings), corporations, partnerships, sole proprietorships, unions, associations, or federal or any other kind of governmental entity.
- d. "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 It is our understanding Austin Energy promised a study of the HOW rates between rate cases in 2012. Has the study been completed and can we review it? How did you involve HOW's when you did this study? Was the study agreed to be completed before this new rate case? If so and it is not

completed, why has the study not been completed? How was this proposed study connected to the HOW discount?

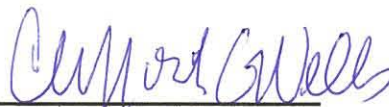
2-2 Referring to ICA 1-10 and ICA 3-26, Attachment 1: Houses of Worship Discount Summary, provide the number of HOW's by rate Class Sanctuary S1 (<10KW), Sanctuary S2 (>10KW<50KW), Sanctuary S3 (>50KW. For each Class provide the number of HOW's, KWH Used, Calculated Income \$\$ and the Discount \$\$ credited. Provide this for your FY 2014 and FY 2015. Of the S3's how many had average demands >200KW and <300KW? What were their values from the ones requested above?

2-3 How many HOW's have solar power? How does having solar power affect their HOW billing? How will the HOW bills with Solar be affected in the proposed rates?

2-4. One of the stated goals of Austin Energy as directed by the City Council was to not exceed increases in costs to consumers over 2%. The rate increase to HOW's from the 2012 Rate increase was double digit. For Bethany United Methodist Church who I represent, the total increase for all our electric accounts was 10.8%, 2015 versus 2012. This increase was mostly due to adding demand charges which make up 50 to 60% of our bills. By your own examples you suggest the increases to HOW will be 20 – 25% with the new rates, while reductions to other commercial customers are predicted to go down. How do you reconcile these increases against your stated goal of no more than 2% increase per year?

2-5 Referring again to the **Independent Consumer Advocate's First RFI** and item ICA 1-10, provide the number of HOW customers by KW Load increment as follows: a. <10KW; 10KW to 20KW; 20KW to 50KW; 50KW to 75KW; 75KW to 100KW; 100KW to 150KW to 200KW; 200KW to 250KW; 250KW to 300KW. What is the Load Factor Range for each increment?

Respectfully submitted,



Clifford G. Wells

Administrative Executive

Bethany United Methodist Church

10010 Anderson Mill Rd.

Austin, Texas 78750-2199

512-258-6017 512-997-8917 (cell)

Submitted this date: April 11, 2016

PERSON(S) RESPONSIBLE FOR ANSWER: