

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

AUSTIN ENERGY  
2016 APR 15 AM 10:55  
BEFORE THE CITY OF AUSTIN  
IMPARTIAL HEARING EXAMINER

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

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The Independent Consumer Advocate ("ICA") hereby propounds its **sixth** 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: April 8, 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 8<sup>th</sup> day of April, 2016.



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

- 6-1 Please identify any electric utilities in Texas which divide the >10 kW secondary commercial class into separate 10 kW – 50 kW and 50 kW – 500 kW classes.
- 6-2 Did Austin Energy consider the Texas PUC's generic customer classification for transmission-distribution utilities in determining appropriate rate classes? Please explain why the PUC's generic customer classes were not used as a template for the >10 kW secondary class.
- 6-3 Please provide all assessments of customer impact produced by Austin Energy of the rate class decision set out in '6-1.'
- 6-4 For purposes of class cost of service, are all class revenues adjusted to reflect end of period number of customers? If yes, please provide workpapers for the adjustments. If no, for each class please provide customers by month and demand and energy base revenues by month (in excel spreadsheet format).
- 6-5 With respect to economic development programs, please provide: (a) total expenditures for incentives, grants, discounts, or construction aid to attract new electric customers or assist in the expansion of customers' existing load; (b) please provide a breakdown of 'a' by type of expenditure. (c) Please provide a breakdown of 'a' by customer class (i.e., number of customers assisted by class and kWh of customers assisted by class).
- 6-6 Please provide a thorough explanation of how CAP customer revenues and revenues to pay for CAP discounts are accounted for in the existing and proposed base revenues.
- 6-7 (a) With respect to the answer to ICA 4-10, is the infrastructure cost for the disaster recovery center part of the 311 program? (b) Do the departmental payments for 311 directly pay for the infrastructure costs of the disaster recovery center? (c) Is the disaster recovery center used by departments other than the electric utility (such police, fire, water and wastewater, etc.) Please explain.