

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

AUSTIN ENERGY  
2016 APR 18 AM 9:47  
BEFORE THE CITY OF AUSTIN  
IMPARTIAL HEARING EXAMINER

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

---

The Independent Consumer Advocate ("ICA") hereby propounds its **seventh** 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 15, 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 15<sup>th</sup> day of April, 2016.



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

- 7-1 Are the voltage level losses utilized in the class cost of service study consistent with the losses utilized for Austin Energy in ERCOT settlements? Please compare electrical losses for ERCOT purposes with the percentage losses shown on WP-F-6.1.2.1.
- 7-2 Re: WP-F-4.1. Please provide a narrative explanation as to why network 15 Kva is less costly per foot than lower voltage network costs.
- 7-3 Re: WP-E-5.1. Please explain why new service connection revenues are classified distribution rather than customer. Does this fee recover incremental costs for new meters and service drops?
- 7-4 The following request is based on Supplemental Response to ICA 4-9. (a) Please provide evidence that Austin Energy has a specific and definite plan to install solar facilities on the Western Coal Generating property PHFU. Identify a specific planned in-service date. (b) Please provide evidence that Austin Energy has a specific and definite plan to install solar facilities on the Toyah property PHFU. Identify a specific planned in-service date. (c) The answer states that CWIP debt service is shown at WP-C-3.1, line 4. Does this mean that commercial paper is used to finance CWIP? Please state the principal and interest amount for the debt service applicable to CWIP.
- 7-5 With respect to WP-H-5.4, please explain why Services are omitted from the customer charge calculated by the cost of service method.
- 7-6 With respect to WP-H-5.4, please explain the full rationale for recovering economic development costs through the customer charge.
- 7-7 With respect to WP-H-5.4, please identify the amount of A&G expense included in each customer charge component (customer accounting, etc.) for the residential and S1 classes.

- 7-8 With respect to WP-H-5.4, please identify the amount of general fund transfer included in each customer charge component for the residential and S1 classes.
- 7-9 Please explain why test year Services is a negative number.
- 7-10 With respect to WP-H-5.4, please identify the revenue items on WP-E-5.1 which are deducted from the calculation of the customer charge.
- 7-11 Is it correct that Austin Energy's cost of service consultant, SAIC, previously recommended the use of Base-Intermediate-Peak production demand method in its report prepared for the public involvement process preceding the last rate case?