

AUSTIN ENERGY'S TARIFF PACKAGE: §  
UPDATE OF THE 2009 COST OF § BEFORE THE CITY OF AUSTIN  
SERVICE STUDY AND PROPOSAL TO § IMPARTIAL HEARING EXAMINER  
CHANGE BASE ELECTRIC RATES §

SIERRA CLUB AND PUBLIC CITIZEN'S  
SECOND REQUEST FOR INFORMATION FROM AUSTIN ENERGY

Public Citizen and Sierra Club request Austin Energy to respond to the following Request for Information set forth below relating to this case. Austin Energy is requested to serve its response to this Request for Information on the authorized representatives 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, emails 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, spreadsheets, minutes, records, photographs, correspondence, 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.

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- 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 Austin Energy 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.

### **Instructions**

- 1. 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.
- 2. 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.

3. 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.
4. If any question appears confusing, please request clarification from the undersigned counsel.
5. 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.
6. 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.
7. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
8. These questions are continuing in nature. If there is a change in circumstances or factors 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 a supplemental response to your earlier answer.
9. 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.
10. If the response to any question is voluminous, please provide separately an index to the materials contained in the response.
11. 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.
12. If the information requested is included in previously furnished exhibits, work papers, 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.
13. 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**

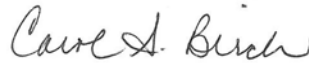
The definitions and instructions set out in this Request for Information apply to these questions. Unless specified otherwise in the RFI, these RFIs refer to the rate-filing package AE filed on January 25, 2016.

1. On December 4, 2014, Austin Energy gave a presentation to the Council Committee on Austin Energy titled "Investing in a Clean Future - Austin Energy's Resource, Generation and Climate Protection Plan to 2020 Updates." Please provide the numbers used to create the graph on slide 11 of that presentation, including the amount of money assumed to pay off debt per year on the Fayette Power Plant.
2. Provide documentation of the nature (including where they originate) and amount (per kilowatt-hour) of the T&D expenses that would be realized for a community solar installation, such as the proposed Kingsbery installation, that would not be realized for customer-sited behind the meter solar installations.
3. Please provide any available documents or communications used to justify implementing different Energy Efficiency Service fees to different customer classes.
4. Please provide any information that indicates how much it costs Austin Energy to provide interconnection for a typical single family home in Austin and how much it costs to provide interconnection for a typical apartment or condo building.
5. How many typical Austin single family homes are served per transformer? How many typical Austin apartments or condominiums are served per transformer? Are there differences in the size and cost of the transformers for these two scenarios? Please provide typical cost for transformers per single family and multifamily residence and any other information pertinent to these questions.
6. Does Austin Energy intend to offer the performance based incentive (PBI) for commercial solar installations until at least after the conclusion of the next

rate case following this one? If so, what will the minimum PBI be for small, medium and large installations, as currently defined by Austin Energy?

7. Please provide any emails, analysis, or discussion by Austin Energy staff related to the request made by the Electric Utility Commission for an analysis of an hourly dispatch cost allocation method also referred to in discussions as the Jim Lazar suggested method.

Respectfully submitted,



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(Signature of Party or Party's Authorized Representative)

Carol S Birch

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

TX Bar No. 02328375

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

April 19, 2016

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(Date Submitted)