

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

AUSTIN ENERGY
2016 APR 18 PM 12:16
BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARING EXAMINER

**HOMEOWNERS UNITED FOR RATE FAIRNESS' S FIRST REQUEST FOR
INFORMATION TO AUSTIN ENERGY**

COMES NOW, HOMEOWNERS UNITED FOR RATE FAIRNESS ("HURF"), and files this, its First Request for Information to the City of Austin d/b/a Austin Energy ("Austin Energy") in the captioned proceeding.

HURF requests that Austin Energy, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the questions.

Definitions

As used in this Request for Information:

- (1) "Austin Energy" and "AE", refer to the City of Austin d/b/a Austin Energy, including its directors, officers, employees, consultants, agents, and attorneys;
- (2) "City" refers to the City of Austin, including its various departments, offices, officers, employees, consultants, agents, and attorneys, other than Austin Energy;
- (3) "You", "yours" and "your" refer to Austin Energy (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.

(4) As used herein, the term "documents" shall mean all writings of every kind, source and authorship, both originals and all non-identical copies thereof, in your possession, custody, or control, or known by you to exist, irrespective of whether the writing is one intended for or transmitted internally by you, or intended for or transmitted to any other person or entity, including without limitation any government agency, department, administrative, or private entity or person. The term shall include handwritten, typewritten, printed, photocopied, photographic, or recorded matter. It shall include communications in words, symbols, pictures, sound recordings, films, tapes, and information stored in, or accessible through, computer or other information storage or retrieval systems, together with the codes and/or programming instructions and other materials necessary to understand and use such systems. For purposes of illustration and not limitation, the term shall include: affidavits; agendas; agreements; analyses; announcements; bills, statements, and other records of obligations and expenditures; books; brochures; bulletins; calendars; canceled checks, vouchers, receipts and other records of payments; charts or drawings; check registers; checkbooks; circulars; collateral files and contents; contracts; corporate bylaws; corporate charters; correspondence; credit files and contents; deeds of trust; deposit slips; diaries or drafts; files; guaranty agreements; instructions; invoices; ledgers, journals, balance sheets, profit and loss statements, and other sources of financial data; letters; logs, notes, or memoranda of telephonic or face-to-face conversations; manuals; memoranda of all kinds, to and from any persons, agencies, or entities; minutes; minute books; notes; notices; parts lists; papers; press releases; printed matter (including books, articles, speeches, and newspaper clippings); purchase orders; records; records of administrative, technical, and financial actions taken or recommended; reports; safety deposit boxes and contents and records of entry; schedules; security agreements; specifications; statements of bank

accounts; statements or interviews; stock transfer ledgers; technical and engineering reports, evaluations, advice, recommendations, commentaries, conclusions, studies, test plans, manuals, procedures, data, reports, results, and conclusions; summaries, notes, and other records and recordings of any conferences, meetings, visits, statements, interviews or telephone conversations; telegrams; teletypes and other communications sent or received; transcripts of testimony; UCC instruments; work papers; and all other writings, the contents of which relate to, discuss, consider, or otherwise refer to the subject matter of the particular discovery requested.

Instructions

These Requests are directed to and cover all documents in your possession, custody, or control, or in the possession, custody, or control of your representatives, including but not limited to, any of its employees, agents, or attorneys, and any other person acting for, on behalf of, or under the authority or control of, Austin Energy.

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 interlineations, receipt stamp, or notation.

Claim of Privilege

If you withhold any documents that you are otherwise required to produce by these Requests under any claim of privilege, specifically identify each document by stating its date, author, recipients and the reason for withholding said document.

Questions

The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.

If any question appears confusing, please request clarification from the

undersigned counsel.

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.

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 sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness 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 sub-parts, please identify the witness or witnesses by sub-part.

Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

These questions are continuing in nature. If there is a change in circumstances or facts or 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, under oath, a supplemental response to your earlier answer.

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.

If the response to any question is voluminous, please provide separately an index to the materials contained in the response.

If the information requested is included in previously furnished exhibits, workpapers, or 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.

To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Respectfully submitted,

/s/ Roger B. Borgelt

Roger B. Borgelt

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CERTIFICATE OF SERVICE

I certify that today, April 19, 2016, I served a true copy of the foregoing First Request for Information to The City of Austin d/b/a Austin Energy on all parties of record via electronic mail.

/s/Roger B. Borgelt

Roger B. Borgelt

- 1-1. Please describe the reason for the difference between the settlement amount in PUC docket 406727 of \$5,751,893 in rate reductions and the proposed suburban customer discount totaling \$5,816,209 in this proceeding.
- 1-2. How is this difference allocated among customer classes?
- 1-3. In the statement, on page 6-17 of the Tariff package, “[f]urther, Austin Energy designed the proposed rates for customers outside the City limits to approximate the current differentials between inside and outside City limits rates as well as the overall revenue generation differential implied in the settlement in PUCT Docket No. 40627”, what is meant by the phrases, “current differentials” and overall revenue generation differential implied”?
- 1-4. In 1-3 above, how were these differentials approximated?