

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

AUSTIN ENERGY  
2016 APR 19 PM 12:43  
BEFORE THE CITY OF AUSTIN  
IMPARTIAL HEARING EXAMINER

**AUSTIN APARTMENT ASSOCIATION's REQUEST FOR INFORMATION  
FROM AUSTIN ENERGY**

---

The Austin Apartment Association requests that you, Austin Energy, make available for inspection and copying all the documents requested within 10 days after receiving this request. If the documents are to be copied, Austin Apartment Association requests that all such documents and tangible things be produced at the main office of Austin Energy, or at some other mutually agreed upon location. Instead of allowing Austin Apartment Association to make copies of the documents, you may choose instead to provide Austin Apartment Association with copies within 10 days after receiving this request.

You must answer each request separately, fully and in writing within 10 days of receiving these requests. For each response, you must identify the individual responsible for providing the information.

In answering the requests, you must provide all information available to you, including information in the possession of your authorized representative and all other persons acting on your behalf. If you cannot answer the request in full after exercising due diligence to find the information, you should specifically state that in your answer and should, to the extent possible, answer with whatever information or knowledge you have.

The requests are to be considered continuing, and you are requested to supplement your answers when you, or anyone acting on your behalf, gets new information which is relevant to

your answer. You should file and serve any such supplement response as soon as you receive the new information.

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.

If the person to be identified is not a natural person (e.g. a corporation) give its name and address and principal business activity.

If you object to attaching to any requested document, to identifying any person, or to responding any request for information, you must file a separate document entitled Objections of Austin Energy to Austin Apartment Association's Request for Information.

### **DEFINITIONS**

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

- a. "Person" means natural persons (e.g. human beings), corporations, partnerships, sole proprietorships, unions, associations, or federal or any other kind of governmental entity.

- b. "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**

1. Explain why Austin Energy decided to wait until the next cost of service assessment to perform a residential study in order to determine the cost of service for multi-family versus single-family residences.

ANSWER:

PERSON(S) RESPONSIBLE FOR ANSWER:

2. Identify any previous studies, analysis or related 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.

ANSWER:

PERSON(S) RESPONSIBLE FOR ANSWER:

3. With regard to service connection and costs, please provide information on:

- 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?
- What is the typical cost for transformers per single family and multifamily residence?




(Signature of Party or Party's Authorized Representative)



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

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



(Date Submitted)