

**From:** Paul Robbins  
**To:** Paul Robbins  
**Subject:** Motion to Compel on 4th RFI from Paul Robbins  
**Date:** Thursday, April 21, 2016 3:03:04 PM

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## AUSTIN ENERGY 2016 RATE REVIEW

### AUSTIN ENERGY'S TARIFF PACKAGE UPDATE OF THE 2009 COST OF SERVICE STUDY AND PROPOSAL TO CHANGE BASE ELECTRIC RATES

### BEFORE THE CITY OF AUSTIN IMPARTIAL HEARINGS EXAMINER

AUSTIN ENERGY  
2016 APR 22 AM 8:07

Judge Herrera,

I am filing a Motion to Compel in regards to denial of information for my 4th RFI.

This RFI read:

#### *1. Request to View Customer Billing Data of CAP Participants*

*I am requesting to view the names, billing addresses, and customer billing data for participants receiving the Customer Assistance Program [CAP] electric discount between March of 2015 and March of 2016.*

*I am aware of the privacy issues related to this. I am willing to sign a non-disclosure agreement to deal with these concerns.*

*Although it is my preference to analyze this data at my office, I will also agree to do this at Austin Energy's [AE] office if this is not possible, and to not transfer the confidential data outside of this office.*

AE's objections center around Competitive Matters – that AE will be placed at a competitive disadvantage if it allows me to see information, even though I will not be allowed to relate the information to others.

I contend that the information is not competitive because AE is not in retail competition. I have already received similar information (names and service addresses) of CAP participants enrolled in the water and drainage utility discount programs. These utilities are not in retail competition either.

It is contradictory to say that water and drainage utilities must give CAP participants' information, but not AE.

Since no one at AE has offered an alternative, I request that I be granted access to this information under the conditions in my RFI.

Sincerely,

Paul Robbins  
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