

AUSTIN ENERGY
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AUSTIN ENERGY'S TARIFF PACKAGE:	§	
2015 COST OF SERVICE	§	BEFORE THE CITY OF AUSTIN
STUDY AND PROPOSAL TO CHANGE	§	IMPARTIAL HEARING EXAMINER
BASE ELECTRIC RATES	§	

**AUSTIN ENERGY'S FIRST REQUEST FOR INFORMATION TO
BETHANY UNITED METHODIST CHURCH**

Austin Energy ("AE") files this first Request for Information ("RFI") to Bethany United Methodist Church ("Bethany Church"). Bethany Church is hereby requested to provide information and answer the attached questions pursuant to Procedural Rule 7.3. The responses are due by 12:00 p.m. within five (5) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if Bethany Church receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearing. Please provide supporting documentation in native in Excel format with all formulas intact when applicable.

Definitions and Instructions

A. "Austin Energy" and "AE" refer to the City of Austin d/b/a Austin Energy, including its directors, officers, employees, consultants, agents, advisors, and attorneys.

B. "City" refers to the City of Austin, including its various departments, offices, officers, employees, consultants, agents, and attorneys, other than Austin Energy.

C. "You," "yours," and "your" refer to Bethany Church, including its directors, officers, employees, consultants, agents, and attorneys.

D. The term "document" shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations, messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records,

income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

E. Austin Energy specifically requests that any electronic or magnetic data (which is included in the definition of “document”) that is responsive to a request herein be produced electronically in its native format and be produced with your response to these requests. Austin Energy further requests that you produce electronic copies of all paper documents, including any metadata attached to such documents, and produce all electronic originals or all responsive documents.

F. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

G. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

H. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

I. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

J. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

K. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

L. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

M. 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.

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

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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THOMAS L. BROCATO

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ATTORNEYS FOR AUSTIN ENERGY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading has been served on all parties and the Impartial Hearing Examiner on this 5th day of May, 2016, in accordance with the City of Austin Procedural Rules for the Initial Review of Austin Energy's Rates.



THOMAS L. BROCATO

Austin Energy's First RFI to Bethany Church

- AE 1-1 Please provide supporting calculations and workpapers for all tables within the testimony.
- AE 1-2 On page 1, please provide supporting calculations for how the numbers "20% to 25%" were derived.
- AE 1-3 On page 2, please provide supporting calculations for how the following numbers were derived:
- A. "80% or more"
 - B. "54%"
 - C. "\$0.013051/kWh (winter)"
 - D. "\$0.013353/kWh (summer)"
 - E. "50% to 65%"
- AE 1-4 On page 3, please provide supporting calculations for how the following numbers were derived:
- A. "20 - 25%"
 - B. "13.1%"
 - C. "31.3%"
 - D. "1.1%"
 - E. "67.6%"
 - F. "21.7%"
 - G. "34.7%"
 - H. "32.5%"
 - I. "78.1%"
 - J. "65.3%"
- AE 1-5 State "yes" or "no" whether you took into account the "20% load factor floor" for all calculations and tables within the testimony. If so, please provide all supporting calculations.
- AE 1-6 With regard to the statement on page 3 concerning the analysis of the bills of over 16 HOWs, summer and winter, using actual 2015 kWh, KW and power factor values and the accompanying chart on page 3:
- A. Please provide all information used in the referenced analysis and calculations.
 - B. Please provide actual calculations, including spreadsheets in native format, documents, specific customer bills reviewed, and kWh, kW and power factor for each month of 2015 for each customer.
 - C. Please identify each of the customers by name, address, utility account number or other unique identifier.
 - D. For each customer, please identify if that customer is responsible for other accounts at the same location that are not served under the HOW discount.
 - E. For those with additional accounts at the same location not served under the HOW discount, please provide bills, kWh, kW and power factor for

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each customer for the same months as those reported in the analysis referenced on the discussion and table on page 3.