

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

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AUSTIN ENERGY
2016 MAY 16 PM 11:16
BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARINGS
EXAMINER

AELIC'S OBJECTIONS TO AUSTIN ENERGY'S THIRD REQUEST FOR INFORMATION NOS. 3-1 AND
3-3.

TO THE HONORABLE JUDGE HERRERA:

COMES NOW, Austin Energy Low Income Consumers objecting to Austin Energy's ("AE")
Third Request for Information Nos. 3-1 and 3-2 stating as follows:

AE's 3rd RFI No. 3-1

RFI No.3-1 restated: On page 6 of its Statement of Position, AE Low Income Customers that
"[First tier] [r]ates should be significantly below cost." Please define what
rate would be considered significantly below cost. Please provide detailed
calculations that demonstrate the appropriate "below cost" rate and
provide any research or other evidence that supports this rate.

Objection: While AELIC responds to AE's request to define what a tier rate would be
considered significantly below cost, it objects to creating documents that
calculate an appropriate below cost rate. AELIC object to this RFI because it
is asking AELIC to prepare documents that it would quantify impact AE's
proposed Street Area Lighting charge will have on Secondary Voltage customers.
Pursuant to City of Austin Procedural Rules for the Initial Review of Austin
Energy's Rates §7.3(c)(2)(F), a party does not need to produce a document or
tangible thing unless that party has constructive or actual possession, custody,
or control of the requested item. AELIC does not possess a document

AE's 3rd RFI No. 3-3

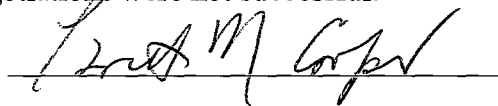
RFI 3-3 Restated: Please quantify the impact Austin Energy's proposed Street Area Lighting
charge will have on Secondary Voltage customers and provide a detailed
explanation of how the bill impact of the SAL charge exacerbates
"affordability concerns." See page 6 of AE Low Income Customers'
Statement of Position.

Objection: AELIC object to this RFI because it is asking AELIC to prepare documents that it
would quantify impact AE's proposed Street Area Lighting charge will have on
Secondary Voltage customers. Pursuant to City of Austin Procedural Rules for
the Initial Review of Austin Energy's Rates §7.3(c)(2)(F), a party does not need
to produce a document or tangible thing unless that party has constructive or
actual possession, custody, or control of the requested item. AELIC does not

possess a document that shows AELIC quantifying the impact of AE proposed Street Area Lighting charge will have on Secondary Voltage customers. However, AE has already included in its rate filing package a quantification of the impact to the secondary voltage customers caused by the proposed Street Area Lighting charge. See Schedule G-9; WP H 5.2; Schedule G-10; Schedule G-7; Schedule H-5.1. AE already has possession of its rate filing package. At 1000 kWh, an AE residential customer'

Certificate of Conference

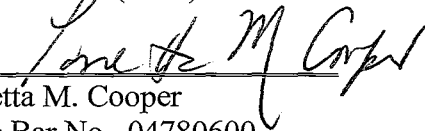
I, the undersigned attorney, certify that AELIC has attempted negotiations with AE concerning the objections stated above. The negotiations were not successful.



Lanetta M. Cooper

Respectfully Submitted,

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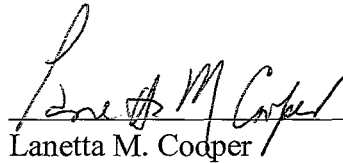
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Attorneys for AE Low Income Consumers

CERTIFICATE OF SERVICE

The undersigned certifies that TLSC has served a copy of the attached document upon all known parties of record by email and to the Impartial Hearing Examiner on the ~~10~~^{15th} day of May 2016


Lanetta M. Cooper