| AUSTIN ENERGY'S TARIFF PACKAGE: | § | |
|--|---|----------------------------|
| 2015 COST OF SERVICE STUDY | § | BEFORE THE CITY OF AUSTIN |
| AND PROPOSAL TO CHANGE BASE | § | IMPARTIAL HEARING EXAMINER |
| ELECTRIC RATES | 8 | |

DATA FOUNDRY, INC.'S SUPPLEMENTAL RESPONSE TO AUSTIN ENERGY'S FIRST REQUEST FOR INFORMATION/PRODUCTION

Data Foundry ("Data Foundry" or "DF") files this Supplemental Response to Austin Energy's ("AE") First Request for Information submitted on May 5, 2016. The Supplement provides a response to AE's request 1-2(b), which Data Foundry inadvertently failed to address in the original response.

AUSTIN ENERGY OLGMAY 16 PM 3: 21 Respectfully submitted,

W. SCOTT McCOLLOUGH
Texas Bar No. 13434100
wsmc@dotlaw.biz
MATTHEW A. HENRY
henry@dotlaw.biz
McCOLLOUGHIHENRY PC
1290 S. Capital of Texas Hwy Bldg 2-235
West Lake Hills TX 78746
512.888.1112 (V)
512.692.2522 (FAX)
Counsel for Data Foundry, Inc.

CERTIFICATE OF SERVICE

I, W. Scott McCollough, certify that I have served a copy of Data Foundry's Supplemental Response to Austin Energy's First Request for Information/Production on all parties listed on the Service List for this proceeding as it exists on the date this pleading is filed, using the email address provided for the party representative.

W. Scott McCollough

May 16, 2016

Supplemental Response to Austin Energy's First RFI to Data Foundry

- AE 1-2. In 'Presentation on Revenue Requirement' on page 4 under footnote 8, please provide the supporting calculations for how these numbers were derived:
 - a. 12.5%
 - b. \$343,575,578
 - c. 42.1%
 - d. \$739,733,112
 - e. 13%

RESPONSE:

See Attachment A, which provides the sources and calculations sought in AE 1-2(a)-(e). Pursuant. Pursuant to AE's Instruction E Data Foundry is also providing a separate electronic version of the native Excel spreadsheet that produced Attachment A.

SUPPLEMENTAL RESPONSE:

AE's counsel contacted Data Foundry's counsel on an informal basis to determine the location of the specific response to 1-2(b) on Attachment A. Data Foundry discovered that it had inadvertently failed to include a specific response to that request.

Data Foundry now supplements to indicate in response to 1-2(b) that the number "\$343,575,578" appearing in note 8 of Data Foundry's initial presentation included a typo. The third digit from the left used "3" rather than "1." The number should have been "\$34<u>1</u>,575,538." This is evident from the fact that the relevant part of the note refers to AE's "alleged demand 'costs'..."

Therefore, after correction of the typo, the source of the number is the same as for 1-1(a). *See* Figure 5.8, RFP p. 5-12; Sch D-8, 1. 7, Col. A.