

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

AUSTIN ENERGY
2016 MAY 18 AM 7:47
BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARING EXAMINER

**INDEPENDENT CONSUMER ADVOCATE'S
FIRST REQUEST FOR INFORMATION FROM NXP/SAMSUNG**

The Independent Consumer Advocate ("ICA") hereby propounds its **first** Request for Information ("RFI") upon NXP Semiconductors / Samsung Austin Conductors LLC ("NXP/Samsung"), with the expectation that responses to this RFI are due within 5 days and governed by the terms of Chapter G of the City of Austin Procedural Rules for the Initial Review of Austin Energy's Energy Rates ("Procedural Rules") as issued by the Independent Hearing Examiner.

GENERAL INSTRUCTIONS

The following General Instructions apply to each of the ICA's RFI requests, which are attached below:

1. For each responsive answer, please identify the individual(s) responsible for its preparation, and the witness sponsoring the answer provided.
2. In the event any document requested in this request is unavailable, describe in detail the reasons the document is unavailable.
3. When producing documents pursuant to these RFIs, designate on the document or group of documents the RFI(s) in response to which the document(s) are produced.
4. If, in answering any of these RFIs, there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact John B. Coffman at:

Email: john@johncoffman.net

Austin Energy may also contact Clarence Johnson at:

Email: cjenergyconsult@att.net

5. These data requests are continuing in nature and require supplemental responses when further or different information with respect to any of them is obtained.
6. Use of the singular or plural word form in a data request is not to be interpreted to exclude information or documents from the scope or intent of the specific request.
7. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these requests any information or documents which might otherwise be considered to be beyond their scope.
8. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner
 - (a) the reason for withholding;
 - (b) the date of the document;
 - (c) a brief description of the document;
 - (d) the name of each author or preparer;
 - (e) the name of each person who received the document; and
 - (f) a statement constituting the basis for withholding the document.
9. Please provide data responses as they become available.

Respectfully submitted,



John B. Coffman
Independent Consumer Advocate

Submitted this date: May 17, 2016

CERTIFICATE OF SERVICE

The forgoing filing has been served upon all of the email addresses contained in the official Service List for this proceeding as found on the website for the Office of the City Clerk's website on this 17th day of May, 2016.



**ICA's First Round of Requests for Information from NXP Semiconductors /
Samsung Austin Conductors LLC**

- 1-1 Goble cross-rebuttal at 6. Is Mr. Goble aware of any case in which the Texas PUC rejected the BIP methodology? If yes, please identify the case and provide relevant documents.
- 1-2 Goble cross-rebuttal at 8, l. 4-6, is Mr. Goble aware of any instances in which the intermediate portion of BIP was calculated in this manner? If yes, provide documentation to support the answer.
- 1-3 Is Mr. Goble aware of any Texas electric utilities which use Summer NCP to allocate distribution plant? If yes, provide the names of the utilities, the docket numbers, and relevant documentation of the answer.
- 1-4 Assuming acceptance of the results of Mr. Johnson's class cost of service study, which shows all primary classes' current revenues to be less than allocated cost, is it Mr. Goble's position that Mr. Johnson should have recommended a revenue increase for primary customer classes? Given Mr. Johnson's cost of service results, explain why Mr. Goble objects to Mr. Johnson's recommendation to spread a recommended base revenue decrease to the classes which include NXP/Samsung accounts.