

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

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BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARINGS
EXAMINER

AELIC'S RESPONSE TO AUSTIN ENERGY'S FOURTH REQUEST FOR INFORMATION


To Austin Energy:

Attached are AELIC's responses to Austin Energy's Fourth Request for Information filed on May 17, 2016.

Respectfully Submitted,

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2101 Interstate 35 South, Suite 300
Austin, Texas 78741
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By:


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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 22nd day of May 2016


Lanetta M. Cooper

AUSTIN ENERGY
2016 MAY 23 AM 7:46

AELIC Response to AE 4th RFI No. 4-1

RFI 4-1 For each witness you sponsor, please provide in native format all calculations, exhibits, models, studies, and workpapers supporting the testimony and positions taken therein.

Answer: AE and AELIC agreed that the calculations, models, studies, and workpapers refer to documents and/or calculations AELIC relied upon in its Statement of Position and in its Response to Intervenor Testimony. Further, AE agreed that AELIC need only reference documents contained in AE's rate filing package or in discovery and not produce the documents.

AELIC's Statement of Position/Presentation

Adjustments to AE's O&M

1. Non-nuclear decommissioning costs

The specific witnesses reviewed by Dr. Szerszen in her discussion of decommissioning studies at the Texas PUC are:

- a. Docket No. 44941 El Paso Electric Francis Seymore and Lisa Budtke
- b. Docket Nos. 42370 and 404443 Southwestern Electric Power Company Steven Bertheau
- c. Docket No. 41791 Entergy Texas Monique Hoffmeister, Kenneth Gallagher and Heather LeBlanc
- d. Docket No. 43695 Southwestern Public Service Francis Seymore

2. Bad Debt

AE Response to NXP/Samsung 4th RFI No.4-6; AE Response to ICA 2nd RFI No. 2-30; AE Response to AELIC ("TLSC") 1st RFI No. 1-19; Rate filing package, Schedule H-5.4

3. Reserves

See AELIC Response to AE 2nd RFI No. 2-2 and AELIC Supplemental Response to AE 2nd RFI no. 2-2 that responded to this same question

Adjustments to AE's Revenues

1. Residential base rate revenue adjustments

a. CAP

AE Response to ALIC 3rd RFI No. 3-10; AE Response to 7th RFI No. 7-9; Rate filing package, Schedule H-5-2, WP H-5.1

b. Customer Count

See Attached email response from AE

Lanetta Cooper

From: Jambor, Liz (Elizabeth) <Elizabeth.Jambor@austinenergy.com>
Sent: Tuesday, September 22, 2015 4:51 PM
To: Lanetta Cooper
Subject: RE: No of Res Cus.

These are end of year numbers as reported in our annual report.

Liz Jambor, Ed.D. | Manager, Data Analytics & Business Intelligence | Austin Energy
811 Barton Springs Rd. | 512-322-6353 (ofc) 512-663-1103 (cell)

From: Lanetta Cooper [<mailto:lcooper@tlsc.org>]
Sent: Tuesday, September 22, 2015 4:48 PM
To: Jambor, Liz (Elizabeth)
Subject: RE: No of Res Cus.

Are these numbers end of year or average. If average, what was end of year for residential?

From: Jambor, Liz (Elizabeth) [<mailto:Elizabeth.Jambor@austinenergy.com>]
Sent: Tuesday, September 22, 2015 4:47 PM
To: Carol Biedrzycki
Cc: Lanetta Cooper; Timothy Arndt (tarndt9@gmail.com)
Subject: RE: No of Res Cus.

We are putting together a list of responses based on the question asked in last Friday's meeting. It was to be part of that repose. However, I can provide you numbers now.

*FY14 – 391,410 residential
45,436 commercial
151 industrial*

Liz Jambor, Ed.D. | Manager, Data Analytics & Business Intelligence | Austin Energy
811 Barton Springs Rd. | 512-322-6353 (ofc) 512-663-1103 (cell)

From: Carol Biedrzycki [<mailto:carolb@texasrose.org>]
Sent: Tuesday, September 22, 2015 1:08 PM
To: Jambor, Liz (Elizabeth)
Cc: Lanetta Cooper; Timothy Arndt (tarndt9@gmail.com)
Subject: No of Res Cus.

Liz,

I am trying to tie up loose ends on the draft report. I was expecting to hear from you by now.

I am looking at the 3rd quarter report distributed to the EUC last night. It says an average of 447,997 customer total but nothing about the number of residential customers. Maybe you can get the number from the people who put the report together.

Carol Biedrzycki
Executive Director
Texas ROSE (Ratepayers' Organization to Save Energy)
2101 S IH 35, Suite 300
Austin, TX 78741-3876
Phone: 512-472-5233

2. Operating Balance

- a. Regulatory Charge over recovery
AE Response to AELIC ("TLSC") 1st RFI No. 1-2; AE Responses to AELIC 9th RFI Nos. 9-5 to 9-9
- b. Proceeds from sale of the Energy Control Center
AE Response to Robbin 1st RFI Nos. 1-2.4.1 and 1-2.4.6; AE Responses to AELIC 9th RFI Nos. 9-20 and 9-21

Cost Allocation

1. Decker Power Plant Black Start Resources
Chapter 3, Rate filing package; AE Second Supplemental Response to AELIC 1st RFI No. 1-13

Rate Design

1. Infrastructure costs
 - a. Bad debt See above discussion of Bad debt
 - b. Fixed Distribution Costs
Rate filing package, Chapter 5 and 6; AE Response to NXP/Samsung 2nd RFI No. 2-16; AE Response to AELIC 7th RFI No. 7-29 AE Response to AELIC 3rd RFI No. 3-4; AE Response to NXP/Samsung 1st RFI No. 1-23; AE Response to AELIC ("TLSC") 1st RFI No. 1-25; AE Response to NXP/Samsung 1st RFI No. 1-76; AE website portal relating to contractors involving electric service design and planning; AE's Response to AELIC 7th RFI No. 7-16; AE Response to AELIC 7th RFI No. 7-15; AE's Response AELIC 7th RFI No. 7-27
 - c. Fixed Meter Costs
Rate Filing package, Chapter 5 and 6, Schedule-5.4; AE Response 5th RFI No. 5-5; AE Response 3rd RFI No. 3-3; AE's Supplemental Response to AELIC 3rd RFI No. 3-4; AE's Response to ICA 3rd RFI No. 3-8; AE's Response to AELIC 1st RFI No. 1-15; AE's Third Supplemental Response AELIC 1st RFI No. 1-14; AE's Response to NXP/Samsung 1st RFI No. 1-80; AE's Response to NXP/Samsung 1st RFI No. 1-23; AE's Response AELIC 1st RFI No. 1-15; AE's Response to AELIC 1st RFI No. 1-14; AE's Response AELIC 7th RFI No. 7-27 AELIC 7th RFI No. 7-19; AE's Response AELIC 7th RFI No. 7-21; AE's Response to AELIC 7th RFI No. 7-16
2. Fixed Production costs
Rate filing package Chapters 5 and 6, Schedules G-6, G-7, and G-8, and WP H-5.1; AE's Response to AELIC 7th RFI No. 7-31; AE's Response NXP/Samsung 1st RFI No. 1-23.
3. AE's residential rate design proposal
This Question was already asked and answered. See AELIC Response AE 1st RFI No. 1-2 and AELIC Response AE 3rd RFI No. 3-1. See also cited references in Statement of Position/ Presentation
4. Street Area Lighting Tariff rate design
See Rate filing package, Appendix K-31, Schedule G-9, WP H-5.2, Schedule G-7, Schedule G-6, Schedule H-5.1
5. PSA rates

AE Response NXP/Samsung 2nd RFI No. 2-6, AE Response to AELIC (“TLSC”) 1st RFI No. 1-2, AE Response to NXP/Samsung 1st RFI No. 1-23, AE Response to Public Citizen/Sierra Club 1st RFI No. 1-4, AE Response to NXP/Samsung 2nd RFI No. 2-16, Rate filing package, Chapter 5, Appendix I, Texas Public Utility Regulatory Act, Texas Utility Code §36.203

6. Late payment penalty fees
AE Response to AELIC 8th RFI No. 8-15, PUC SUBST. Rs. 25.28 & 25.480
7. Prepayment rate tariff
Dombrowski testimony before the City of Austin Electric Utility Commission on April 18, 2016, AE Response to AELIC 2nd RFIs

AELIC’s Responses to Intervenor Presentations:

1. Additional FPP debt defeasance reserve Recommendation
All references are identified in Ms. Szerszen’s testimony
2. decommissioning reserve recommendation
See the answer to decommissioning reserve provided in AELIC’s Statement of Position/Presentation
3. Response to Mr. Robbin’s CAP Recommendations
AE Memo to Council (April 2016); AE Presentation to AE Utility Oversight Committee (February 2016)
4. Response to NXP/Samsung’s Cost of Service Recommendations
AE’s Presentation and ICA witness Johnson testimony