

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

BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARING EXAMINER

AUSTIN ENERGY
MAY 26 AM 7:50

**BETHANY UNITED METHODIST CHURCH'S FOURTH REQUEST FOR INFORMATION
FROM AUSTIN ENERGY**

Bethany United Methodist Church (BUMC) requests that Austin Energy (AE) respond to the following Request for Information (RFI) set forth below relating to this case. Austin Energy is requested to serve its responses to this Request for Information on the authorized representative(s) listed below no later than ten days after AE receives this request and are 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 BUMC'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 RFI's, 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 RFI's there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact Clifford G. Wells at:

Email: cliff.wells@bethany-umc.org

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.

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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.

DEFINITIONS

For the purposes for these requests, the following terms mean:

- a. "Communication" means any disclosure, transfer, or exchange of information, whether Oral or written, of any kind including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item.
- b. "Austin Energy", the "utility", "AE", and "Applicant" refer to Austin Energy.
- c. "Person" means natural persons (e.g. human beings), corporations, partnerships, sole proprietorships, unions, associations, or federal or any other kind of governmental entity.
- d. "Document" means any printed, typewritten, handwritten, mechanically or otherwise recorded matter of whatever character, including but without limitation, letters, purchase orders, memoranda, telegrams, notes, inter- or intra-office communications, statements, investigative reports, announcements, depositions, pleadings, judgments, newspaper articles, photographs, tape recordings, motion pictures and any carbon or photographic copies of any such material if you do not have custody or control of the original.

If any document requested to be identified was, but is no longer, in your possession or control, or no longer exists, state whether the document is:

- 1. Missing or lost;
 - 2. Destroyed;
 - 3. Transferred voluntarily or involuntarily to others and, if so, to whom or
 - 4. Otherwise disposed of; and in each instance explain the circumstances surrounding an authorization of such disposition thereof state the approximate date thereof and describe its contents.
- c. "You" and "your" shall mean the party to whom these questions are directed as well as agents, employees, attorneys, investigators and all other "persons" acting for you.

REQUESTS FOR INFORMATION REGARDING AE'S REBUTTAL PRESENTATION

4-1 In the Tariff package in Section 6.6.2. **Secondary Demand Customer Classes Rate Adjustment for Low Load Factor**, it is stated...."any commercial customer with a load factor below 20 percent will be billed as if the customer had a 20 percent load factor. This approach will reduce billed demand that the customer would see on their bill..." Please show the calculations that would be made in the bill to

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quantify this benefit. Please include all formulas and the elements included in the calculation. Please show examples for 10% and 15% Load Factor Customers, demonstrating the rate mitigation results.

4.2 Has AE determined whether correcting Bethany's bill impact calculations for the 20% Load Factor floor would materially change any of the calculations? If "yes", please provide all calculations prepared by AE which demonstrate that correcting for this alleged error would cause the specific bill impacts presented by Bethany to materially change. Identify the specific bills which are affected and the corrected bill impact.

4.3 Please provide the proposed schedule (approximate timeframes) for the AE proposed studies of commercial rates and characteristics referenced in the ICA Direct Testimony (page 89 of 105) in particular the study of commercial accounts experiencing demand peaks on weekends, outside the AE system peak.

Respectfully submitted,



Clifford G. Wells
Administrative Executive
Bethany United Methodist Church
10010 Anderson Mill Rd.
Austin, Texas 78750-2199
512-258-6017 512-997-8917 (cell)
Submitted this date: May 23, 2016

PERSON(S) RESPONSIBLE FOR ANSWER: