

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

AUSTIN ENERGY
MAY 26 AM 8:01
BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARING EXAMINER

**INDEPENDENT CONSUMER ADVOCATE'S
EIGHTH REQUEST FOR INFORMATION FROM AUSTIN ENERGY**

The Independent Consumer Advocate ("ICA") hereby propounds its **eighth** Request for Information ("RFI") upon Austin Energy ("AE"), with the expectation that responses to this RFI are due within 10 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 24, 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 24th day of May, 2016.



ICA's Eighth Round of Requests for Information from Austin Energy

- 8-1 Admit or Deny that Joe Mancinelli recommended, in a November 30, 2015 memorandum to Mark Dombroski, that AE's class cost of service study utilize the NARUC Cost Accounting method to classify and allocate production O&M expense.
- 8-2 Please provide a full explanation for the table on the bottom of page 8 (Dombroski Rebuttal). In particular, what is the impact of this change on inside city HOW customers' bills. Also, please provide the additional amount of revenue reduction attributable to the S2 and S3 classes as a result of correcting the billing determinant error.
- 8-3 Please provide the change in S2 and S3 rates before and after the correction referenced in Dombroski rebuttal at page 9.
- 8-4 With respect to the adjustment for CAP revenues referenced at page 10 of Dombroski Rebuttal, provide an updated version of the class cost of service study which reflects this change. Identify the change in revenues attributed to each class. Identify the tabs, columns, dollar amounts, and line numbers for reflecting this change.
- 8-5 Provide an over/under recovery amount (compared to cost) for each class, before and after the change in recognizing CAP revenues.
- 8-6 Please provide Austin Energy's revised proposed revenue decrease (amount and percentage) by customer class, which reflects the \$24.55 million reduction discussed at page 10 of Dombroski rebuttal.
- 8-7 With regard to calculation of the residential over/under recovery amount provided in response to no. 8-5, above, is the CAP discount embedded in residential current revenues? Are CAP customer's revenues stated at actual amounts (i.e., at the level reduced by the discount)?
- 8-8 Mr. Dombroski (rebuttal at 10) states that the EES cost structure will be changed to "address cost causation concerns with the initial structure." Which witness or party presentation raised these concerns? Please identify the specific pages and text that raised the concerns.
- 8-9 With respect to the EES change, referenced above, please provide the increase in EES cost assignment by customer class, before and after the change.
- 8-10 Please fully discuss the method of class cost allocation of non-rebate energy efficiency costs, such as personnel, energy audit costs, training and instruction, and overhead.
- 8-11 Please provide the bill impact for a 1,000 and a 2,000 kWh residential customer of monthly EES charges, before and after the change referenced at page 10 of Mr. Dombroski's rebuttal.

- 8-12 Admit or deny that Austin Energy believes that energy efficiency programs reduce future utility costs paid by non-participants outside the customer class of participating customers.
- 8-13 Please provide the average residential customer total bill impact as a result of all of the adjustments proposed in AE's rebuttal testimony, assuming adoption of AE's recommendation. Compare it to the bill impact of AE's original proposal.
- 8-14 Please provide a table comparing the relative total annual dollar impacts of AE's recommendation in this proceeding to each customer class after the adoption of AE's new rebuttal positions, and also show the percentage change in cost recovery from each customer class compared with the current revenues.
- 8-15 Mancinelli rebuttal at 14 states that the Docket No. 43695 finding "presumably" pertains to interim retirements rather than ultimate retirement. What is the basis for this statement? Provide any references from Docket 43695 which he relies upon for this assertion.
- 8-16 Re: Mancinelli rebuttal at 19. (a) What percentage of AE's total payment for 311 is based on call volume? What percentage is based on access to the disaster recovery center?
- 8-17 Is Mr. Mancinelli aware of any electric utilities which allocate A920 on the base of gross plant, net plant, or O&M expense? If yes, please identify the electric utilities.
- 8-18 Re: Mancinelli rebuttal at 20 - 22. What is the basis for Mr. Mancinelli's assumption that Austin Energy's administrative and executive personnel are more concerned with labor expenditures than expenditures on any other cost incurred by the utility?
- 8-19 Re: Mancinelli rebuttal at 23. Please explain whether the service initiation revenues vary in proportion to customer demands or the number of customers.
- 8-20 Mr. Mancinelli states at page 28 that PUC approved rate structures for TDU utilities recover distribution costs through demand and customer charges. Does he agree that the PUC's generic rate design for TDUs provides for recovery of residential and small commercial distribution costs through energy charges?
- 8-21 Re: chart of FPP capacity factors on Mancinelli rebuttal page 35. Please state whether any of the capacity factor variation can be explained by forced and unforced outages. Did FPP's equivalent availability factor fluctuate over the period of this chart? If yes, what was the variation?
- 8-22 Does Mr. Mancinelli agree that the FPP annual capacity factor would be affected by expansion of wind generation during the period 2009 – 2016?

8-23 Re: Mancinelli rebuttal at 38. Please provide the portion of the R.W. Beck report prepared for the Public Involvement Committee which discussed and made recommendations regarding production demand methodologies.