

**AUSTIN ENERGY
2022 BASE RATE REVIEW**

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**BEFORE THE CITY OF AUSTIN
HEARING EXAMINER**

TEXAS INDUSTRIAL ENERGY CONSUMERS' REQUEST TO PARTICIPATE

Texas Industrial Energy Consumers ("TIEC"), pursuant to Procedural Guidelines Section B.2(b), files this Request to Participate in the above-referenced proceeding, respectfully showing as follows:

1. The names, addresses, telephone numbers, and bar numbers of TIEC's authorized representatives are:

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All pleadings and other documents should be served upon TIEC's authorized representatives.

2. TIEC is an association of industrial consumers of electricity, and TIEC's principal purpose is to represent the interest of large industrial users in electricity proceedings. TIEC's members for this proceeding include Samsung Austin Semiconductor, LLC.

3. On April 18, 2022, the City of Austin's municipally owned electric utility, Austin Energy, made their Tariff Package available to the public, therefore indicating the beginning of the rate review process.

4. TIEC member companies own and operate industrial facilities in the Austin Energy service territory and receive electric service from Austin Energy. Therefore, TIEC members will be impacted by the Impartial Hearing Examiner's recommendation to Austin City Council as well as Austin City Council's final determination regarding rates. Accordingly, TIEC has a justiciable interest in the outcome of this proceeding and requests that it be granted an opportunity to participate.

5. TIEC has reviewed Austin Energy's Base Rate Filing Package and pursuant to the Procedural Guidelines Section B.2.(b)(1)(E), believe the Impartial Hearing Examiner should address the questions found in **Attachment 1**. TIEC reserves the right to raise additional questions and issues after further review and investigation of Austin Energy's application.

6. For the above stated reasons, TIEC respectfully requests that the Impartial Hearing Examiner grant this Request to Participate and admit TIEC as a participant in this proceeding for all purposes, and for such other relief to which it may be justly entitled.

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Katie L. Coleman

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**TEXAS INDUSTRIAL ENERGY
CONSUMERS**

CERTIFICATE OF SERVICE

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 10th day of May, 2022 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ John R. Hubbard

John R. Hubbard

ATTACHMENT 1

AUSTIN ENERGY 2022 BASE RATE REVIEW	§ § §	BEFORE THE CITY OF AUSTIN IMPARTIAL HEARING EXAMINER
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TEXAS INDUSTRIAL ENERGY CONSUMERS' LIST OF QUESTIONS

Texas Industrial Energy Consumers ("TIEC"), propose the following questions and concerns be addressed in the Austin Energy Base Rate Review:

1. Are the rates proposed by Austin Energy just and reasonable?
2. Is Austin Energy proposing a reasonable methodology for allocating those costs among different types of classes of customers?
3. Are the rate classes Austin Energy has proposed reasonable?
4. Is Austin Energy's rate proposal based on cost-of-service, and does it appropriately minimize subsidization of customers across different classes and usage characteristics?
5. Should any other requirements or conditions be imposed to ensure that Austin Energy provides reliable, cost-effective service to large users?