

<b>AUSTIN ENERGY</b>	<b>§</b>	<b>BEFORE THE CITY OF AUSTIN</b>
<b>2022 BASE RATE REVIEW</b>	<b>§</b>	<b>HEARING EXAMINER</b>
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**SOLAR UNITED NEIGHBORS FIRST SET OF REQUEST FOR INFORMATION TO  
AUSTIN ENERGY**

Solar United Neighbors submits this First Request for Information to Austin Energy (“Austin Energy,” “the utility,” or “you”) provide information and answer the attached questions under oath under Austin Energy’s 2022 Base Rate Review Procedural Guidelines Section B.3(a) and Section F. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. Please state the name of the witness in this proceeding who will sponsor the answer to the question.

We request that you provide responses via electronic communication (e.g., email or file share) to the RFIs to the following Authorized Representatives as soon as possible, but no later than 14 days from service, or by June 7, 2021, so that the requested information may be reviewed before the party’s Position Statements are due in this case:

The names, addresses, and telephone numbers of SUN's authorized representatives are:

Hanna Mitchell  
Texas Program Director  
Solar United Neighbors of Texas  
5209 Tower Trail  
Austin, TX 78723  
(512) 256-1390  
hmittchell@solarunitedneighbors.org

Liz Veazey  
Policy & Rural Energy Director  
Solar United Neighbors  
912 N 49th St  
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Policy & Advocacy Campaigner  
Solar United Neighbors  
25 Holden St, Unit 2621  
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General: Please provide specific responses to the requests. If any response or portion of a response is provided in an Excel spreadsheet, please ensure that spreadsheet has all data cells unlocked and all formulae intact.

Note: "Value of Solar Tariff" means the Value of Solar rates and other terms and conditions applicable to customer-generators interconnected and operating on Austin Energy's electric service grid and system.

Note: "DER" means Distributed Energy Resource, and includes all manner of resources interconnected to the distribution grid, including distributed generation, distributed storage, demand response, energy management, electric transportation, and others.

### ***Process and Stakeholder Engagement***

1. Please provide a detailed description of the process used to develop the proposed modifications to the Value of Solar Tariff.

2. Please identify all personnel involved in developing the proposed modifications to the Value of Solar Tariff, the role they played, their employer, and any previous experience or involvement they have had in customer solar rates and tariffs.
3. Please provide minutes of all meetings held in which Austin Energy personnel participated relating to the proposed modifications to the Value of Solar Tariff, including the time, date, and location of meetings; the agenda of items discussed; the participants in the meetings; any presentations made; any analysis shared; any recommendations made and by whom; and any decisions made during the meetings, including the decision maker for those decisions.
4. Please provide electronic copies of all data, analyses, studies, scholarly articles and treatises, business articles, and any other materials reviewed and considered by participants in the process of developing the proposed modifications to the Value of Solar Tariff.
5. Please provide copies and/or summaries of all guidance provided by Austin Energy managers and executives to any and all staff and consultants relating to the development of the proposed modifications to the Value of Solar Tariff.
6. Please set out the reasons that Austin Energy managers and executives decided to undertake a process of developing the proposed modifications to the Value of Solar Tariff. Please specify events, costs, observed effects that motivated the effort and the goals for the modification process that managers and executives had in mind when undertaking the effort. Please detail how the proposed modifications to the Value of Solar Tariff reflect and achieved those goals and reasons.
7. Please provide detailed information about all engagements with any stakeholder, city council member or staff, industry representatives, solar business employees, community leaders or representatives, oversight commissions and commission members, utility staff or executives, industry sector consultants, academics, or others relating to the development of the proposed modifications to the Value of Solar Tariff. Please detail the time, place, subject matter, summary of discussions, materials exchanged, and any other relevant details from those engagements. Please explain how the engagements impacted the proposed modifications to the Value of Solar Tariff.

#### ***Selection and Credentials of NewGen Consultant***

8. Please provide detailed information about and copies of documents pertaining to all notes, memoranda, procurement documents, proposals, proposal evaluations, prior Austin Energy relationships, payments, contracting terms, qualifications, reviews, and other information relating to the NewGen consultant and the production of the Value of Solar and avoided cost related reports and memoranda developed by the consultant.

9. Please explain how NewGen was identified as a consultant.
10. Please provide a detailed explanation of any business, personal, or other relationship between NewGen employees and any employee of Austin Energy or the City of Austin.
11. Please provide copies of all information relating to NewGen's qualifications to serve as a consultant on the proposed modifications to the Value of Solar Tariff.
12. Please provide a list and description of all rate design and avoided cost analysis reports and consulting provided by NewGen over the past five years. Please provide a list of all prior clients for such work and a description of the outcome of the proposed work.
13. Please detail all NewGen's prior experience with Value of Solar analysis, whether for Austin Energy or some other client.
14. Please provide in electronic format, all reports, articles, writings, presentations, or other materials generated by or relied upon by NewGen related to any work related to compensation rates and charges applied to customer-generators of electric utilities over the past ten years.

### ***Proposed Changes***

15. Please provide detailed spreadsheet data for all numerical values presented in text or tables in chapter 9 of the Base Rate Review Filing Package.
16. Please summarize all resources, guidance, publications, or other materials relating to rate making in general that were reviewed and relied upon by Austin Energy and its consultants and advisors in developing the proposed modifications to the Value of Solar Tariff.
17. Please explain how Austin Energy views customer-generators of solar energy. Does Austin Energy view customer-generators as a "resource" in resource planning? If not, please explain why not. If so, please explain how the proposed modifications to the Value of Solar Tariff reflect this view.
18. Please explain whether and how Austin Energy would seek to promote and expand use of customer-sited solar generation if not for the Austin Energy Resource, Generation, and Climate Protection Plan to 2030.
19. Please explain how a historical perspective on the Value of Solar accounts for the future resource value of customer-sited generation.
20. Please explain how the proposed modifications to the Value of Solar Tariff account for the future resource value of customer-sited generation.

21. Please explain why Austin Energy chooses not to use a full “value stack” approach to calculating the value of solar as it has in past years.
22. Please explain how the prior ten years of experience with the Value of Solar Tariff impacted the development of the proposed modifications to the Value of Solar Tariff.
23. Please explain what measures Austin Energy has taken to validate and collect data relating to the value of customer-sited generation to the City of Austin and Austin Energy over the past ten years.
24. NewGen’s report to Austin Energy includes a number of assertions and assumptions not supported with direct evidence in the report. These are summarized in the following paragraph from the report:
  - a. However, to the extent the VOS credit is greater than the direct economic savings to Austin Energy, the VOS credit results in a subsidy from non- PV customers to PV customers. Further, it may be possible for Austin Energy to achieve its overall solar generation policy goal at reduced cost by procuring utility-scale PV in lieu of supporting customer-sited PV. In summary, the appropriate basis for the VOS credit is a policy decision regarding the appropriate balance between equity (i.e., minimizing the subsidy) and attainment of the specific customer-sited PV goals. If Austin Energy decides to reform its current VOS credit to minimize the subsidy, it should consider a transition plan to lessen the impact on existing PV customers over a reasonable period of time.
25. Please indicate whether Austin Energy agrees with any of the included assumptions and statements made by its consultant and provide an explanation and supporting data and analysis relating to those positions.
  - a. Please explain whether Austin Energy believes that the current Value of Solar Tariff provides a VOS credit greater than the direct economic savings to Austin Energy. Please provide Austin Energy-specific data to substantiate that belief.
  - b. Please explain whether Austin Energy believes there is any difference in this answer that relates to “direct economic savings to Austin Energy” when the City of Austin as a whole is considered.
  - c. Please explain how Austin Energy defines “direct economic savings,” and what direct economic savings includes and does not include relating to the value to Austin of the customer-sited solar generation. Please explain the time frame, scope, geographic boundaries, and other aspects of the definition that Austin Energy applies.
  - d. Please define and contrast “utility-scale PV” and “customer-sited PV” for purposes of the Value of Solar Tariff. Please provide all Austin Energy’s current

assumptions about the relevant costs and benefits of such resources, including who bears the costs and receives the benefits from such resources.

- e. Please explain the extent to which customer-sited and utility-scale PV “compete” for marginal investment or spending dollars in Austin Energy’s view.
  - f. Please explain whether Austin Energy believes that customer-sited PV receives an unjust and unreasonable subsidy from other customers. Please provide detailed analysis supporting Austin Energy’s position. Please explain whether Austin Energy has decided to “minimize the subsidy” and the specific actions and expected results that flow from that decision.
26. Please provide copies of and details about all analysis performed by Austin Energy relating to the forecasted future solar credits to customer-generators under the proposed modifications to the Value of Solar Tariff for the next twenty-five years. If Austin Energy has not generated or obtained such a forecast, please explain why not.
27. Please provide a comparison, similar to a bill impact analysis, of how the Value of Solar Tariff solar credits under the current tariff design and under the proposed modification would compare over the next twenty-five years. If Austin Energy has not prepared such a comparison, please explain why not.
28. Please provide copies of all analysis or estimates of how the proposed modifications to the Value of Solar Tariff will impact the solar industry in and serving Austin customers. Please provide details about the sources of all such information. If Austin Energy does not possess such information, please explain why not.
29. Please explain why Austin Energy proposes to divide the methods for recovering the costs associated with the Value of Solar Tariff and any incentives. Please indicate whether Austin Energy proposes to treat investments in utility-scale PV and revenues from GreenChoice in the same way.
30. Please explain why or why not Austin Energy proposes any different treatment of pre-existing or “legacy” customers under the proposed modifications to the Value of Solar Tariff.
31. Please explain how Austin Energy’s proposed modifications to the Value of Solar Tariff account for hourly differences in the price and value of energy.
32. Please explain how Austin Energy’s proposed modifications to the Value of Solar Tariff account for avoided line losses on the transmission and distribution systems.
33. Please explain how Austin Energy’s proposed modifications to the Value of Solar Tariff account for customers with installed energy storage, electric vehicles, and other DERs.

34. Please explain whether and how Austin Energy has evaluated the impacts of proposed base rate changes on the economics of and investment in distributed solar by customers. Please provide copies of all such evaluations. If Austin Energy has not evaluated such potential impacts, please explain why not.

***National Standard Practice Manual for Benefit-Cost Assessment of Distributed Energy Resources***

35. Please indicate whether Austin Energy staff and management or any of its consultants involved in the development of the proposed modifications to the Value of Solar Tariff have any experience or familiarity with the National Standard Practice Manual for Benefit-Cost Assessment of Distributed Energy Resources ("NSPM"). (Available at: <https://www.nationalenergyscreeningproject.org/national-standard-practice-manual/>)
36. Did Austin Energy or its consultants rely upon the NSPM in any way in developing the proposed modifications to the Value of Solar Tariff?
37. Please indicate and explain in detail for each whether Austin Energy or its consultants evaluated and quantified these utility system impacts (explained in the NSPM), and if not, why not, over the life of an installed customer generation facility, in developing its proposal for modifications to the Value of Solar Tariff, and provide copies of any and all such evaluation and quantification:
- a. Generation - Energy generation
  - b. Generation – Capacity
  - c. Generation - Environmental compliance
  - d. Generation - Resource Plan compliance
  - e. Generation - Market price effects
  - f. Generation - Ancillary services
  - g. Transmission - Transmission capacity
  - h. Transmission - Transmission system losses
  - i. Distribution - Distribution capacity
  - j. Distribution - Distribution system losses
  - k. Distribution - Distribution operations and maintenance
  - l. Distribution - Distribution voltage
  - m. General - Financial incentives
  - n. General - Program administration
  - o. General - Utility performance incentives
  - p. General - Credit and collection
  - q. General – Risk
  - r. General – Reliability
  - s. General - Resilience

38. Please indicate and explain in detail for each whether Austin Energy or its consultants evaluated and quantified these host customer impacts (explained in the NSPM), and if not, why not, over the life of an installed customer generation facility, in developing its proposal for modifications to the Value of Solar Tariff, and provide copies of any and all such evaluation and quantification:
- a. Host Customer - Host portion of DER costs
  - b. Host Customer - Host transaction costs
  - c. Host Customer - Interconnection fees
  - d. Host Customer - Risk
  - e. Host Customer - Risk
  - f. Host Customer - Resilience
  - g. Host Customer - Tax incentives
  - h. Host Customer - Non-energy impacts
  - i. Host Customer - Low-income customer non-energy impacts
39. Please indicate and explain in detail for each whether Austin Energy or its consultants evaluated and quantified these societal impacts (explained in the NSPM), and if not, why not, over the life of an installed customer generation facility, in developing its proposal for modifications to the Value of Solar Tariff, and provide copies of any and all such evaluation and quantification:
- a. Societal - Resilience impacts beyond those experienced by utilities or host customers
  - b. Societal - Greenhouse gas emissions created by fossil-fueled energy resources
  - c. Societal - Other air emissions, solid waste, land, water, and other environmental impacts
  - d. Societal - Incremental economic development and job impacts
  - e. Societal - Health impacts, medical costs, and productivity affected by health
  - f. Societal - Poverty alleviation, environmental justice, and reduced home foreclosures
  - g. Societal - Energy imports and energy independence

### ***Cost of Service and Other Studies***

40. Please provide the following information regarding Austin Energy's customer-generators, for each year from 2012 through 2022. For all requests that result in a data response, please provide the data in Excel spreadsheet format with formulas intact and cells unlocked.
- a. For each month and year, how many kWh of excess generation were supplied back to Austin Energy by customer-generators? How many kWh were consumed by customer-generators? Provide the aggregate amount for each month and year of total delivered kWh and received kWh by rate class.
  - b. List the number of residential and commercial customers on the Value of Solar Tariff. List the number within each specific rate class.



- c. List the total installed generation capacity (AC and DC) for customers on the Value of Solar Tariff within each specific rate class tariff.
  - d. For each customer-generator, please list the capacity (system size in KW) of their Distributed Generation System, the technology type (e.g. PV, wind, hydro, biomass), the date of interconnected operation, and their rate class. List the total amount of kWh Delivered and Received from each such customer in each month.
  - e. What was the total combined capacity by rate class of all Value of Solar Tariff customers, residential Value of Solar Tariff customers, and commercial Value of Solar Tariff customers for each year?
  - f. What percentage of Austin Energy's single hour peak load for the previous year did Value of Solar Tariff customers represent for each year?
  - g. For each Value of Solar Tariff customer, using anonymized data if necessary, please provide the monthly and annual energy consumption data for the year prior to the interconnected operation of the customer generation system. If this data is not available, please explain why not.
41. Has Austin Energy or its consultants performed cost of service analysis on customer-generators? Please explain whether and how customer-generators cost more or less to serve than non-generating customers. If Austin Energy or its consultants have not performed cost of service analysis on customer-generators, how does Austin Energy or its consultants justify whether its proposed Value of Solar Tariff modifications adhere to the principle of cost causation, i.e. that customers are fairly allocated the costs to serve them. Please provide copies of any and all such studies. If the studies do not exist, please explain why.
42. Please provide a technical and economic description and accounting for the impacts and effects of energy exported from customer-generator facilities. Please confirm whether or not exported energy serves nearby unserved load. Please confirm whether such service results in metered charges for service of such load. Please detail all measured and metered costs associated with the distribution system receiving injected or exported energy from net metered facilities.
43. Please detail all hosting capacity studies and the hosting capacity status of the distribution system by feeder.
44. Has Austin Energy or its consultants performed any marginal cost of service studies for its distribution system? Please provide copies of all such studies. If such studies have not been conducted, please explain why not.
45. Please explain in detail whether any functionality and capabilities provided by the deployment of AMI (Advanced Metering Infrastructure) and the increase in collected and available data regarding customer usage has enabled or improved Austin Energy's understanding of the impacts of customer-sited generation. Please explain how such

improvements in understanding are reflected in the proposed modifications to the Value of Solar Tariff.