

FROM: Paul Robbins
(512) 447-8712

TO: Austin Energy

DATE: May 31, 2022

SUBJECT: Paul Robbins Second Request for Information for Austin Energy 2022 Rate Case

Please fulfill the following information requests related to the 2022 rate case.

1. Austin Energy has made the statement that it must collect a larger percentage of its Residential revenue from monthly fees because average Residential consumption is falling due to energy efficiency.

In 2020, AE provided me with statistics to prove this, included here as **Attachment A**.

I am asking to receive a copy of such statistics or their most recent update as part of official discovery. Spreadsheet format is requested.

Also, provide the following clarifications on the statistics' context.

A. It would appear that the statistics that I received in 2020 included monthly consumption during construction of the project. Is this the case?

B. If it is the case that the statistics included consumption during construction, provide revised statistics that delete consumption during construction.

C. Provide the raw data used in the summary statistics provided to the extent that privacy redactions allow.

D. Clarify if the statistics that AE is providing designate which Residential units are provided cooling and/or heating from a centralized HVAC system (such as occur in downtown condo high rise buildings). If the answer is yes, designate which bills are relevant to this condition in the raw data that is requested.

Note: When I requested this information in 2020, it took almost two months for Austin Energy to provide it. Given the rate case schedule, I am expecting a more timely response this time.

2. AE has held a series of meetings to brief the public on its rate proposals. I am requesting a list of attendees of these meeting, and to the extent available, their contact information. Spreadsheet format is requested.

Also, provide the transcripts of the questions and answers provided at each of these meetings, including the names of the participants associated with them.

3. For fiscal years 2020, 2021 and 2022, I am requesting to see copies of all AE communications, written and electronic, regarding participants in the Customer Assistance Program asking to be removed from the program, or complaining about the program.

I am also requesting a tally of these requests for removals and reasons for complaints for each of these years. Spreadsheet format is requested.

4. Provide Customer Assistance Program (CAP) participation counts and consumption by zip code, zip code +3, census tract, and census block for fiscal years 2019, 2020, and 2021. Spreadsheet format is requested.

5. Provide aggregate monthly Customer Assistance Program consumption by consumption tier for FY 2020, 2021, and the test year.

6. Provide what percent each fuel (gas, nuclear, coal, wind, solar, wood, ERCOT market) made up of the Power Supply Adjustment (PSA) in FYs 2020 and 2021, as well as the total cost of fuel in those years.

7. Provide what percent of each fuel is predicted to make up the PSA in 2022, 2023, and the test year, as well as the total expected cost of fuel in those years.

8. Explain what Austin Energy is doing or plans to do to lobby the federal government to limit foreign gas exports from the U.S. that might increase the cost of domestic supply.

9. Detail the annual work and costs of capital improvements and major repairs for each of the following power plants: the South Texas Nuclear Project; the Fayette Power Plant; the Nacogdoches Biomass Plant; and Sandhill Energy Center since the last rate case. This includes FY 2022. Spreadsheet format is requested.

10. Detail the expected annual work and costs of capital improvements and major repairs for each of the following power plants after FY 2022 for the next 5 years: the South Texas Nuclear Project; the Fayette Power Plant; the Nacogdoches Biomass Plant; and Sandhill Energy Center. Spreadsheet format is requested.

11. Provide the annual principal and interest payments for each of the following power plants beginning in FY 2022 until the debt is retired: the South Texas Nuclear Project; the Fayette Power Plant; the Nacogdoches Biomass Plant; and Sandhill Energy Center. Spreadsheet format is requested.

12. Detail the annual costs provided to local governments to compensate for government services for the Nacogdoches Biomass Plant (possibly labeled payment in lieu of taxes) since Austin Energy assumed ownership, as well as estimates for the test year. Spreadsheet format is requested.

13. Provide the base revenue costs by month by class for FYs 2020, 2021 and the test year. Spreadsheet format is requested.

14. Provide the amount of money paid to CAP participants in FYs 2020, 2021, and the test year for: the monthly fee waiver; each consumption tier; and the CAP surcharge waiver. An example of this (without the surcharge waiver) is provided as **Attachment B**. Spreadsheet format is requested.

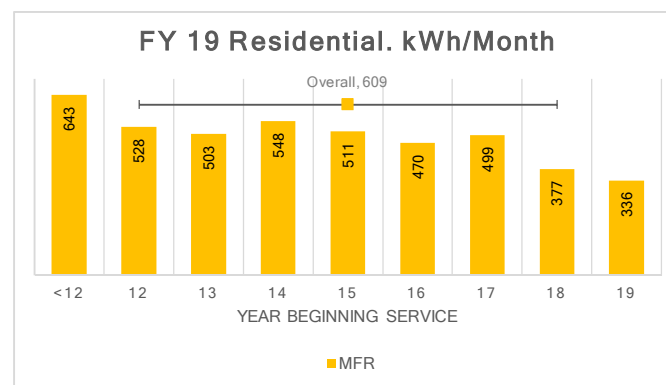
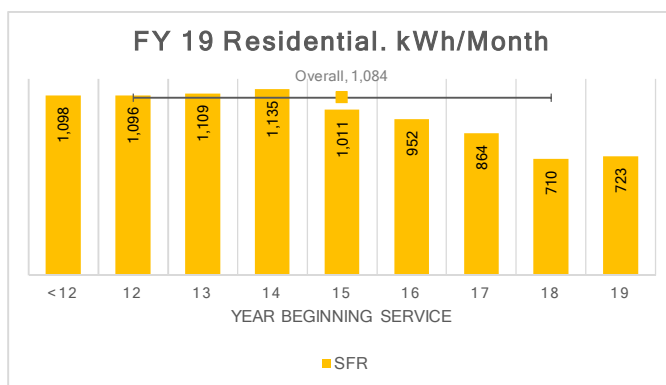
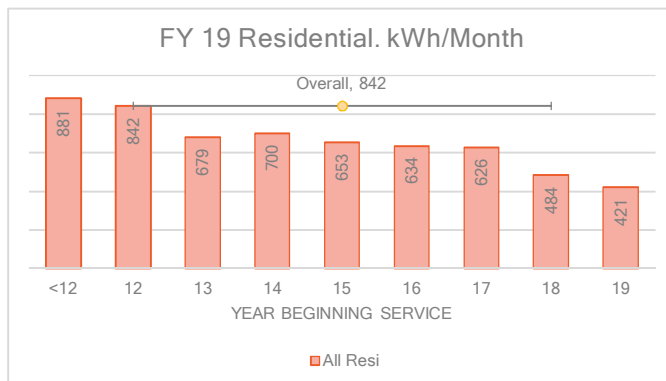
15. Provide a list of property owned by Austin Energy that has been sold or leased since the last rate case, the date of the sale or lease, and the amount of money that the utility has received for each property since sale or lease. Spreadsheet format is requested.

FY 19 Residential. kWh/Month

	All Resi	SFR	MFR
<12	881	1,098	643
12	842	1,096	528
13	679	1,109	503
14	700	1,135	548
15	653	1,011	511
16	634	952	470
17	626	864	499
18	484	710	377
19	421	723	336
Overall	842	1,084	609
Range	5	5	5

Note:

[1] Start of service date is based on the service point installation date as recorded in the billing system.



	201810	201811	201812	201901	201902	201903	201904	201905	201906	201907	201908	201909	Total
Total kWh	358,766,795	299,414,072	289,755,089	334,662,407	311,168,583	290,988,167	265,073,598	301,802,183	422,834,204	495,243,187	568,039,792	584,726,908	4,522,474,985
SARA	358,766,795	299,414,072	289,755,089	334,662,407	311,168,583	290,988,167	265,073,598	301,802,183	422,834,204	495,243,187	568,039,792	584,726,908	4,522,474,985
S/B = 0	0	0	0	0	0	0	0	0	0	0	0	0	0
FIRST_MR													
PRE12	317,010,961	262,441,388	253,155,138	292,519,895	270,830,658	252,267,499	229,541,141	262,540,871	370,360,757	434,626,761	498,636,787	512,624,173	3,956,556,029
2012	5,559,349	4,786,612	4,724,427	5,269,380	4,989,282	4,701,904	4,339,983	4,781,898	6,348,745	7,119,568	8,216,443	8,542,127	69,379,718
2013	6,088,639	5,331,233	5,067,870	5,722,676	5,468,889	5,247,427	4,812,465	5,288,395	7,000,892	7,775,223	8,797,316	9,007,293	75,608,318
2014	6,827,186	6,140,931	6,028,393	6,845,749	6,547,861	6,241,156	5,565,279	6,039,835	7,801,355	8,621,045	9,658,997	9,928,869	86,246,656
2015	7,388,924	6,570,529	6,342,442	7,207,352	6,914,228	6,481,204	5,998,360	6,511,195	8,493,451	9,658,591	10,733,938	11,090,348	93,390,562
2016	6,536,161	5,615,332	5,442,956	6,148,249	5,795,948	5,574,893	5,151,723	5,721,621	7,583,480	8,697,926	9,777,599	9,960,096	82,005,984
2017	6,848,940	6,153,361	6,063,577	7,078,031	6,716,401	6,423,752	5,892,472	6,418,484	8,343,244	9,562,880	10,605,773	10,862,860	90,969,775
2018	2,505,686	2,373,785	2,928,737	3,829,228	3,833,647	3,785,871	3,470,267	4,055,651	5,959,287	7,409,614	8,615,827	8,767,961	57,535,561
2019	949	901	1,549	41,847	71,669	264,461	301,908	444,233	942,993	1,771,579	2,997,112	3,943,181	10,782,382
KWH_USE	358,766,795	299,414,072	289,755,089	334,662,407	311,168,583	290,988,167	265,073,598	301,802,183	422,834,204	495,243,187	568,039,792	584,726,908	4,522,474,985
FIRST_MR													
PRE12	373,985	371,976	371,146	372,759	372,097	373,069	373,415	373,862	375,003	377,363	379,858	375,423	4,489,956
2012	6,836	6,796	6,789	6,829	6,812	6,832	6,855	6,879	6,909	6,964	7,000	6,937	82,438
2013	9,290	9,198	9,104	9,181	9,192	9,197	9,189	9,289	9,322	9,326	9,619	9,406	111,313
2014	10,283	10,189	10,048	10,215	10,125	10,162	10,203	10,264	10,313	10,434	10,514	10,456	123,206
2015	11,917	11,804	11,783	11,873	11,812	11,793	11,919	11,948	12,008	12,082	12,078	12,060	143,077
2016	10,807	10,669	10,637	10,700	10,734	10,685	10,816	10,816	10,836	10,889	10,861	10,920	129,370
2017	12,111	11,980	11,935	12,023	11,985	12,050	12,109	12,105	12,139	12,300	12,316	12,231	145,284
2018	6,582	7,416	8,511	9,447	9,973	10,381	10,814	10,965	11,035	11,331	11,406	11,094	118,955
2019	1	1	1	136	392	793	1,718	2,041	2,927	4,611	5,786	7,233	25,640
BILLS	441,812	440,029	439,954	443,163	443,122	444,962	447,038	448,169	450,492	455,300	459,438	455,760	5,369,239
FIRST_MR													
PRE12	848	706	682	785	728	676	615	702	988	1,152	1,313	1,365	881
2012	813	704	696	772	732	688	633	695	919	1,022	1,174	1,231	842
2013	655	580	557	623	595	571	524	569	751	834	915	958	679
2014	664	603	600	670	647	614	545	588	756	826	919	950	700
2015	620	557	538	607	585	550	503	545	707	799	889	920	653
2016	605	526	512	575	540	522	476	529	700	799	900	912	634
2017	566	514	508	589	560	533	487	530	687	777	861	888	626
2018	381	320	344	405	384	365	321	370	540	654	755	790	484
2019	949	901	1,549	308	183	333	176	218	322	384	518	545	421
Avg/Bill	812	680	659	755	702	654	593	673	939	1,088	1,236	1,283	842

	201810	201811	201812	201901	201902	201903	201904	201905	201906	201907	201908	201909	Total
Total kWh	228,191,185	184,582,655	178,737,458	207,102,547	188,706,553	175,075,101	160,861,226	186,439,802	270,549,966	320,635,442	372,919,965	383,791,239	2,857,593,139
SARA	228,191,185	184,582,655	178,737,458	207,102,547	188,706,553	175,075,101	160,861,226	186,439,802	270,549,966	320,635,442	372,919,965	383,791,239	2,857,641,148
S/B = 0	0	0	0	0	0	0	0	0	0	0	0	0	-48,009
FIRST_MR													
PRE12	207,447,305	167,346,898	161,414,750	187,048,072	170,020,033	157,288,586	144,663,751	167,921,803	244,058,339	289,079,253	336,273,077	345,598,693	2,578,160,560
2012	4,005,101	3,335,609	3,371,850	3,771,641	3,494,796	3,299,992	2,993,818	3,348,612	4,614,867	5,219,410	6,082,518	6,378,725	49,916,939
2013	2,878,489	2,382,640	2,390,221	2,716,949	2,503,751	2,351,419	2,110,359	2,360,399	3,340,525	3,874,517	4,417,065	4,546,422	35,872,756
2014	2,834,424	2,389,264	2,484,807	2,872,301	2,632,138	2,497,448	2,128,920	2,405,955	3,349,284	3,852,045	4,352,953	4,465,946	36,265,485
2015	3,244,773	2,695,481	2,636,766	3,061,313	2,800,924	2,638,214	2,404,897	2,714,628	3,787,535	4,468,913	5,047,280	5,237,329	40,738,053
2016	3,329,842	2,734,696	2,663,811	3,097,647	2,836,512	2,687,578	2,453,367	2,766,746	3,908,023	4,603,219	5,277,129	5,421,592	41,780,162
2017	3,321,153	2,736,009	2,714,175	3,180,892	2,958,258	2,787,424	2,551,022	2,894,395	4,108,968	4,885,924	5,590,359	5,740,778	43,469,357
2018	1,092,847	932,164	1,029,931	1,318,708	1,412,357	1,457,480	1,462,421	1,870,082	3,000,496	3,908,457	4,665,818	4,833,098	26,983,859
2019	949	901	1,549	1,625	16,859	37,983	71,573	133,316	349,013	705,459	1,171,846	1,528,022	4,019,095
KWH_USE	228,154,883	184,553,662	178,707,860	207,069,148	188,675,628	175,046,124	160,840,128	186,415,936	270,517,050	320,597,197	372,878,045	383,750,605	2,857,206,266
FIRST_MR													
PRE12	195,809	195,100	195,092	195,375	195,179	195,329	195,523	195,712	195,881	196,424	196,459	195,486	2,347,369
2012	3,768	3,762	3,787	3,771	3,780	3,787	3,812	3,802	3,830	3,825	3,827	3,806	45,557
2013	2,694	2,680	2,680	2,689	2,683	2,702	2,702	2,702	2,709	2,705	2,701	2,711	32,358
2014	2,673	2,648	2,645	2,659	2,648	2,653	2,651	2,663	2,685	2,685	2,672	2,669	31,951
2015	3,347	3,346	3,343	3,352	3,341	3,337	3,363	3,359	3,368	3,419	3,369	3,356	40,300
2016	3,654	3,641	3,658	3,655	3,648	3,646	3,668	3,678	3,669	3,676	3,627	3,666	43,886
2017	4,145	4,150	4,144	4,178	4,171	4,188	4,206	4,212	4,203	4,246	4,224	4,220	50,287
2018	1,851	2,152	2,390	2,714	2,936	3,233	3,456	3,726	3,805	3,914	3,903	3,927	38,007
2019	1	1	1	4	53	115	246	400	656	1,057	1,357	1,665	5,556
BILLS	217,942	217,480	217,740	218,397	218,439	218,990	219,627	220,254	220,806	221,951	222,139	221,506	2,635,271
FIRST_MR													
PRE12	1,059	858	827	957	871	805	740	858	1,246	1,472	1,712	1,768	1,098
2012	1,063	887	890	1,000	925	871	785	881	1,205	1,365	1,589	1,676	1,096
2013	1,068	889	892	1,010	933	870	781	874	1,233	1,432	1,635	1,677	1,109
2014	1,060	902	939	1,080	994	941	803	903	1,247	1,435	1,629	1,673	1,135
2015	969	806	789	913	838	791	715	808	1,125	1,307	1,498	1,561	1,011
2016	911	751	728	848	778	737	669	752	1,065	1,252	1,455	1,479	952
2017	801	659	655	761	709	666	607	687	978	1,151	1,323	1,360	864
2018	590	433	431	486	481	451	423	502	789	999	1,195	1,231	710
2019	949	901	1,549	406	318	330	291	333	532	667	864	918	723
Avg/Bill	1,047	849	821	948	864	799	732	846	1,225	1,444	1,679	1,732	1,084

	201810	201811	201812	201901	201902	201903	201904	201905	201906	201907	201908	201909	Total
Total kWh	130,509,822	114,771,535	110,961,744	127,488,919	122,372,142	115,846,131	104,153,718	115,296,629	152,189,332	174,493,352	194,989,953	200,801,478	1,663,874,755
SARA	130,509,822	114,771,535	110,961,744	127,488,919	122,372,142	115,846,131	104,153,718	115,296,629	152,189,332	174,493,352	194,989,953	200,801,478	1,663,874,755
S/B = 0	0	0	0	0	0	0	0	0	0	0	0	0	0
FIRST_MR													
PRE12	109,382,146	94,922,307	91,556,733	105,258,892	100,599,392	94,788,257	84,720,610	94,472,427	126,101,837	145,327,533	162,116,277	166,763,018	1,376,009,429
2012	1,553,883	1,450,673	1,352,446	1,497,663	1,494,182	1,401,626	1,345,872	1,433,053	1,733,593	1,899,794	2,133,524	2,162,972	19,459,281
2013	3,209,189	2,947,719	2,676,781	3,004,864	2,964,170	2,895,142	2,701,223	2,927,223	3,659,326	3,899,782	4,379,132	4,459,499	39,724,050
2014	3,989,705	3,749,110	3,540,528	3,969,473	3,912,513	3,740,517	3,433,775	3,631,178	4,448,354	4,764,730	5,301,069	5,457,817	49,938,769
2015	4,131,386	3,863,384	3,692,981	4,129,815	4,099,389	3,830,042	3,582,510	3,785,443	4,689,496	5,170,369	5,664,261	5,831,264	52,470,340
2016	3,198,944	2,870,613	2,770,271	3,041,888	2,950,490	2,878,894	2,690,370	2,945,946	3,662,667	4,081,398	4,484,034	4,521,042	40,096,557
2017	3,504,636	3,397,535	3,329,768	3,873,971	3,736,776	3,616,743	3,322,408	3,501,973	4,204,287	4,642,376	4,977,342	5,083,237	47,191,052
2018	1,404,905	1,434,120	1,895,074	2,501,068	2,387,748	2,313,554	1,996,114	2,172,206	2,939,219	3,476,161	3,923,071	3,906,118	30,349,358
2019	0	0	0	40,222	54,810	226,478	230,335	310,159	592,192	1,061,570	1,817,724	2,406,568	6,740,058
KWH_USE	130,374,794	114,635,461	110,814,582	127,317,856	122,199,470	115,691,253	104,023,217	115,179,608	152,030,971	174,323,713	194,796,434	200,591,535	1,661,978,894
FIRST_MR													
PRE12	177,953	176,655	175,836	177,167	176,703	177,523	177,682	177,944	178,917	180,739	183,204	179,737	2,140,060
2012	3,067	3,033	3,001	3,057	3,031	3,044	3,042	3,076	3,078	3,138	3,172	3,130	36,869
2013	6,594	6,516	6,422	6,490	6,507	6,493	6,485	6,585	6,611	6,619	6,916	6,693	78,931
2014	7,605	7,536	7,398	7,549	7,472	7,504	7,547	7,596	7,623	7,744	7,837	7,782	91,193
2015	8,554	8,443	8,425	8,506	8,456	8,441	8,541	8,574	8,625	8,648	8,693	8,689	102,595
2016	7,141	7,015	6,965	7,031	7,073	7,025	7,135	7,125	7,154	7,198	7,221	7,241	85,324
2017	7,939	7,803	7,763	7,817	7,786	7,834	7,875	7,865	7,907	8,026	8,064	7,983	94,662
2018	4,708	5,242	6,101	6,706	6,973	7,104	7,312	7,191	7,185	7,367	7,459	7,120	80,468
2019	0	0	0	132	339	678	1,472	1,637	2,265	3,546	4,419	5,558	20,046
BILLS	223,561	222,243	221,911	224,455	224,340	225,646	227,091	227,593	229,365	233,025	236,985	233,933	2,730,148
FIRST_MR													
PRE12	615	537	521	594	569	534	477	531	705	804	885	928	643
2012	507	478	451	490	493	460	442	466	563	605	673	691	528
2013	487	452	417	463	456	446	417	445	554	589	633	666	503
2014	525	497	479	526	524	498	455	478	584	615	676	701	548
2015	483	458	438	486	485	454	419	442	544	598	652	671	511
2016	448	409	398	433	417	410	377	413	512	567	621	624	470
2017	441	435	429	496	480	462	422	445	532	578	617	637	499
2018	298	274	311	373	342	326	273	302	409	472	526	549	377
2019	na	na	na	305	162	334	156	189	261	299	411	433	336
Avg/Bill	583	516	499	567	545	513	458	506	663	748	822	857	609

CAP Electric Discount Distribution 2015		
PURPOSE	AMOUNT	PERCENT OF TOTAL
Customer Charge Waiver	\$5,011,460	47%
Tier 1: 0 - 500 kWh	\$373,609	4%
Tier 2: 501 - 1,000 kWh	\$1,443,478	14%
Tier 3: 1,001 - 1,500 kWh	\$1,589,965	15%
Tier 4: 1,501 - 2,500 kWh	\$1,683,960	16%
Tier 5: Over 2,500 kWh	\$543,849	5%
Total	\$10,646,321	