

**AUSTIN ENERGY'S  
2022 BASE RATE REVIEW**

§     **BEFORE THE CITY OF AUSTIN**  
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§     **IMPARTIAL HEARING EXAMINER**

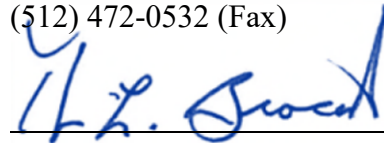
**AUSTIN ENERGY'S RESPONSE TO SIERRA CLUB AND PUBLIC CITIZEN'S  
THIRD REQUEST FOR INFORMATION**

Austin Energy files this Response to Sierra Club and Public Citizen's ("SCPC") Third Request for Information ("RFI") submitted on May 25, 2022.<sup>1</sup> Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § F(2)(f)(1), this Response is timely filed.

Respectfully submitted,

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**ATTORNEYS FOR THE CITY OF AUSTIN  
D/B/A AUSTIN ENERGY**

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<sup>1</sup> Sierra Club and Public Citizen's Third Request for Information was submitted to the Rate Review Administrator after 12:00 pm on May 24, 2022, so it is considered submitted the following business day, on May 25, 2022.

SCPC 3-1: Please provide all data and workpapers underlying the Figures in Section 7.2.3 of the Filing Package in native electronic format with formulas intact. Please provide the underlying anonymized monthly per-customer usage data used to calculate the averages shown, for example, in Figure 7-28.

ANSWER: Refer to Attachments SCPC 3-1A and SCPC 3-1B for all data and workpapers underlying the Figures in Section 7.2.3. Refer to the "data" tab in Attachment SCPC 3-1A for the underlying anonymized monthly per-customer usage data to calculate the averages.

Attachment SCPC 3-1A

Attachment SCPC 3-1B

Prepared by: AAM

Sponsored by: Brian Murphy

**Attachment SCPC 3-1A**  
(provided in Native Excel Format)

**Attachment SCPC 3-1B**  
(provided in Native Excel Format)

SCPC 3-2: For Fayette, please identify the technology/equipment currently installed and utilized by the Company to reduce the each unit's emissions of nitrogen oxides (NOx), and provide the daily NOx emission rate for that unit, expressed in pounds per mmbtu.

ANSWER: Fayette Power Project uses Alstom low-NOx burners and OFA for NOx control. The hourly emissions are available from the Environment Protection Agency's website: <https://ampd.epa.gov/ampd/>

Prepared by: RJ

Sponsored by: Pat Sweeney

SCPC 3-3: Please provide all economic analyses and projections of the cost of tuning or upgrading the Fayette pollution controls to comply with EPA's proposed good neighbor rule, 87 Fed. Reg. 20,036 (Apr. 6, 2022). If the Company has not performed such an analysis, why not?

ANSWER: No responsive documents exist because the proposed rule has not been adopted.

Prepared by: JB

Sponsored by: Pat Sweeney

SCPC 3-4: For each Fayette unit that does not have SCR or SNCR, please provide all economic or resource modeling, evaluation, or studies of the cost, including capital costs and increased operating and maintenance (O&M) cost, of installing and operating SCR or SNCR at Fayette, including, but not limited to, any evaluation of alternatives. If the Company has not performed such an analysis, why not?

ANSWER: No responsive documents exist because the proposed rule has not been adopted.

Prepared by: JB

Sponsored by: Pat Sweeney

SCPC 3-5: If Austin Energy tracks industry costs on SCR or SNCR installations and operations, provide the data, memoranda, presentations, reports, and analysis in the Company's possession, custody, or control regarding SCR or SNCR installation costs and/or O&M costs. If the Company does not track this data, why not?

ANSWER: No responsive documents exist because the proposed rule has not been adopted.

Prepared by: JB

Sponsored by: Pat Sweeney



SCPC 3-6: In its 2030 Resource Plan adopted by City Council in March of 2020, Austin Energy committed to reaching certain goals related to energy efficiency, and local solar.

- a. Please provide the annual energy savings, annual peak demand reduction and annual local solar achievements between 2009 and 2021, the expected amount to be achieved in 2022 and 2023, as well as the amount of energy efficiency MWh and MW savings, and the remaining number of MWs needed to reach the goals established by city council.
- b. Please provide the expected budget for EE and solar programs in each year from 2022 through 2030, not including payments related to the Value of Solar.

ANSWER:

- a. Total saving from Energy Efficiency, Green Building, and Demand Response programs between 2009 and 2021 was 1,595,973 MWh, 810.7 MW. Total saving from Energy Efficiency, Green Building, and Demand Response programs between 2007 and 2021 was 13,297,076 MWh, 940.3346 MW (started tracking to goal in 2007). The remaining needed to reach the goal is 259.67 MW. The MW saving goal for 2022 is proposed to be 62.95 MW. The MW goals for 2023 are tied to the budget process which is still under review and has not been approved. We are unable to provide proposed numbers at this time.

From 2009 to 2021 Austin Energy and its customers installed 100.51 kW of solar for a total of 103.02 kW. Austin Energy expects to add 12 MW in FY 2022 and 12 MW in FY 2023 not counting possible community solar additions.

- b. Austin Energy does not propose and subsequently receive budget approval from Austin City Council beyond any given annual cycle. Austin Energy's commitment to Energy Efficiency and solar remain strong and solid year after year, and there is no indication of any relaxing of Austin Energy's commitment or Austin City Council's strong endorsement of Energy Efficiency and solar. While we cannot commit to projections beyond what we have proposed in our FY 2023 budget, a historical look at the past five (5) years of CES' budget, including, solar, show strong support and continued growth.

Prepared by: TH

Sponsored by: Tim Harvey

SCPC 3-7: In its filing, Austin Energy is proposing to pay for the Value of Solar out of the CBC/EES funds. If the Austin Energy proposal were to go into effect on January 1, 2023, what is the estimated impact in terms of budgetary for the residential and commercial Value of Solar in 2023?

ANSWER: The estimated impact to the CBC/EES budget for FY 2023 to recover societal benefits of the Value of Solar is approximately \$4 million.

Prepared by: TH

Sponsored by: Tim Harvey

SCPC 3-8: Is the proposed tariff for EES and CBC sufficient to meet AE required goals for solar and energy efficiency and pay for Value of Solar payments?

ANSWER: Austin Energy has not proposed a tariff EES rate. The EES rate will be calculated at the conclusion of the Base Rate and Value of Solar (VoS) Reviews. The EES Charge will be modified to recover all costs. The EES Charge, like all pass-through charges, has a mechanism to recover or return any under- or over-recover.

Prepared by: JO

Sponsored by: Rusty Maenius

SCPC 3-9: Austin Energy currently offers a load shifting voltage discount rider for commercial customers that shifts at least 30 percent of the customer's normal annual monthly average on-peak billed demand using storage technologies (e.g., thermal energy storage) and whose point of delivery is located within the limits of Austin Energy's service territory. How many commercial customers currently take advantage of this program, and has Austin Energy not considered a similar program for residential customers? Why or why not?

ANSWER: Austin Energy currently has 12 customers on the load shifting discount rider.

With respect to residential customers, Austin Energy does not currently bill residential customers on demand. Residential customers do not experience demand rates. Therefore, a load shifting discount rider is not currently possible for residential customers.

Prepared by: JL/BM/JO

Sponsored by: Brian Murphy