FROM: Paul Robbins

TO: Austin Energy

DATE: June 8, 2022

SUBJECT: Paul Robbins Fourth Request for Information for Austin Energy 2022 Rate

Case

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

Query 4-1

Provide monthly data for fiscal year 2020 by rate class, for the following:

Kilowatt hour sales; Number of customers; Total revenues.

Spreadsheet format is requested.

Query 4-2

All AE customer classes pay an equivalent Regulatory Charge which recovers dollar-for-dollar Austin Energy's share of managing, using and maintaining the ERCOT-wide transmission grid, as well as other regulatory fees and charges. These ERCOT fees are based on Austin Energy's share of summer peak demand -- about 4% of the statewide total - based on 4 CP.

A. For FY 2019, 2020, 2021, and the test year, how much have regulatory charges been reduced on a value and percentage basis due to residential and commercial consumer efforts to reduce summer peak demand as a result of energy efficiency, demand response and local solar development resulting from Austin Energy-sponsored programs, such as those supported by the EES?

B. For these same years, how much have these regulatory charges been reduced due to efforts of larger industrial customers to reduce 4 CP and summer peak demand?

Query 4-3

For FY 2019, 2020, 2021, and the test year, provide the names, positions, and salaries (including benefits) for the Austin Energy staff working on the Austin Energy Green Building program. If some of these employees are only working part-time on this program, provide estimates of the percentage of time for them. Regarding benefits, these include medical benefits, unemployment, federal taxes paid by employers, and

pension benefits. If the type of benefit is abbreviated in the information, define what the abbreviations mean.

Spreadsheet format is requested.

Query 4-4

For the Continuous Service Program (CSP) that allows apartment managers to temporarily transfer service into their names instead of disconnecting them, provide the following information for FY 2019, 2020, and 2021, and the test year.

The number of CSP customers by month that participated;

The kwh of these CSP customers by month that participated;

The revenue of these CSP customers by month that participated.

Also detail how many CSP customers were participating in the Customer Assistance Program by month and the aggregate discounts that they received by month.

Query 4-5

In an earlier query (Robbins 2-1) I requested the following.

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.

I am appending this query to add part E.

E. Provide in the raw customer data or summary if Multifamily units in this study were participating in the Continuous Service Program, the number of units (in aggregate) in the CSP by month or year (to the extent the information is available), and the consumption of units (in aggregate) in the CSP by month or year (to the extent that information is available).

From: Paul Robbins <paul_robbins@greenbuilder.com>

Sent: Wednesday, June 8, 2022 12:33 PM

To: Rate Fillings 2022

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Subject: Re: Robbins Fourth Discovery Request

*** External email - Exercise caution ***

NOTE: For queries 4-4 and 4-5, the Continuous Service Program may also be known as the Multifamily Partners Program.

On Wed, Jun 8, 2022 at 11:54 AM Paul Robbins < <u>paul robbins@greenbuilder.com</u>> wrote: To Rate Case Participants,

Attached is a fourth set of discovery questions for the rate case.

Sincerely,

Paul Robbins