

**AUSTIN ENERGY'S OBJECTION TO SOLAR AND STORAGE COALITION'S
FIRST REQUEST FOR INFORMATION**

Austin Energy files this Objection to Solar and Storage Coalition's ("SSC") First Request for Information ("RFI"), and respectfully shows as follows:

I. PROCEDURAL HISTORY

SSC served its First RFI to Austin Energy on June 1, 2022. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § F(2)(g), this objection is timely filed.

Counsel for Austin Energy and SSC conducted good faith negotiations that failed to resolve the issues. While Austin Energy will continue to negotiate with SSC regarding this and any future objections, Austin Energy files this objection for preservation of its legal rights under the established procedures. To the extent any agreement is subsequently reached, Austin Energy will withdraw such objection.

II. GENERAL OBJECTIONS

Austin Energy generally objects to these RFIs to the extent they are irrelevant.

III. SPECIFIC OBJECTION

SSC 1-2: One of the pillars for the Value of Solar rate is policy driven incentives, as noted on page 140.

- c. Has Austin Energy analyzed the solar leasing options as part of this pillar?
- d. Has Austin Energy analyzed a process for approving disconnect switches for energy storage systems installed as part of a solar installation?

Objection:

Austin Energy objects to this Request because it seeks information that is neither relevant to the issues presented in this matter nor is reasonably calculated to lead to the discovery of admissible evidence. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § F(1)(a), "[d]iscovery is limited to relevant information that is not unduly prejudicial. In other words, Participants can ask for information related to the Rate Filing Package." Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § A(1)(e), the scope of the 2022 Austin

Energy Base Rate Review is limited to reviewing Austin Energy's base rates. Issues related to Austin Energy's rates or costs that are not in base rates are beyond the scope of the 2022 Austin Energy Base Rate Review. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § A(1)(f), the Value of Solar Rider rates, methodology, and inputs will be re-assessed and updated during the 2022 Austin Energy Base Rate Review. Neither solar leasing options nor equipment approval processes were included as part of the Base Rate Review or the Value of Solar Rider. Therefore, whether or not Austin Energy analyzed solar leasing options or analyzed a process for approving disconnect switches for energy storage systems installed as part of a solar installation has no relevance to the 2022 Base Rate Review or Value of Solar Rider. Thus, this request seeks information outside the scope of this proceeding.

SSC 1-5: On page 49, Cost of Services is divided into functions, one of those is Customer Service.

- a. Please provide information on the average time, minimum time, and maximum time it takes for residential solar permits to be approved. This information should be provided by year for the last 5 years.
- b. Please provide information on the average time, minimum time, and maximum time it takes for commercial solar permits to be approved. This information should be provided by year for the last 5 years.
- c. Please provide information about residential solar permit requests that have been canceled by the customer or rejected by Austin Energy, such as reasons for cancellation or rejection, frequency of cancellation or rejection, and other relevant details.

Objection:

Austin Energy objects to this Request because it seeks information that is neither relevant to the issues presented in this matter nor is reasonably calculated to lead to the discovery of admissible evidence. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § F(1)(a), "[d]iscovery is limited to relevant information that is not unduly prejudicial. In other words, Participants can ask for information related to the Rate Filing Package." Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § A(1)(e), the scope of the 2022 Austin Energy Base Rate Review is limited to reviewing Austin Energy's base rates. Issues related to Austin Energy's rates or costs that are not in base rates are beyond the scope of the 2022 Austin Energy Base Rate Review. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § A(1)(f), the Value of Solar Rider rates, methodology, and inputs will be re-assessed and updated during the 2022 Austin Energy Base Rate Review. Information related to solar permitting approvals, timelines, and cancellations were not included as part of the Base Rate Review or the Value of Solar Rider. The Value of Solar is not considerate of, impacted by, or relevant to installation timelines. Therefore, information on the average time, minimum time, and maximum time it takes for residential and commercial solar permits to be approved, and information about residential solar permit requests that have been canceled by the customer or rejected by Austin Energy has no relevance to the 2022 Base Rate Review or Value of Solar Rider. Thus, this request seeks information outside the scope of this proceeding.

IV. PRAYER

WHEREFORE, PREMISES CONSIDERED, Austin Energy requests this objection be sustained. Austin Energy also requests any other relief to which it may show itself justly entitled.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE &
TOWNSEND, P.C.**

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A handwritten signature in blue ink, appearing to read "T.L. Brocato".

THOMAS L. BROCATO

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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading has been served on all parties and the Impartial Hearing Examiner on June 13, 2022, in accordance with the 2022 Austin Energy Base Rate Review Procedural Guidelines.

A handwritten signature in blue ink, appearing to read "T.L. Brocato".

THOMAS L. BROCATO