

AUSTIN ENERGY
2022 BASE RATE REVIEW

§
§
§

BEFORE THE CITY OF AUSTIN
IMPARTIAL HEARINGS EXAMINER

**NXP SEMICONDUCTORS' RESPONSE TO
AUSTIN ENERGY'S FIRST REQUESTS FOR INFORMATION**

NXP Semiconductors ("NXP"), files this Response to Austin Energy's First Request for Information ("RFI") submitted on June 29, 2022. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § F(2)(f)(1), this Response is timely filed.

NXP reserves the right to object at the time of the hearing to the admissibility of information produced herein.

Respectfully submitted,

By: /s/ J. Christopher Hughes

J. Christopher Hughes
State Bar No. 00792594
Chris Reeder
State Bar No. 16692300
Alaina Zermeno
State Bar No. 24098656
Caidi Davis
State Bar No. 24121557
chris.hughes@huschblackwell.com
chris.reeder@huschblackwell.com
alaina.zermeno@huschblackwell.com
caidi.davis@huschblackwell.com
HUSCH BLACKWELL, LLP
111 Congress Avenue, Suite 1400
Austin, Texas 78701
Phone: (512) 472-5456
Fax: (512) 481-1101

ATTORNEYS FOR NXP SEMICONDUCTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served on all parties of record in this proceeding, in accordance with Austin Energy Instructions, on the 5th day of July 2022.

/s/ J. Christopher Hughes

J. Christopher Hughes

NXP SEMICONDUCTORS'
RESPONSE TO AUSTIN ENERGY'S FIRST RFI

AE1-1: Regarding Mr. Daniel's testimony at page 28, please identify the MOU's he is aware of that use the A&E 4CP methodology.

Response:

Of the over 70 MOU's in Texas, only 12 own generation facilities. Of those 12 MOU's, approximately ½ own only minor generation facilities and those facilities are more than 40 years old. Mr. Daniel has not conducted a survey of the remaining 6 or 7 MOU's that may need to allocate significant demand-related generation costs. The MOU that is similar to AE, CPS Energy, uses the average and excess demand allocation methodology. Mr. Daniel is also aware that Garland Power & Light uses the average and excess demand allocation methodology.

Preparer: Jim Daniel

Sponsor: Jim Daniel

NXP SEMICONDUCTORS'
RESPONSE TO AUSTIN ENERGY'S FIRST RFI

AE1-2: Please describe what binding impact PUCT precedent has on Austin City Council decisions regarding Austin Energy's base rates.

Response:

PUCT precedent regarding wholesale base rates could have a binding impact. Regarding retail base rates, PUCT precedent would not have a binding impact but should be of value to the City Council when deciding AE rate cases, especially since the City Council decision could be appealed to the PUCT.

Preparer: Jim Daniel

Sponsor: None

NXP SEMICONDUCTORS'
RESPONSE TO AUSTIN ENERGY'S FIRST RFI

AE1-3: In response to pages 56 through 60 of NXP's testimony:

- a. Does Mr. Loy believe the General Fund Transfer for MOUs should be limited to recovery of administrative services costs?
- b. Please list all MOUs Mr. Loy is aware of that do not include a General Fund Transfer (or similar expense, such as payment in lieu of taxes) in retail electric rates.

Response:

- a. No
- b. None, although Mr. Loy did not advocate for removal of the GFT in his testimony.

Preparer: Chuck Loy

Sponsor: Chuck Loy