

**AUSTIN ENERGY  
2022 BASE RATE REVIEW**

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

**SIERRA CLUB’S AND PUBLIC CITIZEN’S RESPONSE TO AUSTIN ENERGY’S  
FIRST REQUEST FOR INFORMATION TO AUSTIN ENERGY**

Sierra Club, Public Citizen, and Solar United Neighbors (the “Conservation Organizations”) file this Response to Austin Energy’s First Request for Information. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines § F(2)(f)(1), this Response is timely filed.

Dated: July 5, 2022

Respectfully submitted,



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*Counsel for Sierra Club and Public Citizen*

**AE 1-1:** Regarding page 11 (Bates 013) of Hausman’s testimony, please admit fixed costs to serve residential customers are being recovered through energy charges under the proposed Austin Energy rates. If deny, please explain in detail.

**Response:** As detailed on pages 10-11 (Bates 12-13) of his Direct Testimony, Dr. Hausman does not agree with Austin Energy’s definition of “fixed costs” to serve residential customers. In particular, Dr. Hausman does not believe that it is reasonable or accurate to describe demand-related costs as “fixed costs” for ratemaking purposes. Without clarity and agreement on what constitutes “fixed costs,” Dr. Hausman is unable to answer this question.

Prepared by: Ezra Housman  
Sponsored by: Ezra Housman

**AE 1-2:** Regarding page 15 (Bates 017) of Hausman's testimony, how does Austin Energy's proposed residential rate structure result in "less efficient investment in the distribution system?"

**Response:** See Pages 12-13 (Bates 14-15) of Dr. Hausman's Direct Testimony.

Prepared by: Ezra Housman  
Sponsored by: Ezra Housman

**AE1-3:** Regarding page 24 (Bates 026) of Hausman's testimony, please explain how Austin Energy retires one half of a generating unit.

**Response:** Dr. Hausman made no such recommendation and has not performed the requested analysis.

Prepared by: Ezra Housman  
Sponsored by: Ezra Housman

## **CERTIFICATE OF SERVICE**

I, Joshua Smith, certify that a copy of the foregoing Sierra Club submission was served upon all parties of record in this proceeding on July 5, 2022, by electronic mail, as permitted by the presiding officer.

A handwritten signature in blue ink, appearing to read 'Joshua Smith', is positioned above a horizontal line.

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Joshua Smith  
Sierra Club Environmental Law Program