

AUSTIN ENERGY 2022 BASE RATE REVIEW

SOLAR AND STORAGE COALITIONS' (SSC) RESPONSE TO PAUL ROBBIN'S FIRST REQUEST FOR INFORMATION

Solar and Storage Coalition file this response to Paul Robbin's First Request for Information which was submitted on July 1, 2022. Pursuant to the 2022 Austin Energy Base Rate Review Procedural Guidelines, this Response is timely filed.

Respectfully submitted,

Eric Goff

Date Filed: July 6, 2022

Responses to 1.0 General Questions

1.1 Who are the Central Texas principals in the Coalition (other than the Eric Goff)?

Response: Eric Goff is a member of the Coalition as well as its principal representative and member who is an Austin Energy customer. Ashley Fisher is working with Mr. Goff in the Coalition. Its corporate members work directly with Austin Energy customers. They are Crosswaters East, Sunnova Energy, Sunrun, and Tesla.

Prepared by: Eric Goff

1.2 Does the Coalition have specific rate-related suggestions (with proposed prices and rate structures)?

Response: The Coalition is focused on modifying the Value of Solar tariff to include additional options that reflect modern solar installations. The Coalition did not offer proposed prices or rate structures in its position statement.

Prepared by: Eric Goff

1.3 Currently battery costs are quite high because of the cost of raw materials. I hope this changes, but in the interim, there probably will not be many new customers that apply for these new rates. When does the Coalition predict the rates will see robust participation?

Response: Solar with storage is seeing rapid growth in Texas, particularly in light of Storm Uri. For example, according to public data filed by Oncor in Docket #52945 at the Public Utility Commission of Texas, 14% of the distributed solar installs in Centerpoint came with battery storage, up from 6% in 2020 (Docket 51731). Several Texas public sources have reported a surge in the number of Texans creating their own power microgrids with solar and storage; as is well known, solar cannot continue operating to power a premise in an outage without storage support to the system to operate as a microgrid while the customer premise's grid-tied connection is de-energized during an outage. Quantifying participation as "robust" would certainly depend on the size and scope of a storage participation program: for example, if Austin Energy were to develop a storage pilot rate for customers that have solar and storage, and cap that program at 15 MWs total enrollment, the program may see a higher percentage of enrollees over time than if the program was capped at 50 MWs. Importantly, the purpose of a storage rate is not to simply accommodate existing solar-storage customers on the system, but to incentivize future adoption so customers can

share their clean solar energy through the local distribution grid with others in their community when those MWs are most valuable to the system. An example of such a program which is boosting solar-storage adoption and participation is SMUD's program in California. <https://www.smud.org/en/Rate-Information/2022-2023-proposed-rate-changes/Solar-and-Storage-Rate-details>

Prepared by: Eric Goff

1.4 Provide a current estimate of the number of Austin Energy customers with battery storage (if available).

Response: The Coalition is unable to provide this information. It is maintained by Austin Energy, and not the Coalition.

Prepared by: Eric Goff

1.5 According to an Austin Energy response to one of my discovery questions, the round-trip efficiency of the Austin Shines battery project in 2021 was 59%. I am not sure of the specific reasons for this, but it hints at a problem in decentralized storage.

While average losses may generally be lower, how will the proposed solar plus storage rates adapt to battery losses?

Response: Dedicated device-level metering and revenue metering (smart metering) at a customer premise can account for any losses on a storage facility, by measuring the amount of kWh that is delivered to the grid.

Prepared by: Eric Goff

1.5 The Position Statement has faulted Austin Energy's billing system as an obstacle to its proposed rate/s. Given the history of the situation over several decades, what specific proposals is the Coalition offering that might create a better outcome? (Issuing an RFP for a new system, in and of itself, may not lead to a better situation.)

Response: An RFP after an RFQ would address many of the issues with Austin Energy's billing system. Modern billing systems often have a "plug and play" ability to add new products very easily. While a transition could take several years, a system that is designed for product flexibility would improve rate making options for the utility and create the

opportunity to better align rate structures with the city's environmental and affordability goals.

Prepared by: Eric Goff

1.6 Does the Coalition have a position on whether electric vehicle batteries without solar and small home natural gas generators used in emergencies should also be encouraged to sell to Austin Energy if solar and storage rates are established?

Response: The Coalition is proposing amendments to the Value of Solar tariff. As such, other technologies that do not include solar are beyond the scope of the Coalition's position.

Prepared by: Eric Goff

Responses to 2.0 Customer Assistance Program (CAP) Questions

2.1 In Austin, several low-income census tracts are rife with gentrification. One can find relatively wealthy people within their boundaries, and this trend is increasing at a fast pace.

A. Does the Coalition have any way to estimate how broadly gentrification may affect targeted Census tracts?

Response: Because the Coalition did not develop a specific methodology for this proposal, there are no targeted Census tracts to analyze.

Prepared by: Eric Goff

B. Does the Coalition have a bill impact to the general ratepayers for awarding CAP to gentrified homes or neighborhoods?

Response: Because the Coalition did not develop a specific methodology for this proposal, there are no targeted Census tracts to analyze and thus a bill impact cannot be provided.

Prepared by: Eric Goff

2.2 In its Position Statement, the Coalition has stated one of the reasons for the Census tract approach is CAP's inaccessibility to ratepayers who are immigrants. The following is as much a statement as a question, but is the Coalition aware that about 1/6 of CAP participants are

income qualified, and non-citizens who are Austin Energy ratepayers can apply for the program by this method?

Response: As Mr. Robbins stated, his RFI is more of a statement than a question. However, the Coalition acknowledges that the qualification methods for CAP are publicly available.

Prepared by: Eric Goff

2.3 Is there a bill impact to the general ratepayers for this broad proposal?

Response: Because the Coalition did not develop a specific methodology for this proposal, there are no targeted Census tracts to analyze and thus a bill impact cannot be provided.

Prepared by: Eric Goff

2.4 Can the Coalition cite any precedents for utility low-income bill reduction programs by census tract occurring in the U.S.?

Response: No.

Prepared by: Eric Goff