

**AUSTIN REVIEW
2022 BASE RATE REVIEW**

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

2WR's Fourth Request for Information

To: Austin Energy

Please answer the requests for information set out below. The term "Austin Energy" ("AE") or "your" or "you" set out in these RFIs refers to AE, its employees, and any person acting or purporting to act on Austin Energy's behalf or whose work product was relied upon or reviewed by AE in its business operations since the last rate case, including without limitation, attorneys, agents, advisors, investigators, representatives, consultants, contractors, and other city of Austin Department employees. You are instructed to call if you do not understand the question, if terms in an RFI are confusing or your understanding of the term in one RFI appears to conflict with that term in another RFI, or that you believe the RFI is unduly burdensome. Please do not hesitate to call if you wish to work with me to identify and provide available information responsive to the requests. To the extent AE is not able to provide all the information requested, please provide the available information and explain why all the information cannot be provided.

1. Mr. Galvan discussed the 311 call center in his rebuttal testimony. Please verify his allegations that the costs are based on a cost study and that AE's smart meters do not provide the benefits above and beyond the benefits of smart meters by providing the following:
 - a. A copy of the 311 cost study.
 - b. An explanation of how the 311 cost study accounts for more limited usage after hours—in other words, show how the cost study allocated the costs between daytime 311 services and after hours services (For instance after hour services should have fewer employees and therefore less labor costs and should utilize less floor space) and show how the 311 after hours service was only used for AE back-up and that no other calls requesting information for other non-electric services were made and addressed during the after hour service times) and show that AE's call usage was not double counted by, once the first allocation and, second by the surcharge.
 - c. Explain why AE meters could not connect to AE communication services to send out telephone and email alerts to customers whose service has been recorded as interrupted.
 - d. Explain how AE smart meters are used within AE to alert it that service calls should be made to address service outages;
 - e. Explain how the 311 call center receives the additional information Mr. Galvan discussed at p. 7 of his testimony such as the restoration of services.
 - f. Explain how AE learns of service outages and responds accordingly and how AE's smart meters are used in this process.
 - g. What adjustments were made, if any to normalize the calls by adjusting them to adjust out the abnormal winter storm URI event to more accurately reflect the number of AE

calls that will be made during the period the rates will be in effect, and, if no adjustments were made, how did AE's FY 2021 calls compare to the number of AE's calls for each of AE's three previous FYs?

2. Mr. Rabon addressed smart meters and at page 10 discussed additional features of smart meters. Please explain: how customers report to AE through smart meters; how AE communicates with customers using smart meters; whether AE utilizes smart meters for load reduction such as intermittent interruptions during peak demand; appliance, including thermostat control of usage; and list each function AE's smart meters can perform and how the function addresses customer ability to utilize AE's electric service and how it is utilized by AE.
3. At page 25 of AE witness Rabon's testimony, he contends that TIEC witness LaConte's calculations of General Fund Transfers for FY 2018 through FY2020 were incorrect because she used the wrong revenues as the bases to apply the 12%. Please provide the revenues Mr. Rabon believes are the correct revenues for FY2018, FY 2019, FY 2020 and FY 2021 that should have been used to apply the 12%. And please also provide the GFT amounts for each of these FYs that AE approved in its respective budgets.
4. Both AE witnesses Murphy and Dombroski argue that rate design should address cost causation by the individual customer. If Mr. Murphy and/or Mr. Dombroski do not agree with this summary of their opinions, in whole or in part, please explain why not. Please also provide the underlying calculations and data identifying the source documents relating to AE's discussion of seasonal swings in bills at p. 118 (discussing the 49% increase between winter usage and summer usage) and at p. 119 discussing the price differential.
5. In Mr. Dombroski's rebuttal testimony, he addresses 2WR's recommendation that the sales price AE will receive for the sale of the Town Lake Center building to the City Council. Please provide a copy of the appraisal discussed in AE's response to NXP's 4th RFI No. 4-1 and any notes, reports, minutes and such other written memoranda in which the sale was discussed, and identify any public meetings with which this sale was discussed with the EUC, the Council and/or the public and provide any underlying documentation to support an announced value such as the \$50 million value placed on the building that was discussed in the July 15, 2019 power point presentation to the EUC on the Biomass plant.

6. In his rebuttal testimony, Mr. Dombroski asserts that AE's residential customer usage pattern of lower usage causes the current rate design to be ineffective. For those residential metered accounts from vacated tenancies that are automatically transferred to the name of the property owner, under the continuous service program, how are the transferred accounts usages reported for purposes of allocating the costs of customer service, customer accounting, meter reading, uncollectibles, key accounts, and economic development; and how do these automatically transferred accounts factor in the average monthly kWh consumption in AE's ratefiling testimony to show reduced residential electric consumption, if at all.

Respectfully submitted on July 8, 2022

/s/ Lanetta M. Cooper

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Certificate of Service

The undersigned certifies that 2WR has served a copy of the attached document upon all known parties of record by email and to the filing clerk on the 8th of July 2022.

/s/ Lanetta M. Cooper