

**AUSTIN ENERGY 2022 BASE RATE
REVIEW**

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**BEFORE THE CITY OF AUSTIN
HEARING EXAMINER**

**TEXAS INDUSTRIAL ENERGY CONSUMERS' RESPONSE TO SIERRA CLUB'S AND
PUBLIC CITIZEN'S FIRST SET OF REQUESTS FOR INFORMATION**

Texas Industrial Energy Consumers ("TIEC") files the following responses to the First Request for Information ("RFI") to TIEC filed by Sierra Club and Public Citizen (the "Conservation Organizations"). The request was submitted to the Impartial Hearing Examiner and received by TIEC on July 6, 2022 after the 12:00 p.m. filing deadline. TIEC's response is timely filed. TIEC's responses to specific questions are set forth as follows, in the order of the questions asked.

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Katie L. Coleman

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**ATTORNEYS FOR TEXAS INDUSTRIAL
ENERGY CONSUMERS**

CERTIFICATE OF SERVICE

I, John R. Hubbard, Attorney for TIEC, hereby certify that a copy of this document was served on all parties of record in this proceeding on this 12th day of July, 2022 by electronic mail, facsimile, and/or First Class, U.S. Mail, Postage Prepaid.

/s/ John R. Hubbard

John R. Hubbard

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CO-TIEC 1-1 Refer to the Cross-Rebuttal Testimony of Jeffrey Pollack at page 13, lines 9-13.

- a. Please provide specific examples of energy efficiency investments made by specific members of TIEC in the last five years that have benefited all customer classes by lowering the distribution, transmission and wholesale needs of customers.
- b. Please provide the total investment during the Test Year in energy efficiency measures by TIEC members in the Austin Energy service area.
- c. Please provide the total energy and peak demand savings that have been achieved by those investments.
- d. Please provide the total investment from 2017 to present in energy efficiency measures by TIEC members in the Austin Energy service area.
- e. Please provide the total energy and peak demand savings that have been achieved by those investments.

Response:

- a. TIEC only has access to general information regarding the investments of its members. The information known about such investments in the AE service area is addressed in Mr. Pollock's testimony. Mr. Pollock is aware that TIEC members in the AE area have invested in LED lighting and chillers, and it stands to reason that these improvements would reduce system demand. This would benefit the system in the same way that a reduction in demand at a residential household or a small business would.
- b. TIEC does not have this information.
- c. TIEC does not have this information.
- d. TIEC does not have this information.
- e. TIEC does not have this information.

Preparer: Counsel / Jeffrey Pollock (1-1(a))
Sponsor: Jeffrey Pollock for 1-1(a).

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CO-TIEC 1-2 Is TIEC's position that all high-load customers should be exempt from the Energy Efficiency Services fee, including secondary, primary and transmission-level customers, or is TIEC only representing transmission-level customers?

Response:

TIEC's position is not limited to transmission-level customers. TIEC's position is that all customers involved in competitive lines of business with a strong economic incentive to minimize their usage should be excluded. While this generally applies with high load customers, the defining feature is not the size of the load but the strong business incentive to make reasonable investments that will minimize overhead costs such as electric consumption.

Preparer: Counsel / Jeffry Pollock

Sponsor: Jeffry Pollock

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CO-TIEC 1-3 Does TIEC disagree with Dr. Cyrus Reed that a more inclusive, participatory process is needed to set the annual Energy Efficiency Services fee, regardless of which customers it applies to?

Response:

TIEC has not evaluated or taken a position on this issue.

Preparer: Counsel / Jeffry Pollock

Sponsor: Jeffry Pollock

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CO-TIEC 1-4 Does TIEC take a position in this proceeding on whether Austin Energy's Value of Solar program should be paid for partially through the Energy Efficiency Services fee?

Response:

TIEC has not evaluated or taken a position on this issue, but reserves the right to do so based on the evidence presented at the Final Conference and in briefing.

Preparer: Counsel / Jeffry Pollock

Sponsor: Jeffry Pollock

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CO-TIEC 1-5 Does TIEC disagree with Dr. Reed's recommendation that the Value of Solar program should not be paid for out of the Energy Efficiency Services fee?

Response:

TIEC has not evaluated or taken a position on this issue, but reserves the right to do so based on the evidence presented at the Final Conference and in briefing.

Preparer: Counsel / Jeffry Pollock

Sponsor: Jeffry Pollock