



Control Number: 42866



Item Number: 53

Addendum StartPage: 0

RECEIVED
2014 OCT 10 AM 9:45
PUBLIC UTILITY COMMISSION
FILING CLERK

§§ 87(2)(b), 87(4-b)

OF

**WEST TRAVIS COUNTY PUBLIC UTILITY AGENCY'S THIRD SUPPLEMENTAL
RESPONSE TO TRAVIS COUNTY MUNICIPAL UTILITY DISTRICT NO. 12'S
REQUESTS FOR ADMISSION AND REQUESTS FOR PRODUCTION**

Pursuant to 30 Texas Administrative Code, Chapter 80, Subchapter D and Rule 196 of the Texas Rules of Civil Procedure, and the presiding Administrative Law Judge's Order No. 6, the West Travis County Public Utility Agency ("*WTCPUA*") hereby serves its third supplemental response to Travis County Municipal Utility District No. 12's ("*TCMUD 12*") First Requests for Admission and Requests for Production. Such response is attached hereto as Attachment No. 1 and is incorporated by reference as if fully set forth here.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE &
TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900

Austin, Texas 78701

Telephone: (512) 322-5800

Facsimile: (512) 472-0532



DAVID J. KLEIN

State Bar No. 24041257

GEORGIA N. CRUMP

State Bar No. 05185500

CHRISTIE DICKENSON

State Bar No. 24037667

**ATTORNEYS FOR WEST TRAVIS COUNTY
PUBLIC UTILITY AGENCY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was transmitted by fax, e-mail, hand-delivery and/or regular, first class mail on this 10th day of October, 2014 to the parties of record.



David J. Klein

ATTACHMENT NO. 1

**WEST TRAVIS COUNTY PUBLIC UTILITY AGENCY'S
THIRD SUPPLEMENTAL RESPONSE TO
TCMUD 12'S REQUESTS FOR PRODUCTION**

Request for Production 1-12. Provide any other supporting documents, including drafts, not included in the response to the previous question related to the "Final Report – Wholesale Cost of Service and Rate Design Study" dated October 11, 2012.

Supplemental Response: All of the documents responsive to this request are all of the documents that were previously provided by WTCPUA in response to Request for Production 1-12 but were provided subject to WTCPUA's objections.

Request for Production 1-14. Provide all workpapers supporting the Minimum Bill Calculation for TCMUD 12 for FY 2014 dated August 22, 2013 (attached hereto as Exhibit C) in electronic spreadsheet form, with all links and formulae intact.

Supplemental Response: All of the documents responsive to this request are all of the documents that were previously provided by WTCPUA in response to Request for Production 1-14 but were provided subject to WTCPUA's objections.

Request for Production 1-15. Provide all documents related to the PUA's changes in water revenue requirements or water rates from one methodology to another.

Supplemental Response: After a diligent search, the WTCPUA has concluded that there are no documents responsive to this request.

Request for Production 1-19. Provide all documents that identify the "Participant's System" for Hays County, WTCMUD 5 and City of Bee Cave, as referenced in the Acquisition, Water Supply, Wastewater Treatment and Conditional Purchase Agreement.

Supplemental Response: After a diligent search, the WTCPUA has concluded that there are no additional documents responsive to this request that have not already been produced.

Request for Production 1-25. Provide all documents that identify the customers of the City of Bee Cave's to whom the PUA renders bills, and collects and receives payments, as referenced in Section 4.03 of the Acquisition, Water Supply, Wastewater Treatment and Conditional Purchase Agreement.

Supplemental Response: After a diligent search, the WTCPUA has concluded that there are no additional documents responsive to this request that have not already been produced.

Request for Production 1-26. Provide all documents that identify the customers of Hays County's to whom the PUA renders bills, and collects and receives payments, as referenced in Section 4.03 of the Acquisition, Water Supply, Wastewater Treatment and Conditional Purchase Agreement.

Supplemental Response: After a diligent search, the WTCPUA has concluded that there are no additional documents responsive to this request that have not already been produced.

Request for Production 1-27. Provide all documents that identify the customers of WTCMUD 5's to whom the PUA renders bills, and collects and receives payments, as referenced in Section 4.03 of the Acquisition, Water Supply, Wastewater Treatment and Conditional Purchase Agreement.

Supplemental Response: After a diligent search, the WTCPUA has concluded that there are no additional documents responsive to this request that have not already been produced.