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SOAH DOCKET NO. 473-14-5138
PUC DOCKET NO. 42857

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PETITION OF NORTH AUSTIN §
UTILITY DISTRICT NO. 1, §
NORTHTOWN MUNICIPAL UTILITY §
DISTRICT, TRAVIS COUNTY WATER §
CONTROL AND IMPROVEMENT §
DISTRICT NO. 10 AND WELLS §
BRANCH MUNICIPAL UTILITY §
DISTRICT, FROM THE RATEMAKING §
ACTIONS OF THE CITY OF AUSTIN §
AND REQUEST FOR INTERIM RATES §
IN WILLIAMSON AND TRAVIS §
COUNTIES §
BEFORE THE STATE OFFICE OF
ADMINISTRATIVE HEARINGS

SOAH DOCKET NO. 473-14-5138
PUC DOCKET NO. 42867

PETITION OF NORTH AUSTIN §
MUNICIPAL UTILITY DISTRICT NO. §
1, NORTHTOWN MUNICIPAL §
UTILITY DISTRICT, AND WELLS §
BRANCH MUNICIPAL UTILITY §
DISTRICT FROM THE RATEMAKING §
ACTIONS OF THE CITY OF AUSTIN §
AND REQUEST FOR INTERIM RATES §
IN WILLIAMSON AND TRAVIS §
COUNTIES §
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

CITY OF AUSTIN'S SIXTH SUPPLEMENTAL RESPONSE
TO PETITIONERS' THIRD REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Wells Branch MUD, Travis County WCID No. 10, Northtown MUD, and North Austin Utility District No. 1, through its attorneys of record, Randall Wilburn, Attorney at Law, 3000 South IH 35, Suite 150, Austin, Texas 78704; and John J. Carlton, The Carlton Law Firm, PLLC, 2705 Bee Cave Road, Suite 200, Austin, Texas 78746.

COMES NOW, the City of Austin, (herein sometimes referred to as "City," "Austin" or "Respondent"), in the above styled and docketed consolidated wholesale water and wholesale wastewater rate appeal proceeding and serves this, the City of Austin's Sixth Supplemental

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Response to Petitioners' Third Request for Production of Documents in response to Petitioners' Third Request for Production of Documents, on all parties to this Proceeding.

I. RESPONSES TO REQUESTS FOR PRODUCTION SUBJECT TO RIGHT TO AMEND OR SUPPLEMENT

Each of these responses is submitted pursuant to applicable law and rules. Additionally, Austin reserves the right to amend or supplement this response in accordance with applicable rules.

II. RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 3-13. Please provide the source documentation for the 50/50 debt/equity ratio shown on page "PFT of Greg Meszaros-5322" (Table 293 of Water COS FY 2013 Tables) on Exhibit 19 of the prefiled testimony of Greg Meszaros.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026. Also see documents responsive to Request for Production No. 3-14, Austin RPD Resp. 6136-6137.*

REQUEST FOR PRODUCTION NO. 3-15. Please provide the source documentation for the 9% cost of equity shown on page "PFT of Greg Meszaros-5322" (Table 293 of Water COS FY 2013 Tables) on Exhibit 19 of the prefiled testimony of Greg Meszaros.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-17. Provide the documents related to any assistance provided by the "One-Stop Shop" to any Petitioner during 2012 and 2013.

RESPONSE: *There are no documents responsive to this request.*

REQUEST FOR PRODUCTION NO. 3-19. Provide the documents justifying the allocation of adjusted costs to Raw Water (Production and Transmission) as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-20 Provide the documents justifying the allocation of adjusted costs to Treatment –Average Day as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-21 Provide the documents justifying the allocation of adjusted costs to Treatment Facilities as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-22. Provide the documents justifying the allocation of adjusted costs to Pump Stations and Booster Stations as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-23. Provide the documents justifying the allocation of adjusted costs to Pump Station Power as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-24. Provide the documents justifying the allocation of adjusted costs to Tanks/Reservoir as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-25. Provide the documents justifying the allocation of adjusted costs to Transmission Mains as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-26. Provide the documents justifying the allocation of adjusted costs to Distribution Mains as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-27. Provide the documents justifying the allocation of adjusted costs to Direct Fire as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-28. Provide the documents justifying the allocation of adjusted costs to Retail Meters & Services as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-29. Provide the documents justifying the allocation of adjusted costs to Meters and Services as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-30. Provide the documents justifying the allocation of adjusted costs to Watershed Land Purchases as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-31. Provide the documents justifying the allocation of adjusted costs to LCRA Water Rights as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-32. Provide the documents justifying the allocation of adjusted costs to Customer Service as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-33. Provide the documents justifying the allocation of adjusted costs to Small Calls as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-34. Provide the documents justifying the allocation of adjusted costs to Wholesale Services as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-35. Provide the documents justifying the allocation of adjusted costs to Revenue-Based Fixed Charge as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-36. Provide the documents justifying the allocation of adjusted costs to Revenue-Based Volume Charge as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-37. Provide the documents justifying the allocation of adjusted costs to Indirect Costs as discussed on page 26, lines 5-17 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-38. Provide the documents justifying the allocation of adjusted costs to the wastewater functions discussed on page 26, lines 19-27 of Mr. Anders' testimony.

RESPONSE: *See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.*

REQUEST FOR PRODUCTION NO. 3-89. Please provide all reports, studies, and presentations on inflow/infiltration by customer class in 2009, 2010, 2011, 2012, and 2013.

RESPONSE: *There are no documents responsive to this request.*

REQUEST FOR PRODUCTION NO. 3-107. Please provide the documents supporting the contributed capital amounts included in the amounts shown on page "PFT of Greg Meszaros-6369" (Table 197 of Wastewater COS FY 2013 Tables) on Exhibit 21 of the prefiled testimony of Greg Meszaros.

RESPONSE: See documents responsive to Request for Production No. 3-103, Wastewater Fixed Asset Pivot Table, Austin RPD Resp. 7557-7692.

REQUEST FOR PRODUCTION NO. 3-113. Please provide the source documentation for the 50/50 debt/equity ratio shown on page "PFT of Greg Meszaros-6563" (Table 271 of Wastewater COS FY 2013 Tables) on Exhibit 21 of the prefiled testimony of Greg Meszaros.

RESPONSE: See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.

REQUEST FOR PRODUCTION NO. 3-114. Please provide the source documentation for the 6% cost of debt shown on page "PFT of Greg Meszaros-6563" (Table 271 of Wastewater COS FY 2013 Tables) on Exhibit 21 of the prefiled testimony of Greg Meszaros.

RESPONSE: See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.

REQUEST FOR PRODUCTION NO. 3-115. Please provide the source documentation for the 9% cost of equity shown on page "PFT of Greg Meszaros-6563" (Table 271 of Wastewater COS FY 2013 Tables) on Exhibit 21 of the prefiled testimony of Greg Meszaros.

RESPONSE: See Testimony of Greg Meszaros, Director, Austin Water Utility Exhibit No. 17, Austin Meszaros 3415-4026.

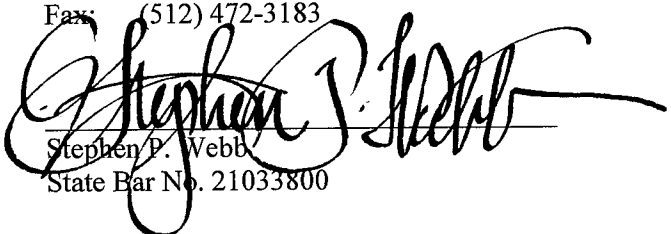
Respectfully submitted,

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ATTORNEYS FOR CITY OF AUSTIN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served via hand delivery, facsimile, electronic mail, overnight mail, US mail and/or Certified Mail Return Receipt Requested on all parties whose names appear on the mailing list below on this 25th day of September, 2014.

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