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APPLICATION OF LIBERTY §
UTILITIES (WOODMARK SEWER) §
CORP., LIBERTY UTILITIES (TALL §
TIMBERS SEWER) CORP., LIBERTY §
UTILITIES (SUB) CORP. TO CHANGE §
RATES FOR SEWER SERVICES IN §
SMITH COUNTY, TEXAS §

BEFORE THE PUBLIC UTILITY
PUBLIC UTILITY COMMISSION
FILING CLERK
COMMISSION OF TEXAS

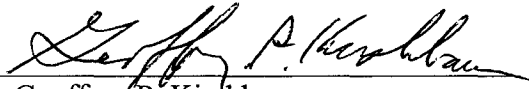
**LIBERTY UTILITIES' SECOND SUPPLEMENTAL RESPONSE TO
OPUC'S THIRD REQUESTS FOR INFORMATION**

To: Office of Public Utility Counsel, by and through its attorney of record, Christiaan Siano,
Office of Public Utility Counsel, 1701 N. Congress Avenue, P.O. Box 12397, Austin,
Texas 78711-2397.

Liberty Utilities (Tall Timbers Sewer) Corp., Liberty Utilities (Woodmark Sewer) Corp.,
and Liberty Utilities (Sub) Corp. ("Liberty Utilities") provide this second supplemental response
to the Office of Public Utilities Counsel's ("OPUC") Third Requests for Information to Liberty
Utilities. Liberty Utilities stipulate that the following response to requests for information may be
treated by all parties as if the answer was filed under oath.

1695

Respectfully submitted,

By: 

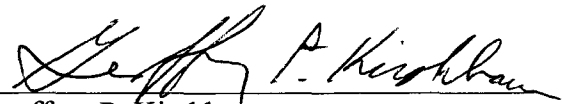
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**ATTORNEYS FOR LIBERTY UTILITIES
(TALL TIMBERS SEWER) CORP., LIBERTY
UTILITIES (WOODMARK SEWER) CORP.,
AND LIBERTY UTILITIES (SUB) CORP.**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on July 7, 2017 in accordance with P.U.C. Procedural Rule 22.74.


Geoffrey P. Kirshbaum

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 3-1 Please reference Liberty supplemental response to OPUC 2-5: Please provide all maps, surveys, analyses, engineering reports, or any other documentations relating to the distance between the City of Tyler's collection system and Liberty Woodmark's collection system.

RESPONSE: Please see Liberty Utilities' rebuttal testimony and exhibits filed on June 30, 2017.

Prepared by Gerry Becker, Manager Rates and Regulatory

Sponsored by Gerry Becker, Manager Rates and Regulatory and Matthew Garlick,
President

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 3-2 Please reference Liberty supplemental response to OPUC 2-5: Please explain in detail how Liberty Tall Timbers “considered” the purchase of wastewater capacity from the City of Tyler.

RESPONSE: Please see Liberty Utilities’ rebuttal testimony and exhibits filed on June 30, 2017.

Prepared by Todd Wiley, General Counsel (West Region)

Sponsored by Matthew Garlick, President

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 3-4 Please reference Liberty supplemental response to OPUC 2-5: Please explain what is meant in your response that “Tyler was not able to provide a proposed cost for purchase treatment capacity.” Also, please state the nature of the query that Tyler would have provided such a proposed cost in response to.

RESPONSE: Please see Liberty Utilities’ rebuttal testimony and exhibits filed on June 30, 2017.

Prepared by Todd Wiley, General Counsel (West Region)

Sponsored by Matthew Garlick, President

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 3-6 Please reference Liberty supplemental response to OPUC 2-5, statement “To this day, the City of Tyler has not been able to provide a cost of purchased treatment capacity to Liberty Utilities.” Has Liberty requested that the City of Tyler provide a cost of purchased treatment capacity to Liberty Utilities? If so, please provide a copy of the request.

RESPONSE: Please see Liberty Utilities’ rebuttal testimony and exhibits filed on June 30, 2017.

Prepared by Todd Wiley, General Counsel (West Region)

Sponsored by Matthew Garlick, President

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 3-7 Please reference Liberty supplemental response to OPUC 2-5, statement “As a result, purchasing treatment capacity from the City of Tyler is not and was not a viable option.” Please explain what is meant by “not a viable option.”

RESPONSE: Please see Liberty Utilities’ rebuttal testimony and exhibits filed on June 30, 2017.

Prepared by Todd Wiley, General Counsel (West Region)

Sponsored by Matthew Garlick, President

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 3-8 Please reference Liberty supplemental response to OPUC 2-5. What is meant by “the City of Tyler raised the possibility of selling treatment capacity to Liberty Utilities?” What was the nature of the City “raising” the possibility? Please provide all correspondence, meeting notes, or any other memoranda indicating this assertion.

RESPONSE: Please see Liberty Utilities’ rebuttal testimony and exhibits filed on June 30, 2017.

Prepared by Todd Wiley, General Counsel (West Region)

Sponsored by Matthew Garlick, President

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 3-9 Please reference Liberty supplemental response to OPUC 2-5, statement “Again however, the City of Tyler did not provide and still has not provided a proposed purchase price for capacity.” Please provide all documentation of Liberty Utility having pursued, requested a proposal, or in any way solicited a “proposed purchase price for capacity” from the City of Tyler.

RESPONSE: Please see Liberty Utilities’ rebuttal testimony and exhibits filed on June 30, 2017.

Prepared by Todd Wiley, General Counsel (West Region)

Sponsored by Matthew Garlick, President