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PUC DOCKET NO. 47912  
SOAH DOCKET NO. 473-18-2475.WS

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RATEPAYERS' APPEAL OF THE DECISION BY SOUTH CENTRAL CALHOUN COUNTY WATER CONTROL AND IMPROVEMENT DISTRICT NO. 1 TO CHANGE RATES § PUBLIC UTILITY COMMISSION OF TEXAS

**SOUTH CENTRAL CALHOUN COUNTY WATER CONTROL AND IMPROVEMENT DISTRICT NO. 1 LIST OF ISSUES**

Pursuant to the Order of Referral issued by the Public Utility Commission of Texas ("Commission") in this docket on February 26, 2018, South Central Calhoun County Water Control and Improvement District No. 1 (South Central Calhoun County WCID) respectfully files this List of Issues to be addressed. This List of Issues in response to Order of Referral is timely filed.

**I. BACKGROUND**

South Central Calhoun County Water Control and Improvement District No. 1 is a political subdivision, with an elected board of directors (the "Board"), which provides sewer services to its retail customers. South Central Calhoun County WCID provides non-metered sewer services charging a monthly base rate per customer class. On August 11, 2017, the Board adopted new monthly sewer rates to become effective November 1, 2017. On December 28, 2017, the ratepayers of South Central Calhoun County WCID filed a petition ("Petition") with the Commission appealing the change in sewer rates which were adopted by the Board.

**II. LIST OF ISSUES TO BE ADDRESSED**

1. Considering only the information available to the Board, what are the just and reasonable rates for South Central Calhoun County WCID that are sufficient, equitable, and consistent in application to each customer class and that are not unreasonably preferential, prejudicial, or discriminatory?

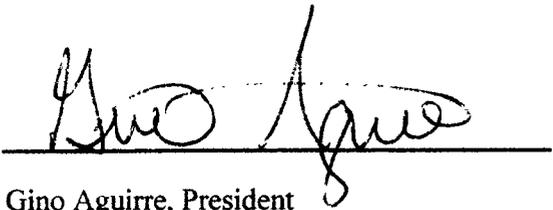
- a. What is the appropriate methodology to determine just and reasonable rates for South Central Calhoun County WCID?
  - b. What is the revenue requirement that would give South Central Calhoun County WCID sufficient funds to provide adequate retail sewer service?
  - c. What is the appropriate allocation of the revenue to customer classes?
  - d. What is the appropriate design of rates for each class to recover South Central Calhoun County WCID revenue requirement?
2. What are the reasonable expenses incurred by South Central Calhoun County WCID in this proceeding?
    - a. Should the Commission allow recovery of these reasonable expenses?
    - b. If so, what is the appropriate recovery mechanism?
  3. What is the appropriate effective date of the rates fixed by the Commission in this proceeding?
  4. If the Commission establishes rates different than the rates set by South Central Calhoun County WCID, should the Commission order refunds or allow surcharges to recover lost revenues? If so, what is the appropriate amount and over what time-period should the refund or surcharge be in place?

### **III. CONCLUSION**

South Central Calhoun County WCID respectfully requests that the Commission adopt South Central Calhoun County WCID's List of Issues and grant such other relief to which it may be justly entitled.

Respectfully Submitted,

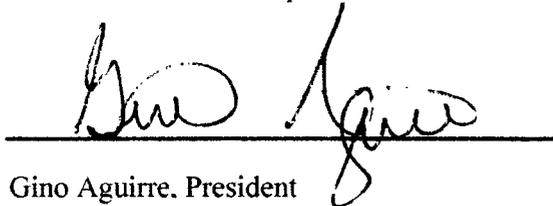
South Central Calhoun County Water  
Control and Improvement District #1

A handwritten signature in black ink, appearing to read "Gino Aguirre", is written over a solid horizontal line.

Gino Aguirre, President  
For the Board of Directors  
P.O. Box 833  
Port Lavaca, TX 77979  
scccwcid1ta@yahoo.com  
(361) 552-0160

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served via U.S. first-class mail, hand delivery, overnight delivery, or facsimile transmission to all parties of record on March 7, 2018.

A handwritten signature in black ink, appearing to read "Gino Aguirre", is written over a solid horizontal line.

Gino Aguirre, President