



Control Number: 47976



Item Number: 1003

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SOAH DOCKET NO. 473-18-3006.WS
PUC DOCKET NO. 47976

APPLICATION OF LIBERTY
UTILITIES (SILVERLEAF WATER)
LLC FOR AUTHORITY TO CHANGE
WATER AND SEWER RATES

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§

BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

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**LIBERTY UTILITIES (SILVERLEAF WATER) LLC'S
RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S
FIFTH REQUEST FOR INFORMATION**

Liberty Utilities (Silverleaf Water) LLC ("Liberty Silverleaf" or "Company") hereby responds to Office of Public Utility Counsel's ("OPUC") Fifth Request for Information ("RFI"). The Table of Contents herein lists Liberty Silverleaf's narrative responses and any supporting attachments, which attachments have been assigned a Bate reference. The Company stipulates that the following responses to RFIs may be treated by all parties as if the answer was filed under oath.

Respectfully submitted,

LAW OFFICES OF MARK H. ZEPPA, P.C.

By:



Mark H. Zeppa (State Bar No. 22260100)
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*Liberty Utilities (Silverleaf Water) LLC's
Response to Office of Public Utility Counsel's Fifth Request for Information
SOAH Docket No. 473-18-3006.WS; PUC Docket No. 47976*

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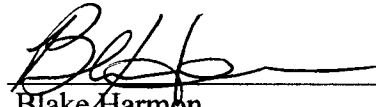
SHAPIRO LAW FIRM, P.C.

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Attorneys for Liberty Utilities
(Silverleaf Water) LLC

Certificate of Service

I, Blake Harmon, Paralegal to Mark H. Zeppa, certify that a copy of this document was served on September 17, 2018 by hand-delivery, facsimile, electronic mail and/or First Class Mail.



Blake Harmon

**SOAH DOCKET NO. 473-18-3006.WS
PUC DOCKET NO. 47976**

APPLICATION OF LIBERTY	§	BEFORE THE STATE OFFICE
UTILITIES (SILVERLEAF WATER)	§	
LLC FOR AUTHORITY TO CHANGE	§	OF
WATER AND SEWER RATES	§	
	§	ADMINISTRATIVE HEARINGS

**LIBERTY UTILITIES (SILVERLEAF WATER) LLC'S
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OPUC RFI 5-1	LU 016069X1 – LU 016069X3

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 5-1 Referencing workbook “OPUC RFI 1-1_S1 Application Sewer Final,” schedule “SW-II-1-Prod,” please provide the linked file labelled “Central Division Flows.1-2017.xlsx” as referenced in the formula in Line 1, Column A.

RESPONSE: See the attached fixed asset schedules at LU 016069X1 – LU 016069X3.

Prepared by: James Walsh, Senior Rate Analyst

Sponsored by: Leticia Washington, Manager, Rates and Regulatory Affairs

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 5-2 Referencing Algonquin Water Resources of Texas, LLC Application for a Sale, Transfer, or Merger of a Retail Public Utility, response to Question 13(C), Attachment A to this RFI, please confirm that the Company is seeking to include a Positive Acquisition Adjustment of \$181,128 as contained in the STM in the current rate proceeding. If confirmed, please provide details, including amounts by NARUC account, regarding where said adjustment is included within the application.

RESPONSE: Liberty Silverleaf is not seeking a positive acquisition adjustment in this case.

Prepared by: Leticia Washington, Manager, Rates and Regulatory Affairs

Sponsored by: Leticia Washington, Manager, Rates and Regulatory Affairs

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 5-3 Please confirm or deny that the Attachment B to this RFI, is a true and correct copy of a tariff for The Villages. If denied, please provide the tariff in effect for 1990 and 1991.

RESPONSE: Liberty Silverleaf can neither confirm nor deny that Attachment B is a correct copy of the tariff for the Villages in effect for 1990 and 1991.

Prepared by: James Walsh, Senior Rate Analyst

Sponsored by: Leticia Washington, Manager, Rates and Regulatory Affairs

RESPONSE TO REQUEST FOR INFORMATION

OPUC RFI 5-4 Please provide a copy of the tariff that succeeded the tariff identified in your response to OPUC RFI 5-3.

RESPONSE: Please see the response provided in Tyler 1-13 filed on July 25, 2018.

Prepared by: James Walsh, Senior Rate Analyst

Sponsored by: Leticia Washington, Manager, Rates and Regulatory Affairs

Holly Ranch Treatment Plant

2017

Date	January	February	March	April	May	June	July	August	September	October	November	December
1	3,101	697	8,468	9,666	2,351	7,690	23,212	26,239	18,962	8,606	4,197	2,832
2	9,421	3,035	6,494	5,712	3,357	7,574	22,111	29,223	10,902	4,302	5,106	6,975
3	1,103	6,553	2,818	8,694	5,198	13,508	21,484	3,751	3,922	3,957	6,538	8,050
4	1,999	608	6,685	5,129	6,112	19,518	24,419	20,638	37,029	5,062	10,087	5,254
5	3,781	8,447	15,511	5,633	7,891	4,806	7,670	20,903	2,598	5,481	7,452	2,550
6	5,677	6,303	7,409	4,843	6,258	20,134	18,251	16,059	3,128	6,534	5,427	3,086
7	1	67	143	6,789	14,133	6,205	42,595	20,296	4,442	9,632	3,947	2,770
8	5,499	7,949	13,519	3,914	7,272	22,740	35,813	11,354	13,713	6,637	5,288	2,887
9	3,026	10,322	11	7,689	8,317	16,281	16,104	20,709	25	7,707	3,732	3,775
10	4,401	1,743	541	9,059	4,776	17,551	14,620	19,194	1,444	3,994	3,105	3,862
11	12,094	790	10,955	6,473	4,911	18,129	11,148	16,543	3,367	5,501	5,838	3,608
12	6,803	7,909	27,358	8,005	4,436	11,985	9,686	1,143	9,008	3,806	3,640	2,521
13	336	12,543	8,214	3,268	5,375	9,449	10,740	1,687	12,243	6,254	3,157	2,720
14	2,633	3,546	1,390	1,748	6,114	15,859	12,996	2,806	6,458	9,432	3,829	1,094
15	4,555	2,446	44,380	17,534	3,735	15,450	12,466	17,453	2,570	7,991	4,898	3,078
16	2,744	5,825	10,944	24,043	5,474		32,195	14,310	8,800	6,926	6,193	6,792
17	20,303	3,321	12,518	10,129	3,078	9,213	10,844	17,155	4,309	4,649	7,336	2,774
18	2	2,973	18,627	9,245	5,459	23,764	26,562	23,859	6,359	6,414	7,642	6,112
19	1,325	498	9,539	8,410	8,303	9,452	6,162	223	3,765	5,140	6,079	6,667
20	427	14,763	4,053	2,699	7,041	4,019	10,615	29,941	5,904	6,643	5,892	2,723
21	940	11,006	2,102	103	7,300	9,015	44,346	5,609	7,326	7,647	4,156	2,828
22	10,429	2,059	5,286	4,144	5,976	10,537	13,217	10,849	6,334	3,227	5,097	3,724
23	2,272	6,517	18,275	6,882	3,930	12,955	12,595	490	158	9,852	4,522	4,254
24	3,120	1,924	935	10,010	5,821	14,557	11,893	4,762	9,547	3,452	15,606	3,880
25	2,684	1,611	286	9,224	5,225	14,983	12,745	5,915	3,669	3,091	18,521	3,833
26	7	9,263	7,758	8,140	7,156	11,000	6,388	11,717	11,980	4,016	23,334	3,668
27		4,661	13,224	6,385	10,483	7,773	6,399	21,339	9,113	4,192	3,429	4,872
28	1,052	5,783	15,959	8,098	26,445	15,316	21,248	89	4,975	3,795	2,572	2,660
29	7,495		6,849	14,828	7,482	18,908	24,802	4,304	7,660	3,994	5,196	4,127
30	2,142		11,852	10,690	18,410	10,501	13,484	4,828	5,059	2,702	1,666	4,377
31	2,658		9,738		10,488		8,005	18,627		3,460		3,128
Ttl	122,030	143,162	301,841	237,186	228,307	378,872	544,815	402,015	224,769	174,096	193,482	121,481
Avg	4,068	5,113	9,737	7,906	7,365	13,065	17,575	12,968	7,492	5,616	6,449	3,919
Max	20,303	14,763	44,380	24,043	26,445	23,764	44,346	29,941	37,029	9,852	23,334	8,050
Min	1	67	11	103	2,351	4,019	6,162	89	25	2,702	1,666	1,094

Big Eddy Treatment Plants

2017

Date	January	February	March	April	May	June	July	August	September	October	November	December
1	31,500	16,600	17,500	49,000	17,100	43,700	58,100	54,400	34,600	24,800	14,900	44,200
2	20,600	14,600	15,100	37,400	15,200	96,700	67,100	46,300	70,000	10,300	10,000	56,300
3	12,900	19,100	32,000	26,000	18,000	96,700	70,900	48,600	46,200	15,400	25,700	27,400
4	14,900	24,500	20,000	24,500	17,800	57,700	62,800	16,700	37,900	11,100	36,300	24,700
5	17,700	19,500	31,300	29,400	12,100	57,900	59,500	83,900	24,500	17,300	16,200	43,200
6	17,600	27,300	23,400	11,300	22,800	44,000	28,100	42,800	19,700	14,500	14,100	34,800
7	17,400	17,400	25,800	26,800	22,800	44,900	33,600	20,100	18,200	34,700	17,600	38,100
8	19,600	16,000	42,100	26,500	38,900	51,100	112,600	87,100	18,300	47,700	13,800	38,900
9	11,900	19,100	40,800	33,700	13,800	55,200	58,800	45,000	26,900	28,200	14,600	35,700
10	12,700	34,600	18,100	13,700	14,400	35,900	46,100	17,200	39,000	24,500	16,300	5,900
11	13,700	20,600		16,200	24,900	48,300	51,800	63,800	13,600	20,600	24,200	60,200
12	13,700	24,500	109,100	18,900	20,400	49,000	47,900	68,500	9,100	30,500	29,800	28,700
13	22,400	15,100	45,300	20,000	32,100	44,700	51,300	70,200	10,000	25,100	10,100	50,700
14	23,300	25,000	38,700	27,100	28,000	43,800	53,500	56,800	12,000	32,700	26,200	23,500
15	40,900	12,900	41,500	38,300	18,700	52,000	53,600	44,900	11,500	32,700	40,800	23,600
16	60,700	12,300	61,100	37,000	18,200	23,100	67,300	36,900	29,900	8,800	17,300	53,600
17	50,200	23,200	29,000	17,100	21,000	85,000	52,300	73,900	21,100	14,600	11,300	17,100
18	51,600	38,100	124,100	14,000	11,000	53,700	46,500	58,900	11,100	9,000	25,700	17,100
19	42,500	40,500	42,200	15,300	19,700	50,400	50,800	56,200	19,000	10,700	28,900	12,400
20	27,900	49,500	17,800	19,400	47,800	46,100	40,700	42,000	9,100	16,900	21,800	12,700
21	31,200	26,000	18,300	27,700	40,300	52,400	69,400	28,800	16,400	17,700	17,100	14,600
22	26,100	11,000	20,400	39,800	26,200	59,000	58,600	34,100	14,700	25,100	1,900	14,700
23	12,800	14,500	7,100	24,600	26,100	52,700	77,200	19,600	21,700	17,800	16,900	24,200
24	12,200	12,600	45,100	17,400	20,500	62,300	42,400	28,000	22,800	9,400	39,700	17,300
25	12,900	44,500	33,500	15,700	37,200	55,900	47,700	28,500	10,600	7,600	28,700	16,200
26	9,000	16,900	26,700	13,600	32,000	47,800	45,800	54,000	23,200	11,900	14,300	12,700
27	20,800	37,800	21,900	16,200	56,600	26,000	39,600	37,600	18,600	18,500	9,100	18,300
28	26,000	19,800	23,400	22,200	67,600	43,500	44,200	27,400	15,000	19,500	5,700	15,600
29	19,400		23,500	40,700	48,300	52,700	67,400	2,700	15,900	11,500	5,700	24,300
30	18,200		30,700	27,100	33,900	48,500	56,000	63,500	22,500	11,500	12,100	14,200
31	12,700		2,800		7,200		49,300	11,100		12,000		19,600
Ttl	725,000	653,500	1,028,300	746,600	830,600	1,580,700	1,710,900	1,369,500	663,100	592,600	566,800	840,500
Avg	23,387	23,339	34,277	24,887	26,794	52,690	55,190	44,177	22,103	19,116	18,893	27,113
Max	60,700	49,500	124,100	49,000	67,600	96,700	112,600	87,100	70,000	47,700	40,800	60,200
Min	9,000	11,000	2,800	11,300	7,200	23,100	28,100	2,700	9,100	7,600	1,900	5,900

Piney Shores Treatment Plant

2017

Date	January	February	March	April	May	June	July	August	September	October	November	December
1	49,000	24,000	24,000	28,000	27,000	36,000	51,000	45,000	31,000	26,000	23,000	40,000
2	64,000	23,000	26,000	45,000	30,000	29,000	54,000	25,000	27,000	36,000	33,000	29,000
3	36,000	42,000	41,000	24,000	37,000	47,000	56,000	39,000	33,000	41,000	20,000	35,000
4	45,000	26,000	41,000	27,000	31,000	49,000	70,000	30,000	28,000	27,000	19,000	25,000
5	46,000	42,000	50,000	28,000	40,000	39,000	51,000	42,000	26,000	18,000	32,000	34,000
6	45,000	31,000	42,000	33,000	45,000	45,000	39,000	45,000	29,000	27,000	35,000	27,000
7	55,000	21,000	33,000	26,000	49,000	46,000	56,000	67,000	35,000	39,000	31,000	35,000
8	23,000	19,000	34,000	50,000	26,000	36,000	39,000	44,000	18,000	28,000	30,000	24,000
9	23,000	29,000	39,000	33,000	24,000	40,000	58,000	41,000	29,000	26,000	40,000	27,000
10	27,000	23,000	42,000	46,000	16,000	43,000	64,000	44,000	24,000	35,000	39,000	50,000
11	28,000	39,000	42,000	59,000	26,000	39,000	40,000	36,000	20,000	30,000	33,000	28,000
12	31,000	39,000	48,000	39,000	27,000	36,000	43,000	33,000	17,000	30,000	38,000	23,000
13	34,000	35,000	50,000	31,000	55,000	37,000	46,000	44,000	17,000	32,000	26,000	15,000
14	44,000	48,000	52,000	39,000	47,000	35,000	49,000	43,000	25,000	41,000	25,000	16,000
15	54,000	38,000	54,000	31,000	30,000	32,000	44,000	48,000	26,000	45,000	21,000	24,000
16	53,000	40,000	32,000	47,000	29,000	45,000	46,000	48,000	32,000	33,000	11,000	45,000
17	72,000	35,000	42,000	58,000	35,000	58,000	44,000	24,000	26,000	32,000	20,000	22,000
18	40,000	29,000	36,000	51,000	25,000	41,000	46,000	43,000	25,000	31,000	26,000	19,000
19	32,000	33,000	47,000	37,000	26,000	39,000	36,000	50,000	22,000	15,000	34,000	23,000
20	51,000	59,000	29,000	36,000	40,000	38,000	36,000	56,000	15,000	36,000	34,000	19,000
21	43,000	24,000	33,000	41,000	47,000	34,000	45,000	46,000	19,000	34,000	37,000	21,000
22	27,000	23,000	19,000	53,000	30,000	39,000	47,000	52,000	17,000	30,000	32,000	34,000
23	22,000	24,000	26,000	43,000	33,000	46,000	55,000	41,000	31,000	21,000	40,000	31,000
24	23,000	39,000	27,000	33,000	31,000	49,000	54,000	31,000	16,000	20,000	44,000	30,000
25	26,000	41,000	37,000	34,000	24,000	49,000	77,000	35,000	21,000	17,000	40,000	38,000
26	29,000	50,000	24,000	37,000	39,000	53,000	69,000	82,000	24,000	21,000	45,000	36,000
27	46,000	30,000	22,000	32,000	40,000	37,000	60,000	181,000	24,000	22,000	23,000	38,000
28	38,000	25,000	24,000	47,000	64,000	51,000	59,000	73,000	22,000	32,000	17,000	49,000
29	34,000		26,000	48,000	33,000	43,000	51,000	60,000	35,000	27,000	26,000	42,000
30	26,000		28,000	41,000	30,000	43,000	53,000	41,000	36,000	22,000	26,000	47,000
31	16,000		28,000		28,000		48,000	43,000		23,000		54,000
Ttl	1,182,000	931,000	1,098,000	1,177,000	1,064,000	1,254,000	1,586,000	1,532,000	750,000	897,000	900,000	980,000
Avg	38,129	33,250	35,419	39,233	34,567	41,800	3,121,000	3,019,000	25,000	28,935	30,000	31,613
Max	72,000	59,000	54,000	59,000	64,000	58,000	77,000	181,000	36,000	45,000	45,000	54,000
Min	16,000	19,000	19,000	24,000	16,000	29,000	36,000	24,000	15,000	15,000	11,000	15,000