

Control Number: 48819



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#### SOAH DOCKET NO. 473-20-1674.WS PUC DOCKET NO. 48819

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# APPLICATION OF NORTHTOWN ACRES WATER SUPPLY FOR AUTHORITY TO CHANGE RATES

## ADMINISTRATIVE HEARINGS

OF

BEFORE THE STAT

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### NORTHTOWN ACRES' RESPONSE TO SOAH ORDER NO. 4

Sheroll and Roger Richardson d/b/a Northtown Acres Water Company (Northtown Acres) and Staff (Staff) of the Public Utility Commission (Commission) jointly file this Response to State Office of Administrative Hearings (SOAH) Order No. 4. In support thereof, movants respectfully shows as follows:

### I. BACKGROUND

SOAH Order No. 4, issued March 5, 2020, directed Staff and Northtown Acres to file revised interim rates that address the structural problems in the existing rate design, particularly the inclusion of 2,000 gallons of usage in the minimum monthly charge, establishing a monthly charge for all meter sizes served, and a pass-through charge that recovers the purchased water costs. SOAH Order No. 4 also required Staff and Northtown Acres to provide schedules showing that the revenues generated by their proposal match those of Northtown Acres' alternative proposal. The deadline for Staff's and Northtown Acres filing is March 31, 2020. Therefore, this pleading is timely filed.

Pursuant to agreement, all parties to this proceeding have agreed to electronic service of all pleadings.

#### II. RESPONSE TO SOAH ORDER NO. 4

Northtown Acres and Staff are providing the attached proof of revenues and rate design in response to SOAH Order No. 4.

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Interim Rates Pursuant to SOAH Order No. 4				
Minimum monthly charge (including zero gallons of usage)				
5/8 inch meter <sup>3</sup> / <sub>4</sub> inch meter 1 inch meter 1 <sup>1</sup> / <sub>2</sub> inch meter 2 inch meter	\$18.75 \$28.05 \$46.75 \$93.50 \$149.60			
1,000 – 10,000 gallons	\$3.00			
10,001 – 25,000 gallons	\$3.25			
25,001+ gallons	\$3.75			
Pass-through rate for purchased water	\$1.96			

The attached rate design required manually recreating the monthly gallonage usage by tier from the monthly billing registers for the test year. In an effort to conserve resources, Northtown Acres and Staff have agreed to use the attached monthly gallonage usage for the test year in ultimately setting rates in this case and as a proxy for determining any over or under collection balance in this case.

Northtown Acres has provided the attached proof of revenues and rate design to Mr. Frank Marx and Mr. Mark Parker. Mr. Marx agrees that the calculations are in compliance with SOAH Order No. 4.

## III. CONCLUSION

For the above stated reasons, Northtown Acres and Staff respectfully request that the SOAH ALJs approve the above referenced interim rates.

Respectfully submitted,

Mace

INSTEAD PC

Stephen P. Mack State Bar No. 24041374 Erika N. Garcia State Bar No. 24092077 401 Congress Avenue, Suite 2100 Austin, Texas 78701 Office: (512) 370-2873 Facsimile: (512) 370-2850 e-mail: smack@winstead.com e-mail: egarcia@winstead.com

**ATTORNEYS FOR NORTHTOWN ACRES** 

## PUBLIC UTILITY COMMISSION OF TEXAS **LEGAL DIVISION**

Rachelle Nicolette Robles **Division Director** 

/s/ Eleanor D'Ambrosio

Eleanor D'Ambrosio State Bar No. 24097559 1701 N. Congress Avenue P.O. Box 13326 Austin, Texas 78711-3326 (512) 936-7021 (512) 936-7268 (facsimile) Eleanor.Dambrosio@puc.texas.gov

#### **CERTIFICATE OF SERVICE**

I certify that on March 31, 2020, a true and correct copy of the foregoing instrument was served on all parties of record by electronic service, hand delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.

Stephen Mack

SOAH Docket No. 473-20-1674 WS PUC Docket No. 48819

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Ainimum Bill				
	(includes 0 g	allons)		
5/8"				18 70
	3/4"	<b>.</b>	\$ \$	28 05
	1"	5	46.75	
1 1/2"			\$	93 50
2"			5	149 60
·	3"	Ť		
	4"		+	
	6"		-	
	Collogogo		—	
	Gallonage f		+	
0	to	10, <b>00</b> 0	\$	3 00
10,00	1 <sup>to</sup>	25000	\$	3 25
25001	I.		\$	3 7 5
	No. of Met	iers		
	5/8"			121
	3/4"			-
	1"			32
	1 1/2"			3
	2"			2
	3"			-
	4			-
	6			-
	Total		-	450
	Total	<u>.</u>	+-	158
	Gallons Bi	illed		
0	to	10000	+	10,199,000
10001	to	25000		2,867,000
25001	0	0		2,190,000
otal		•	+	15,256,00
EVENUE				
REVENUE	Base Ra	te		
EVENUE	Base Ra 5/8"	te	\$	27,152
EVENUE	5/8" 3/4"	te	\$ \$	27,152
EVENUE	5/8" 3/4" 1"		1.	-
EVENUE	5/8" 3/4"		\$	- 17,952
EVENUE	5/8" 3/4" 1"		\$ \$	- 17,952 3,366
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Month	1 - 2,000	2,001 - 10,000	10,001 - 25,000	25,001+	Total
January	244,000	351,000	61,000	78,000	734,000
February	272,000	511,000	96,000	49,000	928,000
March	267,000	501,000	168,000	48,000	984,000
April	262,000	394,000	68,000	13,000	737,000
May	284,000	618,000	272,000	155,000	1,329,000
June	285,000	673,000	346,000	179,000	1,483,000
July	277,000	672,000	361,000	281,000	1,591,000
August	293,000	740,000	389,000	389,000	1,811,000
September	289,000	737,000	487,000	551,000	2,064,000
October	283,000	582,000	275,000	187,000	1,327,000
November	282,000	550,000	172,000	130,000	1,134,000
December	282,000	550,000	172,000	130,000	1,134,000
TOTAL	3,320,000	6,879,000	2,867,000	2,190,000	15,256,000