



Control Number: 49154



Item Number: 65

Addendum StartPage: 0


DOCKET NO. 49154
SOAH DOCKET NO. 473-19-5677.WS

RATEPAYERS' APPEAL OF THE	§	STATE OFFICE OF
DECISION BY LAGUNA MADRE	§	
WATER DISTRICT TO CHANGE	§	ADMINISTRATIVE HEARINGS
RATES	§	

**LAGUNA MADRE WATER DISTRICT'S RESPONSE TO
RATEPAYERS' FIRST SET OF REQUESTS FOR INFORMATION
TO LAGUNA MADRE WATER DISTRICT**

COMES NOW, Laguna Madre Water District, Respondent in the above-referenced matter, and pursuant to the Tex. Admin. Code Ann. § 22.144 (TAC), makes and files this its Responses to Ratepayers' First Set of Requests for Information to Laguna Madre Water District.

Respectfully Submitted,



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**ATTORNEYS FOR RESPONDENT
LAGUNA MADRE WATER DISTRICT**

CERTIFICATE OF SERVICE

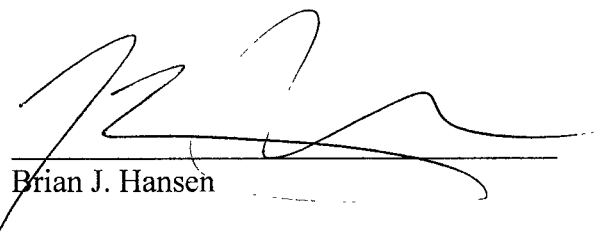
A true and correct copy of the above and foregoing **Laguna Madre Water District's Responses to Ratepayers' First Set of Requests for Information to Laguna Madre Water District** has been served on all parties of record on the 20th day of December, 2019 as follows:

Via U.S. Postal Service:

Kourtnee Jinks
Public Utilities Commission of Texas Legal Division
P.O. Box 13326
Austin, Texas 78711-3326
Attorney for Public Utilities Commission of Texas

Via U.S. Postal Service:

Liliana Elizondo
James H. Hunter, Jr.
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Brownsville, Texas 78521
Attorney for South Padre Island Golf Course



Brian J. Hansen

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PUC DOCKET NO. 49154**

**LAGUNA MADRE WATER DISTRICT'S RESPONSES TO
RATEPAYERS' FIRST SET OF REQUESTS FOR INFORMATION
TO LAGUNA MADRE WATER DISTRICT**

1. Please produce all studies prepared by or for Laguna Madre Water District regarding raw water since in or after 1988.

RESPONSE: See Exhibit "A" -Documents bates labeled LMWD 18505 – LMWD 18822.

2. Please produce all invoices received from Dan V. Jackson, Economists.com, Willdan, and any other firm for whom Dan V. Jackson's work the invoice charged Laguna Madre Water District from 1988 to the present.

RESPONSE: See Exhibit "B" -Documents bates labeled LMWD 18823 – LMWD 18828.

3. Please produce copies of all payments made to Dan V. Jackson, Economists.com, Willdan, and any other firm for work by Dan V. Jackson from 1988 to the present.

RESPONSE: See Exhibit "C" -Documents bates labeled LMWD 18829 – LMWD 18833.

4. Please identify all Laguna Madre Water District raw water rate increases from 1988 to the present by amount and date.

RESPONSE: See Exhibit "D" -Document bates labeled LMWD 18834.

5. Please identify the composition of the water line used by Laguna Madre Water District to transport water to South Padre Island Golf Course.

RESPONSE: Pipeline from Water Plant #2 Raw Water Pump Station to South Padre Island Golf Community meter is 18" PVC CL100 SDR41.

The following components of raw water conveyance system serve all customers, including South Padre Island Golf Course (SPIG):

From Rio Grande River to Reservoir No. 4: Contract 'C' As-Built dated March 1990, 42" Concrete Pipe Class A - 50, 24,230 feet; 14 stand pipes

From Reservoir No. 4 to Cuates Pump Station: Contract 'D' 36" Concrete Pipe Class A – 50, 31,717 Linear Feet (LF) & Class B – 50, 16,091 LF, for a total length of 47,808 LF, built Completed March 1990.

From Cuates Pump Station to Reservoir #3 in Laguna Vista has three parallel water lines:

- 24" Asbestos Cement (AC) water line, 23,425 LF, Completed in July 1985, then 20" AC, 42,500 LF, completed in 1983;
- parallel 16" AC/PVC waterline, 65, 925 LF, age unknown (oldest pipeline, 1950s to 1970s)
- 24" AWWA C905, DR 32.5 PVC, 23, 680 LF completed October 2012, then 24" PVC DR 41 C905, 42, 695 LF, completed August 7, 2014

6. Please identify the age of the water line used by Laguna Madre Water District to transport water to South Padre Island Golf Course.

RESPONSE: As-Built Record Drawings for SPIG irrigation line are dated 8-28-97. Therefore, SPIG water line is 22 years old. The remaining components of the waterline are 29 years old, 34 years old, 36 years old, 7 years old, 5 years old, & unknown (50+ years) as described in response to Item 5.

7. Please identify the dimensions of the water line used by Laguna Madre Water District to transport water to South Padre Island Golf Course.

RESPONSE: Length of 18" diameter pipe is 762 feet from Water Plant 2 raw water pump station to raw water stand pipe. The remaining components of the waterline vary in diameter from 16" to 42" with lengths described in Item 5.

8. Please identify the projected time of replacement of the water line used by Laguna Madre Water District to transport water to South Padre Island Golf Course and explain how this projected time of replacement was calculated, including what it is based upon.

RESPONSE: Virtually all the assets that comprise LMWD's expensive and complex 26 mile raw water transportation system have depreciable/useful lifespans of 40 to 50 years. Each asset, its original cost, and forecast depreciable lifespan is contained by line item in the Rate Model spreadsheet provided by Mr. Dan V. Jackson. The District assumes that as the useful lifespans expire each asset will be replaced accordingly.

Please note that 40 to 50-year useful lifespans are common for water distribution assets in the industry.

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CD CONTAINING DOCUMENTS RESPONSIVE TO
RATEPAYERS' RFI TO
LAGUNA MADRE WATER DISTRICT

LMWD 18505 – LMWD 18834

CD ATTACHED

TO VIEW PLEASE CONTACT
CENTRAL RECORDS
512-936-7180