Control Number: 49189

Item Number: 102

Addendum StartPage: 0

APPLICATION OF THE CITY OF AUSTIN	§	BEFORE THE STATE OFFICE
DBA AUSTIN WATER FOR AUTHORITY	§	OF
TO CHANGE WATER	§	
AND WASTEWATER RATES	§	ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S ELEVENTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 11-1 THROUGH STAFF 11-2

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that the City of Austin d/b/a Austin Water, by and through its attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk. Public Utility Commission of Texas. 1701 N. Congress Avenue, P.O. Box 13326. Austin. Texas 78711-3326.
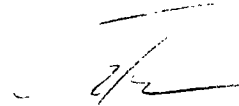
Dated: October 9, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director
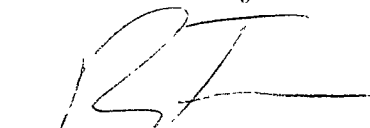
Karen S. Hubbard
Managing Attorney

_____
Eleanor D'Ambrosio
State Bar No. 24097559
Rustin Tawater
State Bar No. 24110430
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7021
(512) 936-7268 (facsimile)
Eleanor.Dambrosio@puc.texas.gov

**SOAH DOCKET NO. 473-19-6297.WS
PUC DOCKET NO. 49189**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on October 9, 2019 in accordance with 16 Texas Administrative Code § 22.74.

_____
Rustin Tawater

**COMMISSION STAFF'S ELEVENTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 11-1 THROUGH STAFF 11-2**

DEFINITIONS

A.   "COA," "AW" or "you" refers to the City of Austin d/b/a Austin Water and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B.   "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms. pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.   In the event any documents requested by this Request for Information have been transferred beyond the Company's control. describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document.   In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

C.   "Districts" refers to North Austin Municipal Utility District No. 1, Northtown Municipal Utility District, Travis County Water Control & Improvement District No. 10, and Wells Branch Municipal Utility District.

SOAH DOCKET NO. 473-19-6297.WS
PUC DOCKET NO. 49189

COMMISSION STAFF'S ELEVENTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 11-1 THROUGH STAFF 11-2

INSTRUCTIONS

1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.

2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.

4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

8) Staff requests that each item of information be made available as it is completed. rather than upon completion of all information requested.

COMMISSION STAFF'S ELEVENTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 11-1 THROUGH STAFF 11-2

Staff 11-1   Please refer to Austin Water's response to Staff 7-9a. Did any customers in any Districts participate in Austin Water's conservation programs during the Test Year? Have any District customers ever participated in Austin Water's conservation programs (while still receiving retail service from Austin Water's wholesale customer)?

Staff 11-2   Please refer to Austin Water's response to Staff 7-9a. Please provide by G/L account the costs of Austin Water's conservation programs that Austin Water requests be assigned to the Districts in this proceeding. Please provide citations to the cost study where the amounts can be found.