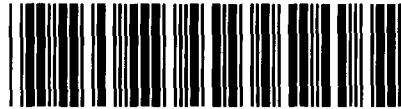


Control Number: 49189



Item Number: 106

Addendum StartPage: 0

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SOAH DOCKET NO. 473-19-6297,WS

PUC DOCKET NO. 49189

2019 OCT 10 PM 2:36

APPLICATION OF THE CITY OF  
AUSTIN DBA AUSTIN WATER FOR  
AUTHORITY TO CHANGE WATER  
AND WASTEWATER RATES

§  
§  
§  
§

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

**CITY OF AUSTIN D/B/A AUSTIN WATER'S  
RESPONSE TO PETITIONERS'  
SEVENTH REQUEST FOR INFORMATION**

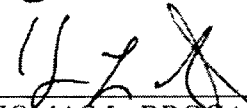
To: North Austin Municipal Utility District No. 1, Northtown Municipal Utility District, Travis County Water Control and Improvement District No. 10 and Wells Branch Municipal Utility District, by and through their attorneys of record, Randall B. Wilburn, Gilbert Wilburn, PLLC, 7000 North MoPac Blvd., Suite 200, Austin, Texas 78731 and John Carlton, 4301 Westbank Drive., Suite B-130, Austin, Texas 78746.

The City of Austin (City) doing business as Austin Water (Austin Water or AW) files its Responses to North Austin Municipal Utility District No. 1, Northtown Municipal Utility District, Travis County Water Control and Improvement District No. 10 and Wells Branch Municipal Utility District's (collectively Districts) Seventh Request for Information (RFI) to Austin Water received on September 20, 2019. This response is timely filed. Pursuant to 16 Tex. Admin. Code (TAC) § 22.144(c)(2)(F), Austin Water agrees and stipulates that all parties may treat the responses as if the answers were filed under oath.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE  
& TOWNSEND, P.C.**

816 Congress Avenue, Suite 1900  
Austin, Texas 78701  
(512) 322-5800  
(512) 472-0532 (Fax)

  
\_\_\_\_\_  
THOMAS L. BROCATO  
[tbrocato@lglawfirm.com](mailto:tbrocato@lglawfirm.com)  
State Bar No. 03039030

106

W. PATRICK DINNIN  
[pdinnin@lglawfirm.com](mailto:pdinnin@lglawfirm.com)  
State Bar No. 24097603

**ATTORNEYS FOR CITY OF AUSTIN**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served by email on October 10, 2019, to the parties of record.

  
THOMAS L. BROCATO

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-1:** Please refer to Attachment 1 (AW 2-1, Attachment 1.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsx does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>1</sup>
- b. This source document supports Austin Water's Application,<sup>2</sup> Schedule II-C-4, Long Term Debt, Line No. 22.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment supports Table 60-1, "Capital Cost Budget," Line No. 11, AW Wastewater COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.

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<sup>1</sup> 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's Second Request for Information to City of Austin dba Austin Water at 4 (Aug. 9, 2019) (Districts' Second RFI).

<sup>2</sup> Application of the City of Austin d/b/a Austin Water for Authority to Change Water and Wastewater Rates (Apr. 15, 2019) (Application).

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

- ii. Identify the source of any non-superfluous information or data:
  - 1. Belinda Weaver, Interim City Treasurer, City Treasury.
  - 2. Bryan Rivera, Deputy City Treasurer, City Treasury.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-2:** Please refer to Attachment 1 (AW 2-1, Attachment 2.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>3</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 25.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

---

<sup>3</sup> Districts' Second RFI at 4.

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-3:** Please refer to Attachment 1 (AW 2-1, Attachment 3.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is commercial paper (short-term debt) issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>4</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-5, Weighted Average Cost of Short-Term Debt.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, AW Water COS Model Docket 49189.xlsx. This attachment supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>4</sup> *Id.*



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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-4:** Please refer to Attachment 1 (AW 2-1, Attachment 4.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is commercial paper (short-term debt) issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>5</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-5, Weighted Average Cost of Short-Term Debt.
- c. Schedule II-C-5 is a schedule of outstanding commercial paper, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>5</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-5:** Please refer to Attachment 1 (AW 2-1, Attachment 5.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>6</sup>
- b. This source document supports the Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 6.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11 in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>6</sup> *Id*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-6:** Please refer to Attachment 1 (AW 2-1, Attachment 6.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>7</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 8.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

---

<sup>7</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-7:** Please refer to Attachment 1 (AW 2-1, Attachment 7.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is an ordinance by the City that authorizes the issuance of debt, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>8</sup> This is the City Ordinance Authorizing the Issuance and Sale of Revenue Bonds, Series 2010.
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

---

<sup>8</sup> *Id.*



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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-8:** Please refer to Attachment 1 (AW 2-1, Attachment 8.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>9</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line Nos. 11 and 12.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, AW Water COS Model Docket 49189.xlsx. This attachment supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>9</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-9:** Please refer to Attachment 1 (AW 2-1, Attachment 9.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>10</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line Nos. 11 and 12.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>10</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-10:** Please refer to Attachment 1 (AW 2-1, Attachment 10.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>11</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 13.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1 "Capital Cost Budget" Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1 "Capital Cost Budget" Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>11</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-11:** Please refer to Attachment 1 (AW 2-1, Attachment 11.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>12</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 17.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>12</sup> *Id.*



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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-12:** Please refer to Attachment 1 (AW 2-1, Attachment 12.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>13</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 1.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>13</sup> *Id*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-13:** Please refer to Attachment 1 (AW 2-1, Attachment 13.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- c. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>14</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line Nos. 2 and 3.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>14</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-14:** Please refer to Attachment 1 (AW 2-1, Attachment 14.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>15</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line Nos. 28 and 29.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>15</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-15:** Please refer to Attachment 1 (AW 2-1, Attachment 15.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>16</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line Nos. 28 and 29.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- c. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>16</sup> *Id.*



**SOAH DOCKET NO. 473-19-6297.WS**  
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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-16:** Please refer to Attachment 1 (AW 2-1, Attachment 16.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>17</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 30.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>17</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-17:** Please refer to Attachment 1 (AW 2-1, Attachment 17.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>18</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 31.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. The attachment supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>18</sup> *Id.*

**SOAH DOCKET NO. 473-19-6297.WS  
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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
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**SOAH DOCKET NO. 473-19-6297.WS**  
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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-18:** Please refer to Attachment 1 (AW 2-1, Attachment 18.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>19</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 32.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>19</sup> *Id.*

**SOAH DOCKET NO. 473-19-6297.WS  
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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

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**SOAH DOCKET NO. 473-19-6297.WS**  
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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-19:** Please refer to Attachment 1 (AW 2-1, Attachment 19.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>20</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 33.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>20</sup> *Id.*



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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-20:** Please refer to Attachment 1 (AW 2-1, Attachment 20.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>21</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 14.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. This attachment supports Table 71-1, "Capital Cost Budget," Line No. 11, in the AW Water COS Model Docket 49189.xlsx. This attachment supports Table 60-1, "Capital Cost Budget," Line No. 11, in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>21</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-21:** Please refer to Attachment 1 (AW 2-1, Attachment 21.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is source documentation for payroll, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>22</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.1.c, General Payroll Increase for Historic Test Year and Adjusted Test Year.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Wastewater COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City, Human Resources Department, City-Wide Bulletin.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>22</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-22:** Please refer to Attachment 1 (AW 2-1, Attachment 22.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is source documentation for payroll, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>23</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.1.c, General Payroll Increase for Historic Test Year and Adjusted Test Year.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Water COS Model Docket 49189.xlsx. This attachment supports Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Wastewater COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City, Human Resources Department, City-Wide Bulletin.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>23</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-23:** Please refer to Attachment 1 (AW 2-1, Attachment 23.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is purchased water supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>24</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-7(W), Purchased Water.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Water COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- c. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Loop 360 Water Supply, Vendor.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>24</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-24:** Please refer to Attachment 1 (AW 2-1, Attachment 24.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is purchased water supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>25</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-7(W), Purchased Water.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Water COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Loop 360 Water Supply, Vendor.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>25</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-25:** Please refer to Attachment 1 (AW 2-1, Attachment 25.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is purchased water supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>26</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-7(W), Purchased Water.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," table in the AW Water COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Loop 360 Water Supply, Vendor.

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Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>26</sup> *Id.*



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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-26:** Please refer to Attachment 1 (AW 2-1, Attachment 26.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is purchased water supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>27</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-7(W), Purchased Water.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Water COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Lower Colorado River Authority, Vendor.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>27</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-27:** Please refer to Attachment 1 (AW 2-1, Attachment 27.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is incentive compensation and bonus plans supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>28</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.3.d, Other Payroll Information – Incentive Compensation and Bonus Plans.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Water COS Model Docket 49189.xlsx. This attachment supports Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City of Austin Advantage 3 Financial System.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>28</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-28:** Please refer to Attachment 1 (AW 2-1, Attachment 28.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsx does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is Operations and Maintenance (O&M) expense supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>29</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Wastewater COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. This is a MicroStrategy Budget report download from the City of Austin Advantage 3 Financial System MicroStrategy reporting tool.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>29</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-29:** Please refer to Attachment 1 (AW 2-1, Attachment 29.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is benefit supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>30</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.1.c, General Payroll Increase for Historic Test Year and Adjusted Test Year.
- c. This attachment supports Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Water COS Model Docket 49189.xlsx. This attachment also supports Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets," in the AW Wastewater COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City, Controller's Department, City-Wide Bulletin.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>30</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-30:** Please refer to Attachment 1 (AW 2-1, Attachment 30.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>31</sup>
- b. This source document supports Austin Water's Application, Schedule WP/II C-6.2, Amortization Schedules for all Short and Long-Term Debt (Water).
- c. This debt issuance was paid off in the test year, 2018, therefore, it is not included in the COS model.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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<sup>31</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-31:** Please refer to Attachment 1 (AW 2-1, Attachment 31.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is O&M expense supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>32</sup> These are support documents for the 45-day Update.<sup>33</sup>
- b. This source document supports the 45-day Update II-D-9 Schedules.
- c. odelCOS models are based on the 2018 test year, with known and measurable changes. The 45-day Update has not been incorporated into the COS models.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. This is a MicroStrategy Budget report download from the City's Advantage 3 Financial System MicroStrategy reporting tool.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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<sup>32</sup> *Id.*

<sup>33</sup> Austin Water's 45-Day Required Update to the Rate Filing Package (Jul. 26, 2019) (45-day Update)

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-32:** Please refer to Attachment 1 (AW 2-1, Attachment 32.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is incentive compensation and bonus plans supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>34</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.3.d, Other Payroll Information – Incentive Compensation and Bonus Plans.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City, Human Resources Department, Procedure Bilingual Pay Program: Interpretation Skills.

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<sup>34</sup> Districts' Second RFI at 4.

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales



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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-33:** Please refer to Attachment 1 (AW 2-1, Attachment 33.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>35</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 32.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget" Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 60-1, "Capital Cost Budget" Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>35</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-34:** Please refer to Attachment 1 (AW 2-1, Attachment 34.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>36</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 33.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>36</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-35:** Please refer to Attachment 1 (AW 2-1, Attachment 35.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>37</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.

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<sup>37</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-36:** Please refer to Attachment 1 (AW 2-1, Attachment 36.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
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  - ii. Identify the source of any non-superfluous information or data:
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>38</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
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<sup>38</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-37:** Please refer to Attachment 1 (AW 2-1, Attachment 37.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>39</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-5, Weighted Average Cost of Short-Term Debt, Line No. 30.
- c. Schedule II-C-5 is a schedule of commercial paper, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

---

<sup>39</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-38:** Please refer to Attachment 1 (AW 2-1, Attachment 38.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is incentive compensation and bonus plans supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>40</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.3.d, Other Payroll Information – Incentive Compensation and Bonus Plans.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City's Advantage 3 Financial System.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-39:** Please refer to Attachment 1 (AW 2-1, Attachment 39.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is incentive compensation and bonus plans supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>40</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.3.d, Other Payroll Information – Incentive Compensation and Bonus Plans.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City's Advantage 3 Financial System.

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<sup>40</sup> *Id*

<sup>41</sup> *Id*.

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-40:** Please refer to Attachment 1 (AW 2-1, Attachment 40.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>42</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 8.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>42</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-41:** Please refer to Attachment 1 (AW 2-1, Attachment 41.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>43</sup>
- b. This source document supports Austin Water's Application, Schedule WP/II C-6.27, Amortization Schedules for all Short and Long-Term Debt (Water and Wastewater).
- c. This debt issuance was paid off in the test year 2018, therefore, it is not included in the COS model.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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<sup>43</sup> *Id.*



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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-42:** Please refer to Attachment 1 (AW 2-1, Attachment 42.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
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If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>44</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line Nos. 11 and 12.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>44</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-43:**

Please refer to Attachment 1 (AW 2-1, Attachment 43.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
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  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>45</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 13.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>45</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-44:** Please refer to Attachment 1 (AW 2-1, Attachment 44.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>46</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>46</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-45:** Please refer to Attachment 1 (AW 2-1, Attachment 45.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>47</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 51.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>47</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales Prepared by: Christina Romero



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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-46:** Please refer to Attachment 1 (AW 2-1, Attachment 46.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is purchased water supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>48</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-7(W), Purchased Water
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Travis County Water Control & Improvement District (WCID) No. 17, Vendor.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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<sup>48</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-47:** Please refer to Attachment 1 (AW 2-1, Attachment 47.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is purchased water supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>49</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-7(W), Purchased Water.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Travis County WCID No. 17, Vendor.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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<sup>49</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-48:** Please refer to Attachment 1 (AW 2-1, Attachment 48.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so.
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>50</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 25.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>50</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-49:** Please refer to Attachment 1 (AW 2-1, Attachment 49.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>51</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 30.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>51</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-50:** Please refer to Attachment 1 (AW 2-1, Attachment 50.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>52</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Long Term Debt, Line No. 22.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Belinda Weaver, Interim City Treasurer, City Treasury.
    2. Bryan Rivera, Deputy City Treasurer, City Treasury.

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<sup>52</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales



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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-51:** Please refer to Attachment 1 (AW 2-1, Attachment 51.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is the documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>53</sup> This attachment was provided to support the Master Property List (MPL) for fixed asset functionalization.
- b. This attachment supports the "2018 Fixed Asset Pivot Table," as AW included in the Application.
- c. This attachment supports Tab 72, "Asset Functionalization," in the AW Water COS Model Docket 49189.xlsm, and Tab 61, "Asset Functionalization," in the AW Wastewater COS Model Docket 49189.xlsm.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. The source of this attachment is an email from Christina Romero, Financial Manager III, Austin Water.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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<sup>53</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-52:** Please refer to Attachment 1 (AW 2-1, Attachment 52.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is educational incentive supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>54</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.3.d, Other Payroll Information – Incentive Compensation and Bonus Plans.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City, Austin Water, Human Resources.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>54</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-53:** Please refer to Attachment 1 (AW 2-1, Attachment 53.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is Bad Debt Expense documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>55</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-2, Bad Debt Expense.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City, Austin Energy, Monica Gonzales, Accounting Manager.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>55</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-54:**

Please refer to Attachment 1 (AW 2-1, Attachment 54.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsx does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is asset documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>56</sup> This attachment was provided to support the MPL for fixed asset functionalization.
- b. This attachment supports the "2018 Fixed Asset Pivot Table," in Austin Water's Application for confirmation of the Glenlake Water System asset type.
- c. This attachment supports Tab 72, Asset Functionalization in the AW Water COS Model Docket 49189.xlsx.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. The source of this attachment is an email from Christina Romero, Financial Manager III, Austin Water.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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<sup>56</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-55:** Please refer to Attachment 1 (AW 2-1, Attachment 55.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsx does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is pension benefits and OPEB (Other Post-employment Benefits) supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>57</sup>
- b. This source document supports Austin Water's Application, Schedules II-D-9.2.a through II-D-9.2.i, Pension and OPEB Benefits.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Vickie Schubert, Controller's Office Staff, City Controller's Office.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>57</sup> *Id.*

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-56:**

Please refer to Attachment 1 (AW 2-1, Attachment 56.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is Commission assigned docket number documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>58</sup>
- b. This source document supports all schedules in Austin Water's Application.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. David Anders, Assistant Director Austin Water.

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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<sup>58</sup> *Id.*

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**PUC DOCKET NO. 49189**

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-57:** Please refer to Attachment 1 (AW 2-1, Attachment 57.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is incentive compensation and bonus plans supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>59</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.3.d, Other Payroll Information – Incentive Compensation and Bonus Plans.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. City, Human Resources Department, Procedure Bilingual Pay Program: Interpretation Skills.
    2. City, Human Resources Department, Procedure Tuition Reimbursement.
    3. Austin Water, Procedure AW Operations Licensure and Certification.

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<sup>59</sup> *Id*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales



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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-58:** Please refer to Attachment 1 (AW 2-1, Attachment 58.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This attachment explains reconciliation of commercial paper interest expense based on outstanding issuances to the expense general ledger (GL) account.
- b. This attachment supports the Austin Water's Application, Schedule II-C-5, Weighted Average Cost of Short-Term Debt.
- c. This is a correspondence to reconcile submitted documents that support the AW Water COS Model Docket 49189.xlsx Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsx is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Fabian Mesa, Accounting Manager II, City Controller's Office.
    2. Crystal Lopez, Accountant Senior, City Controller's Office.
    3. Christina Romero, Financial Manager III, Austin Water.

Prepared by: Christina Romero  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-59:** Please refer to Attachment 1 (AW 2-1, Attachment 59.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is insurance premiums supporting documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>60</sup>
- b. This source document supports Austin Water's Application, Schedule II-D-9.3.e, Other Payroll Information – Insurance Premiums.
- c. The table in the AW Water COS Model Docket 49189.xlsx is Table 29-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets." The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 18-1, "Detail of O&M Budget Before Application of Non-Rate Revenue Offsets."
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- e. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Debra Dollins, Human Resources Department Staff, City Human Resources Department.

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<sup>60</sup> *Id.*

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**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

Prepared by: Songli Floyd  
Sponsored by: David Anders and Joseph Gonzales

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

**AUSTIN WATER'S RESPONSE TO DISTRICTS' SEVENTH RFI**

**DISTRICTS 7-60:** Please refer to Attachment 1 (AW 2-1, Attachment 60.pdf) of Austin Water's Response to Districts' Second Request for Information, DISTRICTS 2-1:

- a. Please explain how this attachment is associated with the development of the Application.
- b. What RFP schedule(s) in the Application does this attachment support? If none, please so state.
- c. What Table(s) in the AW Water COS Model Docket 49189.xlsx or AW Wastewater COS Model Docket 49189.xlsm does this attachment support? If none, please so state.
- d. Please confirm that David Anders is AW's only witness who supports this attachment; if this attachment's sponsoring witness needs to be modified in AW's response, please do so
- e. If this is a PDF document,
  - i. Identify any information or data in this document that is superfluous to the Application
  - ii. Identify the source of any non-superfluous information or data:
    1. If the source is from the City of Austin, identify the name, title, and department of the preparer

If the source is external to the City of Austin, identify specifically the source of that data, and state the relationship of the source to the City (e.g., vendor, volunteer, customer, etc.).

**RESPONSE:**

- a. This is debt issuance documentation, which Austin Water provided in response to Districts' RFI No. 2-1.<sup>61</sup>
- b. This source document supports Austin Water's Application, Schedule II-C-4, Columns k and l.
- c. Schedule II-C-4 is a schedule of outstanding debt, which includes the debt service requirement for the 2018 test year. The table in the AW Water COS Model Docket 49189.xlsx is Table 71-1, "Capital Cost Budget," Line No. 11. The table in the AW Wastewater COS Model Docket 49189.xlsm is Table 60-1, "Capital Cost Budget," Line No. 11.
- d. AW witnesses David Anders and Joseph Gonzales support this attachment.
- c. If this is a PDF document,
  - i. As best as can be determined, all documents provided in Austin Water's responses to Districts' RFI No. 2-1 are non-superfluous to Austin Water's Application. Austin Water interprets "superfluous" in this question as being responsive to the discovery request.
  - ii. Identify the source of any non-superfluous information or data:
    1. Fabian Mesa, Accounting Manager II, City Controller's Office.

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<sup>61</sup> *Id.*