



Control Number: 49189



Item Number: 109

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

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

**BEFORE THE STATE OFFICE
OF PUBLIC UTILITY COMMISSION
ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S THIRTEENTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
QUESTION NOS. STAFF 13-1 THROUGH 13-11**

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

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

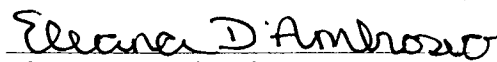
Dated: October 11, 2019

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

Karen S. Hubbard
Managing Attorney



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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on October 11, 2019 in accordance with 16 Texas Administrative Code § 22.74.



Eleanor D'Ambrosio

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**COMMISSION STAFF'S THIRTEENTH REQUEST FOR INFORMATION
TO THE CITY OF AUSTIN DBA AUSTIN WATER
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DEFINITIONS

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

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

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

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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QUESTION NOS. STAFF 13-1 THROUGH 13-11**

- Staff 13-1 Please provide the invoices issued to AW from the City of Austin's Watershed Protection Department for drainage fees expenses included in AW's cost of service.
- Staff 13-2 Please provide the amount of drainage fees included in AW's cost of service and the dollar amount included in each District's cost of service.
- Staff 13-3 Please provide the portion of drainage fees expense included in AW's cost of service that correlates to the following operations
- a) Reclaimed water system;
 - b) The Govalle WWTP;
 - c) Berl L. Handcox, Sr. Water Plant (formerly WTP4).
- Staff 13-4 Provide a list of properties owned by AW for which the drainage fee is assessed and the related impervious cover amounts. Please include (a) the building or plant name; (b) a description of AW's use of the building; and (c) a statement confirming that the building is used for AW operations only, or, if the building is not used for AW operations only, a description of what other City of Austin operations use the building, including the amount of space used for what annual amount of time.
- Staff 13-5 Provide a comparison of the annual expense included in AW's cost of service for the three years prior to the test year and explain any differences that exceed 20% of the previous year's total bill.
- Staff 13-6 With regard to the Community Climate Action Plan adopted by the City of Austin (the Plan) and referred to in the direct testimony of David Anders (page 40), please provide the following information:
- a) A copy of the Plan;
 - b) The name of the department or committee that produced the Plan;
 - c) A description of the process used to approve the Plan approved; please provide city council minutes or other documents approving the plan;
 - d) A list of persons or groups allowed to provide input to the Plan;
 - e) If AW's wholesale customers are not included in the response to part d), an explanation of why these customers were not included in the group permitted to provide input;
 - f) A description of the funds used to pay for the implementation of the Plan (tax revenues, etc.); and

g) The amount included in the City of Austin's annual budget for Plan implementation and operation.

- Staff 13-7 With regard to "Other Support Services – Economic Development": Did the expense categories or accounts included in the Economic Incentives Reserve Fund reported in Docket No. 42857 for AW get transferred or absorbed by the "Economic Development Fund"?
- Staff 13-8 Please provide a budget, or other document if a budget is not available, showing income and expenditure amounts for the Economic Development Fund.
- Staff 13-9 Please identify and describe all funding sources for the Economic Development Fund.
- Staff 13-10 Please provide a list of incentives, if any, provided by the Economic Development fund and identify the entities that may receive the incentives. Please indicate if the Districts have received any such incentives from the Economic Development Fund.
- Staff 13-11 Please explain why the Economic Development Fund expenses are reasonable and necessary for provision of water service by AW to a) its retail customers and b) its wholesale customers.